

LOCAL DEVELOPMENT FRAMEWORK

Lewisham Town Centre Area Action Plan Further Options Report

Equalities Analysis Assessment

June 2011

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Contents

1	Introduction	p1
2	Methodology	p2
3	Policy review	p3
4	Baseline information	p5
5	Groups with protected characteristics	p9
6	Creating a further options report	p12
7	Consultation	p15
8	Assessment of the further options report	p17
9	Conclusions and monitoring	p20
	Appx 1: Assessment Tables	p21

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1. Introduction

1.1 Introduction

Lewisham is a diverse community made up of many different groups and individuals, therefore it is essential to try to understand the different contributions, perspectives and experience that people in our community have. We believe that the diversity of our population and workforce is one of our greatest strengths.

We also recognise that not everyone's experience is equal and there are many forms of discrimination affecting people's lives. Equality of opportunity and freedom from discrimination is a fundamental right for everyone.

This report represents the Equalities Analysis Assessment (EqAA) of the Lewisham Town Centre Area Action Plan (AAP) which forms part of the London Borough of Lewisham's Local Development Framework (LDF). The assessment of the DPD was undertaken by the Planning Policy Team in the Regeneration Directorate, by Matthew Pullen, Policy Planner and will be evaluated by the Corporate Equalities Board. Following public and stakeholder consultation the EqAA will be reviewed.

1.2 Equalities Analysis Assessment - Purpose

An Equalities Analysis Assessment or EqAA enables a service or function to assess the possible implications on the whole community (including staff) when changes are proposed to the way a service is delivered, through policies, strategies, procedures, projects, reviews, organisational change or savings proposals.

Equality Analysis helps ensure that certain groups, individuals or staff are not excluded from services or practices. It also ensures that whole communities benefit from services which the Council delivers.

In brief, the EqAA will ensure that policies developed and implemented through the AAP will contribute to improving the lives of local communities. This report represents the results of the assessment of each options stage of the AAP production process in relation to the potential impact on key equalities groups. Any requirements for amendments resulting from this assessment have been fed back into the AAP production process and will affect the AAP submission version.

1.3 Lewisham Town Centre AAP

Lewisham Council are preparing an AAP for Lewisham Town Centre to ensure the forecast growth for the centre is managed and delivered. The vision for the town centre provided by the Core Strategy aims to ensure that by 2026 the town centre

achieves Metropolitan status, accommodates up to 40,000 square meters of additional retail space, 4,300sqm of additional leisure space and 2,500 additional homes. The AAP is the implementation and delivery plan for the changes that will occur in the town centre during this period. In particular, it will provide a detailed planning and implementation strategy for major opportunity sites within the town centre and the associated infrastructure required to support such development.

The AAP, alongside the Core Strategy, will form part of the Lewisham Local Development Framework and over the coming years will replace the Lewisham Unitary Development Plan (adopted in July 2004). It is anticipated that the AAP will be submitted to the Secretary of State for examination in 2012 for adoption in 2013.

Following the processes set out in Planning Policy Statement 12, the AAP has been produced over a number of stages, including:

- Issues and options for the AAP – October 2005
- Preferred options for the AAP – April 2007
- Further options for the AAP – March 2011

The EqAA provides an assessment of each of the options and proposed policies at each stage of the production of the AAP.

2. Methodology

2.1 The methodology for this assessment has been constructed using a combination of guidance from local Comprehensive Equalities Scheme, the GLA approach, best practice from the Lewisham LDF Core Strategy EqAA and other recent examples.

In general terms the report assesses the potential impacts of the AAP policies by:

A. Reviewing the evidence, including;

- the relevant policy context
- the baseline information
- previous consultation responses.

B. Establish groups with protected characteristics

- Use the baseline evidence to establish the key groups of people with protected characteristics that are considered in this assessment.

C. EqAA Assessment

- Assess the potential level of impact of the AAP on each group for each policy, using a scale of high, medium and low.

D. Stakeholder Review

- Perform an internal and external key stakeholder review of the assessment results to ensure they are fair. This will include the Lewisham Council Equalities Board.

E. Produce Final Assessment

- Amend assessment as required in view of feedback and produce the detailed final report.

3. Policy review

3.1 National policy

In April 2010 the Government introduced new legislation in the form of the Equality Act 2010, replacing and consolidating a number of historic acts relating to equalities and discrimination. The Act requires that local authorities consider the three aims of the Equality Duty and document their rationale/assessment as part of the process of decision-making.

When making decisions the Council is required to have due regard to the need to:

- i. eliminate unlawful discrimination, harassment, victimisation
- ii. advance equality of opportunity; and
- iii. foster good relations.

3.2 Local equality policy

The Council's current equality policy is the Comprehensive Equality Scheme (CES) 2008-11. Work is currently underway to develop a new set of equality objectives to ensure they are in place by the statutory deadline of the 6 April 2012. These equality objectives will reflect the requirements of the Equality Act 2010: Public Sector Equality Duty.

As Lewisham Council's equality policy, the CES essentially serves two purposes:

1. To set out Lewisham's overall commitment to equality and diversity in one central document.
2. To act as the 'umbrella' document for both our statutory and non-statutory equality schemes.

This assessment accords with both the legislative and local policy in place.

4. Baseline information

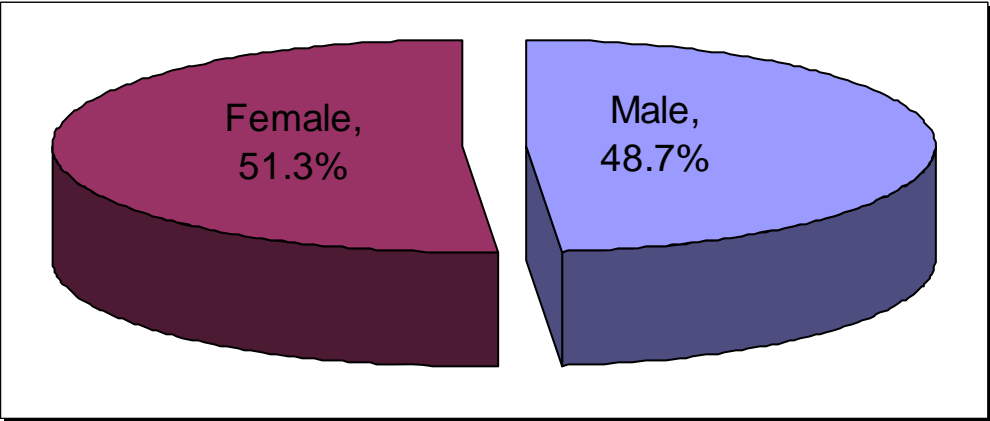
4.1 The London Borough of Lewisham covers around 13.4 square miles, located in south east London. It is important to consider the baseline information for the whole borough, not just those resident within the town centre boundary, as those living elsewhere in the borough will interact with the centre through employment, shopping and leisure activities. The borough is made up of a collection of diverse neighbourhoods and strong communities ensuring that while the borough and its localities develop, they maintain their unique identities and preserve Lewisham’s rich cultural, natural and architectural heritage. It is a vibrant and ethnically diverse borough, home to almost 275,000 people and 113,000 dwellings. The population is expected to increase by approximately 25,000 people up to 2021, representing a significant rise. For a number of statistics, the ward of Lewisham Central is the best comparison to the area covered by the town centre boundary. Within Lewisham Central the increase in population expected is from 17,182 to 22,364, a 30% growth.¹

The borough is considered to be the 31st most deprived local authority area in England with pockets of deprivation in most wards, but especially concentrated in particular areas. One such area of deprivation is Lewisham town centre and it’s immediate surrounds which is among the 20% most deprived areas in the country.²

4.2 Gender

In Lewisham Central, 51.3% of the population are female residents and 48.7% are male residents (see Figure 4.1). There are slightly more male than female residents in most age bands up to the age of 45. Beyond this age there are considerably more females than males, especially above the age of 70.

Figure 4.1: Population by gender in Lewisham



¹ 2010 Round of Demographic Projections – London Plan

² 2010 Indices of Multiple Deprivation

Currently there are around 7,500 more women than men in Lewisham; by 2021 the gap is predicted to rise to around 8,700. However, the older male population is predicted to rise at a higher rate than the older female population. By 2026 the male population aged over 75 years is predicted to increase by 11% while the equivalent female population is predicted to grow by just 7%³

The Census 2001 showed that in Lewisham borough there were 11,242 lone parent households with dependent children. Within the Ward of Lewisham Central there were 548 lone parent families, of which 510 were a female lone parent.

4.3 Black and minority ethnic communities

Lewisham is a diverse borough, with over 40% of the population coming from black and minority ethnic (BME) communities.⁴ This diversity is also evident in our local schools, where 69% of the school population is from minority ethnic groups.

There has been a growth in all groups of the BME population from 39% of households in 2001 (Census 2001) to 49.4% of households in 2007 who are largely focussed in the northern and central parts of the borough, including Lewisham town centre.⁵ Ward data from the 2001 Census showed that Lewisham Central had a 48% BME population.

Over the next decade the borough is expected to become more diverse, with the BME population projected to rise to 43% by 2021. In particular, the Black Caribbean and Black African populations are expected to increase, with the Black African population experiencing the greatest growth. The total number of residents within the Black Other, Indian and Asian Other groups will also grow; however, the Chinese, Pakistani and Bangladeshi populations are projected to remain static.

The total number of people in the White population still increases, but the White population as a percentage of the total population will continue to decline, reflecting the growth of the BME population in relative numbers. The Greater London Authority have projected that the White population of Lewisham will be 55% in 2026, compared to 66% in 2001.⁶

Under the current guidance of the Mayor of London, through the London Plan, 2011, Lewisham are required to provide 9 pitches for Gypsy and Traveller use. The borough currently has zero, but has an active programme to identify viable sites for provision.

³ 2009 Round of Demographic Projections – London Plan

⁴ 2010 Round of Demographic Projections – London Plan

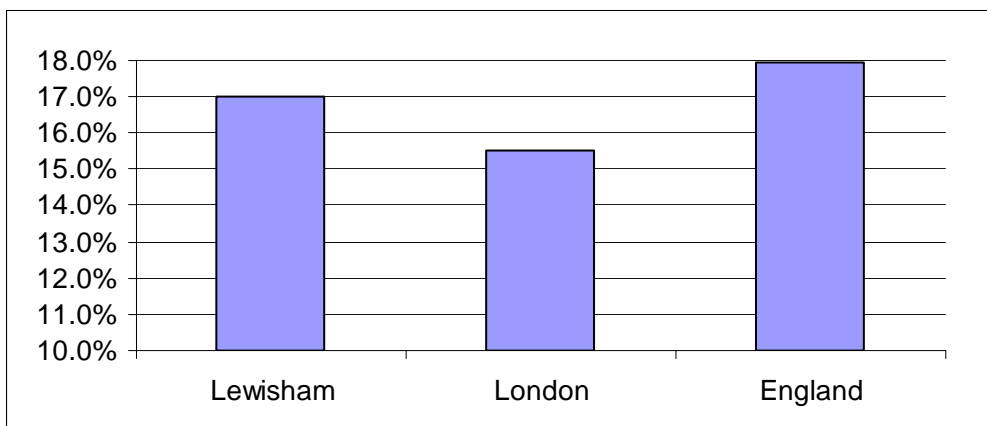
⁵ Lewisham Strategic Market Housing Assessment, 2007

⁶ 2010 Round of Demographic Projections – London Plan

4.4 Disability

The 2001 Census showed that Lewisham has 38,823 people or 15.6% of the population with a ‘limiting long term illness. Within Lewisham Central this was 2,255 people or 17%. This compared to London as a whole at 15.49% and England at 17.93%.

Figure 4.2: % residents with ‘limiting long term illness’



4.5 Age

Lewisham has a relatively young population; almost a fifth of its population is in the 0–15 years age group. Approximately one in eight people in the borough are aged over 60, compared to around one in five nationally.

In percentage terms, by 2021 the overall make-up of the population by age remains relatively unchanged, however there are some apparent trends. The majority of population by year of age increases by between 10% and 30%, however between the ages of 18 and 26 and between 43 and 49 there are losses in the population.

4.6 Sexual orientation

In Britain there is relatively little national research on the lives of lesbians, gays and bisexuals. The only nationwide surveys that have already provided information on sexual orientation are the Census and the National Survey of Sexual Attitudes and Lifestyle (NSSAL).

The NSSAL in 2000 found that approximately 5% of men and women in Britain stated that they had ever had same-sex partners. This figure rose to over 10% for men and almost 7% for women who lived in London.

The Census in 2001 published more localised data, including the number of same-sex couples that were living together in each local authority. This reported that Lewisham has the 12th largest number of same-sex couples sharing a home, with 1,070 people describing themselves as living with a same-sex partner.

In the meantime, there are various other estimates of the extent of the gay and lesbian population in Lewisham. Using central government's guideline of 6% of the total population, the gay and lesbian population in Lewisham would be more than 15,000. This estimate does not include bisexual adults, or people who come to Lewisham to work or socialise, so the true extent of the LGB communities may well be greater than this. In 2009 a question on sexual orientation was included in the Council's Residents Survey. Over 1,000 residents were randomly selected from across the borough to participate in these face-to-face interviews, of which 1% identified themselves as being gay, lesbian or bisexual (a drop from 2% in 2007).

4.7 Religion and belief system

The diversity of Lewisham's population in terms of ethnicity is not reflected in its religions and faiths. Lewisham has the lowest proportion in Inner London of people with a religion other than Christianity (8%), with the highest being 40% in Tower Hamlets and the Inner London average being 17%. More specifically, Lewisham has the lowest proportion of Muslim people in Inner London (4.6%), and the second lowest proportion of Jewish and Sikh people. Although Christianity is clearly the most prevalent religion in the borough (at 61% it is the fifth highest proportion in Inner London), Lewisham also has a relatively high proportion of people (30%) either with 'no religion' or who did not state their religion when asked.

5. Groups with protected characteristics

5.1 Target Groups

Under the Equality Duty, the Council is required to consider groups with a number of protected characteristics. These are groups that are considered at risk of discrimination or are known to experience more inequality and disadvantage than others. These are the sectors of people that are more likely to be disadvantaged by a negative policy or less likely to obtain the benefits of a positive policy.

The following table shows the groups that have been identified for the purposes of the AAP EqAA.

Table 5.1

Equalities category	Key equalities groups	Need for Assessment
Gender (or sex)	<ul style="list-style-type: none"> • Women 	<p>In order to balance both work and domestic responsibilities, many women require employment and training opportunities within easy reach of their residences. Higher levels of part-time work and lower average wages can mean that more women live in social housing and often in areas more susceptible to deprivation. Further, lone parent families find difficulties due to primary caring responsibilities.</p> <p>Safety and security is a paramount concern for women in regards to safe and accessible local services and transport networks.</p> <p>The AAP has policies regarding employment and mixed-use provision, transport and walking networks and public spaces that will be of particular importance to women.</p>
Race	<ul style="list-style-type: none"> • Black and minority ethnic people • Gypsies and Travellers 	<p>Black and Minority Ethnic (BME) people tend to live in more deprived areas. This is the case with Lewisham town centre which is both very ethnically diverse and an area of strong deprivation. Racial discrimination is a major concern for BME groups. There are concerns about fear of crime, abuse and personal safety. Racial discrimination in the labour market and further employment and social issues including,</p>

5. Groups with protected characteristics

Equalities category	Key equalities groups	Need for Assessment
		<p>language barriers and disrupted ethnic community ties are also apparent.</p> <p>Key policies will relate to employment opportunities, town centre viability and public spaces.</p> <p>Gypsies and Travellers experience a lack of sites across London. There is no longer local provision to the town centre, however sites within the boundary are being considered as part of an assessment of new provision. This will impact the character area and site specific policies for Ladywell and the Ladywell leisure centre respectively.</p>
Disability	<ul style="list-style-type: none"> • Disabled people 	<p>A major concern for disabled people is accessibility in general and in particular to key facilities and services. It is important that transport networks, town centre layouts and public spaces are carefully provided and monitored. Public safety is also of paramount importance.</p> <p>Policies regarding transport and parking as well as the shopping and public spaces will be of particular importance.</p>
Age	<ul style="list-style-type: none"> • Young people and children • Old people 	<p>In deprived areas, children and young people can experience social exclusion, a lack of play facilities and public space. Additionally, the lack of services can lead to this group being susceptible to crime on the streets or public transport.</p> <p>Vital policies relate to public transport, safety in public spaces and the provision of social, community and leisure facilities.</p> <p>Similar to young people, the elderly are susceptible to safety and security concerns. Further, discrimination can occur in work</p>

5. Groups with protected characteristics

Equalities category	Key equalities groups	Need for Assessment
		<p>increasing the likelihood of unemployment and living in deprived areas.</p> <p>Vital policies as with young people relate to public transport, safety in public spaces and the provision of social, community and leisure facilities. Additionally fair employment opportunity is required.</p>
Sexual orientation and gender re-assignment	<ul style="list-style-type: none"> • Lesbians • Gay men • Bisexuals • Trans people 	<p>Many policies could affect this group in some way. Of particular concern are those related to safety, crime and fear of crime in public spaces and on public transport. The availability and variety of housing is also a key concern.</p>
Faith	<ul style="list-style-type: none"> • Different faith groups 	<p>Access to suitable facilities for use as places of worship is the major issue for this group. Policies relating to social, community and leisure provision as well as mixed-use provision are of most concern.</p>
Marriage and civil partnership	<ul style="list-style-type: none"> • Married Couples • Gay and Lesbian civil partnerships 	<p>Family and child safety and crime and fear of crime are of importance to this group. An appropriate amount and variety of housing, including affordable housing is also of importance.</p>
Pregnancy and maternity		<p>The accessibility, in particular, of key facilities and services is important to this group. It is vital that transport networks, town centre layouts and public spaces are carefully provided and monitored. Public safety is also of paramount importance.</p> <p>Policies regarding transport and parking as well as the shopping and public spaces will be of particular importance.</p>

6. Creating the further options report

6.1 Introduction

After the AAP preferred options report in 2007, then there was a three year gap until the AAP was progressed, due to advice from the Government Office for London that suggested the Council complete the Core Strategy before proceeding any further with the AAP. Following the break, the preferred options report was informally reviewed and an assessment of all aspects, including equalities issues, undertaken before proceeding to a further round of options consultation. While this internal assessment was not a full EqAA review, it had significant input into the production of the options and alternatives available in the further options report which are formally assessed later in this document.

The following points identify a number of actions taken to represent equalities issues in the AAP further options report as a result of the review of the 2007 preferred options and other progress. They are split by the chapter of the AAP further options document that contains appropriate equalities input and advice.

6.2 Introduction - Lewisham Development Framework

This section acknowledges that the Site Allocations Further Options Report (October 2010) recommends that the former Watergate School site in Church Grove (which is a site within the town centre boundary) be allocated for a Gypsies and Travellers site to encompass five pitches.

6.3 Context

This acknowledges that parts of the town centre are within the 20% most deprived neighbourhoods in England and that the area is ethnically diverse (with 47% of population from black and/or minority ethnic origin).

6.4 Key issues

Sections 2.2.1 to 2.2.3 identify the following key issues that are particularly relevant to equalities issues:

- Need for inclusive design
- Employment prospects need to be enhanced by improving local training
- Need for affordable housing
- Need for decent and accessible housing

- Improving access to health care, education and community facilities
- Raising education attainment
- Addressing deprivation, social exclusion and health inequalities
- Fear of crime and the need to provide a well designed environment with adequate natural surveillance.

6.5 Area-wide Spatial policies

Policy LTC SH3 supports the retention and enhancement of the market in the town centre. Markets are particularly important for deprived and BME communities as they are a source of both inexpensive and ethnically specific foods.

Urban design policies (LTC URB 4 to 6) stress the need for forms of development that create safe places and design out crime, with specific reference to Secured by Design. They also stress the need to incorporate inclusive design principles into the design of the public realm. This is of particular importance to women, disabled people, young and elderly people and the BME and gay community, who may feel particularly vulnerable.

Policy LTC TRS2 seeks to manage public car parking provision so that it increases to reflect increased shopping floorspace, with the justifying text making clear that car parks should prioritise the needs of disabled people and those with children.

Policy LTC COM3 encourages the retention and further provision of community and leisure facilities. The justifying text acknowledges the apparent demand for additional faith facilities.

New Policy 2 highlights the need for social infrastructure, focusing in particular on school places, child care and health care. These topics are of particular concern to young people and vulnerable groups, who tend to experience relatively poor health.

6.6 Sub-area Specific Policies

Options for the Ladywell Road Character Area include the use of the Ladywell Leisure Centre site as a gypsy and traveller site to meet demand for this community for accommodation to meet its needs.

Character Area Policy 5 (Ladywell Road) includes reference to the securing and refurbishment of the former Ladywell Baths building to create a community hub, which depending on it's use could be of significant benefit to a number of vulnerable groups.

Site Specific Policy 5.1 recognises that if Lewisham Free School is redeveloped, alternative provision of equivalent benefit to the community would need to be provided.

Character Area Policy 6 (Central character area) calls for the creation of a more coherent and pleasant environment which meets the needs of both pedestrians and vehicles, including maintaining and where possible enhancing the existing Shopmobility scheme.

Site Specific Policies 6.1 and 6.2 (Land to the north east and south of the shopping centre) acknowledge that new residential development in these locations should not require new dedicated car parking spaces, making wheelchair accessible housing here inappropriate.

7. Consultation

7.1 Introduction

The consultation on the AAP at a number of stages in the production process is a statutory requirement and must be carried out according to the Statement of Community Involvement (SCI) which forms part of the suite of Local Development Framework documents. The SCI was published in 2006 and can be found at:

<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/StatementCommunityInvolvement.htm>

This section includes a brief summary of some of the key equalities principles that have been used in all rounds of consultation and a deeper analysis of the further options report consultation.

7.2 Consultation methods and principles

There have been public consultations on the AAP at the Issues and Options stage, the Preferred Options stage and the Further Options stage. There will also be a further round of public consultation when the draft plan (the Pre-submission plan) is completed. Summaries of each of the completed consultation events can be found at the following location:

<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/LewishamTownCentreAreaActionPlan.htm>

The Planning Service has a comprehensive database of equality groups who were directly informed by post of the AAP, including representatives of all the target groups identified in this EqAA. For each round of consultation the report has been sent to a number of key equality groups and where appropriate further meetings have been arranged with particular groups to discuss any specific equality, community or other matters required.

The AAP further options report was made available for public consultation in April / May 2011 and followed the consultation methods and principles highlighted in the previous paragraphs.

As part of this consultation process, a number of meetings were organised with various equalities groups including, the Lewisham Pensioners Action Group, the Young Mayor and his advisors and Lewisham Council Staff Forums (involving BME, Women, LGBT Forums and Young and Older Workers Groups). Invites for further discussion were sent to a number of other faith and culturally diverse groups, but no response was received.

At any stage of the AAP development process, the feedback received from equalities groups, via letter or face-to-face at a meeting has been used to influence the development of the options for the town centre and the subsequent draft policies. Chapter 6 highlights a number of specific influences that equalities issues had upon the generation of the further options report.

8. Assessment of the further options report

8.1 Introduction

This section details the Equalities Analysis Assessment undertaken of the preferred options / draft policies presented as part of the AAP further options report. The assessment is of the relevance and impact of each preferred option / potential draft policy to each of the eight groups with protected characteristics. Where there is a negative impact as a result of the policy option, preventative and/or mitigation measures are presented and the responsible group for delivery is identified. It should be noted that only the preferred option / draft policy identified in the further options report is assessed. The full results of the assessment can be found in Appendix 1 of this report, or a summary of the results can be found below in section 8.2.

8.2 Summary of findings

Overall, the AAP further options report is seen to have a very positive impact upon equalities groups and issues in Lewisham town centre. There are additionally a small number of concerns that are deemed to be negative impacts.

Positive Impacts:

- Higher density residential accommodation above ground floors will ensure a high volume and variety of housing mix to support equalities groups. This higher density housing will also be in the same location as other town centre services making it extremely accessible.
- The provision of more local employment space will increase local employment opportunities available to equalities groups.
- Wide scale improvements to the cycling and walking networks and the route connectivity to the train station will benefit those groups who use public transport for access. Meanwhile, the retention of public / shopper parking will make the town centre more accessible to those with and without a car.
- An increased quantity and the improved accessibility of social infrastructure provision (including the Ladywell Playtower) will create a more sustainable environment for those groups of people who are less mobile or are vulnerable to social exclusion. Healthcare facilities are important for all, but may be of particular relevance to the elderly, whilst women and lone parent families will benefit from local school and child care provision.

- Enhancements to the public realm, including public safety measures, overlooking and “Secure by Design”, designing out crime, and other inclusive design principles will provide an improved and safer public environment for all equalities groups.

Negative impacts:

- The conversion of non-ground floor commercial units in to residential may lead to housing that is not accessible to disabled groups or the elderly.
- Several sites in the town centre are identified as suitable for car-free or car limited development. These sites may be unsuitable for those who require a car for mobility reasons, such as disabilities groups and the elderly.
- The construction of residential development within Flood Zone 3a High Probability may cause concerns for the safety of those groups who are less mobile or who have dependents.
- There are wider national, regional and local policy demands that state that areas with high PTAL levels, such as most of Lewisham town centre, should provide intensive and high density development. The AAP supports this with a mixed use development policy. Residential elements of such developments may be less appropriate for family housing than less dense locations.

8.3 Summary of mitigation measures

- Residential conversions from commercial should still comply with Core Strategy and London Plan policies where required, to ensure they are accessible. Major ‘new development’ schemes should provide accessible housing units to supplement any additional need.
- In line with the Core Strategy and London Plan and other guidance it should be ensured that residential parking facilities are available for disabled groups even though the housing is proposed to be otherwise car free.
- Each major development should be required to have a Flood Risk Assessment and work with local planners and the Environment Agency to guarantee that flood alleviation, mitigation and evacuation measures are in place to ensure the safety of all equalities groups. This may include upstream flood alleviation measures elsewhere in the borough outside of the town centre, such as the conversion of Ladywell Fields to an open park and functional flood storage area.

8. Assessment of the further options report

- It is considered that within the direct proximity of the town centre boundaries there are wide areas of suburban streets containing substantial family housing provision. Therefore there may be some scope to accommodate reduced levels on some developments with immediate and direct access to transport connections, however care should be taken to monitor the provision across the town centre as a whole.

9. Conclusions and monitoring

9.1 Introduction

This report is an Equalities Analysis Assessment and has followed standard procedures for the production of such a report to ensure a fair and appropriate assessment has been performed. In brief, it has assessed each of the preferred options identified by the Council in the Lewisham Town Centre Area Action Plan Further Options Report against eight groups with protected characteristics.

9.2 Summary of findings

It has been seen that a number of preferred options will have a positive impact upon equalities groups when they are delivered. The planned development will bring a number of improvements to the town centre, including enhanced accessibility, greater employment opportunities, better housing choice and design lead safety schemes.

Three potentially negative policy impacts have been identified, relating to residential access and parking and development in Flood Zone 3a. It has not been deemed necessary to remove any of the preferred options and not take them forward to the AAP draft plan. Alternatively, a number of mitigatory measures have been suggested by the EqAA to defend those groups with protected characteristics.

9.3 Monitoring

The Council understands the importance of monitoring the implementation of plans and developments to ensure that the findings of this assessment are put in place. Relevant measures have been included in the AAP draft plan monitoring framework to monitor this fact.

Monitoring arrangements in the Lewisham Annual Monitoring Report (AMR) will enable the Council to examine and assess more closely the implementation of policies in the AAP once they are adopted, and how they impact on equalities issues. This monitoring will include the equalities measures identified through this assessment and included in the AAP monitoring framework. They will be undertaken by the Planning Management Team, Resources and Regeneration Management Team, the Corporate Equalities Board and Mayor and Cabinet.

Appendix 1 – Assessment tables

This assessment is of the relevance and impact of each preferred option / potential draft policy of the AAP further options report 2011 to each equalities group. Preventative and/or mitigation measures are presented where it is appropriate and the responsible group is identified. It should be noted that only the preferred option / draft policy identified in the further options report is assessed.

Appendix 1a: New preferred options													
↔	= Little or no relevance to equalities group				↑	= Positive impact upon equalities group				↓	= Negative impact upon equalities group		
Preferred option	Gender	Race	Disability	Age	Sexuality	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group		
Area wide spatial policies													
New policy 1: Carbon dioxide emission reduction in Lewisham town centre (p54)	↔	↔	↔	↔	↔	↔	↔	↔	n/a	n/a	n/a		
New policy 2: Social infrastructure (p57)	↑	↑	↑	↑	↑	↑	↑	↑	The provision of highly accessible social facilities will create a more sustainable environment for those equalities groups who are less mobile or are vulnerable to social exclusion.	n/a	n/a		

Appendix 1a: New preferred options												
↔	= Little or no relevance to equalities group				↑	= Positive impact upon equalities group			↓	= Negative impact upon equalities group		
Preferred option	Gender	Race	Disability	Age	Sexuality	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group	
									Healthcare facilities are important for all, but may be of particular relevance to the elderly, whilst women and especially lone parent families will benefit from local school and child care provision.			
New policy 3: Implementation (p61)	↔	↔	↔	↔	↔	↔	↔	↔	n/a	n/a	n/a	
Sub-area specific policies												
Character area policy 5: Ladywell Road character area (p95)	↑	↑	↑	↑	↑	↑	↑	↑	The desire to redevelop the former Ladywell Baths (Playtower) site into a community hub will provide highly accessible social facilities, creating a more sustainable environment for those equalities groups who are less mobile or are vulnerable to social	n/a	n/a	

Appendix 1a: New preferred options											
↔ = Little or no relevance to equalities group		↑ = Positive impact upon equalities group			↓ = Negative impact upon equalities group						
Preferred option	Gender	Race	Disability	Age	Sexuality	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
									exclusion.		
Site specific policy 5.1: Ladywell leisure centre site (p97)	↔	↔	↔	↔	↔	↔	↔	↔	n/a	n/a	n/a

Appendix 1b: Retained or amended policies											
↔ = Little or no relevance to equalities group		↑ = Positive impact upon equalities group				↓ = Negative impact upon equalities group					
Preferred option	Gender	Race	Disability	Age	Sexuality	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
Area wide spatial policies											
LTC HSG3 – Conversion of existing buildings (p25)	↓	↔	↓	↓	↔	↔	↔	↓	Non-ground floor units converted to residential may not be accessible by the disabled, elderly, families or pregnant women.	Residential conversions from commercial should still comply with Core Strategy and London Plan policies where required, to ensure they are accessible. Major 'new development' schemes should provide accessible housing units to supplement any additional need.	LBL Planning and developers
LTC SH2 – Vitality and viability (p26)	↑	↑	↑	↑	↑	↑	↑	↑	Enhancements to the public realm, including public safety measures will provide an improved environment for all equalities groups. Further the provision of local community facilities and employment	n/a	n/a

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	↑	↑	↑	↑	↑	↑	↑	↑	opportunities will make resources more accessible.			
LTC SH3 – Lewisham market (p27)	↑	↑	↑	↑	↔	↑	↑	↑	The protection of the market ensures the long term security of a local resource that provides accessible and affordable food retail. Further, it provides a vibrant cultural and community hub for the town centre.	n/a	n/a	
LTC SH5 – Primary shopping areas (p28)	↔	↔	↔	↔	↔	↔	↔	↔	Little impact on equalities groups. Minor influence from ensuring town centre remains as concentrated accessible focus for A1 use.	n/a	n/a	
LTC SH6 – Secondary shopping areas (p29)	↔	↔	↔	↔	↔	↔	↔	↔				
LTC SH7 – Retail character areas (p31)	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any	n/a	n/a	

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									particular equalities group.			
LTC SH8 – Criteria for evening economy uses (p32)	↕	↕	↕	↕	↕	↕	↕	↕	The encouragement of evening economy uses will create a more active and busier town centre in the evenings and night. This may be seen as a positive step for the safety of those people using the town centre as it provides a greater visibility, however greater pubs and restaurants may also lead to greater safety concerns.	It should be ensured that the development of the evening economy is monitored carefully and public and private community safety teams and the police are involved in the development and management of the town centre.	Public, Private and Police Groups	
LTC SH9 – Town centre boundary (p34)	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular equalities group.	n/a	n/a	
LTC URB4 – Mixed use (p36)	↓	↔	↑	↑	↔	↔	↔	↔	High density residential accommodation above ground	It is considered that within the direct proximity of the town	n/a	

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									<p>floors will ensure a high volume and variety of housing types to support equalities groups. This high density housing will also be in the same location as other town centre services making it extremely accessible.</p> <p>The implementation of high density residential could lead to a reduced level of family housing in the town centre.</p>	<p>centre boundaries there are wide areas of suburban streets containing substantial family housing provision. Therefore there may be some scope to accommodate reduced levels on some developments with immediate and direct access to transport connections, however care should be taken to monitor the provision across the town centre as a whole.</p>	
LTC URB5 – Urban enclosure, grain (p37)	↑	↑	↑	↑	↑	↑	↑	↑	<p>Ensuring urban public spaces are over-looked wherever possible improves the safety of public realm.</p>	n/a	n/a

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LTC URB6 – Public realm (p37)	↑	↑	↑	↑	↑	↑	↑	↑	Use of overlooking, “Secure by Design” and other inclusive design principles are required to design out crime and provide safe public environments. Particular schemes mentioned as required include routes from the town centre to surrounding residential areas and the inclusion of shop mobility.	n/a	n/a	
LTC URB7 – Enhancing Lewisham’s waterways (p38)	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular equalities group.	n/a	n/a	
LTC EMP1 – Employment uses in Lewisham town centre (p40)	↑	↔	↑	↑	↔	↔	↔	↔	The retention and development of employment uses in the town centre will provide highly accessible jobs	n/a	n/a	

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	↑	↔	↑	↑	↔	↔	↔	↔	for those who require public transport to get around.			
LTC EMP2 – Office uses in Lewisham town centre (p41)	↑	↔	↑	↑	↔	↔	↔	↔	The retention and development of employment uses in the town centre will provide highly accessible jobs for those who require public transport to get around.			
LTC TRS2 – Existing public / shopper parking spaces in the town centre (p42)	↑	↑	↑	↑	↑	↑	↑	↑	The retention of public / shopper parking and the potential for slight increases is a positive step to ensuring that the town centre remains accessible to those with a car or those who require a car.	n/a	n/a	
LTC TRS3 – Cycling and walking routes (p43)	↑	↑	↑	↑	↑	↑	↑	↑	Improvements to the cycling and walking networks will make the town centre services	n/a	n/a	

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	↑	↑	↑	↑	↑	↑	↑	↑	more accessible to those without a car.			
LTC TRS4 – Mitigating against the impact of roads and roundabouts (p43)	↑	↑	↑	↑	↑	↑	↑	↑	This will be part of improving cycle and walking networks as well as ensuring public safety for all groups.	n/a	n/a	
LTC COM3 – Range of community, leisure and entertainment spaces (p45)	↑	↑	↑	↑	↑	↑	↑	↑	This policy looks to ensure there are community and leisure facilities in the most accessible location in the borough. This is positive for all equalities groups.	n/a	n/a	
LTC IMP1 – Monitoring (p47)	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular equalities group.	n/a	n/a	
Sub-area specific policies												

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Site specific policy 1.1: Kings Hall Mews (p72)	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular equalities group.	n/a	n/a	
Character area policy 2: Loampit Vale character area (p76)	↑	↑	↑	↑	↑	↑	↑	↑	Improvements to the public realm and cycling and walking routes as part of redevelopment should be positive for all equalities groups. A wide variety of housing types should ensure that regional and local housing mix policy requirements are met.	n/a	n/a	
Site specific policy 2.1: Loampit Vale north – east of Jerrard Street (p77)	↑↓	↑	↑↓	↑↓	↑	↑	↑	↑↓	See detail for Character area policy 2 plus: Required improvements to the	In line with the Core Strategy and the London Plan and other guidance it should be ensured that residential	LBL Planning, developers and the Environment	

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									<p>accessibility of the train station will benefit those groups utilising public transport networks.</p> <p>Residential developments in this highly accessible location are desired to be car free. This could provide issues for those who require a car, such as a disability groups.</p> <p>Further, the site is within Flood Zone 3a High Probability, which may cause concerns for those groups who are less mobile or who have dependents.</p>	<p>parking facilities are available for disabled groups even though the housing is proposed to be otherwise car free.</p> <p>Each major development should be required to have a Flood Risk Assessment and work with local planners and the Environment Agency to guarantee that flood alleviation, mitigation and evacuation measures are in place to ensure the safety of all equalities groups.</p>	Agency

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Site specific policy 2.2: Loampit Vale north – west of Jerrard Street (p78)	↕	↑	↕	↕	↑	↑	↑	↕	<p>See detail for Character area policy 2 plus:</p> <p>Residential developments in this highly accessible location are desired to be car free. This could provide issues for those who require a car, such as a disability groups.</p> <p>Further, the site is within Flood Zone 3a High Probability, which may cause concerns for those groups who are less mobile or who have dependents.</p>	<p>In line with the Core Strategy and the London Plan and other guidance it should be ensured that residential parking facilities are available for disabled groups even though the housing is proposed to be otherwise car free.</p> <p>Each major development should be required to have a Flood Risk Assessment and work with local planners and the Environment Agency to guarantee that flood alleviation, mitigation and evacuation measures are in place to ensure the safety of</p>	LBL Planning, developers and the Environment Agency

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										all equalities groups.		
Site specific policy 2.3: Railway strip (p80)	↕	↑	↕	↕	↑	↑	↑	↕	See detail for Character area policy 2 plus: Further, the site is within Flood Zone 3a High Probability, which may cause concerns for those groups who are less mobile or who have dependents.	Each major development should be required to have a Flood Risk Assessment and work with local planners and the Environment Agency to guarantee that flood alleviation, mitigation and evacuation measures are in place to ensure the safety of all equalities groups.	LBL Planning, developers and the Environment Agency	
Character area policy 3: Conington Road character area (p84)	↑	↑	↑	↑	↑	↑	↑	↑	The policy requires improvements to the accessibility of the area via cycling and walking as well as access from the area to the train station. These policies will benefit those groups utilising non-car based travel	n/a	n/a	

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	↑	↑	↑	↑	↑	↑	↑	↑	methods.			
Site specific policy 3.1: Tesco block and car park land (p85)	↑	↑	↑	↑	↑	↑	↑	↑	As with Character area policy 3, in particular the improved access to Lewisham Station and the Lewisham Gateway site.	n/a	n/a	
Character area policy 4: Lee High Road character area (p88)	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular equalities group.	n/a	n/a	
Site specific policy 4.1: Lee High Road western end (p89)	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular equalities group.	n/a	n/a	
Character area policy 6: Central area character area (p100)	↑	↑	↑	↑	↑	↑	↑	↑	Improvements to the pedestrian and cycling accessibility of the town centre and shopping centre and further enhancements of	n/a	n/a	

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									the Shopmobility scheme will benefit those with mobility issues.			
Site specific policy 6.1: Land north east of the shopping centre (p102)	↑	↑	↑↓	↑↓	↑	↑	↑	↑↓	<p>See detail for Character area policy 6 plus:</p> <p>Residential developments in this highly accessible location are desired to be car free. This could provide issues for those who require a car, such a disability groups.</p> <p>Further, the site is within Flood Zone 3a High Probability, which may cause concerns for those groups who are less mobile or who</p>	<p>In line with the Core Strategy and the London Plan and other guidance it should be ensured that residential parking facilities are available for disabled groups even though the housing is proposed to be otherwise car free.</p> <p>Each major development should be required to have a Flood Risk Assessment and work with local planners and the Environment Agency to guarantee that flood</p>	LBL Planning, developers and the Environment Agency	

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									have dependents.	alleviation, mitigation and evacuation measures are in place to ensure the safety of all equalities groups.		
Site specific policy 6.2: Land to the south of the shopping centre (p103)	↑	↑	↑↓	↑↓	↑	↑	↑	↑↓	See detail for Character area policy 6 plus: Residential developments in this highly accessible location are desired to be car free. This could provide issues for those who require a car, such a disability groups. Further, the site is within Flood Zone 3a High Probability, which may cause concerns for those groups	In line with the Core Strategy and the London Plan and other guidance it should be ensured that residential parking facilities are available for disabled groups even though the housing is proposed to be otherwise car free. Each major development should be required to have a Flood Risk Assessment and work with local planners and the Environment Agency to	LBL Planning, developers and the Environment Agency	

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									who are less mobile or who have dependents.	guarantee that flood alleviation, mitigation and evacuation measures are in place to ensure the safety of all equalities groups.	
Site specific policy 6.3: Citibank Tower (p104)	↑	↑	↑	↑	↑	↑	↑	↑	Redevelopment of the tower for more intensive employment use, would provide more local and highly accessible employment opportunities.	n/a	n/a

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