



Equalities Analysis Assessment

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Date	--	Service	Planning

1. The activity or decision that this assessment is being undertaken for

To accept modifications made to the policy text in the Lee Neighbourhood Plan as outlined by the independent examiner's report and approve the examiner's recommendation that the plan should proceed to a public referendum.

A report outlining the background to the Lee Neighbourhood Plan and any modifications and recommendations made by the independent examiner will be considered by Mayor and Cabinet on the 6th December.

2. The protected characteristics or other equalities factors potentially impacted by this decision

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity/Race	<input checked="" type="checkbox"/> Religion or belief	<input type="checkbox"/> Language spoken	<input type="checkbox"/> Other, please define:
<input checked="" type="checkbox"/> Gender/Sex	<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Household type	
<input type="checkbox"/> Income	<input type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	<input type="checkbox"/> Socio Economic	
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy and Maternity	<input type="checkbox"/> Refugee/Migrant/Asylum seeker	<input type="checkbox"/> Health & Social Care	
<input type="checkbox"/> Nationality	<input type="checkbox"/> Employment	<input type="checkbox"/> Veterans or reservists		

The Lee Neighbourhood Plan contains 23 planning policies relating to themes that include:

- Green and Blue Infrastructure,
- Heritage and Design
- Transport and Connectivity
- Local Retail, Leisure and Economy
- Building Homes and Amenities

The plan also includes 12 Site Allocations that are within the Lewisham boundary of the designated neighbourhood area which aim to provide housing through a design led approach. The site allocations do not include an indicative number of units delivered on each site.

The planning polices found in the Lee Neighbourhood Plan that are subject to this equalities assessment are:

- Policy GB1 Protection and Enhancement of Green Spaces
- Policy GB2 Achieving a Green Infrastructure-led Development Approach
- Policy GB3 Designation of Nature Improvement Areas: River Quaggy Trail and Hither Green Nature Trail
- Policy GB4 Protection and Increase of Tree Cover
- Policy GB5 Managing Flood Risk
- Policy GB6 Protection and Enhancement of Lee's Playing Fields
- Policy TC1 Protect, Promote and Enhance Public Transport
- Policy TC2 Improve Measures to Reduce Pollution Levels
- Policy TC2 Improve Active Travel Options and Road Safety Measures in the Forum Area
- Policy BHA1 Protection, Enhancement and Provision of Community Buildings
- Policy BHA2 Protection, Enhancement and Provision of Social Infrastructure
- Policy BHA3 Enhancement of Public Realm Facilities
- Policy BHA4 Housing Delivery
- Policy BHA5 Windfall Sites
- Policy BHA6 Design of New Development
- Policy RLE1 Maintain, Improve and Sustain the Diversity, Vitality and Viability of Retail Sites
- Policy RLE2 Improve Shopfronts and Advertising in Retail Sites
- Policy RLE3 Improve and Enhance the Public Realm of Retail/Cultural Activity Sites
- Policy RLE4 Protect and Encourage Local Employment Sites
- Policy RLE5 Revitalise Lee Green Town Centre
- Policy HD1 Designation, Conservation and Enhancement of Heritage Assets
- Policy HD2 Design and Scale of New Development
- Policy HD3 Extensions, Alterations and New Buildings

Site Allocations

- Policy SA01: Land Off Dacre Park, Adjacent to Allotments
- Policy SA02: Land on Old Road4.3.6.4 Policy SA03: Old Road Depot
- Policy SA04: Garage Site on Burnt Ash Hill
- Policy SA05: Site of Disused Garages on Wisteria Road
- Policy SA06 Effingham Road
- Policy SA07: Sainsbury's Site
- Policy SA08: Site at 321-341 Lee High Road SE12 8RU
- Policy SA09: Disused Lockup Garages off Burnt Ash Road
- Policy SA10: Leegate Shopping Centre
- Policy SA11: Corner of Millbank Way and Osberton Road
- Policy SA12: Vehicle Hire Corner of Lee High Road and Manor Park

Given the themes of the planning policies found within the Lee Neighbourhood Plan, the protected characteristics above have been selected as groups of people who live in the designated area, which includes parts of the Lee Wards and Blackheath Wards, that may be impacted by the decision. These characteristics are also recognised formally as the Councils protected characteristics.

3. The evidence to support the analysis

All data presented below has been taken from the ward profiles created after the completion of the 2021 Census and published on the council's observatory website

Age

According to the 2021 Census there are:

- 16,080 people living in the Lee Ward
- 17,154 in the Blackheath Ward.

Of this:

- Lee Ward - 23.5% are 17 or under, 65.9% are between the ages of 18 and 64 and 10.6% are over the age of 65.

- Blackheath Ward – 21.2% are 17 or under, 67.8% are between the ages of 18 and 64 and 11% are over the age of 65.

Sex/Gender

According to the 2021 Census there are:

- 7,855 (48.8%) identify as female and 8,225 (51.2%) identify as male living in the Lee Ward.
- 8,658 (50.5%) identify as female and 8,496 (49.5%) identify as male living in the Blackheath Ward

Disability

According to the 2021 Census:

- 6.6% of residents in the Lee Ward had a long-term health problem or a disability limiting their day to day activities
- 6.6% of residents in the Blackheath Ward had a long-term health problem or a disability limiting their day to day activities

Sexual Orientation

According to the 2021 Census, 18,332 (6.1%) people aged 16 and over identify as gay or lesbian, bisexual or other sexual orientation in Lewisham. Data was not available for specific wards.

Ethnicity/race

According to the 2021 census the population by race in the

Lee Ward was:

- White – 9,491 people or 63.2%
- Black – 2,539 people or 16.9%
- Asian – 1,232 people or 8.2%
- Mixed – 1,159 people or 7.7%
- Other - 594 people or 4%

Blackheath Ward was:

- White – 10,236 people or 62.3%
- Black – 2,926 people or 17.8%
- Asian – 1,399 people or 8.5%
- Mixed – 1,249 people or 7.6%
- Other - 621 people or 3.8%

Religion

According to the 2021 census in Lee Ward:

- Christian – 6,389 people or 42.6%
- Buddhist - 140 people or 0.9%
- Hindu - 338 people or 2.3%

- Jewish - 51 people or 0.3%
- Muslim - 853 people or 5.7%
- Sikh - 27 people or 0.2%
- Other - 84 people or 0.6%

According to the 2021 census in Blackheath Ward:

- Christian – 6,811 people or 41.5%
- Buddhist - 172 people or 1%
- Hindu - 276 people or 1.7%
- Jewish - 53 people or 0.3%
- Muslim - 936 people or 5.7%
- Sikh - 45 people or 0.3%
- Other - 155 people or 0.9%

Socio-Economic

Lewisham is the 63rd most deprived local authority in England from a total of 333 local authorities according to the UK Government English Indices of Deprivation 2019. The Lee Ward is ranked as the 355 most deprived ward

4. The analysis

Age

The Lee Ward has a population of 16,080 of which the average age is 37 years old. This is compared to an average age of 36 for the Borough of Lewisham as a whole and 37 in London making the Lee Ward one of the oldest wards in borough.

Similarly of the 17,154 residents who live in the Blackheath Ward the average age is also 37. This is compared to an average age of 36 for the Borough of Lewisham as a whole and 37 in London. This also makes Blackheath one of the oldest wards in the borough.

With an aging population the neighbourhood plan aims to positively impact the Lee and Blackheath Wards by promoting policies that aim to deliver on issues such as appropriate housing tenures, biodiversity, enhancement of green and blue spaces and community facilities. Positively planning for these issues will help improve the health and wellbeing of the residents within each ward.

Sex

Of the 16,080 who live in the Lee Ward 7,855 (48.8%) identify as female and 8,225 (51.2%) identify as male. Of the 17,154 who live in the Blackheath ward 8,658 (50.5%) identify as female and 8,496 (49.5%) identify as male. This is compared to a borough wide figure of 157,820 (53%) identify as female and 142,733 (48%) identify as male.

The planning policies found in the plan aim to enhance connectivity throughout the neighbourhood area by creating safe and active travel corridors. The plan also promotes active frontages in new development and improvements in public realm that will help provide a safer environment, especially for females who experience a higher fear of crime.

Disability

6.6% of the population of the Lee Ward identifies as having a long term health problem or disability which limits their day to day activity. This is compared to the Lewisham average of 7% and the national average of 8.3%

Likewise, 6.6.% of the population of the Blackheath Ward identifies as having a long term health problem or disability which limits their day to day activity. This is compared to the Lewisham average of 7% and the national average of 8.3%.

The plan through its policies aims to enhance and promote health and well being through the provision of new and existing community facilities, sporting facilities and open spaces. By protecting the provision of this social and physical infrastructure facilities will be safeguarded for the communities will assist in supporting a healthier lifestyle aiming to reduce long term health issues for residents in the future.

Through development the plan also requires applications to consider the need to provide accessible housing and public realm facilities for people with disabilities.

Sexual Orientation

18,332 (6.1%) people aged 16 and over identify as gay or lesbian, bisexual or other sexual orientation in Lewisham. Data was not available for specific wards.

The plan focuses on themes around enhancement and provision of accessibility and access to community and safe facilities. Due to an increase in hate crimes targeting LGBTQ+ people, LGBTQ+ communities are more vulnerable to social isolation which highlights the importance of facilities and spaces which can provide a safe environment for LGBTQ+ communities to meet.

Ethnicity/race

In the Lee Ward 54.1% of the population have an ethnicity of White British compared to a 41.5% in Lewisham as a whole, 44.9% in London and 79.8% in England. The three most common ethnicities aside of being white British are, White Other 10%, Caribbean 7.5% and Black African 6.1%. The Lee Ward although having a higher % of people identifying as White British than the borough of Lewisham and London as a whole is still below the national %.

In the Blackheath ward 54% of the population have an ethnicity of White British compared to 41.5% in Lewisham as a whole, 44.9% in London and 79.8% in England. The three most common ethnicities aside of being white British are white other 11.2%, Black African 7.1% and Black Caribbean 6%. The Blackheath Ward although having a higher % of people identifying as White British than the borough of Lewisham and London as a whole is still below the national %.

Concern for some Black and Minority Ethnic groups is focused on individual and community safety and the perception of safety, this concern can also be increased for women within the Black / Minority Ethic communities. Black / Minority Ethnic groups tend to be more likely to live in housing/accommodation that are disproportionately concentrated and over crowded. The plan aims to have a positive impact as it promotes public realm improvements and the delivery of housing that meets the local need of Black/ Minority Ethnic groups by delivering a number of different housing tenures

Religion

In the Lee Ward 52% of the population identify as Christian compared to 52.8% in Lewisham as a whole, 48.4% in London and 59.4% in England. Among those not identifying as Christian the three most common religions are No Religion 30.3%, Not Stated 8.5% and Muslim 4.4%.

In the Blackheath Ward 50.2% of Blackheath residents identify as Christian, compared to 52.8% in Lewisham as a whole, 48.4% in London and 59.4% in England. Among those not identifying as Christian, the three most common religions are NO Religion 31.6%, Not Stated 9.7% and Muslin 4.3%.

As previously discussed, the plan aims to be inclusive of all religions by enhancing, protecting and providing social infrastructure, including community facilities that can be used by all denominations and religions. Improvements

to public realm facilities will also provide a safer environment for members of which feel any concern or vulnerability regarding safety issues.

Socio – economic

Lee Ward is the 355th most deprived ward in London and Blackheath is the 351st most deprived ward in London. Within the context of the Borough of Lewisham this ranks Lee and Blackheath wards in the top 3 least deprived wards.

The plan aims to enhance and promote healthy and vibrant high streets, improved public realm, affordable housing and encourages small businesses and entrepreneurs through the protection of local employment space. One of the key themes of the plan is to revitalise the high street while providing key amenities for people recognised in the protected characteristics.

5. Impact summary

. This section considers each of the policies in the Neighbourhood Plan and identifies whether they are likely to have a positive, negative or neutral effect on people with the protected characteristics.

Policy GB1 Protection and Enhancement of Green Spaces – Positive

This policy aims to protect and enhance green spaces situated within the Lee neighbourhood area. The policy also encourages positive environmental implications focusing on the value of biodiversity within the area. Green spaces are a valuable asset that encourages healthy and active lifestyles for residents.

Policy GB2 Achieving a Green Infrastructure-led Development Approach – Positive

This policy focuses on the importance of promoting development led by an increase in green infrastructure. This requires developers to consider a positive contribution to the quality of the public realm addressing the need for improved biodiversity, green infrastructure and permeable surfaces.

Policy GB3 Designation of Nature Improvement Areas: River Quaggy Trail and Hither Green Nature Trail – Positive

Although officers have identified this a more suitable infrastructure project rather than a planning policy, if delivered the River Quaggy Trail and Hither Green Nature Trail would provide a positive outcome for residents and visitors to the area by enhancing and protecting green and blue corridors within the designated neighbourhood area.

Policy GB4 Protection and Increase of Tree Cover - Positive

The protection of trees and canopy cover within the designated neighbourhood area would have a positive impact on people with protected characteristics. Tree cover improves air quality amongst other positive biodiversity outcomes and is supported by national and local policy.

Policy GB5 Managing Flood Risk – Positive

This policy aims to minimise the impact of flooding within the designated area by encouraging development that positively considers flood risk management by promoting the use of SUDs and permeable surfacing in new developments.

Policy GB6 Protection and Enhancement of Lee's Playing Fields – Positive

The protecting and enhancement of playing fields within the neighbourhood area promotes positive health benefits to the identified protected characteristics. The benefits include health and wellbeing as well as protecting green spaces.

Policy TC1 Protect, Promote and Enhance Public Transport – Positive

This policy aims to protect, promote and enhance an effective public transport network within the neighbourhood area. Although the policy requests the creation of new bus routes which is outside the remit of neighbourhood planning, it also recommends the provision of cycle hire facilities and the introduction of other sustainable travel methods. Increased accessibility through public transport would have positive impact on people within the protected characteristics.

Policy TC2 Improve Measures to Reduce Pollution Levels – Positive

This policy aims to introduce and improve measures to offset and reduce air and noise pollution within the neighbourhood area. This policy would have a positive impact on people within the protected characteristics by improving air quality.

Policy TC2 Improve Active Travel Options and Road Safety Measures in the Forum Area – Positive

This policy aims to improve pedestrian and cyclist safety within the neighbourhood area as well as promoting and encouraging active travel options. The policy requires development to consider and demonstrate a positive contribution to travel and road safety in line with the Mayor of London's Healthy Streets approach to design.

Policy BHA1 Protection, Enhancement and Provision of Community Buildings – Positive

This policy aims to protect, enhance and provide existing/new buildings for community use within the designated neighbourhood area. The policy will protect the area against any loss of community facilities as a result of development and promotes the provision of new facilities to offset any growth in population in the area due to new major development.

Policy BHA2 Protection, Enhancement and Provision of Social Infrastructure – Positive

This policy aims to protect, enhance and provide social infrastructure within the designated neighbourhood area. The policy will protect the area against any loss of social infrastructure as a result of development and promotes the provision as well as identifying any gaps in provision of social infrastructure to offset any growth in population in the area due to new major development

Policy BHA3 Enhancement of Public Realm Facilities – Positive

This policy aims to secure the enhancement and provision of key public realm facilities such as drinking fountains and public toilets through new major development.

Policy BHA4 Housing Delivery – Positive

This policy promotes sustainable communities within the designated neighbourhood area by providing a range of housing tenures that meets the local needs. It supports a minimum viable level of affordable housing. The policy also supports the appropriate provision of social and physical infrastructure needed to support any increase in population to the area through new major development.

Policy BHA5 Windfall Sites – neutral/positive

This policy outlines what the plan deems to be acceptable with regards to windfall/small sites development.

Policy BHA6 Design of New Development – Positive

This policy aims to support new development which follows a sustainable and environmentally conscious design. Development should incorporate appropriate boundary treatments, design features that minimise pollution and maximise energy efficiency.

Policy RLE1 Maintain, Improve and Sustain the Diversity, Vitality and Viability of Retail Sites – Positive

This policy aims to protect and enhance the economic viability of the area through maintaining and improving the retail offering and social infrastructure of the designated neighbourhood area by supporting proposals that promote a positive contribution to the high street.

Policy RLE2 Improve Shopfronts and Advertising in Retail Sites – Positive

This policy aims to improve the character of the designated area by supporting improved shopfronts especially where locally listed buildings are impacted. The policy will also support proposals for advertisements and signage that do not negatively impact the character of the building and have regard to the interests of amenity and public safety.

Policy RLE3 Improve and Enhance the Public Realm of Retail/Cultural Activity Sites – Positive

This policy aims to support the enhancement of the public realm of retail and cultural activity sites through new major development by requesting developers positively consider impacts of development on accessibility, urban greening and connectivity between developments.

Policy RLE4 Protect and Encourage Local Employment Sites – Positive

This policy aims to protect existing local employment sites and promotes that there should be no loss of local employment space unless existing uses are no longer viable or the site has been vacant for a specific period of time.

Policy RLE5 Revitalise Lee Green Town Centre – Positive

This policy promotes a holistic approach to the revitalisation of the Lee Green Town centre by supporting the production of a masterplan which aims to ensure that development within the Lee Green town centre follows an integrated approach.

Policy HD1 Designation, Conservation and Enhancement of Heritage Assets – Positive

This policy aims to identify and protect new and existing heritage assets within the designated neighbourhood area. It requires development to consider an appropriate and measured approach to design, including alterations and extensions, which does not compromise the character of the area.

Policy HD2 Design and Scale of New Development – Positive

This policy aims to support all new development that compliments, enhances or positively contributes to the local character of the designated neighbourhood area. The policy requests that development should not adversely impact existing communities and that development should demonstrate its design is focused towards a human need and that human experiences are central to its consideration.

Policy HD3 Extensions, Alterations and New Buildings – Positive

This policy aims to promote good design practices that consider and do not adversely impact the character of the designated neighbourhood area.

Site Allocations

Policy SA01: Land Off Dacre Park, Adjacent to Allotments – N/A

It has been requested at examination by the forum and council that this site allocation be removed from the plan

Policy SA02: Land on Old Road**4.3.6.4 Policy SA03: Old Road Depot – Neutral**

The impact of this site allocation will not be known until a planning application has been submitted

Policy SA04: Garage Site on Burnt Ash Hill – Neutral

The impact of this site allocation will not be known until a planning application has been submitted

Policy SA05: Site of Disused Garages on Wisteria Road – Neutral

The impact of this site allocation will not be known until a planning application has been submitted

Policy SA06 Effingham Road – Neutral

The impact of this site allocation will not be known until a planning application has been submitted

Policy SA07: Sainsbury's Site – Neutral

The impact of this site allocation will not be known until a planning application has been submitted

Policy SA08: Site at 321-341 Lee High Road SE12 8RU – Neutral

The impact of this site allocation will not be known until a planning application has been submitted

Policy SA09: Disused Lockup Garages off Burnt Ash Road -Neutral

The impact of this site allocation will not be known until a planning application has been submitted

Policy SA10: Leegate Shopping Centre – N/A

A planning application for this site has been approved

Policy SA11: Corner of Millbank Way and Osberton Road – Neutral

The impact of this site allocation will not be known until a planning application has been submitted

Policy SA12: Vehicle Hire Corner of Lee High Road and Manor Park – Neutral

The impact of this site allocation will not be known until a planning application has been submitted

6. Mitigation

No negative impacts have been identified within the equalities assessment and therefore no mitigation is needed at this stage.

7. Service user journey that this decision or project impacts

The service user for the Lee Neighbourhood Plan will be landowners, homeowners and larger developers who will need to consider the planning policies in the plan when applying for planning permission for development within

the boundary of the designated neighbourhood area. Any applicant will need to obtain planning permission from the Planning Department who will assess and consider the application against these policies.

Other service users would include residents and members of the public who may wish to bring unauthorised development, i.e. development that does not abide by national, local or neighbourhood planning policies, to the attention of planning enforcement officers

Signature of Director	
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