

## Equality Analysis Template

<b>Name of proposal</b>	M&C decision on the Re-designation of Deptford Neighbourhood Action neighbourhood forum
<b>Lead officer</b>	Emma Talbot <a href="mailto:Emma.Talbot@lewisham.gov.uk">Emma.Talbot@lewisham.gov.uk</a>
<b>Other stakeholders</b>	
<b>Date of Equality Analysis</b>	September 2021
<b>1. The project or decision that this assessment is being undertaken for</b>	
<p>Deptford Neighbourhood Action neighbourhood forum (the Forum) are a community organisation based primarily in the Evelyn ward of London Borough of Lewisham who have been formally designated as the qualifying body for the purposes of neighbourhood planning.</p> <p>The forum was formally designated by Mayor and Cabinet for a 5 year period on 17<sup>th</sup> February 2016 in accordance with;</p> <ul style="list-style-type: none"> <li>• Section 65F (5) of the Town and Country planning Act 1990 as applied to section 38A of the planning and Compulsory Purchase Act 2004,</li> <li>• Localism Act (2011)</li> <li>• Neighbourhood Planning Regulations (2012) “the Regs”</li> </ul> <p>The Forum have progressed the neighbourhood plan to Reg 14 public consultation stage and have received 198 representations relating to the draft plan. During the Reg 14 consultation the forum are required to engage with local residents, business owners, council officers, members of the public, land owners and statutory consultees.</p> <p>As the 5 year designation of the forum lapsed in February 2021 an application was made to formally re-designate the forum and therefore retain their status as the qualifying body for the purposes of neighbourhood planning within the designated neighbourhood area.</p> <p>The Council held a 6 week public consultation from 18<sup>th</sup> March 2021 to 6<sup>th</sup> May 2021 on the re-designation application to identify what level of support there was within the designated neighbourhood area regarding the re-designation of the forum.</p> <p>The public consultation on the re-designation application had 34 respondents. 17 respondents were supportive of the re-designation of the forum and 17 respondents objected to the re-designation.</p> <p>The results of the consultation are considered to be highly unusual compared to similar forum re-designation consultations held by the council. Officers are also concerned regarding the nature of the objections outlined in the Mayor and Cabinet report. In response to these concerns and prior to any decision on the re-designation being made Council officers asked the forum to respond</p>	

to the points raised and provide supporting evidence where appropriate. Further detail is provided in the Mayor and Cabinet report.

Having considered the representations received during the re-designation consultation and the further evidence provided by the forum it was concluded that the decision to re-designate the forum could not be delegated to officers and should be made by Mayor and Cabinet given the level of objection and seriousness of some of the issues raised.

A report on the re-designation of the Forum will be considered by Mayor and Cabinet on the 6<sup>th</sup> October 2021. The report sets out the background and timeline for DNAs designation and production of its Reg 14 neighbourhood plan, provides a detailed summary of the re-designation consultation and outlines Officer's key considerations in assessing the re-designation of the forum. It concludes with recommending the following:

- Mayor and Cabinet are recommended to:
  - a. Refuse the application for the re-designation of Deptford neighbourhood Action forum for the reasons set out in the Mayor and Cabinet report.
  - b. Direct officers to work with community groups within the neighbourhood area to establish whether a viable neighbourhood planning or masterplanning process can be established to incorporate the views of all community groups and the general public.

This Equalities Analysis considers the impact of the above recommendation.

## **2. The protected characteristics or other equalities factors potentially impacted by the decision**

- Age
- Gender
- Religion
- Ethnicity
- Disability/Health
- Language spoken
- Employment
- Education

Given the extent of the designated neighbourhood area all of the above characteristics have been selected as a large group of people who live in the area may be impacted by the decision.

## **3. The evidence to support analysis**

Ethnicity	Number of residents	% of residents
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White - British	4,297	25.9
White - Irish	214	1.3
Gypsy	12	0.1
Other White	1,962	11.8
White and Black Caribbean	431	2.6
White and Black African	257	1.5
White and Asian	118	0.7
Other Mixed	314	1.9
Indian	208	1.3
Pakistani	78	0.5
Bangladeshi	104	0.6
Chinese	1,074	6.5
Other Asian	1,104	6.6
Black African	3,686	22.2
Black Caribbean	1,491	9
Other Black	782	4.7
Arab	142	0.9
Any other ethnic groups	329	2

Age group	% Population
Age 0 -4	7.5%
Age 5- 9	6.9%
Age 10 – 14	6.7%
Age 15 -19	4.7%
Age 20 -24	8.2%
Age 25 -29	13.4%
Age 30 - 34	12.4%
Age 35 - 39	9.9%
Age 40 - 44	7.2%
Age 45 - 49	6.2%
Age 50 - 54	5.2%
Age 55 - 59	4.2%
Age 60 - 64	2.7%
Age 65 – 69	1.6%
Age 70 -74	1.2%
Age 75 – 79	1%
Age 80 – 84	0.8%
Age 85 and over	0.4%

Sex	Number	% of population
Male	11,106	49.66%
Female	11,258	50.34%
Total population	22,391	

Languages Spoken (Top 4)	% of population
English	70.74%
French	2.35%

Spanish	1.4%
Portuguese	1.37%
Other (over 80 spoken at time of 2011 Census)	24.14

Religion	% of population
Christian	52.64%
Buddhist	3.85%
Hindu	1.59%
Jewish	0.16%
Muslim	10.09%
Sikh	0.14%
Other	0.50%
No religion	23.12%
Religion not stated	7.87%

Education	% of population
No Qualifications	19.1%
Level 1	12%
Level 2	12.7%
Level 3	10.3%
Level 4	33.5%
Apprentice	1.1%
Other	11.3%

Employment	% of population
Full time work	38.4%
Part time work	11.4%
Full time student	5.6%
Self employed	7.4%
Unemployed	8%
Retired	5.1%

#### 4. Impact Assessment

The Forum published its agreed constitution when the Forum was adopted in Feb 2016. The constitution of the forum states their overarching objective as being “to encourage, empower and enable the involvement of all communities living and working in the defined neighbourhood area in the preparation, production and implementation of the neighbourhood Development plan” including an aim to:

- Encourage community cohesion and active citizenship”.

This open membership means that in principle the re-designation of the Forum has the potential to have a positive impact, because it means a wide range of local people can become more closely involved in local planning issues.

However, Officers have found relationships between the Forum and neighbouring organisations over the previous 5 years have been strained with a number of organisations and Councillors objecting to the re-designation. The Council has received little evidence that the forum has sought to address these issues through its previous 5 year period to ensure the process encourages, empowers and enables the involvement of all communities living and working in the area. This is further supported through the responses received in the re-designation consultation.

The results of the re-designation consultation held by the Council were inconclusive showing a 50/50 split between objection and support. Compared to similar re-designation applications held by the council this is a highly unusual result. Previous re-designation application consultations in the borough have been supported by 93 - 97% of those who have submitted a representation. Further details can be found in the Mayor and Cabinet report.

Whilst the Council can provide support and advice it is the responsibility of the Forum to ensure that it complies with its published constitution. Given the experience of the previous 5 years there is therefore some uncertainty over the impact of the re-designation of the Forum and whether this would lead to positive outcomes.

Officers are therefore recommending Mayor and Cabinet refuse the re-designation of the Forum and direct officers to work with all community groups within the neighbourhood area to establish whether a viable neighbourhood planning or masterplanning process can be established to incorporate the views of all community groups and the general public.

It is accepted that there will be an impact on those members of the Forum and those members of the public who have engaged in the process of developing a draft neighbourhood plan to Regulation 14 stage. We recognise that this is an area of high deprivation and a high concentration of BAME residents. However the number of representations received during the stages of public consultations (198 representations during Regulation 14 consultation) are relatively modest when compared to the total population within the neighbourhood area. It can therefore be concluded that the number of residents involved, within those groups that will be directly impacted by this decision is likely to be small.

Given the above, the decision is not considered to impact on those with protected characteristics who are potentially affected by it.

## 5. Mitigation

Officers have considered the options available to the Council through the re-designation process including:

- **Delay the decision and re-consult on the re-designation** of the forum to establish more definitively if there is widespread public support or not. Whilst this may provide additional clarity on public support it would not address the other fundamental concerns outlined in the Mayor and Cabinet report. Officers are also

unconvinced that a further consultation process is likely to change the views of neighbouring groups and Councillors.

- **Re-designate the forum and proceed with neighbourhood plan.** This will not address the fundamental concerns outlined in the Mayor and Cabinet report.
- **Re-designate the forum with the condition that the forum have to work collaboratively to neighbouring groups and demonstrate effective public participation.** As a community lead process the Council is limited in its legal right to be involved in the plan making process, making this a difficult option to monitor and assess the success. Officer's understanding is that neighbouring groups are likely to want to revisit fundamental components of the plan like the vision and policies which may not be palatable to the Forum.
- **Refuse to re-designate the forum and welcome new applications for smaller more focused areas.** Whilst this may address some of the issues outlined in the Mayor and Cabinet report. It is likely to result in two or more applications which will overlap. As this is prohibited under the neighbourhood planning Regulations the Council would have to mediate between the groups and either agree revised boundaries or refuse the applications

Officers are recommending that Mayor and Cabinet refuse the re-designation of the Forum and direct officers to work with all community groups within the neighbourhood area to establish whether a viable neighbourhood planning or masterplanning process can be established to incorporate the views of all community groups and the general public. It is notable that during the period that the Council has been considering the re-designation, the Forum has reached out to neighbouring groups in a positive manner. Officers are therefore encouraged that this could be an option that may see a positive outcome where the community can come together more successfully. During this period the Council would delay any decisions on applications for any new Forum applications received within the Neighbourhood Area.

## 6. Decision/ Result

It is considered that the recommendation for consideration by Mayor and Cabinet on the 6<sup>th</sup> October 2021 on the re-designation of the Forum will have no impact on those with protected characteristics who are potentially affected by the decision.

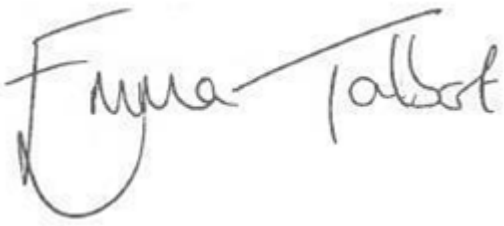
## 7. Equality Analysis Action Plan

We will be engaging with all local community groups within the neighbourhood area to establish whether a viable neighbourhood planning or masterplanning process can be established.

We will consult more widely with the public to ensure we have suitable representation through the process.

We will work with our communities' team to reach out to our seldom heard groups on an appropriate way forward.

**Signature of Emma Talbot**

A handwritten signature in black ink that reads "Emma Talbot". The letter "E" is large and stylized, with a long horizontal stroke that extends across the top of the word "Emma" and underlines the "T" in "Talbot".