



London Legacy Development Corporation Local Plan Consultation Document

Supporting Document: Draft Equality Impact Assessment October 2013

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JCT Business Solutions was commissioned by the London Legacy Development Corporation to undertake an independent Equality Impact Assessment as an iterative process during the development of the Draft London Legacy Development Corporation Local Plan.

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1 Executive Summary

1.1 Equality Impact Assessment

This Equality Impact Assessment (EqIA) sets out how the London Legacy Development Corporation (LLDC) has addressed the equality impacts of the Local Plan Consultation Document. The EqIA has been published alongside the Local Plan Consultation Draft for consultation.

In addition to assessing how the Local Plan Consultation Document has addressed the equality issues identified through Local Plan Interim Consultation, the EqIA will assess how issues and impacts raised from previous consultation and engagement work have been addressed. Since 2008 consultation and engagement for the area has taken place for the following strategic documents:

- Olympic Delivery Authority: Olympic Park Planning Permission 2008;
- Legacy Masterplan Framework 2008-2010; and
- Olympic Park Legacy Company: Legacy Communities Scheme 2011.

The EqIA considers a range of equality, social and health and wellbeing issues set against the Local Plan vision and objectives. The analysis fulfils the LLDC duties under the Equality Act 2010 to:

- ensure policies do not have an unintentional negative impact on traditionally disadvantaged or excluded groups;
- enhance, wherever possible, the positive impact on those groups, and demonstrate its commitment to promoting equality and inclusion;
- show how LLDC is meeting its positive duty to promote equality and good relations between diverse communities and to ensure there is no illegal discrimination and;
- act as a 'sense-check' to ensure policies/strategies and functions are designed with the user in mind.

There are nine recognised protected characteristics in the Equality Act 2010. The EqIA provides a summary of the Local Plan sections and explains the likely impacts for the following equality groups:

- Age: where this is referred to, it refers to a person of a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).
- Disability: a person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
- Gender reassignment: the process of transitioning from one gender role and status to another.
- Race: refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
- Religion or belief: religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect a person's life choices or the way they live for it to be included in the definition.
- Sex: a male or female.
- Sexual orientation: whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Alongside assessing the impact with regard to equality groups, the report will also consider the impact in relation to economic disadvantage and community cohesion.

Key stages of the EqIA are:

- Stage 1 Set the context and establish a baseline;
- Stage 2 Prepare report for review and consultation;
- Stage 3 Consultation;
- Stage 4 Review report and incorporate additional information;
- Stage 6 Report subject to review by Secretary of State and independent examination
- Stage 7 Publish final report; and
- Stage 8 Monitor and report progress of action plan.

Publication of this report is at Stage 3 of the above process.

The EqIA analysis will focus on the impact of the Local Plan for the current and future population of the Legacy Corporation area. The EqIA action plan includes clear mechanisms for monitoring and review. The document will be owned, actions taken and reported on by LLDC.

1.2 Consultation

In accordance with Section 18 of the Planning and Compulsory Act 2004 (as amended), LLDC as a Local Planning Authority is required to prepare the Statement of Community Involvement (SCI). The SCI was prepared, consulted upon and formally adopted on the 25th of March 2013. The SCI sets out how and when the Legacy Corporation will involve the community and key stakeholders in the preparation of local planning policy documents and in the processing and determination of planning applications.

The SCI requires a range of community and stakeholder engagement including:

- Correspondence by email, letter and e-newsletter;
- Leaflets, posters and public displays in key locations;
- One-to-one meetings with key stakeholders;
- Meetings with residents and other interested parties;
- Focus groups and workshops;
- Public meetings; and
- Provision of a contact number and dedicated email address.

Consultation and stakeholder engagement are fundamental to the EqIA process. This reflects the idea that the development of policies and plans is better understood and received where there has been an open and inclusive process that uses information which has been subject to community and stakeholder involvement from the start of the process.

1.3 Local Plan

The Local Plan is a spatial strategy that will set out planning policies to guide development within the Legacy Corporation administrative boundary. The document will give clarity to developers, public sector bodies, the local community and other interested parties regarding policies and will enable the effective determination of planning applications.

The overall purpose of the Local Plan is to respond to the needs of existing and future communities and provide a basis for the regeneration of the Legacy Corporation area to achieve socio-economic convergence with the rest of London over the period to 2030. The Local Plan will address national and London planning policy as well as the growth boroughs' Development Frameworks.

1.4 Integrated Approach

The integrated approach for the Local Plan, Consultation and the EqIA are:

Local Plan Stages	Consultation	Equality Impact Assessment
Stage 1. Regulation 18: Preparation of the Local Plan Consultation Document	Early Engagement Formal Consultation Stages	Stage 1 – 2: Preparation of Draft EqIA
Stage 2. Regulation 19: Publication of the Draft Local Plan	Further consultation	Stages 3-5: Draft Equality Impact Assessment published for consultation
Stage 3. Regulation 22: Submission of Local Plan to the Secretary of State	Supporting Documentation: Statement of Community Involvement (SCI)	Stage 6: Supporting Documentation: Equality Impact Assessment and Action Plan reviewed
Stage 4. Regulation 24: Independent Examination	Statement of Community Involvement (SCI) Reviewed	
Stage 5. Regulation 25: Publication of Inspector's Report		
Stage 6. Regulation 26: Adoption of the Local Plan	On-going review, monitoring and delivery of SCI	Stage 7-8: Action Plan implemented and reviewed as part of Local Plan review and reporting

1.5 Key Issues

The Local Plan addresses many concerns raised during engagement and consultation with equality target groups since 2008. The success of the plan to address recognised inequalities however is dependent on a number of factors some of which are outside the control of LLDC. Working with developers, businesses, employers, educational establishments, and legacy operators to provide opportunities to local people will be a fundamental requirement for the success of the Local Plan for equality groups.

The three areas that will require on-going monitoring to ensure the vision and objectives set out in the plan are delivered are:

- Working with stakeholders and partners to deliver the convergence aims;
- Education and employment up-skilling of local people reduce the gaps between the area and the rest of London; and
- On-going engagement and consultation to find solutions to deliver the Faith and cultural requirements for the area.

Continued engagement and consultation will ensure that the risk of any inequalities are dealt with at the first opportunity and the Local Plan will then be seen as a really positive development by all equality target groups.

2 Introduction

In 2012, the Mayor of London established the London Legacy Development Corporation. The purpose of the Legacy Corporation is “To promote and deliver physical, social, economic and environmental regeneration of the Olympic Park and its surrounding area, in particular by maximising the legacy of the 2012 Olympic and Paralympic Games, by securing high-quality sustainable development and investment, ensuring the long-term success of the facilities and assets within its direct control and supporting and promoting the aim of convergence”.

As the Local Planning Authority for its area, the Legacy Corporation is required to prepare a Local Plan. The Local Plan sets out the Legacy Corporation’s strategy for the sustainable development of its area as a whole, including the general amount, type and location of new development it considers could take place and the policies that applications for planning permission should conform to in order to meet these objectives.

The Local Plan is a spatial strategy that will set out planning policies to guide development within the Legacy Corporation administrative boundary. The document will give clarity to developers, public sector bodies, the local community and other interested parties regarding policies and will enable the effective determination of planning applications.

The overall purpose of the Local Plan is to respond to the needs of existing and future communities and provide a basis for the regeneration of the Legacy Corporation area help to achieve socio-economic convergence with the rest of London over the period to 2030.

The Local Plan incorporates past spatial strategy planning and delivery including the site preparation for the Olympic Park, Legacy Masterplan Framework, and Company’s Legacy Communities Scheme (LCS). In addition the Local Plan will deliver elements of the growth boroughs Local Development Frameworks. All of these plans and frameworks were designed to deliver regeneration of the Lower Lee Valley, to improve the life, employment and business opportunities of the local population and to provide opportunities for growth.

The Olympic Delivery Authority (ODA), London Development Agency, Greater London Authority, London, Legacy Corporation, and the Growth Boroughs, have always been aware and taken into account, the impact the regeneration would have on people from all equality groups. These statutory partners have worked together to ensure the needs of the population are reflected and addressed in the development and delivery of programmes and projects.

3 Equality Information

In order to understand the impact of the Local Plan it is important to recognise the demographic of the area. The LLDC LCS provides details of the equality groups in the growth boroughs:

- 52% were women, and 48% were men;
- 49.2% were from Black, Asian and Minority Ethnic Communities;
- 21% had a Limiting, Long Term illness (a proxy for disability);
- 50% were Christian, 19% were Muslim, 3% were Hindu and between 1-2% are Jewish, Sikh and Buddhist, respectively;
- 38.8% were under 25, and 21.5% over 50; and
- 5-7% may be Lesbian, Gay or Bisexual.

There are a number of recognised inequalities for the area which the Local Plan should help to redress:

- London's Bangladeshi and Pakistani communities are particularly concentrated within the area, making up a significant proportion of the population, particularly in Tower Hamlets. Although the Bangladeshi and Pakistani populations make a strong contribution to the sub region, these communities also tend to be over-represented among those who are workless, lower paid, unemployed and concentrated in sub-standard housing.
- The GLA Child Poverty in London: Income and Labour Market Indicators, 2006 showed that 69% of London's Pakistani and Bangladeshi children, and 51% of London's Black children were living in poverty.
- There is also an over-representation of disabled people (using proxy indicators) in the five host boroughs, with figures standing at 21% of the population compared to 17% in London. Disabled people are less likely to have formal qualifications, and have lower employment rates than the average. The 2006 Annual Population Survey shows that 27% of Disabled people in London have no qualifications at all compared with 37% of non-disabled people.
- While there is an equivalent ratio of women to men in the growth boroughs, the gender pay gap for women in London is still 23%, six percentage points higher than the national average of 17%.
- Equality and Human Rights Commission Triennial Review, 2010, found that Muslim people in England have the lowest rate of employment of any religious group. Only 47% of Muslim men and 24% of Muslim women are employed and figures suggest that 42% of young Muslim people are not in employment, education or training. This has particular relevance to the growth boroughs because of the high representation of the Muslim community in the area.

The available literature and evidence, such as GLA, State of Equality in London, 2008 shows quite clearly that some groups of people have disproportionate structural, persistent, and specific barriers to employment, skills development, safe and appropriate housing, good health and participation in sport, than others. For the Local Plan to become sustainable and successful in, supporting the economic development of the growth boroughs, it must offer opportunities and benefits to people of all backgrounds and mixed incomes.

4 Consultation

On-going consultation and engagement has provided statutory partners with clear evidence of what needs to be done to address inequalities experienced by the local population. Consultation has taken many forms including:

- 1-2-1 meetings;
- Community meetings;
- Business seminars;
- Newsletters, consultation documents and online information;
- Open residents meetings across all boroughs;
- Phone polls;
- Stakeholder consultation;
- Specialist panels;
- Targeted equality group engagement;
- Youth, school and college engagement;
- Workshops and focus groups;

Since 2008 the reoccurring issues raised through engagement and consultation are in regard to:

- Improved access to educational opportunities;
- Business opportunities;
- Cultural and faith requirements;
- Employment and skills training;
- Equal access and inclusive design;
- Housing;
- Open space, play and sports facilities; and
- Safety and security.

All the statutory partners have engaged with target groups, stakeholders, businesses and the general population to develop and deliver on-going strategies to tackle inequalities.

In accordance with Section 18 of the Planning and Compulsory Act 2004 (as amended), LLDC as a Local Planning Authority is required to prepare the Statement of Community Involvement (SCI). The SCI was prepared, consulted upon and formally adopted on the 25th of March 2013. The SCI sets out how and when the Legacy Corporation will involve the community and key stakeholders in the preparation of local planning policy documents and in the processing and determination of planning applications.

The SCI requires a range of community and stakeholder engagement including:

- Correspondence by email, letter and e-newsletter;
- Leaflets, posters and public displays in key locations;
- One-to-one meetings with key stakeholders;
- Meetings with residents and other interested parties;
- Focus groups and workshops;
- Public meetings; and
- Provision of a contact number and dedicated email address.

The Legacy Corporation Community and Engagement Team will carry out equality stakeholder engagement as part of the Local Plan Consultation. The engagement will utilise and build upon the Team's knowledge and contacts developed over the years to ensure that this major strategic plan delivers opportunities for all.

To date LLDC have carried out a number of informative meetings with stakeholders and the public. This process has provided further insight into the equality issues that the Local Plan needs to address. The EqIA includes these issues for assessment alongside the other equality impacts

identified through previous consultation. The EqIA Action Plan includes advisory work which should continue to be undertaken by LLDC to ensure they are engaging with stakeholders and businesses from all equality groups.

5 Assessment of Impact

5.1 Local Plan Consultation Document

The EqIA will assess how LLDC has addressed the equality issues raised through engagement and consultation with equality groups, stakeholders, and businesses. The assessment provides insight into how the Local Plan Consultation Document (LPCD) is addressing equality impacts in relation to the:

- reduction of socio-economic discrimination and exclusion associated with equality groups;
- promotion of the needs of identified equality groups; and
- provision of benefits for identified equality groups.

The EqIA of the LPCD will focus on the plan's ability to address the needs of the following equality groups:

- **Age** where this is referred to, it refers to a person of a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).
- **Disability** a person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
- **Gender reassignment** the process of transitioning from one gender role and status to another.
- **Race** refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
- **Religion and belief** religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect a person's life choices or the way they live for it to be included in the definition.
- **Sex** male or female.
- **Sexual orientation** whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

In addition the assessment will also seek to address discrimination, disadvantage and social exclusion faced by other groups due to class or income, in line with the Mayor's 'Equal Life Chances for All' equalities framework.

The Mayor of London has set out a series of actions which need to be incorporated into local planning to address issues of convergence, these include:

- creating a coherent and high quality city within a world city region;
- improving educational attainment, skills and raising aspirations;
- reducing worklessness, benefit dependency and child poverty;
- homes for all;
- enhancing health and wellbeing;
- reducing serious crime rates and anti-social behaviour; and
- maximising sports legacy and increasing participation.

The LPCD will also be assessed to see how it is delivering the Mayor's convergence aims for people in the Legacy Corporation Area.

The extent to which these points have been addressed will provide the basis to determine the positive or negative impact on target equality groups and therefore the areas which need to be addressed through an Action Plan.

Spatial Portrait of the Legacy Corporation Area

Spatial Portrait of the Legacy Corporation Area section provides comprehensive background into the historical and future opportunities of the area. The section provides details of the four sub areas which make up the Legacy Corporation Area:

- Sub Area 1 – Hackney Wick and Fish Island;
- Sub Area 2 – North Stratford and Eton Manor;
- Sub Area 3 - Central and South Stratford, and Queen Elizabeth Park South; and
- Sub Area 4 – Bromley-by-Bow, Three Mills and Pudding Mill.

The data included in the Spatial Portrait only relates to a single equality group; age. The information shows that the four Growth Boroughs have a mean average age of 29 to 36 yrs. The two largest estimated population groups outside of the mean average are 36-41 and 0-5yr olds. This shows that the Local Plan needs to address the needs of children, and young adults more than any other age group whilst making sure that people outside these groups are not disadvantaged.

Economic Activity and Health

Economic activity and health data are also areas covered by this section. There are challenges with regard to the impact on the socio-economic and health needs of people from different equality groups which need to be addressed. This section highlights the following issues which have traditionally been associated with people from a number of equality groups:

- The following has been drawn from the 2011 Census data for each of the Wards, and in some cases for the four boroughs as a whole, in order to provide a broad picture of the socio – economic setting within which the Legacy Corporation area sits. It provides a mixed picture, with many indicators reinforcing the perception that a significant element of the population have greater difficulty obtaining employment, achieving basic qualifications, and suffer from poor health outcomes.
- Table 1.5 provides information on occupation and unemployment levels for the LLDC wards and LLDC area, demonstrating that these wards have lower levels of economic activity than London as a whole and have higher levels of unemployment than the relevant borough and London as a whole.
- Educational attainment. Table 1.6 identifies the levels of qualification held by residents within the Legacy Corporation area wards are similar to, or in some cases above, the London-wide level for the highest levels of qualifications. However, the number of those within these wards and the boroughs who have no qualifications, is greater than that for London as a whole.
- The 2011 Census data (Table 1.7) shows that while the number of people in these wards and the boroughs as a whole who consider themselves to be in good health and not limited in their day to day activities is similar to London as a whole, significantly more consider that their day to day activities are limited a lot or that they suffer from bad or very bad health.

Assessment of impact

It is generally recognised that in order to address the needs of people from different equality groups the policies should include details of the population across all equality groups.

Positive impacts: the Spatial Portrait does provide clear evidence of the age, economic, health and wellbeing of the residents of the growth Boroughs. This demonstrates an understanding of the need to address the inequalities for these areas.

Negative impacts: Both the Interim Consultation Report and the LPCD lack any evidence of demographic and equality data. Therefore, although inequalities may be addressed through later sections, the LPCD does not include a headline summary of equality data to an extent that would provide reassurance that the needs of the equality groups and others are being addressed from a clear evidence base.

Chapters 2 and 3 of the LPCD set out the vision, objectives and strategic policies for delivery:

- Chapter 2 Vision and Objectives: Sets out the direction and approach to development and regeneration of the Legacy Corporation area and provides a framework from which the planning policies, site allocations and delivery actions have been derived.
- Chapter 3 Policies: Sets out the policies needed to implement the vision.

Business Employment and Economy

Impacts identified through engagement and consultation

Business growth

- opportunities for small and traditional businesses;
- protection and support for existing local enterprises;
- support businesses that attract middle and high earners to live and work; and
- prevent monopolies.

Jobs

- promote opportunities for employment and training which support access to new local jobs;
- designate, consolidate and intensify sites for employment generation;
- protect existing industrial and employment capacity;
- create affordable employment space for local population; and
- support higher value employment uses in emerging growth sectors.

Education

- prepare for quality and timely delivery of education facilities;
- enable some flexibility on the use of sites to provide for future needs;
- provide education to deliver expansion and diversification of economy; and
- support community libraries, heritage centres and information points.

Local Plan Consultation Document

The Legacy Corporation will seek to promote the opportunities within its area to build a strong and diverse economy and a range of high quality employment opportunities that will be accessible to those who live within its area and the surrounding areas of the Growth Boroughs. It will do this through:

- The designation and promotion of retail, commercial and industrial employment hubs, protecting the function of those hubs;
- Promoting growth in key employment and business sectors within the area and seeking to secure the necessary supporting infrastructure;
- Promoting provision of a range of sizes and types of employment and business floor space within major development proposals;
- Promoting the development of cultural and leisure attractors and activity within the area, including maximising the use of the Queen Elizabeth Olympic Park and transformed Olympic venues as an international and more local visitor attraction;
- Promoting opportunities for development of social enterprise and cultural and creative industries as a part of the overall local business and employment mix;

- Maximising the opportunities for business provided by the area's communication and transport infrastructure, promoting provision of international rail services for Stratford and, in the long term, the provision of a High Speed 1 to High Speed 2 rail link, in order to maximise opportunities for national and international business links;
- Promoting access to skills and employment training to increase opportunities for Growth Borough residents; and
- Promoting access to high quality education by supporting the development of new and existing schools and provision of higher education facilities, including those for postgraduate study and research.

Growth Borough Plans

All the Growth Borough Local Development Frameworks (LDF) include the need to develop competitive, affordable business destinations by attracting and retaining a distinctive mix of enterprises. In addition they also refer to the need to address the skills and educational gaps by developing lifelong learning initiatives.

Newham: Town centre proposals are designed to be inclusive and to act as a focal point for the whole community. The town centre offer caters specifically for local needs by encouraging small, independent shops, including budget shopping and a destination market that reflects the cultural diversity of Stratford.

Newham: Proposals to offer a broad range of employment opportunities has the potential to benefit all residents, however little information is available at this stage about the types of jobs that will be available, or the employment needs of different groups.

Waltham Forest: Focussing regeneration activities in the key growth areas of Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre and Wood Street for which Area Action Plans are to be prepared. Steering additional growth in retail, leisure, small office, community and cultural facilities in the designated town centres and maximising residential opportunities, protecting local areas from inappropriate developments, protecting employment land in the designated Strategic Industrial Locations (SIL) and other Borough Employment Areas.

Assessment of impact

The LPCD addresses the concerns raised through the engagement and consultation, and also provides evidence that the needs of a number of equality groups has been taken into account.

Positive impacts: The LPCD delivers many positive impacts including but not limited to:

- Providing business opportunities, managed and affordable workspace in deprived areas will increase the opportunities for BAME, women and LGB&T SME-run businesses;
- Skills training and facilities should help to deliver employment thereby reducing the high workless rates for the area which particularly affects young men, people over 50 and disabled people;
- Maintaining and improving local facilities provides for the needs of people who have limited mobility or access to private transport;
- Promoting the development of cultural and leisure attractors will help to develop community cohesion;
- New developments alongside existing will help to balance the historic and new business elements in the area;
- Good transport links to retail and commercial centres to enable everyone to access the centres; and
- Increasing the number and level of education establishments from primary to higher education will deliver the convergence aims. This will also ensure the correct level of infrastructure is in place to support growth both in population and skill requirements for business.

Negative impacts: The GLA Convergence indicators for the area show that there are a higher proportion of low to medium skilled workers in the area. The gaps between employment rates for a number of equality groups including BAME men, young white men, women, in the growth boroughs compared to London is widening.

The LPCD does recognise that there could be issues for people with low or medium skill levels. Therefore there is a risk of a negative impact for people from equality groups who do not have the required skills to apply for jobs. This could mean that employment opportunities may be more suitable to non-residents; possibly to the detriment of local people seeking employment opportunities.

Housing, Historic and Built Environment, and Infrastructure

Impacts identified through engagement and consultation

Housing

- provide affordable, low rise family housing with gardens
- large family homes across a range of affordability;
- developments to include wheelchair accessible homes and a range of sheltered accommodation;
- ensure higher quality housing than current development of flats;
- protect the Carpenters Estate; and
- support developments that enable people to live and work in one place.

Urban design and design quality

- stipulate high design standards and ensure LLDC Inclusive Design Standards are met throughout all developments;
- promote traffic-free space;
- ensure sensitive integration of new developments with existing environment;
- create inclusive and welcoming environments for different equality groups;
- understand and design out negative impacts of evening economies;
- restrict building heights;
- be mindful of impact of phasing on social infrastructure; and
- improve streetscape, create clean, safe, accessible and appealing public space.

Area character and the historic environment

- maintain existing character;
- protect creative and diverse communities and the spaces they inhabit;
- conserve and preserve heritage; and
- prioritise creative re-use of buildings over demolition.

Community

- provide affordable facilities, shops and restaurants;
- meet the cultural requirements of different communities;
- provide space for the development of multi-faith provision;
- maintain and prioritise existing community and prevent polarisation;
- provide suitable Gypsy / Traveller sites;
- create opportunities for community management and creative contribution; and
- develop social infrastructure which provides for the needs of the whole community through co-location of services, accessible flexible and open community space.

Carpenters Road representations

- existing Housing Crisis in Newham;
- “Betrayal” by Newham Council;
- quality community life in the Estate that should be protected;
- quality housing in the Estate that should be retained; and
- if demolition occurs, residents should be relocated together, to low-rise, affordable housing with gardens.

Local Plan Consultation Document

Housing

- The Legacy Corporation will seek to ensure high quality homes are built within the area which provide real choice for all Londoners. The new homes should meet the local housing requirements of the area and strategic housing requirements of London taking account of local as well as strategic housing market assessments, in particular the need for affordable family housing. Housing delivery is a priority and the Legacy Corporation will seek to achieve the maximum intensity of use compatible with the local context and character, in line with Policy 3.4 of the 2011 London Plan.

Historic and built environment

- The Legacy Corporation will seek to ensure that the built environment within its area is well designed; creates high quality places and supports development that contributes to making places better for people. This includes the design of individual buildings, public/private spaces, as well as larger development projects which are new or subject to refurbishment or change.
- The Legacy Corporation will seek to ensure that the historic built environment within its area is conserved and enhanced through a positive strategy that promotes the wider social, cultural and economic benefits that conservation of the historic environment can bring. This should sustain and promote the significance of Designated Heritage Assets (Conservation Areas and Listed Buildings) and other non-designated heritage assets through encouraging viable uses consistent with their conservation and potential for heritage-led regeneration.

Infrastructure

- The Legacy Corporation will work with its partners to seek to deliver the infrastructure necessary to support the growth and development identified within this Plan and the contribution that this growth can make to achieving the objectives of the Convergence agenda. In doing so it will produce an Infrastructure Delivery Plan that will be reviewed and, where necessary updated, annually in consultation with infrastructure providers and stakeholders.
- The Legacy Corporation will prepare a Community Infrastructure Levy (CIL), which once implemented, will provide monies to apply to the delivery of the infrastructure included within its CIL Regulation 123 list. Where appropriate, infrastructure or contributions toward its delivery will also be secured through the use of Planning Obligations through S106 Legal Agreements, A supplementary Planning Document will be produced to provide guidance on the operation and application of the Community Infrastructure Levy and S106 Legal Agreements.

Delivery of the London Plan

- As with all London boroughs, the Legacy Corporation is directed by the London Plan on a range of housing policies, including strategic housing targets, density and space standards. All of which form part of the Legacy Corporation Local Plan. The National Planning Policy Framework and the governments housing welfare reforms have particular implications for how housing needs are planned for and met in the Legacy Corporation area and across the capital.

Growth Borough Plans

Newham: Carpenters Road: The provision of family housing addresses a local need, and larger homes will be of particular benefit to Hindu, Sikh and Muslim households. Homes will be designed to be tenure blind and will provide a range of tenancy options and will therefore be accessible to those on lower incomes, such as young people and black residents. The proposals involve phased demolition of existing homes, which could be more disruptive to older households given their higher satisfaction with their homes. Improved pedestrian connections to the town centre, Olympic Park and Stratford Station and provision of local services will benefit those with mobility issues. Homes should be built to lifetime homes standards to ensure that housing meets the needs stemming from the projected increase in older people.

Waltham Forest: To ensure adequate provision of social infrastructure across the life of the plan for the following facilities: educational facilities including early years education, primary education, secondary education, further education, adult learning; Health services including primary health and secondary health; Sports and Leisure facilities including swimming pools, sports halls and outdoor sports spaces; Libraries; Community Space and Faith Facilities; Meeting rooms and halls; Emergency Services; and Pubs.

Hackney: Hackney is one of the most health-deprived boroughs in the country. The majority of the borough falls within the top 30 - 40% of health-deprived areas in England and rates poorly on most health indicators. The Core Strategy will ensure the Council and Hackney PCT work together to raise the quality of healthcare and health for Hackney's residents.

Tower Hamlets: The policies provide planning guidance for how Tower Hamlets can meet the housing needs of the borough, both affordable and market. These policies are designed to facilitate sustainable development of housing and have positive impacts for the borough's residents, especially those with more limited economic means. The Council acknowledges that affordable housing tenants have less choice over where they live and for this reason standards are proposed regarding layout of family housing.

Neighbourhood wellbeing and community cohesion should also be maintained by ensuring that new developments do not segregate market and affordable housing, allow gated communities, or contribute towards concentrations of affordable housing which is developed off-site.

Specialist housing is protected and development of new specialist housing will be supported where there is a demonstrated need. Specialist housing often accommodates people who would fit an equality strand and this policy effectively protects residents with specialist housing needs. The Council's policy on student housing is to manage student housing more restrictively. This could have negative impacts on students who often tend to have lower incomes and require specialist student accommodation. This policy approach has been taken because there is a risk that without careful management of student housing, achieving strategic objectives, such as provision of affordable homes, may be restricted.

Assessment of impact

The LPCD sets out the context for creating neighbourhoods, this includes the following information.

Helping to meet London's need for new homes through the creation of a network of new neighbourhoods which are designed to meet the needs of existing and future communities at all stages of life. Providing access to employment opportunities, local shops, and community, cultural and social infrastructure, is a priority for the Legacy Corporation.

A combination of a growing demand for new homes and an increasingly buoyant housing market in London has made much of the capital unaffordable to those on low incomes. Demand for affordable housing is high and it is the role of the Legacy Corporation to ensure mixed and

balanced communities are achieved by providing a range of accommodation that allows a choice of housing tenures and types of accommodation, and at a price that residents can afford.

LLDC have made a clear commitment to continue the inclusive design standards set on the Olympic park through to the Local Plan: 'The Legacy Corporation is committed to carrying forward the significant accessibility and inclusive design work that was undertaken in delivering the Olympic Park and its surrounding infrastructure. It is the Legacy Corporation's aim that development within its area creates wholly inclusive neighbourhoods that can be enjoyed by everyone regardless of disability, age, gender, sexual orientation, race or faith. In order to achieve this, the Legacy Corporation has developed its own standards that set the benchmark for Inclusive Design. Although these standards may not be applicable in all circumstances, the Corporation will nevertheless expect applicants to take them into consideration when formulating their proposals'.

The LPCD provides a clear overview of how issues from and consultation have been addressed. LLDC requires that all developments meet the minimum space requirements set out in the 2011 London Plan. However it should be noted that in other aspects of design the LLDC is exceeding or setting new standards that should be applied to housing as well.

In relation to Carpenters District the LPCD states: 'The core Carpenters Estate area provides the most significant opportunity for change and regeneration. A range of options are possible here including comprehensive redevelopment. However, no specific options have been developed at this stage. A flexible approach is therefore required within this Plan to allow the development of appropriate options'.

Therefore it is not possible at this time to assess the equality impacts of the Carpenters Road Estate. However the Action Plan does include work which will need to be undertaken to ensure the views of the residents are incorporated in the final Local Plan.

LLDC's commitment to meet the challenge to 'ensure that future developments within its area continue to respond to the historic elements that remain, and draw upon the landscape features that have defined this area for so many years' addresses the concerns raised in the interim consultation.

LLDC has committed to encourage the provision of new community infrastructure as part of new large scale development. Where it is proposed to redevelop a site containing an existing community facility, falling within Use Class D1, this facility should be replaced within or close to the proposed site, in a form and size that, as a minimum, allows the existing community uses to continue. This will help protect facilities for a number of equality groups including young and older people, disabled people and people from different faiths and cultures. However it should be noted that the provision to protect a community facility does not extend to protection for a service.

The LLDC sets out how the LPCD will maintain and prioritise the existing community and prevent polarisation through connectivity routes by ensuring that the layout of new and existing places connects with the existing route network, and in a way that facilitates movement along direct, permeable, safe and legible pedestrian and cycle routes. Routes will cater to the requirements of all users equally. Opportunities to connect areas to strategic road, rail and bus networks will be promoted where appropriate.

LLDC commitment to the health and wellbeing of residents in the Legacy Corporation Area more than meets the concerns raised in the interim consultation for all equality groups.

Positive impacts: The underlying principle of the housing aspect of the LPCD is to maximise the opportunities for delivering high quality, accessible and sustainable homes, including new affordable family homes.

Providing clear guidance that developments will be expected to deliver against the LLDC Inclusive Design Standards will continue to ensure that the equality needs of a number of target groups are met.

The inclusion of family homes of 3 or more bedrooms will help to meet the housing needs of large BAME families.

The requirement that there is not a net loss of residential units including affordable housing will help to meet the housing demand for low income families.

The housing needs of wheelchair users will be addressed through Lifetime Homes and wheelchair accessible units. Requiring the provision of play space and additional outdoor amenity space addresses the concerns raised in the interim consultation. This space will benefit all equality groups and will also help to the address issues associated with people's health and wellbeing.

Requiring developments to include safe and secure environments, reducing the opportunities for crime, and minimising the fear of crime, will have a positive impact across all equality groups but particularly, young and older people, disabled people, LGB &T people and BAME people.

The 35% target benchmark of affordable housing will ensure that low income families and individuals across the equality target groups are able to remain in the area.

Specialist housing will address the needs of young people, older people who require sheltered or supported housing, protection of hostel, staff and shared housing stock will also benefit people from all groups including homeless people. Working with the growth Boroughs to ensure good quality, accessible sites for Gypsies and Travellers recognises the heritage of the community in the area.

Protecting designated views and ensuring that new developments make a positive contribution will help to sustain community cohesion and a sense of place for existing residents across all equality groups.

LLDC is committed to 'Locally list those heritage assets that have a degree of significance which merits consideration in planning decisions. Assessing the significance of heritage assets will be based around an understanding of an assets age, rarity, historic association and value - either evidential, aesthetic, group, social or communal'. This should provide people with a degree of comfort that they can seek to have buildings with a social or cultural significance considered for local listing and therefore protection.

Negative impacts: It is not clear from the LPCD to what extent developers will be expected to deliver homes which take into account the faith and cultural requirements of residents as set out in the LLDC Inclusive Design Standards.

The Local Plan Consultation Document makes no reference to the provision of places for worship. Failing to acknowledge the faith needs of the community could negatively impact faith/religious groups.

Natural Environment

Impacts identified through engagement and consultation

Health and wellbeing

- support developments that facilitate positive social interaction for individuals and families;
- all developments to meet the LLDC Inclusive Design Standards to help incentivise people from different equality groups to visit and use the Parklands;
- free open play and activity space and facilities throughout developments;
- play space close to housing developments;

- community use and access to legacy sports venues;
- space for developments to provide activities by the older population;
- provide quality infrastructure and facilities that improve physical health; and
- create public safety improvements.

Open Space and Biodiversity

- well maintained spaces to reduce crime and help create and maintain safe environments;
- protect and enhance open space and biodiversity;
- adhere to 'Blue Ribbon' network policies;
- flood management and "sequential approach" testing; and
- protect yard spaces and canals for traditional ways of life.

Climate Change and Energy

- mitigate climate change and reduce CO² emissions;
- consider sustainable land use options and local energy sourcing; and
- employ high environmental standards.

Local Plan Consultation Document

Health and Wellbeing

- LLDC will seek to secure a high quality built and natural environment that promotes physical and mental wellbeing for those who live and work within the Legacy Corporation area and that helps to achieve health outcomes and a general quality of life that is equivalent to at least the average for Greater London, including seeking to secure the provision of health care space sufficient to meet the needs of the Legacy Corporation area and contribute towards meeting the wider healthcare needs of surrounding communities, while encouraging use of the sporting, recreational and cultural facilities that form part of the legacy from the 2012 Games .
- By creating inclusive places, the LLDC seeks to secure through inclusive design, places and buildings that can be easily used and enjoyed by everyone when they choose, confidently, independently and with dignity.
- LLDC sustainability objectives will draw together and balance the strands of economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area, to maximise the life chances of its residents in the existing and new communities and minimises the opportunity for negative environmental and social effects.

The Natural Environment

- LLDC will work with its partners and seek to ensure that the natural environment within the Legacy Corporation area is protected and enhanced so that growth takes place within the context of a high quality environment, contributing to positive outcomes for health and wellbeing, while achieving an effective series of Green Grid and Blue Ribbon networks within and through the Legacy Corporation area and within the wider context of the Lea Valley and East London.

Growth Borough plans

Waltham Forest: Reducing the proliferation of any use which is seen to reduce people's ability to be healthy such as Hot Food takeaways and betting shops, providing convenient pedestrian and cycle access to the Olympic Park and its Legacy and associated sports facilities throughout the Lea Valley. Providing high quality Leisure Centres in accessible locations; ensuring easy and local access to clinical health services in the borough. Promoting higher levels of everyday exercise from walking and cycling through a more attractive and safer public realm. Protecting people from unsafe, unhealthy and polluting influences, and promoting a high quality living environment.

Newham: Forefront of environmental technology making the area a cleaner, greener and more pleasant to live.

Hackney: to enhance the quality of existing open space to provide equal opportunities for all residents in Hackney to enjoy a safer, cleaner and greener place.

Assessment of impacts

The work already carried out across the Lee Valley and the Queen Elizabeth Olympic Park has improved the areas that people work, live and play. The protection of open parks, parkland and play space will ensure that future generations continue to reap the health and wellbeing benefits of the Local Plan.

Positive impacts: The delivery of the health and wellbeing commitment objectives will mean that the area population life expectancy and quality of life will be much improved for all, but particularly children, older people, disabled people and BAME people who are more at risk of diabetes and heart problems, and which have higher instances of mental health issues.

Free and easy access to increased outdoor activity space will also help to balance the health and wellbeing inequalities for a number of equality groups, those on low incomes and people who prefer not to take part in organised and structured activity for cultural or other reasons. LLDC are also working with the Legacy Sports Operators to ensure access to the facilities at affordable prices.

By employing the principles of Secure by Design and the LLDC Inclusive Design Standards the Parklands, venues and facilities will provide optimum access for all. However there will need to be a well monitored maintenance programme in place to ensure the area continues to be a safe, secure and accessible environment.

Negative impacts: On-going construction work will have an impact on people living and working in the area for a number of years. The re-opening of the Queen Elizabeth Olympic Park in 2014 will help to mitigate the impact of the on-going works.

Transport and Connectivity

Impacts identified through engagement and consultation

Transport and connectivity

- improved strategic and local connections;
- provision for sustainable transport modes;
- exemplar standards for cycle routes and storage; and
- safe access.

Health and wellbeing

- improve walkways and cycle paths to incentivise physical activity.

Climate Change and Energy

- reduce the need for travel and car use; and
- support the principle of 'walkable' neighbourhoods.

Local Plan Consultation Document

• Transport and Connectivity

Seek to maximise growth within the boundaries of existing transport (including highway, rail and waterway) capacity and that of committed projects to improve that capacity, while maximising the

opportunities for local movement by foot and bicycle, facilitating improved local connectivity where required to achieve this.

- **Climate change and energy**

Contribute to the Mayor's target of achieving "an overall reduction in London's carbon dioxide emissions of 60% (below 1990 levels) by 2025", by improving the energy efficiency of buildings, increasing the use and availability of decentralised energy within the Legacy Corporation Area and minimising the need for vehicular travel.

- **Jobs**

Secure a significant growth in good quality jobs within the Legacy Corporation Area during the Plan period, providing a diverse range of employment opportunities that are easily accessed by those living within or in close proximity to the area.

- **Creating Neighbourhoods**

To expand existing, and create new neighbourhoods that are good places to live and work and which provide the setting for communities to grow and prosper, with good links to the amenities and facilities available in the wider area.

Growth Borough plans

Waltham Forest: Ensure Waltham Forest is a safe, vibrant and healthy place to live and work by enhancing connectivity across the borough, facilitating regeneration and growth in a sustainable manner, minimising congestion and pollution, and providing a range of attractive travel options to enable access to jobs, opportunities and facilities within the borough and beyond.

Tower Hamlets: Requiring development to integrate with the transport network protects residents from isolation, which is especially important for people with limited mobility. Reducing forms of pollution caused by transportation of freight will have a positive impact on the health of residents. Extensive parking provision undermines alternative means of transportation such as public transport, cycling and walking. Encouraging travel by public transport reduces pollution and traffic congestion on the roads. Improved cycle provision allows more mobile residents greater opportunity to use renewable, green, and relatively cheaper transportation. This will also have positive benefits for resident health.

Assessment of impacts

The LLDC is committed to increasing sustainable and access transport methods and hubs, and to improving connectivity between different types of transport. There is an acknowledgment that the historic situation of disconnected routes intersected with major roads and waterways did not provide for local connectivity or ease of movement across the Lee Valley.

LLDC will be 'seeking to secure improved strategic and local connections to support intentional and national economic growth' via train travel between airports and cities across the UK.

LLDC has committed to increasing and improving cycle parking and cycle routes, in addition to safe pedestrian routes. Pedestrian routes should be clear of obstacles and have clear designated markings to reduce conflict with cycle routes. Cycle routes, where possible, should have a physical segregation from vehicular traffic.

The engagement and consultation in the past has included comments that the Greenway should be lit for safety reasons; the LPCD makes reference to the Greenway as a walking and cycling route but does not include reference to lighting.

LLDC have acknowledged that reduced parking should not include reductions in the levels of Blue Badge parking at sites and venues.

There are a number of transport improvement projects identified which will improve transport connections across the area including:

- Upgrade of Hackney Wick Station;
- Improvements to Bromley-by-Bow Station;
- A new western entrance to Stratford Regional Station; and
- New and improved links across the A12 and River Lea and Lea Navigation.

Improved transport links across all transport modes will help people seeking employment, setting up businesses, and accessing areas for leisure activity. There needs to be joined up planning with other areas in London and surrounding Counties, to enable people to travel independently across the region. Increased accessible transport at all London mainline stations, across the underground, at airports and the new Cross Rail network will need to be in place to encourage more people to use public transport.

LLDC commitment to 'require development proposals to provide new or improved access to the waterways, improvements to towpaths and footpaths and facilitate the introduction of moorings and other waterway-related infrastructure where these do not compromise the other functions of those waterways' will also provide opportunities for people who live, work or enjoy accessing the river and canals to connect with the towns and developments.

Positive impacts: Increased and improved pedestrian routes will help to reduce isolation for disabled people, older people and people who do not have access to private transport. Improving lighting will make areas more secure and help to reduce crime and other anti-social behaviour which will have a positive impact on all equality groups. Increased access to all modes of transport and better connectivity will benefit people from all equality and disadvantaged groups.

Negative impacts: Reducing the options for private transport can have a negative impact on people's ability to access the community, for example, parents and guardians with children, older people, and people with restricted mobility.

6 Conclusion

The Local Plan addresses many concerns raised during engagement and consultation with equality target groups since 2008. The success of the plan to address recognised inequalities however is dependent on a number of factors, some of which are outside the control of LLDC. Working with developers, businesses, employers, educational establishments and legacy operators to provide opportunities to local people will be a fundamental requirement for the success of the Local Plan for equality groups.

In general, the assessment has identified minor negative impacts in the Local Plan, many of which can be mitigated or a solution found to address the impact with ease. However, it should be noted that the area's faith provision does require further investigation, engagement and consultation. This has historically been an area of differing opinions and will need all groups to be engaged in order to find a solution.

Continued engagement and consultation will ensure that the risk of any inequalities are dealt with at the first opportunity and the Local Plan will then be seen as a really positive development by all equality target groups.

7 EqIA Action Plan

The EqIA action plan sets out how LLDC can ensure that the views of target groups and hard to reach groups are incorporated into the final Local Plan. The Action Plan provides details of work which needs to be carried out to address and mitigate any negative impacts.

LLDC will be responsible for ensuring the negative impacts identified are addressed through the development of the final document and the subsequent Local Plan process.

7.1 Consultation and engagement

Area of work	Target Group	Actions	By whom and when
Database and target group identification	All	<p>Establish the demographic and equality nature of public and business population.</p> <p>Update current database to reflect type of groups to be engaged with i.e. technical, community, partner etc.</p> <p>Address any gaps in target group identification in relation to the local population.</p>	Community Engagement Team Before start of on-going consultation.

Area of work	Target Group	Actions	By whom and when
Engagement with local target groups	All but particularly Faith Groups and LGB & Groups	<p>Target engagement with Faith Groups and LGB &T groups who needs are under-represented.</p> <p>Develop and fund work with local target groups to ensure people are informed and engaged.</p> <p>Produce a summary document which can be used by local groups to engage members.</p>	Community Engagement Team
Leaflet, letter and email distribution	All but particularly people who are hard to reach because of disability, age, culture or other social factors.	<p>Work with social, community and voluntary providers to get information out to and responses from hard to reach groups.</p> <p>Use a freepost address for correspondence</p>	<p>Community engagement team</p> <p>On-going through consultation phase</p>
Contact number/ dedicated email address:	All	<p>Use both a free phone number and Lo-Call number.</p> <p>Assess the need for translation services which can be used with the phone line</p> <p>Carry out equality monitoring of respondents</p>	<p>Team responsible for phone line and email correspondence</p> <p>On-going through consultation phase</p>

Area of work	Target Group	Actions	By whom and when
<p>Meetings with residents associations/ other interest groups</p> <p>Workshops and focus groups</p> <p>Stakeholder engagement</p>	<p>All groups for whom there is no identified data or feedback</p>	<p>Work with Market Research company to target groups for consultation.</p> <p>Workshops in all geographic areas to ensure issues to each area can be addressed.</p> <p>Ensure all meetings are well published and in accessible buildings.</p> <p>Provide evidence that a mix of community and stakeholder groups were engaged.</p>	<p>Community and Stakeholder Engagement Team</p> <p>On-going through consultation phase</p>
<p>Public displays/ exhibitions</p>	<p>Older People, disabled people, people from different faiths and hard to reach groups due to likelihood of non-engagement in the past.</p>	<p>Provide displays for community leaders and stakeholder groups to use to gain feedback from members.</p> <p>Work with all faiths to provide display space in places of worship.</p> <p>Use additional media such as bill boards and bus shelters around the area, social media such as Twitter and Facebook.</p>	<p>Communications Team</p> <p>Before and on-going through consultation phase</p>
<p>Local Plan Newsletter, including Legacy Corporation E-Newsletter</p>	<p>All</p>	<p>Ensure messages are linked to other growth Borough work.</p> <p>Monitor feedback to check where responses are coming from and from which groups.</p>	<p>LLDC and Growth Borough Communications, Community Engagement Teams</p> <p>Before and on-going through consultation phase</p>

7.2 Spatial Portrait of the Legacy Corporation Area

Area of work	Target Group	Actions	By whom and when
Equality data and evidence	All	Provide headline equality data in relation to the LPCD: employment, business ownership, education attainment, income, housing and households, transport and leisure.	GLA / LLDC

7.3 Business Employment and Economy

Area of work	Target Group	Actions	By whom and when
No actions identified However on-going monitoring of planned work to ensure positive impacts are being achieved.	All	Independent review and monitoring of impact of planned projects and programmes.	LLDC Employment and Skills Team, Business Support Services, and Independent Auditor

7.4 Housing, Historic and Built Environment, and Infrastructure

Area of work	Target Group	Actions	By whom and when
Carpenters Road Estate	All	On-going consultation with the residents of the Estate, to ensure their views are incorporated into the final Local Plan.	LLDC Community Engagement and Planning Teams.
Inclusive Design experts to be engaged on all development design teams.	All	Clear statement of the requirement to consult and or engage inclusive design experts for all housing developments.	LLDC Senior Manager - Accessibility and Inclusive Design
Places of worship	Faith and religious groups	Undertake research and provide evidence of what the faith and religious requirements are for the area and how they have been addressed.	LLDC to confirm

7.5 Natural Environment

Area of work	Target Group	Actions	By whom and when
Construction work	All	Maintain current level of community engagement and mitigate noise and disruption throughout the construction phases of development.	LLDC Community Engagement Team

7.6 Transport and Connectivity

Area of work	Target Group	Actions	By whom and when
Reduced access to areas by private transport	Older people, people with restricted mobility, parents and guardians with children.	Ensure transport plans consider the needs of these groups when reducing access to areas by private transport.	Transport and Planning Teams. On-going.

8 Glossary

CIL	Community Infrastructure Levy
BEAP	Built Environment Access Panel
EqIA	Equality Impact Assessment
GLA	Greater London Authority
Growth Boroughs	Hackney, Newham, Tower Hamlets and Waltham Forest
LLDC	London Legacy Development Corporation
LPCD	Local Plan Consultation Document
LVRPA	Lee Valley Regional Park Authority
SCI	Statement of Community Involvement
TFL	Transport for London

9 Reference Documents

LLDC Interim Consultation Report 2013
September 2013

LLDC Inclusive Design Standards
March 2013

Waltham Forest Local Development Framework Core Strategy Proposed Submission Equality
Impact Assessment
January 2011

Newham Stratford Metropolitan Masterplan Supporting Document Equality Impact Assessment
February 2011

Hackney Local Development Framework Equality Impact Assessment
February 2011

Tower Hamlets Equality Analysis of the Managing Development of the Local Development
Framework
November 2011

GLA Equal Life Chances for All
July 2009

Entec Integrated Impact Assessment Full Report: Consultation draft replacement London Plan
(Spatial Development Strategy for Greater London)
October 2009