

Evidence Base Equalities and the Local Plan

February 2017

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1 Introduction

Purpose

1.1 This paper sets out the information and understanding we have gathered regarding equalities groups¹ in Newham and their particular needs, issues and aspirations that we need to be aware of in the process of equalities impact assessment of spatial planning strategies and policies. As such, it is intended to be of relevance to the preparation of all planning policy documents. This understanding is carried through into a checklist against which policy directions, options, and draft policies can be assessed. This has been and will continue to be applied as the Local Plan develops, with conclusions and action points amended accordingly. It is included within the Integrated Impact Assessment as in effect, this evidence base generates the basis of an Equalities Impact Assessment.

How has this work been undertaken?

1.2 The process of information-gathering and assessment has occurred concurrently with a wider process of issues and options scoping and evidence base generation, commencing in 2016, building on earlier work between 2010 and 2012. This work has been undertaken by the Planning Policy Team in close liaison with colleagues in Corporate Policy and Research, drawing on a process of continuous engagement with stakeholders, including local residents themselves. Anyone is welcome to comment on it and contribute to its completeness and accuracy.

A 'live' document

1.3 This document is however, not an end-point, and we will continue to re-visit the equalities evidence base as engagement and other research continues, updating and widening our understanding. This is particularly relevant as we work within a wider corporate research, consultation and engagement context to avoid consultation fatigue and make best use of resources. The checklist included in the Integrated Impact Assessment will provide evidence

¹ Equalities groups are those covered by legislation concerned to prevent discrimination and promote equality of opportunity on grounds of gender, age, race/ethnicity, faith, sexual orientation, disability and caring responsibilities, and socio-economic background. They therefore conventionally comprise the following [and any combination – inequality is often experienced on multiple grounds]:

⁻ Older and younger people and their carers

⁻ People of different faiths

⁻ People of different, (particularly minority) ethnic backgrounds, including gypsy-travellers

⁻ Lesbian, Gay, Bisexual and Transgender people

⁻ People with disabilities and their carers

⁻ Women

⁻ Less affluent socio-demographic groups.

of this process at appropriate points, and comment on the evolving picture in the conclusion.

Structure of the document

- 1.4 The paper firstly sets out the corporate approach to equalities, which provides the context to this work. It then gives an overview of the engagement undertaken with equalities groups or representatives of them, both directly in connection with the Local Plan, and indirectly through events and exercises with wider corporate purposes. Our understanding of the prevalence, overlap and spatial distribution of such groups (both through residence and their day-to-day activities) in Newham is then set out. From this, it is possible to draw out an understanding of how development in particular areas, and the borough as a whole needs to be sensitive to the needs and aspirations of equalities groups. Lastly, the particular needs and aspirations of such groups that we have identified both through engagement and other resources² as relevant to spatial planning, are highlighted, whilst reflecting on the commonalities between them, and those expressed by the wider population.
- 1.5 The conclusion presents a structured way of approaching equalities issues in the Local Plan going forward, enabling a proactive and focused approach to equalities impact assessment.

² Notably the Mayor of London's SPG Equality and Diversity in Planning; see also the references section at the end of the paper.

2 Newham's Approach to Equality and Community Cohesion

- 2.1 Newham's approach to Equality and Diversity is about ensuring all of our residents are able to take full advantage of opportunities and fulfil their potential. This is a key part of our vision to build resilience. The Council's values, policies and services are designed to ensure we both meet our legal duties, and actively working to eliminate inequality and build a sense of belonging in Newham.
- 2.2 This is underpinned by a clear commitment to:
 - Treating individuals equally and respectfully.
 - Using research to establish where these is disadvantage and ensure we understand and tackle its causes
 - Eliminating discrimination based on age, gender, race, disability, sexual orientation, belief and class (socio-economic status).
 - Ensuring everyone has the opportunity to fully participate in community engagement and decision making.
 - Building the capacity of individuals to realise their aspirations.
 - Valuing diversity as a community leader, an employer and a service provider.

Building Community Cohesion

- 2.3 Newham is the most diverse local authority area in the country, where people from many different backgrounds and cultures come together. We celebrate our diversity, which is one of our greatest strengths. However, we also know that the Council has a proactive role to play in building community resilience, promoting fairness, and helping all our residents come together as one community.
- 2.4 Our approach is built on three core areas:

1) Building common ground:

When you have lots of people with different background coming from all over the world, part of our job as a council is to help build common ground. That is why:

• We make sure that when people use our community assets or council funding, it is for inclusive events that are open to all residents - not restricted according to particular religious or ethnic groups.

- We continue to fund free English Language tuition open to all, despite cuts in government funding. We know that speaking English is a key part of building a shared identity and enabling everyone to play an active role in the community.
- We celebrate people's cultures and backgrounds in an inclusive way, encouraging the whole community to get involved. Or community events embrace residents' cultures, and we raise the national flag of the countries many of our residents come from on their national day.
- Our annual Faith Conference brings together different faith groups to build dialogue, and encourage residents to work together shared local priorities.

2) Bringing people together

Cohesion requires regular communication between people from different backgrounds, helping to build relationships, develop a common sense of purpose, and dispel myths and suspicion. We are committed to doing everything possible to build mixed communities and to enable the people of Newham to build strong relationships with other members of the community. That is why:

- Our programme of free Community events bring people from all background together, with events such as the Mayor's Newham Show and the Under the Stars festival attended by thousands of residents. Our 'Let's Get the Party Started' small grants scheme also supports residents to host street parties and other events.
- Our housing policy aims to create sustainable, mixed communities that reflect the diversity of the borough as a whole. We believe that in the interests of cohesion, our neighbourhoods must be mixed by class, ethnicity and tenure.
- Our community neighbourhoods approach is at the heart of our efforts to build community resilience, and aims to empower the local community to come together and make a difference in their local area. Hosting over 500 events per week on average, we encourage residents from all background to get involved, whether providing opportunities to volunteer; learning new skills such as IT skills; or simply attending one of our coffee mornings or joining in with activities in our libraries.

3) Promoting fairness:

In order for community cohesion to exist there must be a sense that everyone is treated fairly and has equal access to public services. We are determined to avoid jealousy, suspicion and prejudice, and we are committed to even-handedness and transparency in the provision of all of our services. To ensure a fair deal for all:

- We invest in enforcement to make sure everybody plays by the rules, including strong enforcement of regulations on housing to drive out rogue landlords and improve housing conditions, and on environmental crime.
- Our housing allocations criteria is based on a clear first-come, firstserved principle and rewards contribution, with a residence criteria and people in work or caring prioritised. We are ensuring that nobody is 'jumping the queue' for housing in Newham.
- We ensure our services are accessible and open to everyone. In taking
 a mainstream approach to service provision, we recognise that
 sometimes people and certain groups within the community face
 barriers which prevent them accessing services or facilities, and in
 these circumstances the Council has a duty to ensure we remove
 these barriers.

Overview of Engagement Undertaken

2.5 The engagement audit trail maintains a log of engagement undertaken on an ongoing basis, which is used to keep this document live. Whilst in general a mainstreaming approach has been followed, with engagement activities designed and monitored to ensure that they incorporate a range of views from residents from all walks of life, these have been supplemented with some specific engagement with those groups that are 'typically under-represented' in mainstream consultation. This can also help to give us a more clearly articulated steer as to specific issues faced by particular equalities groups, rather than them being subsumed by the majority view (although the latter is of no less importance). In 2015-6, relevant information was gained from engagement with councillors and youth councillors, local residents at the Mayor's Show, and engagement on the Gypsy and Traveller Accommodation DPD, including a meeting with local site residents.

3 Prevalence and distribution of equalities groups in Newham

Newham's diversity

3.1 Newham, in common with many inner London authorities is a visibly (and audibly) diverse and young borough, which in relation to equalities groups means that:

- Varied ethnic groups are more prominent than elsewhere in England, and even than in many parts of London. At the last census 71% of Newham's population were from BAME groups³, indicating an increase in diversity across the borough since the 2001 Census. The annual School Census 2016 found that 74.2% of primary school pupils (and 66.3% of secondary school pupils) in state-funded schools within the borough did not have English as their first language⁴.

- Christian and Muslim faith groups are the most prominent, (39.9% and 31.9% of the population respectively according to the latest census), with Christianity less commonly practised than elsewhere, and Islam more common; Hindus and Sikhs are also present in relatively high numbers (8.7% and 2.0% respectively). However people with no faith also equate to 9.5% of the population⁵.

- Newham continues to have a much younger population profile than elsewhere, with the population aging at a slower rate. GLA interim mid-2015 based estimates are that over 65s accounted for 7.0% of the population in 2015⁶. Conversely, those under 25 accounted for around 36.2% of the population.

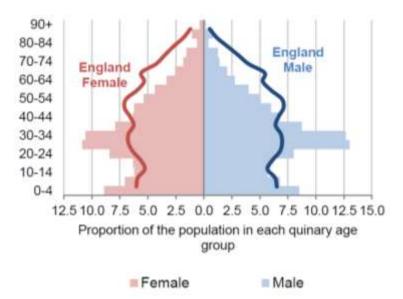
Figure 1: Population pyramid for Newham compared with England, ONS 2015-mid-year estimates

³ Census and ONS data accessed from Office of National Statistics Online

⁴ Department of Education (2016), Schools, pupils and their characteristics: January 2016

⁵ GLA (2014) Percentage of Population by Religion, Borough, Census 2011 data

⁶ GLA (2017), Interim 2015-based population projections



Source: Newham, Children and Young People JSNA 2016

- Although there is a marginally larger proportion of men within the borough, gender is roughly balanced, as might be expected, except among older people due to the longer life expectancy of women.

- Lone parent households were recorded on the last census for 10% of the households in Newham, slightly higher than the average of 8% in London. Following the London trend, 93% of the total lone-parent households are female lone-parent. Full-time home-makers are predominantly women and account for 14% of the total of economically inactive female population, higher than the average for London which accounts for 9.5%⁷.

- Though information about sexuality is hard to come by, census data about people living in same-sex couples points to a relatively small LGBT population (around 637 people, or 0.3% of the over 16 population). This is borne-out by more recent ONS data on Marital and Civil Partnership Status as well as civil partnerships register⁸, which shows much lower rates than other Inner London authorities, with only 247 civil partnerships registered during 2006-2015 in Newham, out of 11,911 civil partnerships recorded in Inner London for the same period.

- Disabilities, long-term limiting illnesses and associated carers are present at relatively high levels in the borough. ONS Annual Population Survey⁹ data indicates that 12.1% of economically inactive working age population were found to be suffering from a limiting long term illness in 2016, below London average and showing a downward trend – see Figure 2 overleaf. As per 2011 Census, 24% of the households in Newham had at least

⁷ Office of National Statistics (2011) Occupation and Households data

⁸ GLA (2016), Civil Partnerships

⁹ ONS, Annual Population Survey, available from www.nomisweb.co.uk

one person with a limiting long term illness¹⁰. Whilst in 2016 around 0.8% of the working age population were in receipt of Disability Allowance, a downward trend, while 1.7% were receiving Carer's Allowance, a growing trend¹¹ - see Figure 3 overleaf. The number of working age people receiving Employment and Support Allowance or Incapacity Benefits has also reduced from 5.9% in 2011 to 5.1% in August 2016, in line with wider London and national trends.¹²

- As the latest census showed, there are relatively high levels of people in routine and semi-routine occupations (22.3% of the total of working age residents) and relatively low levels of people in higher managerial and professional occupations¹³

- While Newham was considered the 2rd most deprived local area in both London and England when assessed by the Index of Multiple Deprivation 2010, the 2015 release of the Index showed improvement, with Newham now being ranked as the 4th most deprived local authority in London, and 8th in England¹⁴. When measured by extent of population living in most deprived LSOAs, Newham is now ranked 25th in England, up from 2nd. Mapping of deprivation at LSOA level is included as Figure 5 (pg.14) for the Index of Multiple Deprivation 2010 and Figure 6 (pg.15) for Index of Multiple Deprivation 2015. The domains that have seen the least improvement include Income, Barriers to Housing and Services, and Crime¹⁵.

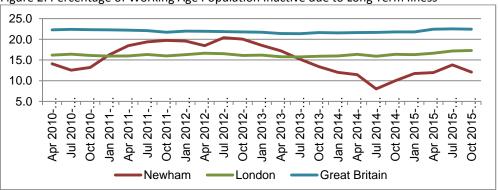


Figure 2: Percentage of Working Age Population Inactive due to Long Term Ilness

Source: ONS, Annual Population Survey, available from www.nomisweb.co.uk

Figure 3: Percentage of Working Age Population in receipt of Disability Allowance and Carer's Allowance

11 DWP, Benefit Claimants, available from www.nomisweb.co.uk

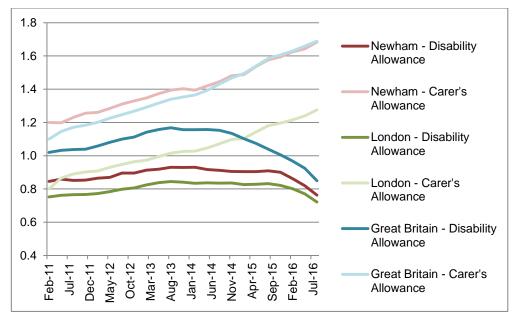
¹⁰ ONS (2011) Adults not in Employment and Dependent Children and Persons with Long-Term Health Problem or Disability for All Households

¹² DWP, Benefit Claimants, available from www.nomisweb.co.uk

¹³ Census and ONS data accessed from Office of National Statistics Online

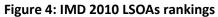
¹⁴ DCLG, The English Indices of Deprivation 2015, by rank of average rank

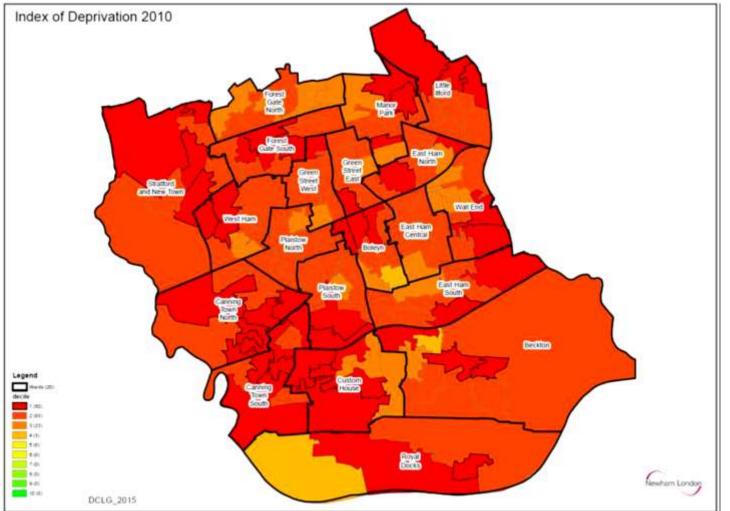
¹⁵ DCLG, The English Indices of Deprivation 2015, by rank of average rank



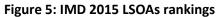
Source: DWP, Benefit Claimants, available from www.nomisweb.co.uk

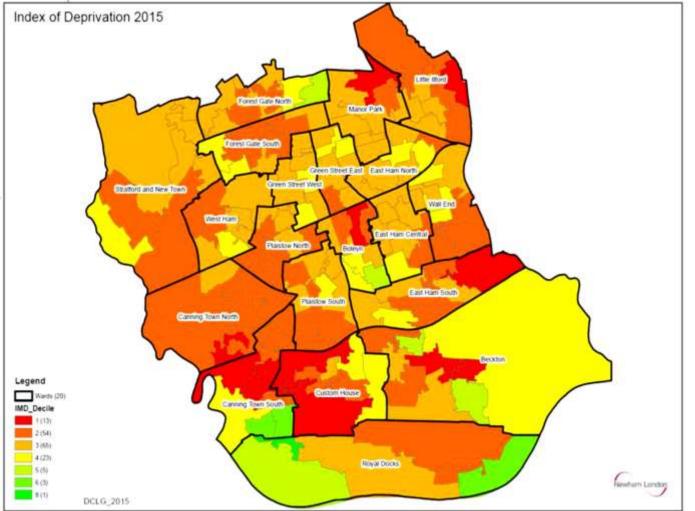
- Close to two fifths of all Newham residents are worried about being a victim of crime in their local area (37%), a 3-percentage point reduction since 2014. By CN, residents of East Ham (52%), Royal Docks (50%) and Plaistow (47%) are most likely to worry about being a victim of crime, while residents of Beckton (28%) and Forest Gate (24%) are least likely.





Source: Newham, 2016, based on data from DCLG, The English Indices of Deprivation 2015





Source: Newham, 2016, based on data from DCLG, The English Indices of Deprivation 2015

Equalities groups within Newham – spatial patterns and overlaps

3.2 The following section looks at each equalities group (and some sub-groups) in more detail, considering spatial patterns in their use of variation in their places of residence, and other uses of space and overlaps in group membership where possible¹⁶. It should be noted that deprivation and socio-economic equality is tackled as a borough-wide over-arching/cross-cutting issue in the main discussion section.

Ethnic groups, recently arrived migrants and asylum seekers

- Census data from 2011¹⁷ see Figure 6 overleaf suggests that the most 3.3 ethnically-mixed community forum areas (with a fairly even mix of ethnic groups) are Plaistow, Green St and East Ham, though East Ham is a focus for Asian groups, especially Indians, and Plaistow is a slight focus for people of Bangladeshi origin. In turn, Manor Park and Green Street have the largest non-white population whilst Royal Docks is the most 'white' area, closely followed by Beckton, Canning Town-Custom House, and Stratford-West Ham, though a significant proportion of this population is non-white British, particularly in Stratford-West Ham. Asian populations are most focused in East Ham and Manor Park (though Manor Park is more of a focus for Pakistani communities, East Ham Indian and 'other'). Black-African and Black Caribbean people are most concentrated in Plaistow and Canning Town, though Black Africans are also a relatively significant component of the population in Beckton, Stratford-West Ham, and Royal Docks. Royal Docks and Beckton have the highest Chinese population, while Beckton has a significant Latvians population.
- 3.4 This largely corresponds to data from a survey of town centre businesses, $(2009)^{18}$ which showed that the highest levels of black, Asian and minority ethnic group workforce composition were in Green St, East Beckton and East Ham town centres, with the highest levels of businesses only employing white people seen in Canning Town and Forest Gate town centres. Forest Gate would be the anomaly here given the community forum area has one of the lower white populations, but this may reflect the smaller nature of the centre compared to the extent of the community forum area.
- 3.5 In turn, information about the shopping patterns of different ethnic groups from a 2009 consumer survey¹⁹ shows similarly that Green Street is an

¹⁶ This section will be updated as new data becomes available. Not all data is available at lower than borough spatial levels (i.e. ward, lower super output area, community forum area etc.)

¹⁷ ONS, Census 2011, Ethnic and age groups by ward

¹⁸ Undertaken as part of the Retail and Town Centre Study

¹⁹ Undertaken as part of the Retail and Town Centre Study

important shopping destination for Asian people and Chinese people, though for people of Indian origin East Ham, East Beckton and Forest Gate are also significant destinations, and for Chinese people, East Beckton. Black Caribbean people are significant customers at Stratford and Forest Gate, whilst Black African people are more prominent users of East Beckton and Stratford. Green St is the only centre where people of white ethnicity are not the largest group of shoppers. Canning Town, Stratford and East Beckton are most dominated by white shoppers, with the second largest ethnic groups in these locations being Indian (Canning Town, East Beckton) and Black African (Stratford). Likewise key locations for ethnic shopping (food) are Green St, East Ham and Forest Gate plus local centres at Manor Park, Plaistow High Street, Abbey Arms, Greengate, North Woolwich and shops at Maryland. Stratford is also important for specialist ethnic non-food products.

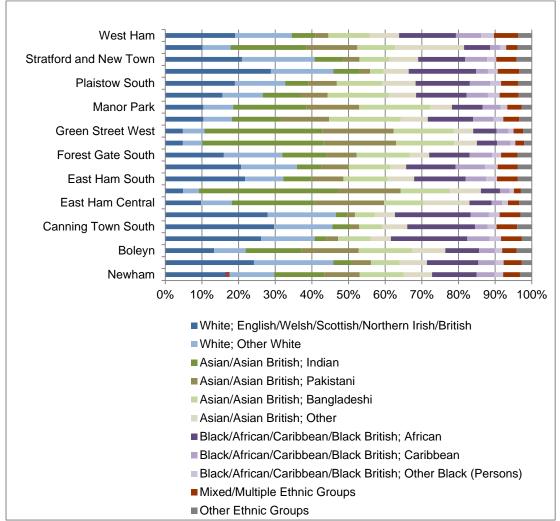


Figure 6: Ward Ethnicity Demographics

Source: ONS, Census 2011, available from www.neighbourhood.statistics.gov.uk

3.6 Newham also has a small gypsy-traveller population living on a site in Stratford (15 pitches) and some in bricks and mortar housing. Further information on this group is given in the Gypsy-Travellers section.

People of Faith

From the more up to date ethnicity data discussed above, plus local 3.7 knowledge it is also possible to surmise that Islamic, Hindu and Sikh people are more likely to be focused in Green St, East Ham and Manor Park. Christian groups are likely to be more focused in Custom House and Canning Town, Royal Docks, Beckton, Stratford and West Ham. Although a majority of Christian people are located in Plaistow and Forest Gate, it is closely followed by Islamic population²⁰. This is largely supported by data from Aston Mansfield (2013) on the distribution of religious meeting places at that time. This found that whilst Christian meeting places were most numerous and reasonably equally spread throughout the borough with predominance in Canning House and Custom House (presumably reflecting historic patterns), Muslim meeting places were clustered in the north and east of the borough (East Ham, Manor Park and Green Street, and to a lesser extent, Stratford and West Ham and Plaistow), while Hindu meeting places were to be found in mainly in Green Street then East Ham, Stratford and West Ham and Manor Park

Disabled People and Carers

- 3.8 It can generally be assumed that carers and disabled people and/or those with a limiting long term illness will be co-located. Data from the 2011 census indicates that Custom House and Canning Town, and East Ham had the highest proportion of the population reporting limiting long term illness, while Royal Docks had the lowest. Persons registered as permanently sick and disabled were relatively evenly distributed across the borough, with slightly higher levels in the South West.
- 3.9 More recent data on claimant counts however, indicates that Custom House and Canning Town had the highest proportion of the population claiming Incapacity and Disability allowance benefits, followed by Beckton. Stratford and West Ham presented the lower rate for this variable. Further high counts are found in pockets (individual lower super output areas) in Forest Gate, Green St and Manor Park²¹. In addition, the 2011 Census data found that the community forum areas with most people with life-limiting health problems were Manor Park, Custom House and Canning Town.. Overall the conclusion to be drawn appears to be that disabled people and carers are widely distributed across the borough, though Custom House and Canning Town is most likely the area where more of the population have consistently been affected by disabilities.
- 3.10 Interestingly however, the same census data showed that disabled people were less commonly employed in Custom House and Canning Town and Manor Park, with higher levels of workforce representation in Royal Docks

²⁰ Newham info (2011) Religion datasets by ward

²¹ GLA (2014) Incapacity Benefits claimants

and Stratford and West Ham, suggesting disabled people in Custom House and Canning and Manor Park may have more difficulty accessing the labour market locally.

Older people

- 3.11 According to the ONS population data for 2011²², higher proportions of older people are found in Plaistow, Green Street, Custom House and Canning Town and East Ham. There are more older people amongst the white population and Asian population²³. In addition, the 2011 census reported a correlation between age and disability/limiting long term illness.
- 3.12 Life expectancy statistics from ONS between 2010 and 2014 indicate that life expectancy for both males and females in Newham is improving, but remains below England and London values²⁴ Figures 7 and 8. GLA interim mid-2015 based projections estimate that the over 65s population in Newham will increase from 7.0% in 2015 to 9.3% by 2030²⁵.

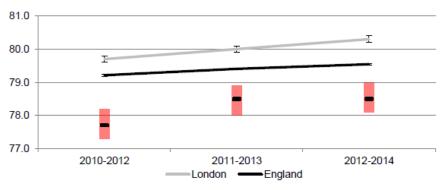


Figure 7: Male life expectancy at birth (years) from 2010 to 2014

Source: LBN, Children and Young People JSNA 2016

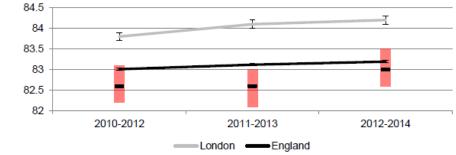


Figure 8: Female life expectancy at birth (years) from 2010 to 2014

23 ONS, Census 2011 Ethnic groups by age group and ward

Source: LBN, Children and Young People JSNA 2016

²² ONS, Census 2011 Population by age group and ward

²⁴ LBN, Children and Young People JSNA 2016

²⁵ GLA (2017), Interim 2015-based population projections

Younger people

- 3.13 According to the latest ONS population data²⁶, higher proportions of under-15 year olds are found in East Ham, Plaistow and Custom House and Canning Town, whilst higher proportions of 15-24 year olds are found in Beckton, Forest Gate, Green Street and Stratford and West Ham. Combined, Green Street, Manor Park, Custom House and Canning Town, Beckton and Stratford and West Ham have the highest levels of people aged 0-24. There are more younger people amongst Newham's BAME population (79% of the total of under 25 years) than the white population²⁷.
- 3.14 IDACI scores from 2010 put the proportion of children in Newham living in income deprived households at 47.7%; much higher compared to the London average of 31.9%. More recent IDACI figures from 2015 are more encouraging, with 28.8% of children in Newham living in income deprived households; however, this proportion remains higher compared to the London average of 24.1%. Areas in East Ham/Wall End, Green Street West and Forest Gate North show under 15% of children experiencing income deprivation. In the Southeast high deprivation (above 30%) is seen in Beckton and in the East of the East Ham South ward Figure 9. These areas are surrounded by lower prevalence of income deprivation; however, parts here contain large expanses of non-residential land use.

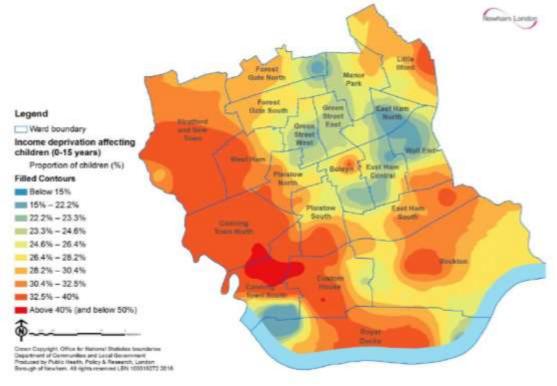


Figure 9: IMD 2015, Income Deprivation Affecting Children, heat map

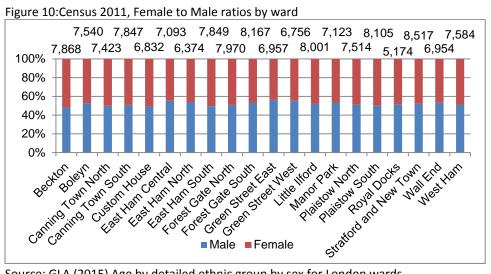
Source: LBN, Children and Young People JSNA 2016

26 ONS, Census 2011 Population by age group and ward

²⁷ ONS, Census 2011 Ethnic group by age

Women, including lone parents, and those who take on the majority of childcare and home-making

3.15 According to the latest GLA statistics analysis of census data (2015), the female population is generally evenly distributed among the wards, with slightly higher proportions of females to males in Beckton, Custom House, East Ham South and Plaistow South wards – Figure 10. This data also suggests that there are greater numbers of females amongst BAME (particularly Indian, Bangladeshi and Black/African women populations)²⁸ – Figure 11.



Source: GLA (2015) Age by detailed ethnic group by sex for London wards

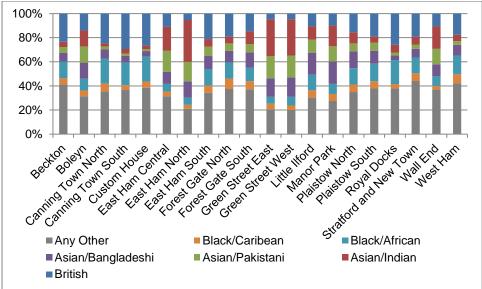


Figure 11: Census 2011, Ethnic diversity among female population by ward

Source: GLA (2015) Age by detailed ethnic group by sex for London wards

²⁸ GLA (2015) Age by detailed ethnic group by sex for London wards, based on 2011 Census data

- 3.16 According to the 2011 census, lone parents were present at highest levels in Custom House and Canning Town, Beckton and Plaistow; which indicates a correlation between lone parents and female population located in Beckton and Plaistow.
- 3.17 Around 47% of town centre businesses surveyed in 2009 (Town Centre Business Survey) had more than 50% female staff; this was higher in Green St, Stratford, and East Beckton (the latter probably skewed by the large supermarket).

LGBT people

3.18 There is no data available on the spatial distribution of lesbian, gay, bisexual, and transgender people in the borough, and there are no obvious places of congregation of such groups equivalent to those elsewhere in London. However, it is important to recognise that the actual extent of the LGBT population is likely to be larger than recorded by the census co-habitation and civil partnership data, not least because people are more likely in some ethnic and faith groups prominent in Newham to hide their sexuality from friends and family, but also as cohabitation/ relationship status does not provide an accurate indication of sexual orientation or gender identity.

4 Issues and Aspirations Relevant to Spatial Planning in Newham by Equalities Group

Deprivation, Regeneration and Equalities Groups

- 4.1 Given the remaining high levels of deprivation in Newham, and the wellestablished fact that many people who fall within one or more equalities group suffer from multiple deprivations due to a complex web of causal factors (MoL, 2007) impact on socio-economic inequality and deprivation is discussed here first as an over-arching issue.
- 4.2 In response, on the one hand, it is reasonable to expect that everyone will benefit to some extent from area-based improvements to job opportunities, environmental quality, housing choice and quality, crime prevention, community facilities etc. This is the Newham-wide 'regeneration' that the Council and its partners wish to achieve through spatial planning, addressing reinforcing spirals of decline to help to achieve 'convergence' with the rest of London. A wide 'catch-all' mechanism of this type is the well-established justification for area-based regeneration interventions as opposed to individualised interventions in deprivation that can get overly complex to administer. Indeed, to a large extent, engagement with different equalities groups suggests their main concerns are shared with the wider population: crime, grime, anti-social behaviour, jobs for local people, affordable housing and family housing and convenient and good quality facilities, although priorities may vary from group to group.
- 4.3 Conversely, multiple deprivation as experienced by equalities groups means that we need to take extra care to ensure people are not further disadvantaged through planning and development, and if possible, to tackle through carefully directed spatial investment particular barriers to opportunity that they face. This will partly be done through appropriate social, economic and environmental impact assessment. Whilst ostensibly, this is at the heart of the British planning system of nationalised development rights which seeks to ensure that development occurs 'for the public good' weighing up costs and benefits, it is well known that some impacts/effects can be unevenly distributed socially and geographically. This is variously described by concepts such as environmental injustice, the failure of 'trickle down' and social exclusion and injustice. As such, sustainability appraisal, the key policy testing tool here, needs to be undertaken in the knowledge of these potentially distinctive or uneven impacts. The other concern will be to ensure that particular needs, where appropriate within the context of community cohesion, can be met (directly or indirectly) and aspirations addressed.
- 4.4 Therefore the two foci of the remainder of this section are the specific or priority needs and aspirations of, plus potential distinctive or uneven impacts

on, particular equalities groups. This analysis is concluded by identifying the key equalities challenges for the Local Plan, and with a summary table which lists checkpoints relating to particular themes that need to be reflected in planning policy documents to meet equalities obligations.

4.5 Firstly however, a brief consideration of environmental injustice in Newham is appropriate given its relation to multiple deprivation and hence relevance to all marginalised equalities groups through this link (as discussed above) rather than groups-specific mechanisms.

Environmental Injustice in Newham

- 4.6 Newham as a whole suffers from a London-wide environmental injustice effect, whereby in being historically outside the more restrictive city boundaries, it became the disproportionately-favoured location for dirty, malodorous and noisy industry and infrastructure. In turn, this has meant historically that Newham has been a less desirable location within London, with cheaper land and rent, attracting poorer residents who are in turn less likely to complain about such land uses, despite being affected by them. As such, more deprived groups are likely to suffer more from environmental and health impacts.
- 4.7 Within Newham, this situation particularly applies to populations living in proximity to the sewerage works in the East, the airport to the South, and remnants of 'dirty industry' along the Lower Lea Valley in the West. The spatial response therefore must be to consider carefully whether any new housing is justified in close proximity to these sites, and in turn, whether any further development of this type should be allowed in these locations. Equally, particular attention to mitigation of existing impacts should be considered.

Older People, Disabled People and their Carers

4.8 Focus groups and ongoing engagement show considerable overlap in the particular spatial concerns of these groups: crime, fear of crime, anti-social behaviour, the availability of specialist and generally good quality housing, good quality (safe, accessible, with adequate parking) public realm and buildings, (including publicly accessible toilets, which can significantly impact the usability of spaces) healthier lifestyles, and conveniently-located facilities and services that people know about, including opportunities for socialising (some clustering of specialist housing may help with this, and make it more peaceful). The recent Liveability Survey²⁹ has also shown that disabled people and people aged 45 to 64 are significantly less likely to be satisfied with their life overall (20% and 16% respectively), and residents with a long term illness/disability are less likely to feel able to cope with, bounce back from

²⁹ The Liveability Survey 2015

stressful events, difficult times and setbacks. This corresponds to what the literature suggests we need to be sensitive to in relation to these groups, further pointing out the value of quality public realm and open space in enhancing people's mental health and well-being, and improving legibility, particularly for those with learning disabilities.

- 4.9 Disabled people also have lower household incomes than other residents. The median net equivalised household income of disabled residents is £11,641 before housing costs and £9,519 after. By contrast, residents who are not disabled have a median household income of £16,298 before housing costs and £11,916 after housing costs. Utility and food bills have a greater impact on people who consider themselves to be disabled. The median proportion of household income accounted for by bills is 36% among those residents who consider themselves to have a disability, compared with only 26% among people who do not consider themselves to have a disability.³⁰
- 4.10 Quality, inclusive housing that is more energy efficient, more accessible and visible community infrastructure, improvements to the public realm and town centres, and increased job opportunities including support for intermediary mechanisms such as Workplace, continue to be relevant development-linked responses here.

Ethnic groups, (other than gypsy travellers) recently arrived migrants and asylum seekers

- 4.11 Newham is unusual in the extent of its non-white British population, and relatively high levels of community cohesion reported. As such, Black and Asian people, as well as white British people tend to be well represented in mainstream consultation events, including focus groups and surveys that are deliberately recruited to on a stratified basis. As a result, we can largely assume that the priorities expressed through these namely crime and antisocial behaviour, public-realm environmental improvements, affordable and family housing and improved job opportunities are also those that would make most difference to Black and Asian groups as well as the white-British population.
- 4.12 Nonetheless, consumer survey work referred to above³¹ highlights the importance of specialist ethnic retail provision in many of the borough's town and local centres and elsewhere, and that all town centres are clearly well-used by ethnic groups. Indeed, such shops and services are commonly places of social interaction as well as meeting specific consumer needs. Many black, Asian and people from minority ethnic backgrounds are highly prominent

³⁰ LNB, Understanding Newham 2014

^{31 2009,} as part of the Retail and Town Centre Study

business-owners and workers³², particularly in/of smaller shops and services, though in some cases, recent enforcement work suggests employment conditions are poor (notably in hot food takeaways). This indicates that future changes to these centres and other shops need careful consideration in relation to potential impacts on BAME groups, seeking to maintain an adequate range of affordable, smaller shop units and where appropriate, market stalls.

- 4.13 The Census data (2011) identified that BAME people (particularly Bangladeshi and Black African residents) were more likely to be found in overcrowded households, and are more likely to be living in housing in a poor condition, or otherwise be unsuitably housed than the white British population. Further statistics report lower rates of employment and higher rates of unemployment amongst BAME groups in Newham as compared to the borough average.³³ Whereas 50% of men are in paid employment, this falls to 36% of women. Conversely, one-quarter of women in Newham (25%) are looking after the home or family, compared with only one per cent of men. There are also differences in the employment status of ethnic groups: residents of Pakistani and Bangladeshi backgrounds and Black African residents are more likely to be looking after their home and/ or family than average (25%, 29% and 23% respectively, compared with 14% of residents overall). Again, reflecting the overall trend, these figures are led by women. This fits with the wider literature that refers to the need to pay particular attention to the need to address discrimination in the job market, and issues of multiple deprivation discussed above, whilst also promoting community cohesion. As such employment interventions such as Workplace are likely to be particularly important, as well as overall increasing job opportunities and promoting general community cohesion and integration to break down barriers. Nevertheless, 67% of people in management and professional positions are from BAME groups.³⁴.
- 4.14 Three-fifths of Asian residents (58%) work for less than the London living wage. This compares with only two-fifths of white (41%) and black (39%) residents who do so. Among the Asian community, Pakistani and Bangladeshi residents are more likely to work for less than the London living wage than Indian residents (70% of Pakistani and 78% of Bangladeshi residents earn less than the London living wage, compared with 45% of Indian residents). Residents who have moved to the borough more recently are more likely to earn less than the minimum wage. By contrast, only seven per cent of residents who have lived in Newham between two and eight years are paid below the minimum wage.³⁵ Providing more quality, affordable and family-

³² ONS Population Survey 2011 found that of over 16 year olds employed as sales and consumer staff 82% are from BAME groups.

³³ LBN (2014), Understanding Newham

³⁴ ONS, Annual Population Survey, 2011 found that of over 16 year olds employed in managerial and professional posts, 67% were from a BAME background.

³⁵ LBN (2014), Understanding Newham 2014

sized housing that reduces fuel and other running costs will also therefore be a relevant spatial intervention, as well as providing upskilling opportunities.

- 4.15 Concerns about jobs and housing may in turn link to higher levels of stress and other mental health problems which are more common in BAME groups³⁶. The healthy urban planning literature suggests that open space, and natural green space may be particularly important to bring relief to such conditions. In addition, Local Plan engagement and development management case work has indicated the demand for community spaces from small, often minority-community groups, affected both by the lack of affordable new space and by access to more exclusive community facilities. This suggests the importance of continuing to facilitate multiple use and flexible re-use of premises, as discussed further below in relation to places of worship.
- 4.16 Lastly, in relation to recently-arrived migrants and asylum seekers, issues of temporary and affordable housing, access to healthcare and cheap transport are reported in the literature to be particularly acute. It is also possible to envisage that informal social opportunities in public spaces and awareness of community facilities will also be important to this group.

Gypsy-Travellers

- 4.17 Newham has one public Gypsy-Traveller site, Parkway Crescent, comprising 15 pitches with no vacancy and limited pitch turnover. Engagement undertaken by GTAA consultants³⁷ ORS in October 2015 identified 41 persons of Romany Gypsy origin living at Parkway Crescent, comprising 21 adults and 20 children and teenagers aged under 18, the majority of whom are long-term residents that has been tenants on the previous site, relocated as a result of the development of the Olympic Park. There were no obvious signs of over-crowding on the pitches, and whilst the majority said that they lived on the site because there was no other option, rather than through choice, all of the households were satisfied with the site due to its location in relation to work, family, friends, schools and other local facilities.
- 4.18 Whilst none of the gypsy and traveller families identified in Newham fall under the definition of PPTS 2015 (i.e. those that travel for work purposes), Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a cultural need and right to a caravan site under the Equalities Act (2010) and case law associated with the Human Rights Act. Furthermore, provisions set out in the Housing and Planning Act (2016) includes a duty for local authorities to consider the needs of people residing in or resorting to their

³⁶ NHS Newham/ LB Newham 2009, JSNA 2009 – Black (25.3%) and Asian (23.4%) women are particularly affected, as compared to white women (19.2%) or men in general (13.6%). 37 LBN Gypsy and Traveller Accommodation Assessment (2016)

district with respect to the provision of sites on which caravans can be stationed.

4.19 National guidance providing further detail on this duty is currently in draft, however it is anticipated that following its final publication the Council will undertake such a study. In the meantime, engagement with local Gypsies and Travellers and the London Gypsy Traveller Unit highlights the likelihood of there being a housing need for these groups going forward due to children coming of age and present unmet preferences (Gypsies and Travellers housed in bricks and mortar accommodation). This is also to likely to be affordable need, again requiring appropriate policies to address housing mix and choice, responsive to commissioning requirements.

People of faith

- 4.20 Engagement with faith groups and umbrella third sector organisations that work with faith groups suggests that whilst some traditional places of worship and other potential worship space is under-used (such as some smaller independent community centres) quite a lot of Newham's faith infrastructure is at capacity. They report that many groups are already sharing worship space to the extent that it may be limiting their frequency of worship, linked community activities and so on. This is also evident by our contact with faith groups through the development management process, which sees a steady flow of applications for new worship and associated community facilities, often in inappropriate locations where loss of employment space would be involved, and access by means other than private car would be less convenient. Equally, it is clear that many faith groups in London travel some distance to worship - faith communities are not necessarily geographically-constrained as they once were, and congregations can be very large. However, we also know that some spaces (e.g. schools, traditional church buildings, some community centres not in council ownership) could be more intensively used by the community, including particular faith groups.
- 4.21 In line with the corporate community cohesion and sustainable communities approach, this suggests the need for a continued emphasis on multi-use, flexible facilities/spaces in accessible locations, (applied to both new and existing facilities/spaces) and facilitation of inter-faith/inter-congregation working to make co-ownership, -use and -development possible to meet local needs. This is particularly relevant given the diversity of faith (and non-faith) groups in Newham, and that the use of worship space tends to be highly cyclical, with peaks and troughs according to worship cycles and religious calendars. Facilitating access to places of worship elsewhere through improved cross-boundary connectivity may also be important, together with clear guidance to proponents of new, perhaps larger facilities as to where and in what form they are likely to be acceptable, where they address local needs.

Again, in line with the corporate cohesion and sustainable communities approach, this will be about ensuring that such facilities are integrated (through their design and functioning/management) into the urban fabric, with minimal impact on residential amenity or employment potential, and easy access by non-car means.

- 4.22 Some faith groups have a particular burial need requirements Jewish, Muslim, Buddhist and Roman Catholic communities; although Zoroastrian and Hindu religions also have burial requirements³⁸. However, Table Table 2.4 of the 2010 London Burial Provision Audit, summarises Newham's capacity status as '5 - SUSTAINABLE: Grave re-use in the borough has extended capacity of an existing cemetery infinitely'³⁹
- 4.23 The literature also draws our attention to the fact that some groups, perhaps because of their distinctive clothing or other aspects of appearance may live in fear of intimidation and crime due to religious intolerance. When asked what concerns them most about life in Newham, 27% of young people cited racism and 25% cited bullying, 9% report being the victim of racist abuse within the last 12 months. ⁴⁰ Overall, crime is the second most important issue reported by 34% of residents in the latest survey⁴¹. This highlights the continued need to promote integration and cohesion, not least through opportunities for informal social contact, and discouraging segregated or specialist facilities and housing. Similarly, distinctive appearances and practices may mean that some faith groups are more likely to suffer from employment discrimination, finding it difficult to access jobs, suggesting the importance of increases in job opportunities and support to access them, as well as affordable housing. Whilst we have no more up to date data, the 2009 Housing Market Assessment Household Survey suggests that Muslims in particular were more dependent than other groups on social rent and intermediate housing.
- 4.24 Faith is also a factor in some people having larger families due to religious practices. This was borne out by the 2009 Housing Market Assessment Household Survey which found Muslims, Hindus and Sikhs were more likely to be living in overcrowded conditions. Lastly, access to specialist shops and services may also be important to some groups (e.g. Halal butchers and takeaways in Newham).

³⁸ Assessment of the GLA'S impact on faith equality, December 2014

³⁹ An Audit of London Burial Provision, University of York, 2010, page 18

⁴⁰ The Newham Youth Survey 2012

⁴¹ LBN, Liveability Survey 2015

Younger People

- 4.25 Younger people in Newham express⁴² concerns both about the need for better facilities for themselves (including open spaces such as the Greenway) and wider issues that affect them and their families such as the need for more and better employment opportunities, affordable housing, family-sized housing, easier parking, health facilities, local facilities rather than everything being concentrated in areas such as the Olympic Park, clean streets, and the general need to make the area somewhere to be proud of, where people feel safe and un-intimidated. Crime, the availability of jobs and issues relating to promoting community cohesion are the top 3 issues facing Newham's young population⁴³. This corresponds with official ONS data which shows that younger people are more likely to be on Jobseekers Allowance than older people⁴⁴.
- 4.26 Longer term, engagement work has also indicated that there was also some concern that they would be priced out, or crowded out by change, but also ambition to continue into higher education and professions. They also indicated that compared with other groups they are more aware of, and concerned about, sustainability and climate change, and enthusiastic proponents of choice, contemporary design and innovative solutions such as mobile facilities, high quality design to allow less compatible neighbours to reside side by side, and re-use of buildings. These issues and concerns translate into the relevance of designing inclusive public spaces for informal interaction, support for employment intermediaries such as Workplace, as well as new affordable family housing, more and better job opportunities, reviews of infrastructure provision and overall better, more secure and environmentally-sensitive design.
- 4.27 Youth survey work undertaken in 2012 also highlights the importance of healthy urban planning, centred around food access, and access to active recreational opportunities. Around half of young people eat takeaway once a week or more while a 5th eat fruit and vegetables rarely if at all⁴⁵. Indeed, a recent focus group with the Youth Council found that they wanted to see fewer takeaways targeting children in the vicinity of their schools and homes⁴⁶. The survey work also found that lack of free time and appropriately timed sessions, together with lack of local facilities were a key reason for not undertaking more physical activity, and most facilities on a 'wish list' related to this (including ice skating/ice hockey, extreme sports facilities, outdoor gym, BMX and skateparks, goal posts etc).

45 The Newham Youth Survey 2012

⁴² Engagement Evidence Base

⁴³ The Newham Youth Survey 2012

^{44 5.1%} of 16-24 years olds are claiming Job Seekers' Allowance, compared to 2.4% of 50+ year olds. ONS Population survey projections for 2012. Jobseeker's Allowance Claimants

⁴⁶ Engagement Evidence Base

4.28 Beyond this, the literature advises sensitivity to the need for safe independent travel, open spaces that are not excessively managed to enable imaginative play, better air quality and environments that help to reduce obesity, and sufficient affordable childcare. It also reminds us that child poverty is a significant issue in London.

Women including lone parents and those that take on the majority of child-care and home-making

- 4.29 On the basis of the limited amount of information we have as to distinct gender-based priorities and preferences⁴⁷, women engaged with in Newham generally seem more conscious of and concerned about family-oriented issues, including the availability of family housing, affordable housing, and opportunities for themselves and their children social, educational and employment-based. As with other groups, women were also concerned about crime and anti-social behaviour, and the usability of public space; affected by for instance, provision of publically accessible toilets.
- Importantly, official ONS statistics⁴⁸ indicate that women in Newham are 4.30 more likely than the London average to be economically inactive, and when in employment, to work fewer hours than men. This suggests that family life is likely to be a greater focus for them, but also that women may be excluded from the labour market for various reasons, and more likely to be living in households with lower incomes. This is supported by recent corporate surveys⁴⁹, as discussed above in section 'Ethnic groups, (other than gypsytravellers) recently arrived migrants and asylum seekers'. Black and Asian women also suffer disproportionately from mental health issues⁵⁰. Along these lines, the literature draws our attention to the significance in most women's lives of good, safe public transport, walking and cycling; access to natural green space and good quality housing; clusters of good quality local services; affordable childcare facilities; and opportunities for informal interaction with others to socialise outside the house, particularly for women who are the main carers and home-makers. Likewise, women may also benefit from targeted support to access job opportunities and training.

49 LBN (2014), Understanding Newham 2014

⁴⁷ Engagement Evidence Base

^{48 48%} of women in Newham are economically inactive, as opposed to 32% in London as a whole. Only 11.3% of female Newham residents work more than 45 hours a week compared to 30.2% for male residents. 27% of working female residents in Newham work less than 30 hours a week. Source, Office for National Statistics, Annual Population Survey 2011

⁵⁰ NHS Newham/LB Newham (2009): NHS national psychiatric morbidity survey work shows that Black (25.3%) and Asian (23.4%) women are particularly affected, as compared to white women (19.2%) or men in general (13.6%).

LGBT people

- 4.31 Focus group work has found that LGBT people did not have any specific concerns relating to the expression of sexuality in Newham, although they welcomed an overt presence and acknowledgement of their community as part of the wider community events. Some homophobia was reported, but this was frequently indistinguishable from other hate crime and other threatening behaviour from certain groups, and as with many people, this affects feelings of safety in certain areas/parks. Promotion of community safety and community cohesion were therefore an area of importance highlighted.
- 4.32 Backing up what action group and service providers had told us about patterns of service access, LGBT people were largely happy to access more specialist services and social facilities in other boroughs, notably Waltham Forest and Tower Hamlets, and may choose to do so due to concerns about being 'outed' in their own community. This suggests good cross-borough connections to the north and west may be particularly important to this group.
- 4.33 Action groups also suggest that homelessness in LGBT populations is on the rise, particularly amongst younger people in BME groups, due to problems with family acceptance of their sexuality, across London, Again this highlights the importance of increasing affordable housing supply.

5 Conclusions and Action Points

Conclusions and the policy formulation checklist

- 5.1 Newham is an obviously diverse borough, not only in the variety of faces that can be seen here, the languages that can be heard, the cooking smells smelt, but also in terms of its cultural landscape, which includes a diversity of places of worship, shops and services. In many respects therefore, planning and development can be seen to respond well to diversity already. Recent economic migration from Eastern Europe for instance is already reflected in shops and social spaces. However, in reality, diversity represents an ongoing management challenge within the urban environment and within planning as part of this. Failure to explicitly acknowledge it, and the less obvious associated potential equalities issues, would be to risk the disintegration of social cohesion, disruption of the opportunities for people to achieve their potential, and the ability to make Newham a better place.
- 5.2 Generally we can see that in response to an explicit acknowledgement of the need to manage diversity and an analysis of the potential equalities issues by equality group, the key spatial interventions in addition to regeneration that are indicated are of 4 types:
 - 1. Regulatory to prevent disproportionate harm; [Red]
 - 2. Provision (or enablement of provision) for specific needs where appropriate within a cohesion agenda; [Yellow]
 - 3. Provision for mechanisms to access mainstream opportunities; [Blue] and
 - 4. Priorities within general themes that will particularly benefit equalities groups as well as the wider population [Green].

These relate to the various legislative duties which seek to manage distributional effects (uneven outcomes), prevent discrimination and ensure equality of opportunity, social inclusion and cohesion.

- 5.3 From the analysis above, a series of checkpoints has been distilled for the Local Plan, to be applied in the formulation of policy and guidance. These can be seen in the matrix used in Appendix 1, with the colour coding linking back to the type of intervention above as indicated. [In some cases categories overlap; where this is the case the text is one colour and the shading the other, with the shading being the more significant]
- 5.4 In general, all equalities groups, along with the wider population should benefit from the interventions suggested, and many are easy to incorporate into a planning system that already embraces them for other reasons. Nonetheless, a number of challenges can be anticipated, notably:
 - a. Balancing the desire for exclusive facilities for faith reasons, with the widely accepted view that community cohesion is best fostered

through different groups coming into contact with each other on a daily, informal basis, rather than allowing for complete segregation.

- b. Promoting environmental justice in the context of well-established patterns of land-use, such that there is the need for retrospective mitigation and it usually makes sense to place further similar uses in the same, generally relatively low-populated area, rather than spread the impact further.
- c. Responding to changing diversity Newham's population is everchanging, and though we may aim to make it more stable, its historic associations and place in London, together with wider cultural and demographic patterns mean that equalities issues now, may not be those of the future.
- 5.5 As with many decisions in planning, a balancing of conflicting objectives will be required, with due consideration of appropriate mitigation and in some cases, the need to step back and work to find alternative solutions by altering the mainstream, sub-regional working and so on. In relation to problem (a), mitigation is provided for within the checkpoint that relates to faith infrastructure and in checkpoint 2 in the table; whilst cross-boundary solutions are suggested by checkpoint 3. In relation to problem (b), mitigation fallbacks are represented in checkpoints 1, 11 and 18 in the table, and cross-boundary alternatives by checkpoint 3. Thus, whilst in theory some checkpoints have more serious consequences if not responded to, in many cases these checkpoints rely on each other to achieve the best outcomes, particularly in the context of wider planning objectives that also need to be achieved.
- 5.6 Equally, in response to challenge (c) regarding changing diversity, an overriding consideration must be the need to plan for flexibility. Significantly, this will include considerations of ownership as well as adaptability, a key lesson that has been learnt from past experiences of asset transfer In Newham, which have seen the keys to important community facilities being held by people and organisations that are no longer involved in its social and community life. Fortunately this is an external test (of 'soundness') that the Local Plan must pass before it is adopted, so it will be reviewed as a matter of course. Monitoring and review will also be important however.
- 5.7 **Monitoring** through the Authority Monitoring Report bulletins, which keeps policies under review, identifying areas where modification is required. Key indicators include:
 - Environmental health complaints re economic activity
 - Satisfaction with the area/need for improvements (which can be interrogated per equalities group)
 - Cross-boundary connectivity improvements secured.
 - Crime and fear of crime rates
 - Provision of community infrastructure

- Access to community infrastructure
- Meanwhile uses in place
- Public realm investment projects
- Walking and cycling rates
- Employment and activity rates
- Improvements to housing quality including environmental performance (SAP performance, BREEAM/Code for Sustainable Homes levels achieved)
- Funding/outputs of employment and training intermediaries
- Delivery of affordable housing, family housing and specialist housing including gypsy-traveller pitches
- Physical activity rates and key health statistics
- Location of housing and infrastructure investment
- Provision of a variety of business unit sizes

5.8 **Ongoing engagement**

- With all equalities groups through the Council's mainstream research programme, particularly regarding housing and infrastructure needs, but also to help to review issues and needs as presently scoped, including issues that are less easily monitored by standard indicators e.g. visibility of community facilities, management of change.
- This will also help give more nuanced interpretations of monitoring work by equalities group, where this is not available in the statistical source.

References

In addition to the engagement work and statistical sources referenced above, the following documents have been consulted:

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Appendix 1: Summary Checklist for consideration through the Local Plan to ensure equality of opportunity, social and environmental justice and social inclusion and cohesion

Check Point	Equalities Groups Particularly Relevant To (in most cases all groups will benefit)							Notes
	Older people, disabled people, carers	BAME people & recently arrived migrants	Gypsy-travellers	People of Faith	Young People	Women, incl. lone parents/FT home- makers	LBGT people	
1. A more robust approach to environmental impact, with greater attention to community engagement, cumulative, health and distributional effects and more stringent mitigation and separation of uses	+	+	+	+	+	+	+	Manage the transition of town centre activity from retail to culture, leisure and tourism.
2. Provision for truly public spaces/public realm (including adequate management/ maintenance) and inclusive facilities	+	+	+	+	+	+	+	Includes provision of publicly-accessible toilets
3. Improvements to cross-boundary connectivity	+	+			+	+		
4. Designing out, [or re-designing to reduce] crime and fear of crime	+	+	+	+	+	+	+	
5. Clear guidance on where and how new faith infrastructure is likely to be acceptable to meet local needs, whilst also facilitating		+		+				

the multi-use of new and existing community								
infrastructure or other appropriate spaces,								
co-development/ownership and an								
understanding of the logic of a community-								
cohesion approach, to ensure exclusive								
spaces are minimised.								
6. Accessibility-based approach to	+	+	+	+	+	+		
infrastructure planning, ensuring all types of								
housing have good infrastructure access								
(including to green space) or at least good								
low cost transport connections								
7. Promotion of clustering and multi-use of	+	+		+	+	+		
community infrastructure facilities, including								
flexible re-use of otherwise redundant								
spaces								
8. Support for low cost transport modes	+	+	+	+	+	+		
9. Increasing and diversifying job	+	+	+	+	+	+	+	
opportunities, both in absolute terms and								
through local labour agreements								
10. Child/day care provision/enablement	+	+	+	+	+	+		
11. Higher environmental and quality	+	+			+	+		Important mitigation
(especially space) standards in housing								for legacy of
								environmental
								injustice
12. Support for training and employment	+	+	+	+	+	+	+	
intermediaries								
13. Provision for affordable housing and	+	+	+	+	+	+		
specialist housing needs, (including non-								
conventional housing and family housing)								
within genuinely mixed communities,								

coouting of much mainstreaming of								
securing as much mainstreaming of								
adaptations as possible. Some clustering of								
specialist housing for certain groups may be								
appropriate.								
14. Ensuring that publicly-accessible facilities	+	+		+	+			
are visible and obvious within the urban								
context								
15. Application of principles of healthy urban	+	+			+	+		
planning focused on healthy lifestyles (HIA is								
covered by checkpoint 1)								
16. Acknowledgement of the importance of		+		+				
particular locations for specialist ethnic								
shopping and services in planning and								
managing change in these locations								
17. Provision for appropriate levels of	+							
disabled persons' parking								
18. Consideration of targeting investment in	+	+	+	+	+	+	+	'Compensates' or
housing and infrastructure improvements in								helps retrospectively
most deprived areas								mitigate for legacy of
								environmental
								injustice
19. Acknowledgement of the importance of		+						
smaller shops as places of business,								
employment and social interaction for BAME								
groups in planning change that affects these.								
groups in planning change that arrects these.								