Appendix C

The update to the Residential Design Standards Supplementary Planning Document

Appendix C for Planning Committee Report and Cabinet Report:
Amendment to Residential Design Standards
Supplementary Planning Document

Planning Committee: 21 March 2011 Cabinet: 22 March 2011

Appendix A	The update to the Residential Design Standards Supplementary Planning Document
Appendix B	The consultation plan
Appendix C	The Equalities Impact Assessment

LOCAL DEVELOPMENT FRAMEWORK

Southwark Council

Equalities Impact Assessment

Draft amendments to the Residential Design Standards Supplementary Planning Document March 2011

London Borough of Southwark

Equalities Impact Assessment

1. What policy, strategy or plan is this assessment addressing?

This is the Equalities Impact Assessment (EqIA) for the draft amendments to the Residential Design Standards Supplementary Planning Document (SPD) (March 2011). The SPD and all the supporting documents can be found on our website at: www.southwark.gov.uk/planningpolicy

The Residential Design Standards Supplementary Planning Document (SPD) was adopted in September 2008. It sets out the council's required design standards for residential development. The SPD was originally prepared to provide guidance to the housing policies in the Southwark Plan, which was adopted in July 2007. The SPD will provide a framework to ensure that all new housing development is accessible and of a high quality, and does not have a negative impact on the amenity, privacy and aesthetics of surrounding areas.

Since the SPD was adopted, we have prepared new planning policy through the Core Strategy (due to be adopted in April 2011). The Mayor has also prepared new regional planning policies through the draft replacement London Plan (2009). Parts of the Southwark Plan are now out of date and are no longer being used, having be replaced by the Core Strategy and London Plan.

2. Is this a new or an existing policy/strategy?

We are proposing a number of amendments to the existing adopted Residential Design Standards SPD. These amendments are needed to take into account changes in national, regional and local policies and guidance. In particular it needs to take into account changes to our policies through our core strategy and our area action plans for Aylesbury and Canada Water.

The SPD forms part of the council's Local Development Framework, which contains all of the council's planning policies used to guide how

land is used in the borough and in the determination of planning applications.

Existing policy for residential design standards is contained within our Core Strategy, the London Plan and the policies in the Southwark Plan we are still using (the "saved" policies). The SPD sites below these documents and provides detailed guidance to support the policies in them. It does not change or create new policy. This extra detail helps us apply our policies and make decision on planning applications.

3. If existing, has the policy/strategy already been reviewed under the previous EqIA programme? If so, what were the findings to come out of this and has the agreed action plan been implemented? What has changed since the last assessment was undertaken (in terms of context, nature of the policy/strategy or the type of people affected by the policy/ strategy).

We carried out an equalities impact assessment as part of the preparation of the current adopted 2008 Residential Design Standards SPD. The EQIA looked at both the impacts of the SPD consultation and impacts associated with the implementation of the SPD. At the scoping stage we identified a number of possible issues ensuring the design standards reflected a diversity of needs whilst also not making housing overly expensive and difficult to deliver. Stage 2 of the EQIA highlighted that overall the SPD would have positive impacts on the equality target groups by requiring a higher quality of design for residential development.

The only potential short fall identified was a possibility that having more design quality requirements may increase the cost of housing, making it unaffordable to some groups. However, affordable housing (social rented and intermediate housing) must be affordable to people within a threshold of incomes (as set by the Mayor) and so this should continue to ensure equality. Furthermore, there are many other factors affecting house prices, including availability of supply and mortgage requirements. Developers would be expected to factor in the requirements of policy into the cost of purchasing sites.

We also set out how we would ensure the SPD was applied consistently and fairly including through ensuring our planning permissions are granted in accordance with our policies and monitoring the impact of the SPD. From our Annual Monitoring Report (09/10) we can see that the amount of family homes delivered in Southwark is increasing. In the year 2009/10 17% of new housing was family housing (36% of social rented housing was family housing). We need to keep monitoring this to see how the higher targets introduced through the Core Strategy are met. In the year 2009/10 there was also a higher proportion of housing meeting Lifetime Homes Standards (20% more than the previous year). However 2% less homes met wheelchair accessibility standards. We need to keep this under review. We are also looking at ways that we can monitor the Building for Life Standard.

We also carried out equalities impact assessments of the Southwark Plan, core strategy, the Aylesbury Area Action Plan and the Canada Water Area Action Plan. This SPD provides further guidance and information to the policies in all four development plan documents. We have reviewed these as part of the preparation of the SPD and this has fed into section 4 of this EQIA. The Equalities Impact Assessments for these documents can be viewed on our website at:

www.southwark.gov.uk/planningpolicy

The scoping stage of the Core Strategy EqIA identified the following potential issues relating to the design quality of residential development:

- Ensuring there is an adequate supply of housing suitable for wheelchair users. Without this, disabled people may not be housed in dwellings that meet their needs.
- Access to specialist housing such as care homes and supported housing. This is likely to have the greatest impact on elderly people and people with disabilities.
- As part of the core strategy we will look at how we can successfully create mixed communities with a range of housing types and tenures. This should help to improve social cohesion.
- By improving areas, there is always the likelihood that house prices will rise which may cause conflict between groups. For example new people may move into the area and be able to

- afford the new housing whilst existing groups may have to continue to live in less desirable housing.
- The core strategy includes issues and options to improve the quality of future housing. This should have a positive impact on all groups.
- We may encourage more or less family housing in different areas. When we encourage a higher amount of family housing, this will have a positive impact on certain groups such as religious and ethnic groups who are more likely to have larger families. It may have a less positive impact on groups who are more likely to live alone and do not want family housing.
- People currently living in the area may feel resentful towards large numbers of people moving in. This tension could be further exacerbated if people moving into the area buy up newer and higher quality housing.
- New housing may only meet the needs of some people, and other people may feel it does not meet their needs and that other groups are being prioritised over their needs. This could cause tension between different groups.
- Communities may be split up by regeneration which could have a negative impact on all the equality groups.

The adopted Residential Design Standards SPD 2008 provided guidance solely on the Southwark Plan policies. The draft amendments to the SPD provides guidance on the new documents within the Local Development Framework as well as the saved Southwark Plan policies.

The amendments can be summarised as follows:

- Correct references to policies by adding in new Core Strategy policies and removing reference to Southwark Plan policies no longer being used.
- Factual update of the information on density standards, to reflect new Core Strategy density policy
- Adding in an appendix setting out how density is calculated. This has been carried over from the Southwark Plan.
- Adding in additional guidance on minimum dwelling sizes these are in line with those proposed in the London Plan and Mayor's London Housing Design Guide.

We included minimum dwelling sizes in the final draft of our Core Strategy, along with increased requirements for family housing. The Core Strategy EqIA highlighted the positive impacts that the housing policies would have. In particular the type and size of homes being required better reflected the housing needs of the residents living in Southwark. The core strategy seeks to promote a range of housing types, increasing the provision of family accommodation in the borough. The dwelling mix is derived from Southwark's borough-wide housing needs assessment.

The EqIA of the London Plan found that the housing policies, which includes minimum dwelling sizes would lead to more diverse housing supply in London to help meet the varied requirements of its different communities. It found that requiring more family housing would help reduce overcrowding, which data shows is more acute amongst deprived areas and BME communities.

Since we adopted the 2008 SPD, the new Equalities Act 2010 was passed on 8 April 2010, and came into effect from October 2010. The Government has also recently consulted on a new public sector duty which is due to come into effect in April 2011. This introduces nine characteristics that we should look at. The previous legislation required us to look at the impacts of our policies and SPD on the six equalities target groups.

Due to the changes in legislation and our changed planning policies since the preparation of the 2008 SPD we feel it is necessary to carry out a new EQIA for the draft amendments to the Residential Design Standards SPD 2011.

4. What do you think are the main issues for your policy or strategy in relation to equality, diversity and social cohesion?

We are looking at the impact of the draft amendments to the Residential Design Standards SPD on the nine characteristics in accordance with the new Act and duty:

- Age
- Disability

- Gender re-assignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

We have identified potential barriers that could prevent our nine protected characteristic groups from benefitting fully from the SPD. This scoping stage highlights the main issues of the SPD on equality, diversity and social cohesion.

The barriers we have identified could create differential impacts on certain groups and reduce social cohesion. We also have identified how the SPD may have positive impacts on these groups and how it may improve social cohesion. We have tried to minimise the negative impacts and maximise the positive impacts through the SPD and its preparation. Following consultation on the draft amendments and the scoping of this EqIA we will consider whether there is anything further we can do within the SPD to maximise positive impacts and minimise negative impacts.

These impacts can be split into two categories

- 1. Impacts created through the production of the draft amendments in terms of public consultation
- 2. Impacts associated with the implementation of the draft amendments and the detailed information and guidance within the SPD.

4.1 Impacts associated with consultation on the draft amendments to the Residential Design Standards SPD

There are a number of barriers associated with consultation on all our planning policy documents which may create problems for social cohesion. It is important that everyone is offered the ability to be involved in the preparation of the SPD and that the final document reflects the views of our diverse community. We have prepared a consultation plan for the SPD which aims to do this. The plan sets

out how we plan to consult the local community, developers, landowners, Registered Providers and other stakeholders. After the 12 week consultation period we will prepare a consultation statement which will set out the findings of our consultation including a summary of the representations received. We will provide officer comments on all the responses we receive explaining why we have/have not amended the SPD to reflect the comments. We will also provide information on the methods of consultation we used and how these were effective in consulting with our diverse community. This will help us to continually monitor and adapt our consultation methods and techniques to try and be as effective as possible and reach as many different groups as possible.

This is in accordance with our Statement of Community Involvement (SCI). Our SCI sets out how and when we will involve the community in the development of planning documents and applications for planning permission. Within the SCI, we have identified barriers to involving equalities target groups and ways to overcome them. These include English not being someone's first language, problems accessing information, people not feeling safe attending evening meetings and the documents using too much jargon. We have tried to tailor our consultation to try and overcome as many of these barriers as possible. This includes writing in plain English and providing a glossary, offering translation services where required, and attending community meetings when requested. Please refer to <u>Appendix A</u> of this document for the full list of barriers to consultation. We have considered this comprehensive list as part of the preparation of the draft amendments.

Our Annual Monitoring Report also looks at the effectiveness of our consultation and whether we need to change how we consult on our policy documents. As part of the preparation of the Annual Monitoring Report we carry out a survey asking everyone on our mailing list what they think of our consultation and how we could make it more effective. The results of this are reported in our Annual Monitoring Report, and helps inform us how to improve our consultation on future planning documents.

4.2 Impacts associated with the objectives and implementation of the draft SPD amendments

The content of the SPD

The Core Strategy sets out our overall strategy to provide good quality homes that meet a wide range of needs. Most of the guidance in the adopted SPD remains current and line with the overarching strategy, policies in our saved Southwark Plan policies and area action plans.

The key change that we are considering is the introduction of minimum dwelling sizes. The other amendments are factual updates to correct policy references and summaries of current policies. These new policies have already been subject to EqIA as set out in Section 3.

The possible impacts and issues of the draft amendments to the SPD

The overall aim of the SPD is to raise the quality of residential development for everyone in the borough. This should produce a positive impact for all of the community.

The proposed minimum dwelling sizes are split by household size, requiring a mix of different sized housing to be provided within schemes. This will help contribute to a more diverse housing supply to better responds to the varied needs of Southwark's communities, and help support mixed and balanced communities. More variety in the size of homes will allow households to remain in their local area as their family size changes through different life stages. This will have benefits to all the groups.

The SPD provides guidance on the mix of different sized units. The Core Strategy and area action plans have already increased the requirement for family homes. Combined with these requirements, the proposed standards will help address issues of overcrowding to by increasing the space requirements in new homes. This will have a positive impact on certain groups, especially those with larger families which are often BME groups.

However some groups may feel that the minimum dwelling size requirements do not go far enough to meet their specific needs such as parents with young children who may require more space for their children to play in, and elderly people who may spend more time in the home due to mobility restrictions. These standards are based on those to be adopted by the Mayor. In preparing the draft amendments we have had to weigh up larger house sizes with the need to meet our overall housing targets and the impact on building bulk and scale.

By improving the design standards within the borough there is a possibility that house prices could increase as developers may charge more for having to meet minimum space standards. This could prove problematic for certain groups who may then not be able to afford housing in their local area, particularly for lone parents, disabled people, the BME community, refugees and asylum seekers, and elderly people. However by setting out the standards clearly in our planning documents developers should be able to account for the cost of building larger homes in the price of purchasing land.

5. What happens next

We are consulting on the EQIA alongside the SPD. Following consultation we will look at the feedback we receive on the EQIA and the SPD and feed this into the preparation of the final SPD and part B and C of the equalities and impact assessment.

APPENDIX A: Barriers to community involvement with different equalities target groups and how to overcome them

(extract from Southwark Statement of Community Involvement (January 2008)

1. Voluntary groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The voluntary sector in Southwark is made up of around 18,000 individuals delivering services through 1,600 organisations, groups and projects. In 2001-2 Southwark Council supported around 300 voluntary and community groups with an investment of around £10m in grant-aid, service agreements and contracts.	 These barriers are generic barriers faced by many voluntary groups. Need for prior knowledge and experience; Jargon and legal terms; Other funding commitments and priorities than planning; Lack of time; and Knowledge of how and where to access information. 	 Provision of information and training about planning focused on these groups; Ensure that a range of community involvement methods are used that are accessible to these groups; Make sure that groups are added on to relevant mailing lists; and Hold/attend meetings at appropriate times that are accessible to these groups. Translators and interpreters to be used where appropriate.

2. Community groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Southwark is lucky in having a large number of community groups that	These barriers are generic barriers faced by many community groups:	 Provision of information and training in planning focused on these groups;
are involved with a diverse range of	Need for prior knowledge and	Ensure that a range of community

issues.	 experience; Jargon and legal terms; Lack of time; Other priorities than planning; Accessing information barriers. 	 involvement methods are used that are accessible to these groups; Make sure that groups are added on to relevant mailing lists; and Hold/attend meetings at times that are accessible to these groups. Translators and interpreters to be used where appropriate.
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3. Business – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
There are 11 000 businesses in Southwark. These range from large international and national organisations to small family owned businesses. Approximately 96% of the total businesses in Southwark comprise less than 50 employees of which, approximately 20% are Black and Minority Ethnic businesses. Many businesses are members of Southwark Chamber of Commerce and other local groupings.	 Accessing information outside of business hours (this is particularly a problem for small businesses); Attending community meetings that do not address their needs; Not understanding planning influences on their issues; Other priorities than planning. 	 Ensuring that information is available at places which are open outside of normal office hours; Hold/attend meetings at times that are accessible; and Provide information and training focused at businesses. Translators and interpreters to be used where appropriate.

4. Environmentalist and amenity groups - Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
A wide range of people express	 Other priorities than planning; 	 Provide information to ensure these

their concern for their environment
through membership groups such
as Friends of the Earth or
Greenpeace. Some of these larger
organisations have active local
branches. Some people get
involved in local groups with the aim
of protecting or improving a
particular area or amenity such as
the Friends of Burgess Park or the
Dulwich Society.

- Attending community meetings that do not address their issues;
- Jargon and legalistic terms; and
- May not be aware of how other planning issues may affect their area of interest.
- groups are aware of how planning influences their area;
- Use plain English; and
- Translators and interpreters to be used where appropriate. .

5. Neighbourhood, tenants and residents groups - Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
There are approximately 232 neighbourhood, tenants and residents groups in Southwark. Many are formally consulted by us to provide residents views about social and private housing. These groups meet, many of them very regularly, to discuss matters affecting the local area including estate improvements.	 Other priorities than planning; Suffer from 'consultation fatigue' as they get consulted on a number of our initiatives and programmes; Need prior understanding and knowledge of planning issues; and Finding the time to get involved in planning. 	 Coordinate consultation between different parts of the council to ensure that groups are not overwhelmed with consultations; Make sure that groups are added on to relevant mailing lists; Provide focused information; and Hold/attend meetings at accessible times. Translators and interpreters to be used where appropriate.

6. Health organisations - Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to
		consultation

Health service organisations
provide important services to the
community. Formal structures can
be used to consult and gain
feedback from local health
organisations on how healthy living
issues and requirements might
influence or affect planning.

- Limited time to access and absorb detailed planning information;
- Other priorities than planning; and
- May not understand how planning impacts on health.

- Hold/attend meetings at appropriate times; and
- Ensure that information is easily accessible, relevant and understandable.
- Translators and interpreters to be used where appropriate.

7. Transport organisations - Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Transport for London and the public transport providers are statutory consultees. There are smaller local groups that are interested in the improvement of cycling, walking and public transport infrastructure.	 Other priorities than planning; and May not be aware of how other planning issues may affect their area of interest. 	 Provide information to ensure these groups are aware of how planning affects them. Translators and interpreters to be used where appropriate.

8. Refugee and Asylum seekers – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The Southwark Refugee Communities Forum (SRCF) was established by Refugee Community Organisations (RCO) in 2003 to enable the voices of refugees themselves to be heard. The membership of SRCF currently	 Need for prior knowledge and experience English may not be their first language Other priorities than planning Discrimination Lack of knowledge of how and 	 Avoid jargon and ensure that all information is given in plain English Ensure that all written information is available in different languages Provide information and training that is focused on these groups Use a range of community

where to access information
 Difficult to gain access to these groups, as they may not be recognised local community groups on our database

- involvement methods to ensure that they are accessible to all.
- Source local knowledge about how to engage groups and those for our mailing lists.
- Translators and interpreters to be used where appropriate.

9. Individuals and groups from other boroughs – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
A number of issues in Southwark have an impact on our neighbouring boroughs such as Lambeth and Lewisham. Groups and residents that are on the borders of Southwark should be included in matters that affect them.	 Need for prior knowledge and experience; Other priorities in their own borough and other than planning; English as a first language; and Lack of knowledge of how and where to access information. 	 Provision of information in appropriate locations; Hold/attend meetings/events at appropriate locations that are accessible and appropriate to these groups. Translators and interpreters to be used where appropriate.

10. Residents and individuals (including newcomers to the borough) - Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Residents and individuals in the borough may not belong to a specific group, but it is important that they are able to engage and get involved with issues and decisions that impact on them.	 Need for prior knowledge and experience; Jargon and legal terms; English may not be their first language; Discrimination; 	 Provision of information and training in planning focused on these groups; Ensure that a range of community involvement methods are used that are accessible; Source local knowledge about how to

 Problems accessing information; Other priorities than planning; and Lack of knowledge of how and 	 engage individuals; and Add onto our mailing lists. Translators and interpreters to be used where appropriate.
where to access information.	

11. Black and minority ethnic groups (including travellers and gypsies) - Equalities Target Group - Race

Description	Barriers to involvement	Measures to overcome barriers to consultation
Southwark is a very ethnically diverse borough. As a result there are many established and new groups and organisations that address issues relevant to each different community.	 Jargon and legal terms; Need for prior knowledge; English may not be the first language; Other priorities than planning; Discrimination; Problems accessing information; We may not be aware of their existence. 	 Avoid jargon; Use plain English; Translators and interpreters to be used where appropriate. Training groups in planning and council officers in understanding equality and diversity issues; Coordinate council consultations; Range of involvement methods; and Gain local knowledge about how to engage groups; and Add to mailing lists.

12. Religious groups - Equalities Target Group -Faith/Belief

Description	Barriers to involvement	Measures to overcome barriers to consultation	
organisations are a valuable consultation link due to their very strong links to local communities. groups have a contribution to make to social inclusion and community	 Needs not being understood; Need for prior knowledge and experience; English may not be their first language; 	 Avoid jargon; Use plain English; Translators and interpreters to be used where appropriate. Training groups and individuals in planning and 	

cohesion that is separate from promoting religion. As they are involved in running community services, community development and leadership representing community interests.	 Other priorities than planning; Discrimination; Accessing information; and May not understand how planning affects their group. 	 Training council officers to understand and belief issues; Coordinate our consultations; Range of involvement methods; and Gain local knowledge about how to engage groups; and Add to mailing lists.
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13. Older people Forum's Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation	
Pensioner forums help represent older people's views and are able to represent many local people over particular issues that are affected by planning.	 Older people may not feel safe attending meetings in the evenings; A lack of respect for their views; and Lack of knowledge of how and where to access information; Other priorities than planning. 	 Provision of information in appropriate locations; Hold/attend meetings/events at accessible times; We listen to the views and feedback; and Make information relevant. Translators and interpreters to be used where appropriate. 	

14. Education and young people - Equalities Target Group - Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
Schools, colleges, learning institutions and youth agencies are important aspects of the community, particularly as finding ways of involving young people have been identified as a priority by a large	 May not be aware of the impact planning can have on them and/or how they can have an input; English may not be a first language; and 	 Provide information that is focused at young people; Attend schools and after-school centres and local youth forums to consult them on planning issues; Translators and interpreters to be

number of people	•	May not be able to attend meetings in the evenings or during the day in term time.	•	used where appropriate; and Hold/attend meetings/events at accessible times.
	•	Other priorities than planning.		descentio annee.

15. Disability Forum - Equalities Target Group - Disability

Description	Barriers to involvement	Measures to overcome barriers to consultation	
This forum helps to identify planning issues including safety, access and housing from the perspective of disabled people.	 Venues for meetings may not be accessible; and Written or verbal material is not always appropriate. Other priorities than planning. 	 Hold/attend meetings/events at accessible locations; and Ensure that all written information is available in different formats such as Braille, large print and audio. Translators and interpreters to be used where appropriate. 	

16. Lesbian, gay, bisexual and transgender - Equalities Target Group - Sexuality

Description	Barriers to involvement	Measures to overcome barriers to consultation
The Southwark Anti Homophobic Forum (SAHF) is the longest established LGBT Forum of its kind and works to meet the needs of the LGBT community in key areas including education, safety in the home, the streets and housing. The	 Do not feel secure in raising LGBT issues at open events; Other priorities than planning; 	 Hold specific LGBT consultation events; Avoid jargon and use plain English; Hold/attend meetings/events at convenient times and ensure that the venue is accessible and a safe environment.

Southwark LGBT Network is a social support group for LGBT	Translators and interpreters to be used where appropriate.
people and their friends who live and work in Southwark.	