

**APPENDIX C: EQUALITIES IMPACT ASSESSMENT FOR AYLESBURY AREA
ACTION PLAN PREFERRED OPTIONS REPORT**

AYLESBURY ESTATE REGENERATION PROGRAMME

EQUALITIES IMPACT ASSESSMENT

Stage One: Scoping

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

This Equalities Impact Assessment will deal with the regeneration of the Aylesbury Estate Renewal Programme including:

- Integration into the ongoing development of the Area Action Plan (AAP), scheduled to be formally adopted in 2009.
- The implementation of the physical redevelopment.
- The preparation and implementation of programmes and projects addressing the social and economic conditions of the area.

The AAP will be developed and prepared in accordance with statutory regulations and in close consultation with the local community. The policies in the Aylesbury Estate Area Action Plan must be in general conformity with national and regional guidance and policy and contribute towards meeting local needs. The renewal of the Aylesbury Estate is a long-term project. This Assessment will assess the predicted outcomes and set the framework for the continuing assessment of the project.

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

This exercise represents the first scoping of a formal Equalities Impact Assessment (EqIA), which will provide a framework for assessment throughout the programme. It draws upon research and processes conducted in connection with both the New Deal for Communities (NDC) programme and the preparation of the brief for the Aylesbury Area Action Plan (AAP).

The Aylesbury Estate is home to over 7,500 people and situated on a 285,000 square metre (28.5 hectare) site. It contains 2,578 homes, of which 2,262 are social rented and 496 are lease held. It will be demolished in stages and replaced with around 5,000 new homes, which will include approximately 2,200 affordable homes. This will largely comprise social rented homes, although may also include some intermediate housing such as shared ownership. The remaining balance of housing is likely to be predominantly private for-sale housing. Although works will principally be focused on the Aylesbury Estate, the Area action Plan/Master Plan will also include the surrounding area ensuring the redeveloped estate is fully integrated into surrounding neighbourhoods. In all, the redevelopment of the estate is likely to take between 15 and 20 years. The consultation strategy seeks to focus community engagement on the area, which will be subject to the most significant amount of change, that is the estate itself. It will also be necessary to give residents and other stakeholders located in the area outside the estate the opportunity to have a say during the preparation of the AAP, and keep borough-wide interest groups informed. This will ensure that resources can be targeted at greatest need, and findings assessed within a broader perspective. The preliminary EqIA will operate within the overall consultation strategy as an additional process to provide greater sensitivity to assessing the impact of the development.

Policies and Objectives:

The works will result in the creation of a high quality, mixed use, sustainable neighbourhood that will require both a local and London-wide perspective in its execution. It will require integration into a number of strategic and local development frameworks including, from a strategic level, national planning policy guidance and the London Plan (February 2004). From a local level there are also a number of emerging plans and policy frameworks of relevance, including the emerging Southwark Plan (March 2007) and local development framework (LDF), Southwark's Building Schools for the Future, the sustainable community strategy, Southwark 2016, and the New Deal for Communities (NDC) policy framework.

The Aylesbury Estate Area Action Plan will be a new policy document and will form part of the council's Local Development Framework, which will contain all of the council's planning policies used to guide how land is used in the borough and in the determination of planning applications.

Part 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)?

Below is a list of services, strategies and policies that are related to the activities of the Aylesbury Estate Area Action Plan. (cross refer to appendix B for relevant policies and services relating to this EqIA.)

- The emerging Southwark Plan (March 2007)
- Southwark 2016: Sustainable Community Strategy
- Southwark Employment Strategy
- Southwark Enterprise Strategy
- Southwark Housing Strategy
- Southwark Waste Management Strategy
- Southwark Contaminated Land Strategy
- Southwark Sustainability Strategy
- Southwark Crime and Drugs Strategy
- Southwark Biodiversity Action Plan
- Southwark Local Implementation Plan (Walking, Parking, Cycling, School Travel)
- Southwark Air Quality Management and Improvement Plan
- Southwark Open Spaces Audit
- Elephant and Castle Supplementary Planning Guidance
- Peckham Area Action Plan

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

Objective

A major redevelopment of an estate the size of the Aylesbury with residents in-situ, will have substantial direct, indirect, and long term implications for a large number of residents and small local businesses. The estate's proximity to Burgess Park and the proposal to provide a tram link between Camden and Peckham will provide enormous opportunities for improved leisure facilities, and improved transport access to an estimated 69,000 employment opportunities predicted in the north of the borough. Two new schools and a new community centre are planned as part of Southwark's Building schools for the future programme. In 2006, the council held a series of visioning sessions with residents and other stakeholders. These sessions established a series of objectives, which were set out in the master planning brief. While these objectives may be refined over the next 12 months, they will guide the approach to the preparation of the AAP. These objectives are set out in appendix A of this report. At the core of the Borough's approach, particularly since the reassessment of the project beginning in 2005, has been the requirement to maintain economic and social diversity in the area and to take the lead in managing directly the impact on local people, rather than permitting solely commercial considerations to dominate. This approach is designed to secure better outcomes for all local people.

The above objective can be separated into key considerations:

DEVELOPMENT PHASING PLAN

The physical redevelopment will be carried out in phases. The first phase will comprise the demolition and rebuild of the southwest corner of the estate, including rebuilding the Aylesbury Day Centre with housing above it. These will be used as one of the four new build sites for residents located in the area. The extent of the first phase was developed through a period of comprehensive and inclusive consultation with stakeholders, including mail outs, newsletters, resident drop-in sessions, and meetings and presentations with traders and local businesses. More formalised consultation was undertaken with representative groups including the NDC Board, leaseholders and local TRA's. This comprehensive approach helped to develop an ethos of partnership. This spirit of cooperation and partnership was evident when stakeholders developed the re-housing policy framework for leaseholders and tenants in November 2006. This document helped to identify the priorities for the redevelopment.

Considerations:

- That the phasing plan ensures quality standards are maintained throughout the redevelopment and the objective outlined above of developing economic and social diversity does not create an area of "haves" and "have nots".
- The means of finance and resourcing the development throughout the redevelopment period are secured, and not frontloaded significantly for aspirational reasons. This may result in funding shortages, which may impact on quality in the later stages.

- Inactive consultees may not have full understanding or access to the phasing programme, or early policy and budgeting decisions. This may limit their involvement in the early discussions and may become beneficially weighted in favour of more vocal residents, for example, carers, young people, housebound residents and pensioners may not get equal access to early policy decisions.
- The allocation policy needs to be thoroughly assessed to ensure it accommodates all residents' need, entitlement, and choice, from an equalities perspective.
- The relocation of the Youth Offending Team and demolition of the bail hostel may displace the support required in the area for existing users to less high profile locations, thereby increasing the potential for youth and bail clients services to be displaced for cosmetic, rather than pragmatic reasons.
- Redevelopment and regeneration of the area may result in the disruption of social groupings and localised communities.
- Day Centre users may feel forced into the new location to accommodate the needs of residents being relocated into the new housing units.

HOUSING REFERENCING

The process by which the housing needs and preferences of each tenant and leaseholder household on the Aylesbury Estate and, where applicable, early housing site, are discussed and assessed. It is the key opportunity to identify priority groups amongst the residents most immediately affected by demolition and new house building. Referencing should allow the council to assess how priority groups take up its rehousing proposals, and to assess whether decisions are being taken differentially. The process will directly influence decisions upon mix and unit types of replacement housing and therefore provides an immediate opportunity to respond to the identification of unanticipated adverse impacts on population retention levels. In order to provide opportunities and choice for residents, the options for rehousing will be provided through 4 routes:

- new mixed tenure housing through partnerships with Residential Social Landlords (RSL's);
- by allocating existing Council units to those residents who wish to remain Council tenants;
- by identifying new affordable housing (under the planning obligations) in the redevelopment area which will be available to Aylesbury households;
- and by introducing a package of other measures including compensation for leaseholders to offer the widest possible choice of re-housing opportunities.

Considerations:

- The referencing exercise for the residents needs to extend beyond purely housing needs, and include quality measures of the resident's social needs and neighbourhood groupings, etc. This will help residents to maintain some of the less obvious social characteristics of the neighbourhood: for example, neighbours have coexisted for many years and created support neighbourhoods for individuals who may feel increased vulnerability, for

example LGBT residents who may suffer from increased anxiety after relocation.

- The referencing team need to be highly trained as members of the LGBT community and followers of a particular faith, may find difficulty discussing their specific housing needs with council officers.
- The need to maintain an economic and social mix in the area may encourage land market forces to become a major influencer on the programme, at the expense of the existing resident mix. This will force low-income families and unemployed into cheaper locations.

MAINTAINING EFFECTIVE HOUSING MANAGEMENT

During the lifetime of the development programme large numbers of people will continue to live in the area and visit its services and facilities. Indeed towards the end of the programme a much larger resident and working population is expected. As parts of the area are being rebuilt there will be particular needs to ensure that public and private services are delivered well to maintain a high quality of life. This will include basic environmental services – including keeping the area clean, ensuring community safety, and enabling community facilities including schools to function well. Arrangements to ensure a coordinated and effective area management are being developed.

Considerations:

- The needs of certain groups may not be properly considered throughout the construction period, which may mean that they are unable to use the services and facilities in and around the area. For instance, older people and partially sighted people may find it disorientating to deal with a constantly changing environment.
- Individual residents who may have particular rehousing needs may find themselves the only remaining resident in a block before demolition causing blight and encouraging anti-social behaviour in the area. This may have a greater impact on older people and residents with specific needs.
- A high proportion of new tenants are young people who may require specific community support and training towards accessing potential job opportunities created through the construction period.
- Access to the full range of services provided and opportunities for involvement in community life may be limited for disabled people. This may require targeted funding and coordination from the governments Supporting People Funding.
- Given the pressure on council resources to meet decent homes targets, our ability to deliver improvements in neighbourhood environments is highly dependent on the availability of partner resources.
- Residents with mental health problems may have difficulties sustaining their tenancies during the construction phase.
- Issues of harassment and hate crime may disproportionately affect LGBT tenants and may not be fully investigated in a changing environment.
- Dealing with issues which can cause specific tensions within communities e.g. nuisance, noise, clashes emanating from lifestyles, is one of the functions of housing management. It is difficult to isolate any particular factor

in determining why people feel more or less safe or comfortable within a community so made more difficult in a constantly changing environment.

HOUSING/DENSITY

There are around 7,500 residents in 2,758 dwellings in the estate, of which around 18% are now in private hands through “right to buy”, with approximately 82% council tenants. Residents are highly diverse in terms of ethnic composition with 67% of them belonging to a minority ethnic group. Around 21% of them are over 60 years of age (compared with 14% across Southwark). There is also a relatively high proportion of lone parent households and non-European born persons. The needs and aspirations of the above groups will need to be assessed and incorporated into the mixed tenure balance:

Considerations:

- Possible increased density in the area against needs of minority groups. The Southwark Plan indicates that around 1,900 new affordable housing units are required every year for the whole borough, with the greatest need being affordable housing with 3 or more bedrooms, as well as those with wheelchair accessibility. The Southwark Housing Strategy 2005-2010 points out that since July 2005, unregistered housing developers can now apply for Housing Corporation funding which could have a detrimental affect on the councils ability to secure S106 for affordable housing. These factors combined with the governments emphasis on numbers at lowest possible cost may have a negative impact on the Aylesbury achieving its objective of providing a range of high-quality affordable housing. The combination of these conflicting needs to increase density by building flats, against providing houses with gardens etc, may result in the needs of the BME families and wheelchair users’ needs becoming secondary.
- The plan could unintentionally fail to meet local housing needs by not providing the right housing type and mix for the local community which could sustain or result in overcrowding and poor quality accommodation which in turn disproportionately effects older people, young and BME community. And whether the determination of the mix of housing to be provided to meet the needs of current residents will provide a balance of housing that best meets the longer term needs of the community.
- The need to improve land values for the area, particularly towards the end of the scheme, may result in certain groups being unable to afford the new homes and choosing to move to areas with more affordable housing. This may have significant negative impact on lone parents, disabled people, the BME community, young people, Mental health service users and the elderly who may have spent generations in the area.
- 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 cater for a broad market and fail to cater for the needs of specific groups such as disabled people, families with children, young people, and older people.
- People may feel that the needs of certain groups are being prioritised over others such as the need to have housing for larger families.

EDUCATION

There are five schools in the Area Action Plan area, which generally perform well, but despite recent improvements, Walworth School does not yet meet the average performance standards of the borough and London levels. As part of Southwark's Building Schools for the Future programme, there are proposals to provide support for Walworth Upper and Lower School to take on academy status, and for the Michael Faraday Primary School to be comprehensively redeveloped. The redeveloped schools will act as keystones as part of the Extended Schools programme, and aspects of the design will promote a range of community and leisure uses outside of the main school day. The area also contains a range of special education facilities operating out of specialist and other mixed use facilities such as community centres.

Considerations:

- The location and design of the school environment and surroundings areas need to consider pupil safety when arriving and leaving school, particularly in winter months.
- The design proposals for Michael Faraday School will need to consider accessibility and flexibility of use, so as to ensure that all members of the community can gain access to the extended schools initiatives. For example, older members of the community may not consider using the premises, as they may not have children of primary school age and therefore, may not have become part of the school community.
- Consideration needs to be given to the integration of the special educational facilities into mainstream provision. Possible undervaluing of the supplementary provision, against the smart new, custom made mainstream facilities, may have a significant negative impact for pupils with behaviour difficulties, adult learners, or pupils with English as a Second Language.

CONSULTATION

Whether the ongoing arrangements for communication, consultation and engagement are fully taking account of the diversity of the residents (and businesses) directly affected by the scheme – for example in terms of language needs, outreach, methodologies, age-related factors.

Whether the ongoing arrangements for communication, consultation and engagement recognise the potential impact on, and therefore need to engage with wider groups of residents and businesses on the fringes and beyond of the Action Area.

Whether the Councils arrangements for managing the overall scheme are visible, accessible and well understood by the diverse range of stakeholders with an interest in the scheme.

Considerations:

- Vulnerable groups may be suffering from consultation fatigue, as the Aylesbury process has been ongoing for many years. Certain groups may have a negative perception of the council or disappointing experiences of community consultations which stop them becoming involved in the process.
- Certain groups may not be able to access information and consultations as easily as others i.e. disabled people, those who do not have English as their first language, young people, those who support vulnerable people such as women who are most likely to care for children, older people and those with limiting illnesses.
- Certain groups may not feel comfortable expressing their views in public due to fear of discrimination such as people from the LGBT community, faith groups, young people and the BME community.
- People may not feel safe in attending public information or consultation events at certain times of the day, in particular after dark, such as older people and women
- Events have previously been held without taking into account people's faiths, which has excluded people at times of their religious observance.
- Information may not be presented in a way that engages people effectively, such as material only printed in English; information is presented in a complicated format or language.
- Certain groups may not understand what relevance the Aylesbury Area Action Plan has to them, and therefore they do not become involved in the process.
- People may misunderstand the purpose of the Aylesbury Area Action Plan and what can be achieved which may result in tensions between groups if it does not deliver what they expect.
- If people do not feel that they can access information at an early stage or have problems accessing it, they may become disillusioned in the process and lose interest i.e. BME groups, young and elderly people and disabled people.
- Some people may not be aware how to express their views or how these will feed into the process i.e. children and young people.
- There may be differences in the needs and aspirations between different groups, which may result in conflict.
- People may feel as though certain groups are having a greater impact on how the area action plan is developed which may increase tensions in the community.

COMMUNITY FACILITIES

The increase in population will increase the need for provision of community facilities in the area. The plan will have to consider carefully how to accommodate all members of the community particularly how policies will address conflicting priorities within a broader socio-economic population.

Considerations:

- A lack of adequate, accessible and affordable community facilities could act to isolate certain members of the community, such as women who

may need a respite from supporting others such as children and those with limiting illnesses or older people who may live alone and need to interact with others.

- Tensions between certain groups may remain unresolved if there are no facilities for people to come together and interact in informal surroundings. Social cohesion may be threatened by a deficit of community facilities in the area i.e. between different faith groups, BME groups and those who are not able to speak English.
- People on lower incomes may feel isolated from the rest of the community if they are unable to access affordable leisure and community facilities. This may result in isolation and social exclusion.
- A lack of appropriate community facilities may create boredom through a lack of things to do. This could result in a rise in anti social behaviour problems, particularly with young people.
- The needs of certain groups may not be properly considered when deciding on the number and type of community facilities that are considered appropriate for the area. For instance the need for meeting places for older people, BME groups, faith groups and the need for high quality childcare and play, leisure, cultural and educational facilities for children and young people. Also somewhere safe and approachable for the LGBT community.
- If poorly designed and located, it may limit the use of these facilities. For instance, disabled people may not physically be able to access the facilities, those on lower incomes may not be able to afford to use them, such as older people, young people and refugee and asylum seekers. Some people may not be able to travel distances due to other commitments, such as women with dependants.
- People having different priorities for the use of community facilities, i.e. for women it may be health and childcare, for young people it may be youth clubs and sporting facilities and for other groups it may be informal meeting places. LGBT children and young people need a space that is not an existing youth group in order for confidentiality and safety. Tensions could arise among different groups in the community if it is perceived that the needs of one group are being prioritised above others.

LEISURE

With the exception of Burgess Park, there is very little provision of more formal sports and leisure infrastructure within the study area. The sports provision within Burgess Park, however, is of a good quality and is well used. There are also a number of areas with play provision for young children, including Burgess Park, Faraday Gardens, Surrey Square Park, and Nursery Row Park. Through the development and implementation of the park and play areas, the area will experience significant changes through growth in population, housing and access to employment. As development intensifies the value of the open space increases, especially where there are current deficits. In addition to the overall quantity of the open space, the location and use of the space is also important to ensure that they are accessible to all members of the community. The following considerations need to be taken into account when developing and implementing policies for open space in the Action Area:

Considerations:

- The needs of different user groups may not be properly considered which will result in certain groups not feeling that they are able to use the park. This may occur where there are conflicting priorities of how the space should be used, i.e. elderly people may want the park to be landscaped and intensively managed, whereas others may want to retain a wild character to the park which may increase anti-social behaviour. This may exclude certain groups as they fear for their personal safety, such as women, members of the BME community, members of the LGBT community, members of different faith groups, older people, also young people and mental health users.
- Poorly designed play spaces, poorly located, or those with inadequate management may result in eventual neglect and inappropriate use by anti social individuals in the community. This may have a negative impact on lone parents using the facilities, which may lead to eventual isolation and tension within families.

TRANSPORT IN THE EVOLVING PLAN

At present, the level of accessibility by bus varies considerably throughout the study area. Public Transport Accessibility Levels, (PTAL's) in the centre of the study area need to be increased significantly in order to provide future residents with improved sustainable travel options. Walworth Road has a total of 70 buses per hour per direction, while Thurlow Street has a total of 13 buses per hour per direction. The area poses significant barriers to pedestrian and cycle movement, including Old Kent Road and Burgess Park at night. In addition, there are few cycle-specific facilities within the Aylesbury Estate area.

Sustainable transport choices need to be encouraged, through the provision of better walking and cycling facilities, better public transport, the consideration of car ownership and parking, and the location of residential land use relative to other trip-attracting development. Sites and routes that will be critical in developing infrastructure to widen transport choices must be protected. This refers most specifically to the route of the Cross River Tram.

Considerations:

- Proposed transport and infrastructure projects are reliant on central and regional governmental funding. Programmes may be subject to delay or cancellation, which may not be concurrent with the Aylesbury construction phases. This may cause anger and frustration amongst the community if their expectations are not met, especially among those that do not have access to cheap and reliable public transport such as children, older people and parents with children (who are predominantly women).
- Transport services may continue to feel unsafe for certain user groups, particularly during construction periods, for example road closures, etc.

This may make some people feel unsafe when walking to bus stops, which may need to be temporarily relocated. This may impact particularly on women and young people, members of the BME community, the LGBT community or people following a certain faith, such as Muslims and Sikhs. In the same way, walking routes may continue to feel unsafe for these groups if they are constantly being rerouted.

- If PTAL's are not increased alongside increased density, older people and young people may not have the opportunity to be independently mobile. This could further exacerbate the need for parents and carers to continue to use unsustainable forms of transport, such as the car. This also puts pressure on ensuring the availability of accessible parking spaces in areas where required.
- Although it has been recognised that Southwark council has taken disabled people's needs into account, this should continue to be an important consideration to avoid circumstances where disabled people continue to find it difficult in accessing convenient and reliable public transport due to poor design and management. This could act to create further barriers to their inclusion within the wider community and limit their opportunity to job opportunities predicted for the north of the borough. This could make disabled people unnecessarily dependant on others and limit their inclusion.
- Disabled access may be provided but they may be segregated from other access routes, which further exacerbates separation and isolation from the rest of the opportunities becoming apparent in the borough.
- People may have different priorities in terms of transport such as parents with children, disabled people and those on lower incomes. Tensions may arise if people think that the needs of any one-user group are being prioritised above their own.

Stage two: Assessment of Impacts

Part A: Feedback from the Equalities and Diversity panel

1. What feedback did the panel give you at stage one

The Equalities and Diversity Panel met on the 17 July and their comments have been incorporated into the stage one scoping report. These comments were broadly around the following considerations:

Employment and Business space – What arrangements will be put in place to support businesses which are displaced by the redevelopment and how will the AAP support and promote the growth of small businesses;

Young People – What provisions are being made to meet the needs of young people:

Mental Health – How will mental health issues be addressed and in particular those issues affecting vulnerable groups such as the elderly;

Community Facilities – How will the provision of community facilities meet the needs of a diverse community.

Part B: Purpose and aims of policy/strategy

2. What is the overall purpose of the policy/ strategy?

The Aylesbury Area Action Plan, when adopted, will be part of Southwark's Local Development Framework. This will make it an important document which will be used for deciding what sort of development should take place within the Aylesbury area, and when, where and how it should happen.

3. What are its aims?

The aims of the plan are set out in Appendix A of this report.

4. Could these aims be in conflict with the Council's responsibility to:

- Eliminate discrimination
- Promote equality of opportunity
- Promote community cohesion and good relations between different groups

The scoping report identifies a number of key considerations which have been acknowledged and addressed in the Stage two assessment as follows:

DEVELOPMENT PHASING PLAN

An approach has been taken to phasing which is based on the following principles:

- Minimises the number of moves for residents;
- Minimises the number of residents that move off site;
- Allows those residents who move off site to have the right to move back into the estate at a future date should they want to;
- Provides a range of housing types within each phase including low-rise houses and medium and high-rise flats.
- Protects the health and well being of existing and new residents by minimising disruption, maintaining security and ensuring that all redeveloped sites adhere to good place making principle during construction;
- Tries to keep the community together as much as possible;
- Parcels up sites so that new development will form complete urban blocks to create a higher quality living environment and minimise disruption to the community associated with construction;
- Seeks to bring forward as early as possible sites where there is potential for a large uplift in the numbers of new homes provided;
- Mixes the location of where redevelopment takes place between higher value sites (e.g. overlooking the park) with less valuable sites (e.g. within the heart of the area) at each phase so that the whole area benefits and risk to the project is balanced;
- Provides good access to community facilities throughout the regeneration process by delivering early community facilities and then phasing more facilities, shops and employment space over the course of the redevelopment.

HOUSING REFERENCING

The issues associated with housing referencing were covered comprehensively in the scoping report. They remain valid and whilst the preferred options themselves do not have any implications for housing referencing it will be one of the key considerations as the regeneration moves into the redevelopment phase.

MAINTAINING EFFECTIVE HOUSING MANAGEMENT

The issues associated with maintaining effective housing management were covered comprehensively in the scoping report. They remain valid. Within the preferred options, the phasing plan aims to provide good access to community facilities throughout the redevelopment process. However, it is recognised that an effective housing management strategy co-ordinated with a maintenance plan, a

comprehensive community safety strategy and a health plan will be required to ensure the key considerations associated with maintaining effective housing management are addressed as the regeneration moves into the redevelopment phase.

A health impact assessment will be undertaken to inform the health plan.

HOUSING/DENSITY

The preferred options aim to develop a mixed community through the balanced provision of social rented, intermediate and private housing which should contribute to the promotion of community cohesion and good relations between different groups.

The type and size of homes will reflect the re-housing needs of the existing Aylesbury residents as well as borough wide housing needs. There will be a range of housing types, all with secure private space – flats, maisonettes, houses with gardens.

The emphasis of the preferred options is on providing family accommodation at a significantly higher level than the existing Southwark Plan (Unitary Development Plan). The dwelling mix in the preferred options is derived both from Southwark's borough-wide housing needs assessment and the estimated rehousing needs for tenants on the estate. For the latter reason, there may be slightly fewer large social rented homes than would have been the case had the borough-wide housing needs mix been applied. We are aware that some groups may have a need for larger units and we recognise that the preferred option may not pick up the full needs for all the BME groups. This has to be balanced however against the needs of existing residents who will need to be rehoused.

There will be higher residential densities in the area but these will only be in locations with good existing and future public transport links and where there are good local facilities.

The preferred options ask for very high standards for all new housing delivered as part of the AAP. All new homes will be designed to Lifetime Homes Standards. They will be flexible enough to meet the changing lifetime needs of residents such as when people get older. For example, ensuring there is space to install a shower next to a downstairs toilet. Homes will be able to be altered and adapted to meet the needs of single people, older people, couples, large families and disadvantaged groups. This will prevent residents from having to move as their housing requirements change and will help to ensure that a sense of community is maintained amongst a long-term resident population.

At least 10% of all new homes will be designed to meet the needs of vulnerable groups such as the elderly and disabled including specialized housing schemes, providing appropriate level of support and homes designed for wheelchair users at each phase of the development. There will be a range of housing types in each development block which will help to create a more mixed community. Small numbers of general needs properties, for example, suitable for older people can be grouped together.

New homes will also be tenure blind. There will be no visible difference between affordable and private housing. Both types of tenure will be of the same high standards of design which will help to eliminate discrimination and promote community cohesion and good relations between different groups.

The preferred options also ask for homes to be very efficient in terms of sustainability for example homes will be designed to ensure they minimize energy use, which will help residents that might suffer from fuel deprivation.

Homes will also be designed with access to high speed broadband which will help to give equality of opportunity to those who might otherwise not have broadband.

EDUCATION

The aim of the preferred options is to ensure that education services are fully integrated into the area, connected physically through good street networks and community spines, co-located with other services and are designed to be flexible enough to adapt to changing needs. These principles are embedded within Southwark's Building Schools for the Future Programme.

TRANSPORT

The preferred options are intended to help ensure that homes, jobs, shops and other services in the new neighbourhood are accessible and to promote sustainable transport choices. In general this means prioritising cycling and walking in the layout and design of new development, discouraging car use through locating higher density development in areas which have very good public transport accessibility and restricting the amount of parking to the minimum which is needed to ensure that the development can operate effectively. This approach is in line with government policy and is intended to promote healthier lifestyles and reduce carbon emissions arising from car use and dependency on fossil fuels.

In principle, this approach benefits all members of the community. Car ownership levels tend to be lower among the young and elderly. Therefore a policy which seeks to promote walking and cycling, creating routes which are safe from conflict with vehicles, which prioritises non-car users, and which also maximizes opportunities to use public transport should benefit these groups in particular, promoting inclusivity and equality of access to jobs, services etc.

It should be noted however that there are certain groups who may rely on using a car. This might include the elderly, people with disabilities and parents with young children. The preferred options seek to mitigate the impact of a general presumption in favour of low parking levels by prioritising parking for people with disabilities, even within what are otherwise in some cases "car free" developments.

The preferred options seek to ensure that parking spaces are provided equitably across housing tenures which should help promote social cohesion. This can run against the tendency of the market and development control officers will need to pay careful attention to ensure that these priorities are delivered.

It will also be very important that a reduction in car parking and promotion of sustainable modes of transport are undertaken in tandem with improvements in public transport and the public realm. While in theory promoting walking and cycling is beneficial to all users, if routes out of developments are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as the elderly and young, people with disabilities, women and LGBT groups. It could also apply in areas which already experience significant levels of deprivation such as the Aylesbury Estate which currently does not have good access to public transport.

In addition to promoting the tram, the preferred options seek to improve bus services and the council is working with TfL to improve frequencies on existing services. This will also be accompanied by soft measures such as provision of parking spaces for car clubs, safer routes to school and measures to raise awareness of public transport facilities. Measures such as these should contribute towards social cohesion by providing a greater choice over mode of transport and improved access for all members of the community to jobs, shops etc.

PUBLIC REALM AND OPEN SPACES

The preferred options propose a network of streets which are intended to maximise permeability and prioritise ease of movement for pedestrians and cars. It will be a fundamental principle of the plan that all streets should be overlooked, well lit and accessible to disadvantaged groups such as people with disabilities, the elderly, parents with pushchairs etc. The objective will be to create an urban environment in which all groups feel comfortable. The preferred options also propose provision of home zones and traffic calming to help make the new neighbourhood friendly towards young children.

The new neighbourhood will have a network of open spaces. This will include spaces of different sizes, roles and for different age groups within the Aylesbury area. These spaces will include both equipped and informal play and sports spaces for all age groups, as well as more formal spaces for relaxation and learning.

Play spaces which have different functions, ranging from small low key areas for toddlers and young children, to larger areas with more varied types of equipment. These will be within distances established by the Mayor in his play space guidance ie 100m from homes for the under 5s, 400m for the under 12s and 800m for older children, and will ensure that all members of the community have access to the spaces.

All open spaces should meet green flag standards .e. ensuring that they are:

- Welcoming
- Safe and secure to use
- Clean and well-maintained
- Environmentally sustainable
- Appropriate to their surrounding context
- Sensitive to existing and potential biodiversity interest
- Enjoyable for all members of Aylesbury's diverse communities to use

The preferred options also set out a number of themes to guide improvements to Burgess Park. The aim will be to create a park which reflects the cultural diversity of Aylesbury's surrounding communities, feels safe and secure, provides an educational, training and skills development resource, as well as an environmental resource. The preferred options provide a general framework. Detailed design work will need to be taken forward by the emerging Trust in consultation with users. It will be important at this stage that the detailed needs of all users are taken into account.

CONSULTATION

The stage 1 EqlA highlighted the need to ensure that the methods used to consult and engage people in the preparation of the AAP are open accessible to all members of the community. To help address this issue the council prepared a consultation strategy which sets out the principles of how it will consult and the importance of reducing barriers to consultation. It emphasises that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

At issues and options stage a variety of means were used to publicise, consult and engage with local people. These are described in detail in the Consultation Statement which accompanies the preferred options report and is summarised below:

- **Publicity:** Consultation on the AAP issues and options report was widely publicized through a mailout to contacts on Southwark's Planning Policy database, Southwark's website, a newspaper advert, making information available in libraries and council offices, and quarterly newsletters sent to all residents on the estate.
- **Events and exhibitions:** A Show Homes Exhibition with a mock up of the flats being proposed in Phase 1a of the redevelopment of the Aylesbury Estate took place in June 2007. This was followed by the Building Futures Exhibition in October which sought feedback on the issues and options and which was combined with a family fun-day, on-site surgeries, and special viewings for particular community groups. In addition, regular surgeries have been held in Thurlow Lodge and officers staffed an AAP stall at the Walworth festival.
- **Stakeholder meetings:** A Neighbourhood Team comprising representatives of the Aylesbury estate tenants and residents organisations, ward members, and representatives of local business groups, voluntary organisations and health and youth service providers has been established. The team has prepared a charter setting out its objectives for the redevelopment of the estate and this forms the basis of the AAP objectives. The team has also participated in a series of planning for real events, looking at issues surrounding design, density and value and has visited other cities to look at good practice examples elsewhere. Continuous consultation on the issues

and options has also taken place with the Aylesbury Estate Steering Group, as well as the Re-housing Subgroup and the overarching consultation strategy and issues and options have been presented to Walworth Community Council.

The monitoring of consultation showed that wide range of groups and communities were involved at issues and options stage, particularly in the Building Futures Exhibition. Special viewings for women's groups, certain ethnic groups and for people with disabilities were held in October. The Show Homes Exhibition and the Building Futures Event both included youth events and Family Fundays to encourage participation from younger people. The Show Homes Exhibition also included special viewing times for people over 50. In general there was an equal divide between the number of male and female respondents and the ethnic background of attendees was very diverse. No information on the number of respondents from LGBT groups is available however and this is an issue which could be considered in the next stage of consultation.

The range of people who responded to the formal questionnaire on the issues and options was much narrower and emphasised the need to continue to pursue informal means of engaging with the local community. The response of young people was very positive during the exhibitions and highlighted a need to consider using bespoke questionnaire forms for young people.

COMMUNITY FACILITIES

The preferred options seek to provide a better range and number of shopping, employment, learning, healthcare and flexible community facilities located together at a number of highly accessible hubs throughout the AAP area in a way in which these different facilities and services can complement and support each other. This approach will have a more positive impact upon the lives of existing and future residents in that it will allow people to meet and foster community cohesion and good relations.

Flexible community space will be provided to allow for a range of uses such as meetings, parties, weddings, exhibitions, arts and cultural events, small scale recreation and sports, training, health related activities and faith based uses.

The preferred options also recognise that there is a need to maintain Health & Social Care and Children's services throughout the redevelopment. The preferred options also seek to ensure that where temporary or interim venues are required for these facilities and services, these will be provided at safe locations and along safe routes and allow for easy access during the redevelopment period.

The council will work hard to relocate existing business and to provide assistance to find new premises. Small and affordable units for small and start up businesses will be provided. The procurement option requires that a proportion of the necessary goods and services required for the redevelopment will be obtained from the local area in order to benefit local businesses and residents.

5. Does the documentation relating to this policy/strategy include specific reference to the Council's responsibility (as set out above) and a commitment to work to meet this?

While the council's responsibility for eliminating discrimination and promoting equality of opportunity and social cohesion are not specifically referred to in the preferred options report, the objectives of the AAP, which were identified by local residents and other local stakeholders, consistently refer to the aim of creating a strong community and a neighbourhood in which the needs of all groups are taken into account.

The consultation strategy for the AAP does refer specifically to the need to ensure that in accordance with Southwark's Equalities Scheme 2005-2008, as well as the Aylesbury NDC's Equalities and Diversity Policy, the Equalities priorities groups are involved and that arrangements are made to include under-represented groups and individuals;

Part C: Application of this policy/strategy

6. What steps are you taking or will you take to ensure that the policy is or will be implemented consistently and fairly?

The draft AAP will contain a framework which will set out how the plan will be monitored as it moves into the implementation phase. The implementation is likely to take between 15 and 20 years and will require periodic monitoring. The AAP also provides an umbrella framework for a number of council strategies, including rehousing policies, the Southwark Schools for the Future and Academies programme for schools in the AAP area, the employment and enterprise strategies where they relate to the AAP area and an open spaces strategy for the regeneration of Burgess Park. The equalities impacts of each of these strategies will need to be considered in more detail as implementation progresses. The Housing section of the report above notes the need for an effective housing management strategy co-ordinated with a maintenance plan, a comprehensive community safety strategy and a health plan. It also recognises the need to monitor how priority groups take up its rehousing proposals through the referencing exercise which will be carried out.

Consultation on the AAP will be monitored at each stage of the plan preparation process to ensure that all groups will be engaged as effectively as possible. The consultation statement which accompanies the preferred options report contains more details on this. When the draft AAP is submitted to the Secretary of State, the council will also submit a consultation statement (Statement of Compliance) demonstrating that the consultation which has been carried out meets statutory minimums and meets the requirements of Southwark's recently adopted Statement of Community Involvement.

7. Could the way that this policy/strategy is being or will be implemented be discriminating against any particular individuals or groups or be potentially damaging to relations between different groups?

The preferred options aim to contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community relations.

As outlined in the response to question four, an effective housing management strategy and plan will be put in place to ensure that the negative impacts of the redevelopment are minimised. In the long term the plan should help to improve relations between different groups and should not discriminate against any particular individuals.

8. What changes could you make to either the policy/strategy itself or the way it is applied to improve the positive outcomes for all groups and to reduce or eliminate any negative outcomes?

In preparing the preferred options report, the findings of the EqIA scoping have been considered and the report has been prepared iteratively with the stage 2

EqlA. This stage 2 assessment recognises those areas where the AAP may have differential impacts and where appropriate mitigation measures are proposed to address these. The council will take all representations on the preferred options into account and there will be a further opportunity to adjust policies prior to the submission of the draft plan to the secretary of state, should this be necessary or appropriate.

9. What information do you collect or do you plan to collect to monitor the impact of this policy/strategy on different groups?

As is noted above the council monitors participation in the AAP preparation process to ensure that all groups have the opportunity to be involved. Where there is evidence that some groups have not been engaged, the council can seek to address this at the next stage. The consultation which has been carried out will be reported in the consultation statement to be submitted to the secretary of state.

The council's team in the Analytical Hub prepares periodic updates on demographic changes in the population, including changes relating to ethnicity, age, and faith. The council also monitors economic activity, health and pupil attainment in schools. Biannually the council also commissions a residents' survey to ascertain how local people feel about their area and whether it is improving. These analyses are carried out at community council level. As the AAP area covers a large part of the community council area, these analyses will be useful in determining the success of the AAP.

These analyses are also reported in the council's annual monitoring report which assesses the impact of all development in the borough. Once the AAP has been adopted, the AMR will report annually on the implementation of the AAP, using indicators such as new housing completed in the AAP area, social rented and intermediate housing completed, new retail and business space completed, including small business units, average household income, the percentage of residents who feel safe at night business start ups and the local employment rate.

The council's rehousing team also collect information on household size, medical, gender, age, ethnic background and disability of residents living on the estate through the household registration (referencing) process which takes place prior to rehousing. This information will be used to help monitor whether the AAP is delivering the right kind of housing which meets the needs of the existing community and will assist in a review of the AAP dwelling mix policy.

As mentioned above, the AAP comprises an umbrella framework under which a number of strategies, including those of the council and its partners will be implemented. While organisations such as the PCT may have their own strategies for monitoring the impact of their policies on key equalities groups, the preparation of the AAP may enable the council and PCT to identify a set of key indicators for the AAP area. The council will be undertaking a health impact assessment of the AAP at the next stage and will ensure that a monitoring framework is put in place to assess this aspect of the AAP.

The need to provide high quality schools is a key objective of the AAP and in this respect it seeks to support the Southwark Schools for the Future Programme and the Academies Programme. An EqlA has already been carried out for the SSF secondary schools programme, which assesses the impact on equalities up to outline business case stage. The council is also currently preparing an EqlA for the

SSF primary schools programme and details of the monitoring framework will be identified as part of that process.

APPENDIX A: AYLESBURY ESTATE AAP OBJECTIVES

The project brief establishes the following objectives for the Aylesbury Estate AAP:

Housing

- Replace the existing housing with a range of affordable, high quality accommodation that addresses a variety of local needs including those of pensioners and vulnerable residents.
- Ensure that the first phase of replacement housing sets high standards of design, quality and sustainability for the lifetime of this programme and more widely in Southwark and beyond.
- Provide an efficient and supportive assessment and re-housing programme for all existing residents.
- Ensure that the existing housing and public areas are maintained to a high standard throughout the lifetime of the redevelopment programme.

Education

- Create a learning and achievement culture for all ages through development of high quality infrastructure, particularly via the redevelopment of Michael Faraday School and the establishment of the new Walworth Academy.
- Establish in-demand local schools that retain and develop local skills and attract aspirational families to the area.
- Recognise and invest in the specific needs of pre-school children and their carers while consolidating existing facilities and successful practice.

Social/healthcare

- Provide a wide range of high quality, integrated facilities that:
- Recognise and build upon existing services.
- Respond to local need through the provision of improved and innovative services.
- Provide opportunities to create a single point of user engagement and thus reduce waste and overlap in the delivery of linked services.
- Promote a healthy lifestyle culture for all residents within the new neighbourhood with an emphasis on prevention, education, and early intervention.
- Maintain a strong sense of 'community spirit' through the provision of decent, affordable meeting places available to a wide range of groups and individuals.

Community Support

- Ensure that the needs of specific local groups with particular needs are recognised and that measures are implemented to:
- Provide appropriate support throughout the programme of change and upheaval.
- Design both housing, infrastructure and services to meet present and future need.
- Groups include pensioners and the vulnerable, young people, people with disabilities, and those with particular ethnic/or cultural requirements.

Transport and Movement

- Ensure that the new neighbourhood enjoys excellent public transport connections to central London and the wider southeast area.
- Provide for safe mobility within the neighbourhood through the design of safe permeable routes, high quality pedestrian and cycle routes and the development of 'home zones'.
- Ensure that the parking and movement of private vehicles within the area is effectively managed to promote a safe and sustainable environment.
- Facilitate the development of a significant new transport corridor through the area providing a route for the new Cross River Tram

Environment

- Promote new buildings of the highest quality and sustainability standards while enduring that in both design and delivery there are opportunities for innovation and diversification.
- Create within the new area open space, which by their safe, clean and welcoming nature encourage local residents to fully utilise them for a range of leisure and recreational pursuits.
- Ensure that all open spaces are properly cleaned, managed and where appropriate supervised.
- Provide a wide range of recreational and leisure opportunities for residents of all ages which fully utilise the benefits/proximity of Burgess Park, Elephant and Castle and other local resources.
- Ensure during the construction of buildings and open spaces that every opportunity for the use of sustainable materials, energy conservation etc is fully utilised.
- Provide a cost effective infrastructure that delivers core energy services and provides for recycling, effective waste management, and energy conservation.
- Ensure that the street and public areas are safe, well lit, and promote public activity thereby eliminating the fear of crime.

Employment and Enterprise

- Create a 'can-do' culture that encourages local enterprise, recognises commercial opportunities arising from the new development, and encourages local participation and involvement.
- Develop a physical infrastructure that supports new and expanding local enterprises.
- Ensure that the local community enjoys the full economic benefit of the regeneration programme, e.g. local purchasing, local contracts and employment and training opportunities for local people.
- Develop, with residents, a range of social enterprise opportunities that can both provide employment and deliver high quality and accountable local services

APPENDIX B: RELEVANT POLICY CONTEXT

The London Plan

- The London Plan provides the strategic spatial development strategy for London and forms the regional policy framework for Southwark. The AAP needs to be in general conformity with the London Plan.
- The London Plan was published in 2004 and early alterations, which increased housing allocations, were adopted in December 2006. Southwark's housing allocation was increased from 1,480 to 1,630 dwellings per annum. Further alterations have been proposed to the London Plan. These are programmed for examination in June/July 2007 with adoption scheduled for early 2008.
- Further alterations include simplification of the density matrix and related definitions of 'central', 'urban' and 'suburban' setting. The AAP will take account of the London Plan and these emerging alterations.

The Southwark Plan

The Southwark Plan provides the planning policy framework for the borough. It is due to be adopted in July 2007 and will replace the 1995 unitary development plan. It contains 20 strategic policies in part 1, which feed into detailed policies in part 2 which relate to employment and enterprise, life chances, the natural and built environment, housing and transport. The emerging Southwark Plan has been subject to EqlA. The main findings of that process were:

- Provision of small local businesses which are easily accessible by local communities encourage the closure of development gaps for the local communities through an increased sense of belonging, redressing disadvantage and equality of access to services.
- By ensuring that new developments are safe and secure, disadvantage is addressed, community relations are improved and equality of opportunity is promoted.
- Protection of residential accommodation reduces discrimination and promotes equality of opportunity through providing inclusive and accessible housing for communities within the borough.
- Provision of accommodation other than houses and flats recognises the diverse needs of communities within the borough and promotes equality of opportunity since communities that will benefit are frequently the marginalized.
- The protection of transport impacts creates a sustainable, inclusive and accessible borough for its residents, future residents, users and occupiers.
- Public transport improvements assist in the creation of an accessible and inclusive borough by focusing on sustainable forms of transport as well as being socially inclusive. Accessible and inclusive transport links promote equality of opportunity and prevent barriers of exclusion and discrimination.
- Mini cab offices in the borough make transportation in the borough accessible to those who may not have access to public transport or private car use.

Housing Strategy 2005–2010

The Housing Strategy 2005-2010 sets out the vision and direction for housing services and investment in Southwark. It outlines southwark's strategic approach to tackling housing problems and delivering housing services. The document was agreed after a considerable amount of consultation was undertaken to identify priorities. Whilst the following priorities were agreed from a borough-wide perspective, the principles will be considered throughout the Aylesbury redevelopment. Summaries of the issues highlighted from the consultation are as follows:

- Ensure regeneration is sustainable in the long term, improving understanding of planning, building and managing mixed developments
- Link the need for larger homes to tackling under-occupation
- Be explicit about whether Southwark can meet housing needs within its boundaries
- More emphasis on tackling crime and antisocial behaviour
- More emphasis on community cohesion and sustainability
- Provide greater choice
- Focus on improving the quality of temporary accommodation and preventing homelessness
- Focus more on delivering housing and services for young people to deliver the priorities of the Every Child Matters² agenda
- Focus more on leaseholder and tenant management issues
- Focus more on black and minority ethnic issues
- Give higher profile to resident participation
- Give more emphasis to and improve joint working to deliver objectives and five-year supporting people strategy

Education Achievement

The Aylesbury NDC area has almost 10% more people with no qualifications than the Southwark average. However, while there are high levels of unqualified residents, over 25% of those with qualifications have reached level 4/5, which is clearly higher than both England and the Aylesbury AAP area. Underachieving groups identified were:

- pupils in receipt of free school meals across all communities but in particular white working class boys;
- Black Caribbean pupils, particularly boys;
- Traveller, Gypsy and Roma children;
- Children Looked After;
- Children who move school during the primary phase;
- Children living in specific geographic areas linked to high levels of deprivation;
- Summer born children particularly boys.

Southwark 2016

Southwark 2016 sets out the shared vision for the next ten years of the main public service providers that work in the borough and their partners in the voluntary and private sectors. It determines the objectives and challenges facing Southwark over the next ten years. The principle challenges considered across the borough will feature significantly on the Aylesbury Estate. The comprehensiveness of the referencing exercise currently being undertaken will provide greater validity to the local evidence.

- Migration in and out of the borough is high: this makes it difficult to measure the success of interventions (because the beneficiaries may have moved on and another, more disadvantaged group, taken their place).
- It also makes it more difficult to predict the composition of the borough over the next 10 years.
- Southwark's population will continue to grow so that by 2016 it could be between 286,000 and 301,000. That means anything from 14,000 to 20,000 more households needed than in 2001.
- By 2016 around 43% of the population is expected to be from black and minority ethnic backgrounds, with many different faiths and cultures.
- Southwark's population ranges from those who enjoy significant affluence to those in severe poverty. Southwark is becoming more socially and geographically divided.
- We have a 10% gap in the numbers of people of working age (16-74) in Southwark who are in employment compared to the national average. In that age group, 65% have no or first level NVQ qualifications, rising to over 80% for people of Bangladeshi and Black Caribbean origin.
- 39% of local authority homes and 40% of private rented properties do not yet meet the decent homes standard.