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MEETING:	<b>Equality &amp; Diversity Panel</b>	Date:	21 February 2006
ITEM TITLE:	Elephant and Castle Regeneration Programme: Equalities Impact Assessment - Stage 1 Scoping		
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**SUMMARY OF CONTENT**

The attached paper sets out the overall approach to the Equalities Impact Assessment for the Elephant and Castle Regeneration Programme. This is a long term project. The Assessment will assess the predicted outcomes and set the framework for the continuing assessment of the project.

Part 4 of the paper covers:

- The case for change at the Elephant and Castle (Section 2);
- An outline of our current understanding of the area and the data and information that will be needed to monitor the impact and implementation of the change (Section 3);
- Southwark's general approach to EqIAs (Section 4);
- The application of the Southwark approach to undertaking EqIAs to this complex long term case (Section 5)
- The preliminary analysis of issues which will merit further investigation during the course of the assessment: in relation to the overall plan (Section 6); the implementation of the plan (Section 7).
- The way forward in completing the assessment (Section 8)

In particular the Assessment will deal with three main blocks of activity:

- The overall plan for the physical redevelopment of the area, expressed principally in the *Framework for Development*
- The implementation of the physical redevelopment
- The preparation and implementation of programmes and projects addressing the social and economic conditions of the area.

In each case it will cover the following strands:

- Race and ethnicity
- Gender
- Disability
- Age
- Faith/belief
- Sexual Orientation

It will therefore identify actual and potential impacts (both beneficial and adverse) upon identified groups in order that disadvantageous, disproportionate effects can be minimised or avoided, and benefits developed to maximum effect in relation to all groups. It will also support an assessment of how far the projects can promote equality of opportunity and good race relations.

#### **KEY ISSUES**

A regeneration programme of this scale, complexity and length will have impacts on the existing communities in the area: some of these are directly affected (eg those being relocated), others indirectly (eg those in the surrounding areas). But it will also have potential impacts on those who use the area for other reasons (shopping, leisure, as a transport interchange). The programme is also designed to provide opportunities for new homes, shops, community facilities and jobs over a long period with potential benefits for people who do not currently form part of the local community.

There will therefore be a need to take an overall view about the balance of the impacts on various groups, including in the longer term.

#### **DECISIONS REQUIRED:**

To comment on the scope of the proposed Assessment so that the detailed work can be undertaken.

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**Equalities Impact Assessment for the Elephant and Castle Regeneration**

**Stage 1 Scoping**

Version 1.0

14 February 2006

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**SUMMARY**

This scoping document sets out the framework for conducting the Equalities Impact Assessment of the Elephant and Castle Regeneration Programme.

This draft is for consultation with the Equalities and Diversity Panel. Subject to the views expressed by that panel it will be revised to act as guidance for the more detailed work on the assessments.

The four main parts set out the answers to the questions required for scoping documents in the Southwark methodology. Part 4 contains the substantive analysis and outlines the full framework for assessment.

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**Part 1**

**What policy/ strategy and processes is this assessment addressing?**

This Equalities Impact Assessment will deal with the regeneration of the Elephant and Castle Area including:

- The preparation of the overall plan for the physical redevelopment of the area, expressed principally in the *Framework for Development*
- The implementation of the physical redevelopment
- The preparation and implementation of programmes and projects addressing the social and economic conditions of the area.

The regeneration of the Elephant and Castle is a long term project. This Assessment will assess the predicted outcomes and set the framework for the continuing assessment of the project.

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**Part 2:**

**Is this a new policy or strategy?**

The Elephant and Castle regeneration has been under consideration since the mid 1990s, when planning guidance and development proposals were initially prepared. These initial plans were complemented by the Elephant & Castle Single Regeneration Budget (SRB) Project, which commenced in 1998.

The current Elephant & Castle regeneration proposals will require extensive action over a minimum of 10 years leading to the comprehensive redevelopment across over 55 acres of urban land. The strategic elements of the scheme are contained within the *London Plan* and the *Southwark Plan* (Southwark's Unitary Development Plan (UDP)). The overall outline of the proposals is set out in the *Framework for Development*, which was adopted by the London Borough of Southwark in Feb 2004 as Supplementary Planning Guidance (SPG). Significantly greater detailed design will be necessary before full implementation can commence.

There have therefore been processes of consultation and planning activity since the mid 1990s including formal consultation on the London Plan and the UDP. Specific consultation on the preparation of the *Framework* document began formally in July 2002.

This exercise represents the first scoping of a formal Equalities Impact Assessment which will provide a framework for assessment throughout the programme. It draws upon research and processes conducted in connection with both the SRB programme and the preparation of the SPG, which are containable within its scope.

The main physical redevelopment programme has yet to start. Work has commenced on the site in Wansey Street which will become the first housing available for the relocation of residents. But the major programme of early housing developments is subject to the preparation, submission and approval of individual planning applications. Registered Social Landlords (RSLs) have now been selected as partners and, subject to completion of formal contractual arrangements, will build out the remaining early housing sites.

The Commercial Partner selection process is underway but not due to complete until late in 2006.

There is therefore substantial information upon which to identify impacts and sufficient time and opportunity to make adjustments to the programme as necessary to incorporate the conclusions of this initial work.

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**Part 3:**

**If existing, has the policy/strategy already been reviewed under the previous EIA 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)?**

This is the first EqIA in relation to the Elephant & Castle using the methodology adopted by the Council

Strategic choices in relation to the Elephant and Castle have been set out in the *London Plan*, which was subject to an overall assessment by the GLA, and the *Southwark Plan*, which was subject to an assessment by the Council through the UDP process.

The Council's work to date has amassed a body of information and research of a kind similar to that necessitated by an EqIA. A schedule of relevant material is set out in Appendix 1

This includes

- the initial SRB assessments undertaken in support of the original SRB Delivery Plan,
- the Business Needs Survey July 2000 undertaken by South Bank University
- the Appendices to the SPG (e.g. retail catchment assessment, ARUP Economic assessment, transport survey data etc.)

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**Part 4:**

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

**1 Introduction**

- 1.1 Regeneration of such a large area at the core of a densely populated city will inevitably have substantial direct, indirect and long term implications for a large number of people. This part sets out:
- a. The case for change at the Elephant and Castle (Section 2);
  - b. An outline of our current understanding of the area and the data and information that will be needed to monitor the impact and implementation of the change (Section 3);
  - c. Southwark's general approach to EqIAs (Section 4);
  - d. The application of the Southwark approach to undertaking EqIAs to this complex long term case (Section 5)
  - e. The preliminary analysis of issues which will merit further investigation during the course of the assessment: in relation to the overall plan (Section 6); the implementation of the plan (Section 7).
  - f. The way forward in completing the assessment (Section 8)
- 1.2 Given the complex nature of the programme this scoping document includes a substantial discussion of the key components of the project. This will ensure that all the aspects of the programme are covered – either by this initial assessment or by subsequent work.

**2 The case for change at the Elephant and Castle**

- 2.1 The defined regeneration area [see Map 1 attached] is the product of a plan conceived in the late 1950's and early 1960's. Physically it is characterised by a large and heavily trafficked road system, a high proportion of system-built 1960's and 1970's council housing and an enclosed shopping mall built in 1965. The surrounding areas are of varying characters with a predominance of period properties with higher levels of owner occupied housing to the west, a university district to the north-west, inter-war council flats to the north-east, the Heygate Estate to the East, the Walworth Road to the south and more council estates to the south-west.
- 2.2 There are around 16,000 residents in 5500 households in the core of the Elephant and Castle core area and nearly 70% of them live in social rented housing. Just under 40% of households have children. There has been relatively little investment or development until very recently in the central Elephant & Castle area. The physical conditions of the Heygate Estate and shopping centre are poor. The Elephant & Castle is in close geographical

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proximity to central London and is well connected by fixed-link transport connections to the capital's central infrastructure.

- 2.3 The people at the Elephant and Castle are highly diverse in terms of ethnic composition with 28% defining themselves as Black and just under 10% as Asian. This is reflected in the variety of businesses and services represented in the regeneration area.
- 2.4 Since the mid 1990s the argument for major change at the Elephant has rested on the possibility of bringing major investment into the area as a result of its key strategic location within London. There are over 69,000 jobs in the four wards around the Elephant – over half the jobs in Southwark. That investment can then be used to improve the conditions for current and future residents and businesses. This argument underpinned the commissioning of the Elephant Links Single Regeneration Budget partnership aimed at supporting residents and businesses through the period of change. The overall strategic approach was reinforced with the preparation of the *London Plan* which sought to find locations to accommodate significant growth of population and employment in London.
- 2.5 A coordinated plan for comprehensive change has therefore been proposed by the Mayor of London (through the London Plan designation as an 'Opportunity Area') and supported by the London Borough of Southwark (through its Unitary Development Plan UDP).
- 2.6 Throughout the period of developing proposals the Borough has been conscious of two major areas of risk:
  - a. When regeneration is driven by major physical change and investment there is a significant risk that it will threaten the distinctive character and diversity of an area. Development has tended to be based on areas of similar types of housing in terms of ownership, size and style. Alongside these are often similar approaches to shops and offices..
  - b. The implementation of major physical change including the proposed demolition of 1200 homes and a centre with approximately 100 businesses will disrupt existing social and economic networks
- 2.7 At the core of the Borough's approach, particularly since the reassessment of the project beginning in 2002, 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 and businesses, rather than permitting solely commercial considerations to dominate. This approach is designed to secure better outcomes for all local people.
- 2.8 In addition the two risks (paragraph 2.6) might lead to differential impact on the different parts of the diverse communities in the area and make more difficult the promotion of equality of opportunity. Southwark places great value upon the diversity of the area, and delivery of the project must therefore aim to ensure that benefits are equitable for all identified groups, both in the current residents

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and businesses in the area and amongst those for whom the development will offer new opportunities in the coming years. The opportunity to use the change in this area to promote equality of opportunity over a long period will require careful planning and handling on the basis of detailed information about the different groups affected now and likely to be affected in the future.

### **3 Understanding the current area**

3.1 There is a substantial body of existing data relating to the Elephant and Castle. Appendix 2 sets out high level summaries of information from the census, the Index of Multiple deprivation, and some other available sources.

3.2 The baseline data indicates a diverse population mix in an area exhibiting high levels of deprivation, low levels of education attainment, and high levels of BME populations concentrated in certain areas. As a result the area also has a more diverse range of faith facilities, health provision and school population. However, the possible result of this population mix is that there are low levels of retail spend and a reduced offer in terms of quality, quantity and range of businesses.

3.3 The full set of baseline data for this assessment will need to deal with

- a. **The residential population** (Socio-economic Profile: Age: Household type: Race and ethnicity: Income/tenure: employment status: School aged Children: Health data (disability, mental health) Faith/belief: Gender;
- b. **Businesses** Business profile: sector, size, ethnicity of owner/managers. Market analysis of growing/declining sectors; customer base, supply chains. Baseline of shops and services in the area. Extent to which the local population is served by the Shopping centre and other retail in the area; Patterns of spend and its impact on the character of the central area; Business baseline information (LEPU study; Elephant Jobs survey);
- c. **Voluntary and community groups and organisations:** how people in the area group themselves, i.e. nature number and type of local community organisations/groups; what support this provides to local residents and how this illustrates features about the local population of the area?
- d. **The physical environment and the nature of facilities/services** in the area including: Health facilities Leisure Facilities Faith/religious facilities Tenants and community facilities Education facilities and opportunities and relation to catchment areas including intake of the local schools; Higher education- LSBU data and LCC data on their student population.
- e. **Housing** Housing stock survey information; Who lives in which accommodation; The impact of the redevelopment on housing stock; Quality/type of housing in Heygate and the surrounding area

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- 3.4 The baseline will pull together all existing information and collate it in a single location. The EqIA baselines will increase the level of detail in the data across the whole regeneration area. To identify the potential differential impacts of plans and processes we will compare the baseline with:
- a. the wider picture across the borough and other relevant parts of London. The effect of such a large project may not be confined to the narrowly drawn regeneration area;
  - b. the longer term projections of the outcomes of the project;
  - c. the longer term projections of the outcomes for the area in the absence of the project.

#### **4 Southwark's approach to Equalities Impact Assessments**

- 4.1 The EqIA is designed to deal with all aspects of Southwark's duties under equalities legislation. It will therefore identify actual and potential impacts (both beneficial and adverse) upon identified groups in order that disadvantageous, disproportionate effects can be minimised or avoided, and benefits developed to maximum effect in relation to all groups. It will also support an assessment of how far the projects can promote equality of opportunity and good race relations.
- 4.2 Southwark's system of undertaking EqIA's identifies the following strands of potential inequality;
- a. Race and ethnicity
  - b. Gender
  - c. Disability
  - d. Age
  - e. Faith/belief
  - f. Sexual Orientation
- 4.3 The way in which plans, proposals and implementation processes respond to people with any of those characteristics may lead to differential outcomes. However a common thread is likely to be the way in which longer term trends in market and development pressures bear on individuals.

#### **5 Applying the approach to a major regeneration programme**

- 5.1 The Elephant is one of a number of areas in London and other cities in which the long term working of the development market and the impact of earlier plans have resulted in outcomes that are widely regarded as unsatisfactory – both in the conditions for those who live and work in the area and the contribution of the area to the wider social and economic health of the city. As these conditions are recognised and the pressure for redevelopment rises, then the evidence suggests that the likely outcomes of such market based development will be to create a more uniform area in terms of the mix of

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buildings and people. This reflects the importance of the private housing market as a key driver for development gain and the implications that the services then provided in the area will reflect the needs of the residents in that market housing. The plan for the Elephant is designed to lead to better outcomes than the market would otherwise provide. To do so will require a complex balance to be struck between the possible impacts on individuals and groups within the area now and the potential impacts on individuals and groups who may be attracted into the area.

- 5.2 The baseline analysis for the Elephant and Castle provides a snap shot of the diversity, especially ethnic and cultural diversity, in the area. The aim is to have a **regeneration** programme rather than simply a **redevelopment** programme. A **regeneration programme** aims for sustained improvement in the life experiences and chances of local people. It does so by responding to and retaining the extensive current diversity and by providing for the expected diversity of the inner London communities over the next 20 years. However, any regeneration programme has to be realistic. There are constraints from the overall policies of government and the Mayor. There are limits to the influence from the Council and other public bodies that can be brought to bear on the existing market and development system. We should not eliminate the underlying development gain that enables any change to happen.
- 5.3 The Council has addressed the regeneration of the Elephant and Castle area via a number of different initiatives over the last 15 years. In 1998, it concluded that there was no way of dealing with the issues described in the baseline other than by comprehensive redevelopment and submitted a Single Regeneration bid for £25m (1999) to secure central government support for this process. This approach now underpins SRB, UDP, and London Plan, which identify the Elephant and Castle area as a development opportunity location. Given that regeneration has to take place in this context, it is necessary to plan for and manage change in order to be able to influence the nature of the new development. The Development Framework in the form of Supplementary Planning Guidance for the Elephant and Castle area (SPG) is an attempt to plan for change in a way that enables the Council to mitigate the excesses of the market and balance borough priorities with national and sub-regional ones.
- 5.4 Against that background there are three overall blocks of distinct work on the Elephant and Castle that will need consideration through the Equalities Impact Assessment:
  - a. The *overall regeneration plan* for the long term development of the area ie what we aim to achieve;
  - b. The actions leading to the *delivery and implementation of that plan* ie the individual steps we now have to take to give effect to the plan;
  - c. The *day to day processes* with which the council and its partners operate in the delivery of the long term change ie those aspects that are more recognisable as a “service”.

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5.5 We will aim to understand the anticipated overall consequences within each of those blocks on the six equalities strands (Race and ethnicity, Gender Disability Age Faith/belief Sexual Orientation). So for each block (and the more detailed issues within them) we will need to build up a picture of outcomes, impacts and opportunities for each strand. To do so we are likely to need to cover the following common questions about each strand of equalities in relation to each block of work:

- a. What is the current position? How does that reflect existing differences between areas in Southwark and across London?
- b. What would be the outcome if we did nothing?
- c. What is the short term and long term impact of the prospective change, taking into account both existing residents, workers and businesses and the likely future residents, workers and businesses
- d. Do the plans and processes lead to an improvement relative to the current position or relative to the likely outcome in the absence of the plan? Does this improve the overall equality of opportunity and cohesion?
- e. What measures would be necessary to mitigate any short or medium term disproportionate adverse impacts?

5.6 Once these separate impacts and outcomes are clarified we will need to make an overall assessment, striking a proportionate balance between both positive outcomes and any adverse impacts as between different groups or interests and over time.

5.7 The assessments will mainly be made by analysis of the Elephant and Castle programme but because of the complexity of the issues we will also use comparisons with other regeneration areas.

5.8 The following sections review each of the main blocks of work:

- a. by describing the current position and the main features of the plans and activities;
- b. by outlining some preliminary views on more detailed questions that will need to be covered in the course of the assessment.

5.9 Section 6 covers the *overall regeneration plan* for the long term development of the area and the main individual elements of the plan. Section 7 deals with the *delivery and implementation of the plan* and in paragraph 7.17 onwards the *day to day processes* with which the council and its partners operate.

## **6 Preliminary analysis of implications and areas for detailed assessment: the Regeneration Plan**

6.1 The main vehicle for explaining and setting the long term regeneration plan has been the production of **The Development Framework for the Elephant and Castle (SPG) area**. This has enabled the Council:

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- a. to establish, through a detailed programme of public consultation and involvement, a pattern for redevelopment that can be achieved through the attraction of funding and development partners,
  - b. to establish a framework for detailed planning decisions
  - c. to establish a certain and achievable programme for delivery with particular reference to the re-housing of Heygate residents and the phased investment in infrastructure.
- 6.2 The SPG takes its themes from the Council's Community Strategy and the emerging Unitary Development Plan (UDP). Through developing the SPG in parallel with the UDP it has been possible for each to influence the other and has meant that consultation and public involvement has been in the context of a comprehensive review of land use and planning policy for the Borough as a whole.
- 6.3 The framework takes the key principles and policies of the new UDP and applies them in detail to the specific circumstances of the Elephant and Castle. This is necessary because the scope of the Elephant and Castle proposals embrace approximately 55 acres of land most of which are proposed to be cleared of existing buildings over the next 5 years.
- 6.4 Underlying the plan is an approach to modifying significantly the impact of market pressures. Some of these factors are set out in the Table below. Although there would be individual requirements to consider planning applications and to manage services to meet equalities requirements the overall outcomes will be more satisfactory if the plan overall aims for a better balance amongst all communities.

<b>Likely outcomes of market pressure</b>	<b>Regeneration Plan Objectives</b>
Market would provide 1- 2 bed units for sale in high-density developments. Market would also want to provide local facilities that appeal to the types of purchasers for these premises, i.e. high earning couples, restaurants, bars, entertainment, clothing, life style products.	Plan places emphasis on long-term resident market, i.e. families and facilities/services and activities. It assumes a population sufficiently mixed and diverse to require permanently a range of educational, health, retail, leisure and public facilities that reflect a broad range in terms of age, ethnicity and socio-economic standing.
Responding to market pressures could maximise land value to Southwark. The larger the amount of this type of high value use, the more money would be available for the council to implement social programmes/improvement in the area or in the wider borough	The Plan seeks to balance the financial benefits from higher land values with the need to provide new social housing and improve the conditions of the existing housing in the area
Market seeks to meet the requirements of institutional investors in commercial and retail development. Investors prefer to see offices and shops let to companies with strong financial records, These are often bigger companies including the national chains of shops.	Plan seeks increased local employment, which may be facilitated by attraction of major businesses and retailers to the area. However, the plan also encourages services, shops and businesses that can serve and reflect the requirements and cultures of a highly diverse population. The consequential benefits and disadvantages of each approach will require detailed assessment.
Incoming populations would bring new demands. More affluent populations (as in North Southwark) would drive supply of new facilities e.g. restaurants, bars, shops, private health/sports facilities.	Plan seeks to encourage continuity of residency by existing residents and business continuity amongst local, independent businesses. Existing residents may perceive pricing-related exclusion from new facilities and businesses may be unable to adapt rapidly to changing demand patterns if population shifts occur.

**Key components of the plan**

6.5 There are currently six main components of the regeneration plans. These are set out with the paragraphs 6.7 – 6.20 below:

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- a. **Re-housing of Heygate Estate residents:** The provision of new housing to enable the rehousing of the residents of the Heygate estate and its subsequent demolition;
  - b. **Unlocking early sites::** The encouragement of development on underused sites within the framework;
  - c. **Infrastructure and transport improvement:** The reshaping of transport infrastructure to reduce the need to travel and the impact of traffic on the area;
  - d. **Transition to a new retail centre** The transfer of major retail activity from the existing shopping centre to new commercial areas;
  - e. **A new and expanded development in the long term:** The delivery of a comprehensive set of development opportunities for new housing (both market and social) and community facilities, including open spaces;
  - f. **A continuing social, economic and community programme:** The implementation of a continuing programme of social, economic and community activities in the area.
- 6.6 Since the SPG was first published in December 2002 the proposals have been constantly modified and refined through a continuous programme of public involvement and technical testing. The document as a whole is therefore intended to be a formalized expression of all the issues that have been debated over that period.
- 6.7 **Re-housing of Heygate Estate residents:** The opportunities for rehousing will be provided through 4 routes:
- a. developing new mixed tenure housing through partnerships with Residential Social Landlords (RSL's) in three regeneration cluster areas;
  - b. by allocating existing Council units to those residents who wish to remain Council tenants;
  - c. by identifying new affordable housing (under the planning obligations) in the regeneration area which will be available to Heygate households;
  - d. and by introducing a package of other measures including compensation for leaseholders to offer the widest possible choice of re-housing opportunities.
- 6.8 The plans will provide sufficient homes for all existing residents who wish to relocate within the area.
- 6.9 Key issues for assessment through the EqlA will include:
- a. the impact of the new developments on the areas surrounding them: this will be a matter to be dealt with in the planning system;



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surrounding area the plan proposes re-alignment of the Walworth road in order to create a continuous High Street of retail and public activities directly connecting local services into the dense and busy new centre. This reinforces the accessibility to local people and should spread the benefits of increasing activity to local businesses and service providers. This will be more flexible in providing for a full range of retail opportunities, including those based on smaller locally owned companies and providing for the needs of the local communities. The relocation of existing businesses wherever possible on to the Walworth Road and surrounding trading locations will help to strengthen the retail offer of the Walworth Road and re-establish a traditional high street with active frontages all the way through to the town centre. Key issues for further assessment will include:

- a. how far in the long term the plan – and the arrangements for long term investment in the area – will enable the retention of a diversity of businesses;
- b. how the plan can minimise the disruption to the trading environment for current businesses and offer equality of treatment to businesses in the shopping centre and within the wider area.

6.14 **A new and expanded development in the long term:** The eventual outcome of the plan will be to enable the delivery of:

- a. additional private and social housing
- b. new commercial and industrial space offering opportunities for new employment
- c. additional facilities for local people including schools
- d. 5 major open spaces within the core area

6.15 These developments will make a major contribution to the growth requirements in the London plan. By incorporating these in a redevelopment and regeneration area there will greater opportunity to deliver a high quality and integrated outcome. For example: the layout of the area is now more directly derived from the arrangements of the open spaces than from the siting of particular buildings. This has been further developed into the definition of five quite different public spaces each designed to attract different uses and to create settings for distinct collections of buildings. The schedule for redevelopment has been specified in such a way as to incorporate early improvements to open spaces and early facilities in the immediate surroundings of the early housing schemes to provide early benefits for local residents.

6.16 The plan builds on the strength of location of the Elephant and Castle and its existing large population in the core area and the likelihood of being able to increase it in absolute numbers and also the level of owner occupation in area that is mainly social housing. It also aims to improve the quality of housing, transport, environment, safety and security and quality of services, restaurants, shops, leisure facilities, schools, cultural and arts activities. The plan seeks to

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provide this first for existing population and second for incoming population, whether they will find a permanent home in the area or subsequently move on.

6.17 All elements of the plan are underpinned by the principle of sustainability: reducing reliance on private cars, improving public transport, setting and meeting high standards for buildings in terms of usability by all sections of the community and the use of energy.

6.18 Key issues for further assessment will include:

- a. the impact on the overall local housing market of the planned new housing and the mix of properties;
- b. whether the range of community and social facilities will meet the needs of all groups.

6.19 **A continuing social, economic and community programme:** Longer term benefits for residents will be facilitated by continuing the social support programmes started under the SRB. These will be enhanced by the application locally of borough wide programmes dealing with employment, training and enterprise. The proposals for new education and leisure facilities at the Elephant will increasingly inform training and business development programmes as new commercial space is planned and defined. In particular this will assist in the creation of the new employment and access facilities such as the one being developed at 56 Southwark Bridge Road as part of the SRB legacy programme. The plan encourages the existing population to increase their capacity and options including improving educational attainment at school and subsequently.

6.20 Key issues for further assessment will include:

- a. Whether the support programme provides opportunities equally to all future residents and meets their needs.

## **7 Preliminary analysis of implications and areas for detailed assessment: delivery and implementation**

7.1 The main actions *currently being undertaken* to implement the development include:

- a. The continuing evolution of the main plan and related documents
- b. Implementation of the early housing sites
- c. The preparations for the rehousing of the Heygate residents
- d. Selection of the commercial partner
- e. Communication and engagement about the overall project

7.2 The main actions that will be required in the *medium and long term* will include:

- a. The implementation of transport and infrastructure improvements

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- b. Transfer of businesses and demolition of the shopping centre
- c. Management of the long term development plans in conjunction with the commercial partner
- d. Securing benefits for local people from the extensive construction activity.

***Current implementation actions***

7.3 **Evolving the plan:** Detailed interpretation of the plan continues and will evolve as there are further discussions with other partners – including the GLA and prospective commercial partners as well as other local interests. The plan is still very flexible, but this will be reduced over time as individual decisions are taken especially on infrastructure, i.e. the more that is built the less flexibility.

7.4 Key issues for further assessment will include:

- a. How far the continuing processes of engagement – including through the formal planning system – enables people to shape the detailed planning at this stage
- b. How to ensure that the plan continues to take account of the longer terms requirements of all communities

7.5 **Building programmes on the Early Housing Sites:** This is done via a partnership between the house builders (RSLs), the council and the tenants in particular working with existing Tenants and Residents Associations.

7.6 Key issues for further assessment will include:

- a. Whether this approach ensures a fully representative view of the tenants to be provided
- b. Whether the focus on the needs of one estate being rehoused will reduce the opportunity to create mixed and diverse communities
- c. Whether the focus on people who are most immediately affected can be balanced against need to consider future residents.
- d. Whether there are particular impacts on vulnerable and elderly people.

7.7 **Rehousing:** There are two main stages to the rehousing of the current tenants and leaseholders:

- a. **Referencing** is the process by which the housing needs and preferences of each tenant and leaseholder household on the Heygate 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

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provides an immediate opportunity to respond to the identification of unanticipated adverse impacts on population retention levels.

- b. **Allocations:** The policy framework for the allocation of new homes has been set out. It is based on the Council's overall policy framework with a small number of changes being piloted within the Elephant and Castle project.
- 7.8 This links in part to the issue above in relation to the delivery of the early housing sites but deals with the consequences for each individual being displaced. Key issues for further assessment will include:
- a. Do the processes and policies give equal access and weight to the views of all individuals and deal with their particular needs?
  - b. Does the approach equally encourage all people to stay in the area?
  - c. Does the way in which we describe the more affluent future act as an attractor or detractor for people when deciding to remain or leave the area?
  - d. Are the current and predicted outcomes for all groups well monitored?
- 7.9 **Commercial Partner Selection:** There is a very limited number of developers able to take on a project of the scale and complexity of the Elephant and Castle. The extensive process of selection still provides an opportunity to test whether the potential agreement with the developer captures all of the relevant issues and will offer a long term partnership which understands the complex needs of the area. Key issues for further assessment will include:
- a. Do the evaluation criteria ensure that the partner will have the ability to design plan, deliver and manage a scheme that can be sympathetic to all categories equally?
  - b. Can examining the record of the developer teams on other schemes enable us to make reasonable conclusions about the likelihood of achieving a satisfactory outcome. Does it provide evidence of their willingness to address these issues?
  - c. Does the continuing role of the Council in the development provide safeguards for the interests of all local people equally?

***Medium and long term implementation actions***

7.10 A range of specific actions will take place over the 10 year lifetime of the project. As a consequence, detailed preparations for the processes and activities required to implement are at an early stage. It will be appropriate therefore to undertake a more detailed EqIA of these processes nearer the time and in the light of experience on managing some of the earlier stages of the regeneration programme. We can at this point therefore only indicate some of the broad issues and potential areas for more detailed assessment.

7.11 **Transport Improvement Programme:** The Council will implement a programme of infrastructure change in conjunction with Transport for London

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and Network Rail. In particular this will include the removal of the Southern Roundabout followed later by the realignment of Walworth Road. The intention is to create safe routes between the transport interchanges and to improve access to the shopping and leisure facilities. The implementation stage could result in some temporary disruption to both traffic and pedestrian routeways.

7.12 The assessment will need to consider:

- a. Whether the implementation arrangements ensure that vulnerable groups, including those with disabilities, are able to access the area safely and easily, and use whatever interim provision is put in place during the period that the transport infrastructure changes are being made.
- b. Whether the arrangements for consulting residents, travellers and businesses over the implementation of the transport infrastructure changes take account of people in the equalities groups who pass through the area as well as those who live and work there.

7.13 **Managing the relocation of existing businesses:** There has already been extensive consideration of the policy to be applied to the potential relocation of existing businesses. This has had to take into account the role and responsibilities of the current owner of the shopping centre with whom the businesses have a legal relationship. In due course the final development of the shopping Centre is likely to be the responsibility of the Council's commercial partner. Throughout this period the Council will be seeking to ensure that both the new commercial and retail developments meet the commitments to provide a much more diverse business offer. This will then enable it to give the maximum opportunity for existing businesses to transfer. Key issues for the assessment will include:

- a. Whether the advice and support offered to local businesses prior to the decanting stage is equitable and tailored to the needs of those businesses, and enables them to make informed choices about their future options
- b. Whether the arrangements the Council has in place with the commercial partner will enable the Council to mitigate and monitor the impact of decanting on local businesses

7.14 **Managing the long term development process:** During the programme of regeneration a large number of individual projects will come forward. Each will be require planning permission and will therefore be subject to consultation and review in the normal way. Some are likely to be part of other decision making processes by the Council (eg where they are delivering a service) which will again be subject to consultation and review. As noted above individual assessments will be needed of each proposal as it comes forward.

7.15 **Managing the area during the development process:** During the lifetime of the development programme large numbers of people will continue to live and work 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

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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. Key issues to be considered in the assessment will include:

- a. Whether the effective delivery of services is of greater value or importance to particular groups;
- b. Whether additional or tailored arrangements to ensure feedback about the quality and delivery of services may be needed.

**7.16 Securing local benefit from the extensive construction work:** The scale of the regeneration offers opportunities during the lifetime of the programme for the employment of local companies and local labour in construction and ancillary trades. It also offers potential for local service providers, for example in catering and security. There is a wider programme considering the use of the Council's procurement processes and its other policy levers to achieve the maximum benefit of all projects for local people and firms. The assessment will need to consider:

- a. Whether the Council has taken adequate steps to encourage and support local residents and service providers to gain benefits from the commercial and housing partners during the lifetime of the regeneration programme?
- b. How far the contracts let either by public authorities and by private contractors can act as models of best practice in promoting equality of opportunity for all sections of the community?

***Underpinning consultation and community engagement processes***

7.17 With a 10 year regeneration programme, the ongoing processes of consultation and community engagement are vital to ensuring that both the long term impact of the programme, and the impact of the various implementation processes and stages, results in the widest potential benefits and mitigates equitably any disadvantages.

7.18 There has been extensive consultation undertaken over the last four years. This has taken place through a variety of mechanisms:

- a. consultation with tenants and residents through the existing representative structures and open meetings;
- b. the inclusion of representatives from tenants, residents and others in a number of formal arrangements around the development project and the Elephant Links board, including the Diversity Panel;
- c. wide ranging public communication including newsletters and exhibitions with opportunities to meet officers and members to give feedback on the project;

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- d. the formal opportunities for consultation within the plan making process including two rounds of the “objections” on the draft Unitary Development Plan and hearings during the public Inquiry on the Plan;
- e. extensive survey work designed to capture a representative sample of opinion (see Market Link schedule in Annex 1)
- f. a liaison group with the traders most directly affected in the Town Centre, chaired independently, and with support offered to the traders to be better informed about their position.

7.19 In addition, given the size and importance of the project, the normal mechanisms of the council have offered opportunities for debate on the project, including most recently the consideration by Scrutiny of the approach to the relocation of the traders. Matters are also raised at the relevant Community Councils and schemes are considered in the normal way by Planning Committee.

7.20 All of those approaches will continue and be developed. In particular the area is one of high population turnover. During the lifetime of the scheme, there will be new people who will need to become engaged and informed.

7.21 The assessment needs to consider:

- a. 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.
- b. 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 Master Plan area
- c. Whether the Councils arrangements for managing the overall scheme are visible, accessible and well-understood by the diverse range of stakeholders with a interest in the scheme.

## **8 Undertaking the assessments in detail**

8.1 Given the long term nature of the programme this overall EqIA will need:

- a. To make direct specific assessments of a number of key issues now;
- b. To identify some issues on which future assessments will need to be made, either through existing processes (eg planning) or through separate arrangements;
- c. To identify issues where re-assessment or continuing monitoring may be appropriate from time to time;
- d. To provide an overall framework for those later or continuing assessments.

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- 8.2 The next step will be to refine the analysis above. This will allow us to compile sets of information, description and analysis which address all the combinations of:
- a. the key elements of the plan, the implementation actions and the underlying processes
  - b. the general questions outlined in paragraph 5.5 above and the more specific questions raised above on each topic;
  - c. each of the equalities strands set out in paragraph 4.2.
- 8.3 In practice not all combination of questions will be relevant or appropriate for further more detailed work. In some cases the best approach may be to consider a number of related questions about a single equalities strand. However the approach will ensure that there is at least a framework to check that all aspects have been considered for more detailed assessment.
- 8.4 In the next period the focus will be particularly on issues which will be relevant to the selection of the commercial partner.

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***Appendix 1:***

***Outline of main existing relevant documents***

**1 Consultation Information: Action Research**

Action Research Papers - Interim Report and Review of Progress - December 2001  
Sustainability Study - Sustainability at Programme Level - 30<sup>th</sup> September 2004  
Sustainability Study - Sustainability at Project Level - 1<sup>st</sup> November 2004  
Draft Forward Strategy - 3<sup>rd</sup> February 2005  
Assessment of the ELP Programme - Impacts Study - November 2005

**2 Single Regeneration Budget papers**

CIX – Area Profile  
Elephant and Castle Baseline Position  
Community Kitchens – Preliminary Assessment  
Consultation Results – Community Wardens  
Demographics  
Research report – Planning Survey  
Public Participation Consultation & Research – Final Report  
Business Needs and Services Baseline Survey 2000

**3 Marketlink**

Resident Feedback 2002  
Resident Feedback 2003  
E & C Feedback 2003  
Overall view slideshow 2003  
Supplementary information provided to Marketlink  
Heygate exhibition – Focus Group feedback  
Heygate Residents Feedback Questionnaire  
Updated Topic Guide  
Resident Feedback May 2004  
New Homes for Heygate Launch and Exhibition Summary  
Overall View – summary regeneration feedback forms  
Elephant and Castle recommendations and actions  
Heygate Estate Residents Qualitative Research – 2005  
Quantative Survey – Residents, Local Workers & Students – 2005  
Qualitative Research – Local Businesses – 2005  
Heygate Residents Consultation – May 2004

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**Appendix 2:  
Summary of key data on Elephant and Castle Regeneration Area**

Where not otherwise stated, data relate to 55 selected Output Areas defined for the 2001 Census and contain 2001 Census data. The Opportunity Area Zone is more or less identical to the E & C 'Core Area' for population purposes (See map 2).

Dark red = percentages for E&C 55 OAs

Blue = percentages for whole Borough

**Population Profile:**

TOTAL:

16,000 : 8,000 male; 8,000 female (50.0% each)

**AGE**

<b>Age</b>	<b>Number</b>	<b>%age</b>	<b>%age Southwark</b>
0-4	1,300	8.2%	7.1
5-15: [school age]	2,030	12.7 %	13.2
16-29:	4,200	26.3%	24.1
30-49:	5,210	32.6%	34.3
50-pensionable age	1,410	8.8%	9.9
Pensionable age – 74:	1,070	6.7%	7.4
75 plus	740	4.6%	4.8

**HOUSEHOLD TYPE**

<b>Household Type</b>	<b>Number</b>	<b>%age</b>	<b>%age Southwark</b>
Lone pensioners	850	15.3%	11.6
Lone others	1710	30.8%	25.8
Lone parents with dependent children	620	11.2%	10.0
Others with dependent children	1010	18.2%	18.1
Other households	1360	24.6%	34.5

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**HEALTH:**

Residents in Households	Number	%age	%age Souththwark
with limited long-term illness	2600	16.4%	15.6
with 'not good' health	1400	9.0%	8.7

**DEPRIVATION:**

- The Opportunity Area mainly lies within 12 Super Output Areas. On average these have an Index of Multiple Deprivation Score of 38.6 from IMD 2004 (the official government measure of deprivation);
- the average ranking of these SOAs is 4,946 of 32,482 SOAs in England.
- All four wards were in the worst 20% in England;
- East Walworth is in the most deprived 10% in London (57<sup>th</sup> of 624).

n.b. each SOA comprises app. 5 Output Areas.

On average the Southwark SOAs were **7,021** out of 32,482;  
**24** of the 165 SOAs were in the worst 10% in London (and **5** out of 21 wards)

[source: GLA/DMAG]

**MIGRATION:**

	Number	%	%age Southwark
Same address or move within borough	5740	93.7%	92.6
Moved from outside the borough	390	6.3%	7.4
Moved to rest of UK	460	7.6%	8.1

**ETHNICITY & CULTURE:**

:

ETHNIC GROUP			
'White'	8,790	55.0%	62.9
'Mixed'	630	3.9%	3.7
Asian' (mainly south Asian)	1480	9.3%	4.1
Black'	4,550	28.4%	25.9
Chinese	340	2.1%	1.8
'Other'	210	1.3%	1.5

**RELIGION:**

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Religion			
Christian	9120	57.0%	61.6
Buddhist	190	1.2%	1.1
Hindu	150	1.0%	1.1
Jewish	30	1.0%	0.4
Muslim	2,190	13.7%	6.9
Sikh	50	0.3%	0.2
Other religion	40	0.2%	0.4
no religion	2,450	15.3%	18.5
not stated	1790	11.2%	9.9

**Housing:**

15,600 residents in households [total]:-

	<b>Number</b>		
owner occupied	2400	15.7%	31.4
social rented	10700	68.3%	53.5
private rented	2500	16.0%	15.1

**ECONOMIC & EMPLOYMENT**

**EMPLOYMENT IN AREA:**

[this is based on the four wards converging at the Elephant, which include 50% of all jobs in Southwark, mainly in London Bridge/ Blackfriars areas]

Manufacturing	5600	8.1%	7.9
Construction	3100	4.4%	3.8
Distribution	4400	6.4%	10.3
Hospitality	2800	4.0%	5.7
Transport & communications	9700	14.0%	9.4
Financial services	3300	4.7%	7.9
Business services	17100	24.7%	25.9
Public administration	7500	10.8%	5.8
Education	3600	5.1%	7.2
Health & social work	8000	11.5%	9.6
Other services	4300	6.2%	6.7

69,300 Total employees working in area; source Annual Business Inquiry 2003 [O.N.S.]

**INCOME:**

[source: CACI data – copyright, for internal use only – check w/GLA]

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Mean figure for 51 Output areas = £29,000;  
Median figure = £25,000 [to nearest hundred]

**ECONOMIC ACTIVITY:**

Economically inactive residents (age 16-74): 4,417

Economically active residents	7,556	63.1%	65.9
Employed residents	6,197	82.0% of the above	85.1
Unemployed	783	10.3%	6.2

Students [inc econ active} 1,898

**OCCUPATION:**

<b>Occupations</b>			
Managers & senior officers	910	13.6%	15.2
Professionals	840	12.6%	15.7
Assoc professional & technical	1170	17.6%	19.0
Admin & secretarial	1000	15.1%	14.5
Skilled trades	470	7.0%	6.6
Personal services	520	7.8%	6.8
Sales & customer services	470	7.0%	5.9
Process, plant, machine operatives	300	4.5%	4.2
Elementary occupations	980	14.7%	12.0

[Total: 6,650 age 16-74 in employment]

**INDUSTRY:**

<b>Industry</b>			
Manufacturing	380	5.7%	6.4
Construction	260	3.9%	3.9
Distribution	840	12.6%	11.4
Hospitality	560	8.3%	6.0
Transport & Commns	500	7.5%	7.2
Financial Services	350	5.2%	7.6
Business Services	1380	20.7%	21.6
Pub admin/soc security	460	6.9%	5.6
Education	460	6.9%	7.7
Health & social work	790	11.9%	12.7
Other services	620	9.3%	9.1
Elementary occupations	980	14.7%	12.0

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Total employed residents 16-74: 6,650

**Education**

<b>Qualifications</b>			
no qualifications	3100	25.8%	24.4
Level 1	1300	11.2%	11.0
Level 2	1800	15.1%	14.6
Level 3	1300	11.3%	10.0
Level 4/5	3700	31.2%	34.8
Other or unknown	600	5.3%	5.1

Total 11,900 age 16-74

*Data from LBS Education Dept.  
for 9 Primary Schools in E & C area:*

Average Value added (KS1 to KS2) = 100.2

Average KS2 score = 26.8

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**Crime:**

Data for *violent crime* in Elephant & castle O.A core area only:

FY 2002/03: 504 Violence Against Person, 162 robbery, 43 sexual [inc 3 murders;

FY 2003/04: 567 V.A.P., 172 robbery, 42 sexual [inc 1 murder]

FY 2004/05: 695 V.A.P., 218 robbery, 22 sexual. [inc 1 murder]

Data for Sept '04 to Aug '05 for 4 whole wards as above:

Burglaries -	1224
Drugs -	617
Robbery -	706
Theft -	3758
Vehicle crime –	1324
Violence against per –	2325
Total offences -	12516

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**MAP 1: THE WIDER REGENERATION AREA**

**MAP 2: THE CORE STATISTICAL AREAS**

