

## Cabinet

Monday 16 September 2024

1.30 pm

Rooms GO2A, B and C, Southwark Council, 160 Tooley Street, London  
SE1 2QH

## Appendices

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Date: 5 September 2024

London Borough of Southwark

# Local Flood Risk Management Strategy 2023 - 2029



# Foreword

Over 2,000 properties are at a high risk of flooding from surface water within the Southwark borough. With the effects of climate change this number is likely to rise in coming years. It is vital that we invest and support the development of flood risk management within the Southwark borough to better protect people, property and the natural environment.

Collaboration between departments in Southwark Council, led by the Flood Risk Management Team, has meant that sustainable and innovative flood alleviation projects have been successfully delivered.

The Dulwich and Herne Hill areas experienced widespread flooding in 1984, 2004, and 2007. In 2015 a flood alleviation scheme was completed that provided £12m of economic benefit to the area, whilst protecting over 200 properties at risk of surface water flooding and 80 properties at risk of sewer flooding.

This Local Flood Risk Management Strategy sets out four strategic objectives which Southwark Council will follow to deliver improved flood risk management duties over the next six years. These are underpinned by core themes of flood risk awareness, collaboration and communication, socio-economic and environmental benefits, and climate change.

Our recently updated Surface Water Management Plan has refreshed our understanding of flood risk within the Southwark borough. This information has subsequently informed decisions taken for this Local Flood Risk Management Strategy, from which a detailed action plan has been produced which establishes 41 actions for delivery by Southwark Council and other risk management authorities to improve Southwark's flood resilience.

The Southwark Flood Risk Management Team will lead on the delivery of most actions however it is crucial that risk management authorities collaborate effectively to support the overall delivery of flood risk management.

Flood risk cannot be avoided completely but actions taken by individuals, businesses, community groups, and organisations can help to reduce damage and improve recovery.

We would like to thank colleagues across Southwark Council for contributing to the development of this Local Flood Risk Management Strategy. We would also like to thank the Environment Agency and Thames Water for their support in taking ownership of some actions within the Southwark borough.

Alongside this we would like to thank all those who have taken the time to respond to our public consultation and provided us with valued feedback which will be considered through the development and delivery of this Local Flood Risk Management Strategy.



**Councillor James McAsh**  
**Cabinet Member for the Climate Emergency,  
Clean Air and Streets**

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# Abbreviations

Abbreviation	Definition
BNG	Biodiversity Net Gain
CDA	Critical Drainage Area
DEFRA	Department for Environment, Food and Rural Affairs
DLUHC	Department for Levelling Up, Housing and Communities
DWMP	Drainage and Wastewater Management Plan
EA	Environment Agency
FAS	Flood Alleviation Scheme
FCERM	Flood and Coastal Erosion Risk Management
FRMP	Flood Risk Management Plan
FRR	Flood Risk Regulations
FWMA	Flood and Water Management Act 2010
GiA	Grant in Aid
HRA	Habitats Regulations Assessment
JTS	Joint Thames Strategies
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
LoDEG	London Drainage Engineers Group
LPA	Local Planning Authority
MAFP	Multi-Agency Flood Plan
NFM	Natural Flood Management
PFR	Property Flood Resilience
PFRA	Preliminary Flood Risk Assessment
RFCC	Regional Flood and Coastal Committee
RMA	Risk Management Authority
RoFSW	Risk of Flooding from Surface Water
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
Southwark borough	The geographical area known as the London Borough of Southwark.
Southwark Council	The Local Authority who governs the London Borough of Southwark.
SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plan
TFA	Thames Flood Advisors
TfL	Transport for London
TWUL	Thames Water Utilities Limited
UGF	Urban Greening Factor

## Monitoring and reviewing

# Executive Summary

## Summary of LFRMS

The Local Flood Risk Management Strategy (LFRMS) presents how the Lead Local Flood Authority (LLFA) will deliver flood risk management in partnership with other stakeholders for the next six years, through a new set of four strategic objectives and 41 updated / new actions.

The four Strategic Objectives are:

- A. To improve community awareness of local flood risks and the authorities responsible for managing them.
- B. To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.
- C. To support development across Southwark encouraging the integration of SuDS within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.
- D. To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.

Southwark's LLFA is proposing a stronger focus on improving public understanding of flood risk and the RMAs who are responsible for these. There will be improved communication between RMAs and the public through partnership schemes and the delivery of website improvements and community engagement activities. In partnership with the LPA, the LLFA will be supporting resilient development across Southwark that addresses flood risk and the impacts of climate change.

The actions established in this LFRMS will be adaptable and will aim to align with any future changes in technical guidance and/or policy. This will ensure that an effective and resilient approach will be taken in delivering flood risk management.

The LFRMS is typically updated every six years in line with Flood Risk Management Plans (FRMPs), although the LFRMS may require an update prior to this due to the following reasons:

- Significant changes in the LLFA's understanding of flood risk or flood monitoring practices.
- Significant changes in Government guidance / legislation.

An on-going review of progress in delivering the LFRMS will be tracked within an internal (Council only) version of the action plan. Periodic updates will then be published on Southwark Council's flood risk management webpages to show the progress of delivering these actions.



# 1. Introduction

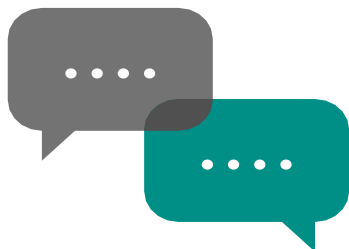
There are more than 5.2 million properties at risk of flooding and coastal erosion in England, as stated in the [National Flood and Coastal Erosion Risk Management \(FCERM\) Strategy for England \(2020\)](#). Flooding is dynamic and cannot be fully prevented, but there are methods to better manage and prepare the chance of flooding. Preparing for flooding is more necessary than ever with the growing pressures from climate change.

## 1.1 What is a Local Flood Risk Management Strategy?

The purpose of the Local Flood Risk Management Strategy (LFRMS) is to present how the Lead Local Flood Authority (LLFA) will deliver flood risk management within its administrative boundary. This is based on the local flood risk for the area and is supported by outputs from other strategic documents, such as the [Strategic Flood Risk Assessment \(2017\) \(SFRA\)](#) and [Surface Water Management Plan \(2022\) \(SWMP\)](#). In conjunction with the LFRMS a detailed action plan will be produced listing actions the LLFA will take to manage flood risk.

Southwark's LFRMS covers:

- The roles and responsibilities of authorities
- Southwark's local flood risk
- How the LLFA plans to support resilient local communities
- Sustainable flood risk management
- What Southwark Council has done to manage flood risk
- Actions for delivering flood risk management in the future



## 1.2 Why do we need a LFRMS?

The [Flood and Water Management Act \(2010\) \(FWMA\)](#) sets out the responsibilities and duties governing bodies must deliver. Under this legislation, Southwark Council is appointed as the LLFA for the Southwark borough. The LLFA is responsible for the management of surface water, groundwater, and ordinary watercourses (defined as 'local flood risks'). As part of this the LLFA has the statutory duty to update its LFRMS along with other strategic flood risk documents. This LFRMS replaces the previous Southwark LFRMS published in 2015. Further information on policy and legislation that inform the LFRMS can be found in [Appendix B1](#).



## 1.3 How has the LFRMS been prepared?

The process of drafting a new LFRMS has involved workshops where a variety of Risk Management Authorities (RMAs) have contributed ideas and comments on the delivery of local flood risk management.

The LFRMS has been through a public consultation process where members of the public and other stakeholders had the opportunity to provide feedback. This took place in Summer 2023. Following this, appropriate actions were taken to amend the LFRMS and its associated documents.



## 1.4 Additional assessments

As the LFRMS is a local strategy, it must be assessed through Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening reports.

### Strategic Environmental Assessment

The purpose of the SEA is to assess whether the proposed LFRMS strategic objectives and actions will pose any significant impacts to local environments or habitats. An SEA is required under the [European SEA Directive \(2001\)](#) which establishes five stages of assessment.

- Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope.
- Stage B:** Developing and refining options and assessing affects.
- Stage C:** Preparing the environmental report.
- Stage D:** Consulting on the draft strategy and the SEA report.
- Stage E:** Monitoring the significant effects of implementing the strategy.

*Appendix A2* presents the SEA screening report which completes Stage A and determines whether progression onto later stages is required.

### Habitats Regulations Assessment

The purpose of the HRA is to determine if the proposed LFRMS strategic objectives or actions will pose any risks or implications to habitats and protected areas. This is required under the [Conservation of Habitats and Species Regulations \(2017\)](#). There are three tasks to a full HRA.

- Task 1:** Screening. To check if the strategy, plan or proposal is likely to have a significant effect on a European site's conservation objectives.
- Task 2:** Appropriate Assessment. To assess the significant effects of the proposal in more detail and identify ways to avoid or minimise any effects.
- Task 3:** Derogation. To consider if proposals that would have an adverse effect on a European site quality for exemption.

*Appendix A3* presents the HRA screening report which completes Task 1 and determines whether progression onto later tasks is required.



Figure 1-1 Photograph of flora and the Shard building in Southwark (Credit: Southwark Council)

## 1.5 The LFRMS strategic objectives

The LFRMS is required to produce a set of strategic objectives which will outline targets for the LLFA for the next six-year LFRMS period. Southwark's strategic objectives also align to the main objectives established in the National FCERM Strategy.

The Southwark LFRMS strategic objectives are presented in *Table 1-1* with the LFRMS Action Plan set out in *Appendix A1*.

Communication with stakeholders and delivery partners will be key to ensuring the effective delivery of the LFRMS actions. By providing updates on advancements in flood risk knowledge and the delivery of projects, Southwark's LFRMS will ensure communities are well informed and become more resilient.

The LFRMS aims to support the delivery of the National FCERM Strategy by following its three core objectives, which are:

- Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change.
- Today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure.
- A nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to take action.

Table 1-1 Southwark Council's LFRMS strategic objectives 2023-2029

### Objective A

To improve community awareness of local flood risks and the authorities responsible for managing them.

### Objective B

To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.

### Objective C

To support development across Southwark encouraging the integration of Sustainable Drainage Systems (SuDS) within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.

### Objective D

To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.

## 2. Roles and responsibilities

### 2.4 How is flood risk management shared between authorities?

Many different RMAs assist with the management of flood risk, they can range from government organisations to private companies, and each have their own duties to perform before, during and after a flooding incident.

A summary of which RMA manages each type of flood risk within Southwark can be seen below in *Table 2-1*. There are also additional responsibilities involving drainage management duties which must be performed to assist in reducing flood risk. The RMAs responsible for these drainage management tasks are summarised in *Table 2-2*.

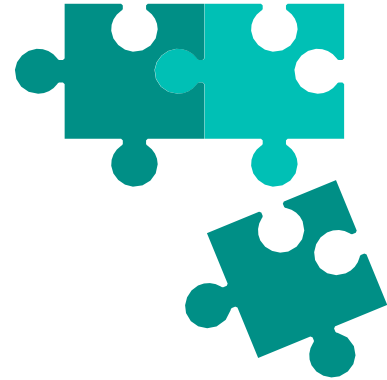


Table 2-1 Responsibilities of RMAs to manage different types of flood risk

Flood Risk Responsibility	Risk Management Authority		
	Southwark LLFA	Environment Agency	Thames Water
Fluvial flooding from main rivers & estuaries		✓	
Tidal flooding		✓	
Ordinary watercourses (small designated rivers)	✓		
Flooding from public sewers			✓
Groundwater flooding	✓		
Reservoir flooding		✓	
Surface water flooding	✓		

Table 2-2 Drainage management responsibilities of RMAs

Drainage Responsibility	Risk Management Authority		
	Southwark Council	Transport for London	National Highways
Highway drainage and asset management of major A-roads ( <a href="#">Red Routes</a> )		✓	
Highway drainage and asset management of motorways			✓
Highway drainage and asset management of other public roads	✓		

## Southwark Council - LLFA

Southwark Council is one of the principal RMAs for managing local flood risk within the borough. The Council has many responsibilities and duties in managing flood risk which are shared across different departments. The Flood Risk Management Team have the following responsibilities as the LLFA, mostly under the [FWMA](#):

- Prepare and maintain a LFRMS, consulting with local organisations and the public.
- Perform works to manage local flood risk in its authority area.
- Maintain an asset register, which is a record of features that have a significant effect on flooding in the area.
- Undertake flooding investigations when a significant flooding incident has occurred. The threshold criteria for when the Southwark LLFA will conduct a flooding investigation is presented in *Figure 2-1*.
- Regulate and maintain the proper flow of ordinary watercourses, including issuing consents and enforcing obligations on physical structures.
- Provide technical advice as a statutory consultee on surface water drainage proposals for major development to Southwark's Local Planning Authority (LPA).
- To assist the Southwark in its lead role in emergency planning and recovery after a flood event.

The LLFA also has further responsibilities under the [Flood Risk Regulations \(2009\) \(FRR\)](#):

- Determine whether, in its opinion, there is a significant flood risk in its authority area, identifying the part of the area affected by the risk (flood risk areas) and detailing this within a Preliminary Flood Risk Assessment (PFRA).
- Prepare in relation to each relevant flood risk area (1) a flood hazard map, and (2) a flood risk map.
- Prepare a flood risk management plan in relation to each relevant flood risk area.
- Co-operate with any other relevant authority which is exercising its function under the FRR.

## Southwark Council - Local Highways Authority

Southwark Council is also responsible for drainage issues affecting public roads, pavements and footpaths, such as blocked and broken gullies and drains. This applies to adopted highways in the Southwark borough which can be checked via the online mapping service [here](#).

## Flood Investigation Criteria

We are likely to carry out and publish a detailed investigation when the following criteria are met:

- If three or more properties (residential or commercial) flood internally\* as part of a single flood event in the same location.
- If five or more properties (residential or commercial) flood externally (within property boundary) as part of a single event in the same location.
- If one or more properties (residential or commercial) flood internally two or more times within a 12-month period from the initial flood incident.
- If a section of Major Highway\*\* or Major Rail Link becomes impassable.
- If a section of Minor Highway\*\*\* becomes impassable to emergency vehicles or Minor Rail Link becomes impassable.

\* *Internal flooding is defined where water enters the habitable part of a residential property. This excludes garages, outhouses, storage areas and gardens.*

\*\* *Major Highway is defined as TfL operated roads (TLRN), Strategic Road Network (SRN), Principal Road Network and Distributor Roads.*

\*\*\* *Minor Highway is defined as Unclassified Road Network including Local Access Roads and Private Streets.*

Figure 2-1 Southwark's Flood Investigation Criteria under Section 19 of the FWMA

## Thames Water

Thames Water Utilities Limited (TWUL) is the clean water and sewerage provider within Southwark. TWUL has the responsibility to manage the risk of flooding in relation to water supplies and wastewater facilities. TWUL must also manage the flood risks posed from their infrastructure if it were to fail and ensure that public sewers are well maintained.

## The Environment Agency

The Environment Agency (EA) is the national flood risk authority for the UK.

Large watercourses, categorised by the EA as main rivers, are under the EA's regulatory control however the EA also has strategic overview of all sources of flooding and coastal erosion as defined under the FWMA. There are no main rivers that flow through Southwark, although the EA is responsible for managing the risk of flooding from the River Thames which forms the northern border of the borough.

The EA has further responsibilities including:

- Delivering flood risk warnings in partnership with the Met Office.
- Producing flood risk maps and data.
- Managing the construction and maintenance of flood defences on main rivers.
- Consenting / enforcement of works near to or within main rivers.
- Producing guidance on Flood Risk Management Plans (FRMPs).
- Supporting other flood risk RMAs by providing resources and allocating funding from Government for projects.

## Category One Responders

A Category One Responder has responsibilities under the [Civil Contingencies Act \(2004\)](#) when a major flooding incident is declared. They will be involved in managing and delivering the response, and include organisations such as:

- Southwark Council
- Emergency Services
- EA

Other organisations may also be involved depending on the circumstances of the incident, such as what the cause of flooding is. Southwark Council is required to produce a Multi-Agency Flood Plan (MAFP) which will present the emergency response Southwark Council will deliver in the instance of a major flood event. The MAFP defines major flooding as an incident where there is an extensive inundation of structures and roads. Further information can be found online [here](#). London also has its own [Strategic Flood Response Framework \(updated June 2022\)](#) which provides strategic direction to London Responders before, during and after a significant flooding incident in London.

## Transport for London

Transport for London (TfL) has the duty to manage the public transport network for London. Under this role TfL also has the responsibility to manage certain highway drainage and roadside ditches under the [Highways Act \(1980\)](#).

## Landowners

Private landowners are responsible for taking measures to protect their own land and property from flooding. Any measures put in place must not inflict a greater negative impact on surrounding property / land by increasing their flood risk.

Riparian landowners have a duty to ensure that any structures on their land linked to neighbouring watercourses are clear of debris so that watercourses can flow naturally. Natural right of drainage is allowed however landowners must not artificially channel water in a way that will affect neighbouring property, and if a landowner has flood defences these must also be maintained correctly.

Additional guidance on how to manage a watercourse on a property can be found [here](#).



Figure 2-2 Photograph of flooding at Herne Hill prior to FAS delivery (Credit: Southwark Council)

# 3. Local flood risk

## 3.4 What are the flood risks in Southwark?

Southwark is vulnerable to a variety of sources of flooding, which include:

- Flooding from surface water
- Flooding from rivers / tidal flooding
- Flooding from groundwater
- Flooding from sewers
- Flooding from artificial sources

Descriptions of each flood risk and how they affect infrastructure in Southwark are summarised below. For further detailed information please refer to the recently updated SWMP (2022) for Southwark.

You can check the local flood risk for your postcode area via the [check your long-term flood risk](#) tool

### Flooding from surface water

The definition of surface water flooding is when rainwater cannot drain away quickly enough via existing drainage systems or into the ground through infiltration. This often occurs during times of intense rainfall, resulting in pooling or overland water flows. This is the most likely type of flooding for residents within Southwark to experience. As *Table 3-1* shows that 2,365 properties are at a high risk from surface water flooding.

Table 3-1 The total number of properties at risk of flooding from surface water during different expected rainfall events

	Total no. properties
1 in 30-year rainfall event	2,365
1 in 100-year rainfall event	7,130
1 in 1000-year rainfall event	23,880

Ordinary watercourses, such as the Albion Channel, are rivers which are not managed by the EA. These are instead the responsibility of the LLFA. The ordinary watercourses in the Southwark borough can be viewed within maps [here](#).

### Flooding from rivers / tidal influences

Flooding from rivers (also known as fluvial flooding) is when a river's capacity is exceeded, and the river's banks are breached by the excess water. The Southwark borough only has interactions with one main river, the River Thames, the risk of which is managed by the EA. The EA's statutory rivers map can be viewed [here](#).

The risk of fluvial flooding is categorised into high, medium, low and very low, these can be checked online for a specific area [here](#), and the chance of flooding for each risk level is summarised in *Table 3-2*.

Table 3-2 The percentage chance of flooding for risk levels

Risk level	% chance of flooding
High	Greater than 3.3%
Medium	Between 1% and 3.3% each year
Low	Between 0.1% and 1% each year
Very low	Less than 0.1% each year

Tidal influences have the potential to impact fluvial flooding in Southwark as the borough is within the tidal extent of the River Thames. This may occur when there are extremely high tides or storm surges which increase the amount of water being funnelled into the River Thames. This can then cause fluvial flooding. Southwark is protected by the Thames Barrier and other flood defences which help to protect infrastructure.

## Flooding from groundwater

Instances of groundwater flooding occur when groundwater levels within aquifers rise to the surface. Southwark has several 'lost rivers' which are rivers which no longer exist on the surface but are still present underground. Areas near to these 'lost rivers' may be at greater risk of groundwater flooding at times of high groundwater levels or heavy prolonged rainfall.

## Flooding from sewers

Sewer flooding occurs when the volume of rainfall entering the sewer is too large to be contained. This results in the sewers backing up, surcharging and creating overland flow. The majority of sewers in Southwark are combined (surface water and foul water within the same piped network) and are managed by TWUL. Sewer flooding may occur for a variety of reasons; these are explained within Southwark's SWMP along with further information on the number of sewer flooding incidents within the borough as recorded by TWUL. You can view where live combined sewer outflows have occurred using [TWUL's online mapping tool](#).

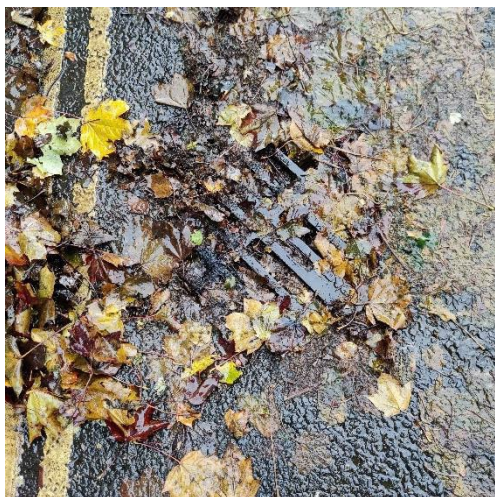


Figure 3-1 Photograph of a blocked gully in Southwark  
(Credit: Southwark Council)

## Flooding from artificial sources

Artificial flooding happens as a result of infrastructure failure or human interaction, typical sources include reservoirs and canals. Certain areas of eastern Southwark are vulnerable to artificial flooding from reservoirs if there were to be a breach. Maps of Southwark's flood risks can be viewed [here](#).

## 3.5 Flooding history in Southwark

Flooding history within Southwark is limited and there have not been many significant flooding events recorded since the previous LFRMS. In a twenty-year period between 2001-2021 there have been 102 flood incidents which the LLFA have on record. The recently updated SWMP (2022) includes further information on where flooding incidents have occurred, from a variety of flooding sources.

However, it should be noted that not all incidents of flooding are reported to the LLFA. It has been identified that residents are not always aware of where to report cases of flooding, therefore some flooding incidents may have been reported to other RMAs which the LLFA may be unaware of. In order for the LLFA to have a thorough overview of all flooding occurring within Southwark, it is recommended to always report incidents of flooding to the LLFA via the [online reporting tool](#). This information can then inform locations for potential interventions and Flood Alleviation Schemes (FASs).

The LLFA is looking to improve its approach of working in partnership with other RMAs to support the improvement of communication across the flood risk management authorities within the Thames River Basin District. Strategic Objective B focuses on this and the proposed actions for this can be viewed in *Appendix A1*. Existing ways of how the LLFA already works in partnership across internal departments and external authorities is summarised in *Section 6.4*.



It should be noted that some areas of public green space in Southwark will flood occasionally as these areas help to manage flooding at times of high rainfall. Surface water flow paths may be redirected to channel water towards these spaces away from properties and infrastructure to protect them from flood water. Green spaces can recover quicker than a property following a flood and avoids costly fees which could be faced by property owners.

### 3.6 Climate change and flood risk

Southwark Council recently updated its [Climate Change Strategy](#) in July 2021. This document sets out a clear vision on how climate change targets will be delivered.

Priority 3 of the Climate Change Strategy, 'Thriving Natural Environment', aims to use improvements to natural spaces to support Southwark becoming a carbon neutral borough. Increasing tree coverage and green spaces can help to reduce flood risk by creating greater storage for rainwater via uptake in trees and greater infiltration to the ground through permeable surfacing.

Southwark Council's aim of becoming carbon neutral by 2030 is also something which the LLFA supports and looks to maximise opportunities within the delivery of FASs. Actions addressing climate change issues have been included under LFRMS Strategic Objective D and broadly aim to:

- To reduce carbon emissions, with the aim of being carbon neutral.
- To improve biodiversity by contributing to net environmental / biodiversity gain.

Beyond this the LLFA will collaborate with Southwark climate change leads to support the delivery of the [Climate Change Action Plan](#) where these actions relate to flood risk.

Climate change is also set to increase the risk of tidal flooding Southwark is vulnerable to from the River Thames. At present this risk is managed by the Thames Tidal Defence System which in its entirety includes:

- The Thames barrier and eight other flood barriers.
- Over 330km of walls and embankments
- Over 400 other structures such as flood gates, outfalls and pumps.

However these assets need to be regularly maintained and where this cannot be met there is a reduced standard of protection offered by the Tidal Thames Defence System due to asset deterioration and the impact of climate change.

To manage this the Thames Estuary 2100 Plan sets out an adaptive plan for different rates of sea level rise and monitors how the estuary is changing. Regular reviews of this plan enables an effective approach to maintaining and improving defences along the Thames Estuary against the effects of climate change.



Figure 3-2 Photograph of works notice for the London Bridge SuDS Scheme at Melior Street  
(Credit: Southwark Council)



## 4. Advice for residents

The National FCERM Strategy for England explains that the implementation of flood risk management strategies must be a collaborative approach and that everyone needs to support these actions. It is essential that individuals, communities, businesses, land managers and infrastructure providers help towards planning and adapting to future flooding and coastal change.

### 4.4 Being aware

The first step is for residents and property owners is to check their [long-term flood risk](#) using the online tool managed by the EA. Alternatively this information can be obtained by contacting the Floodline by telephone on **0345 988 118** or textphone **0345 602 6340**.

Residents can also [check for flooding](#) by using the EA's tool to see flood predictions for the next five-day period.

If the property is located within a Flood Zone it is recommended that the property owner and/or resident [registers for Flood Alerts](#) which is a free service. These alerts can also be registered for by contacting the Floodline on the numbers above. Basement and ground floor properties may be at greater risk of flooding, but upper floor properties could still be cut off by floodwater.

The [National Flood Forum](#) offers advice and support to people at risk of flooding. They can be contacted on **01299 403 055**.

#### Basement properties

Residential basement properties may be more at risk during a flooding event than a ground or upper floor property. It is therefore more important that residents are aware of their flood risk and take steps such as preparing an emergency flood plan. The Mayor of London produced a [Flash Flooding leaflet](#) which should be read by anyone living in a basement property. This leaflet includes information on how to be prepared for flash floods.

### 4.5 Property resilience

Although preventing all flooding is not possible, there are ways to mitigate the impacts of flooding. There are two main approaches that can be adopted when looking to protect a property these are:

1. **Resistance** –  
Aims to prevent water entering a building.
2. **Resilience** –  
Aims to reduce the damage that is done when water does enter a building.

There are a variety of measures that can be put in place to increase a properties resistance and / or resilience to flooding. These are often called Property Flood Resilience (PFR) measures but can be known under other names. Some simple PFR options include:

- Non-return valves fitted on drains and pipes
- Applying water resistant paints
- Fitting automatic anti-flood airbricks

The National Flood Forum also provide an independent directory - [Blue Pages](#) - of PFR products where you can find examples of PFR measures. Although these are not endorsed by the National Flood Forum and an informed decision by the property owner should be made. The Southwark LLFA strongly recommends always checking PFR certifications.

It is also important to consider external areas to a property and how non-permeable surfaces in driveways and gardens can increase flood risk. Property owners should consider de-paving areas or switching to permeable materials which allow water to seep into the ground. Options of green roofs for storing rainwater and providing biodiversity benefits could also be considered by property owners. The use of water butts to store rainwater can further contribute to flood resilience. This also supports other [Southwark Local Plan](#) objectives on reducing water usage (P67) through encouraging greywater recycling where possible.

Unused parking bays, small grassed areas, public realm areas and wide footways, and potentially roundabouts and traffic islands, could provide an opportunity for Southwark Council to put in place small scale SuDS. This will help to reduce flood risk and may also include updated planting improving amenity and biodiversity. If you think there is an opportunity near you, please contact the [Flood Risk Management Team](#).

Property owners should also check if their insurance covers flood damage. Re-insurance after a flood can be difficult but schemes such as [FloodRe](#) can help with this. Insurance providers should be contacted directly to see if they offer additional support with flood risk insurance.

## 4.6 What to do before, during and after a flood

The EA has produced guidance on actions individuals can take before, during and after a flood. A summary of this advice follows in *Figure 4-1*, but full guidance can be found online [here](#).

### Before

- Sign up to the EA's free 24 hour Floodline Warning Direct Service.
- Prepare an emergency kit and prepare an emergency plan.
- Know how to turn gas, electric and water supplies off.
- Take inventory and photos of valuables for insurance purposes.

### During

- Turn off gas, electric and water supplies.
- Do not approach fast flowing or deep water.
- Move to higher ground or upper levels.
- Floodwater may be contaminated so keep cuts clean and covered.

### After

- Only return to a property when officials say it is safe to do so.
- Do not turn on electricity until it has been checked.
- Record photos and flood height, and contact insurance providers.
- Report the flood to appropriate authority.

Figure 4-1 Summary of EA advice on what to do before, during and after a flood

## 4.7 How to report different types of flooding

As part of the update to Southwark's LFRMS the LLFA has revised how to report flooding incidents on the Southwark Council website. This is a simpler process which will enable the LLFA to improve its response to reports of flooding and develop more detailed records to support the selection of areas for future FAS. Full information on how to report incidents of various types of flooding is explained in *Figure 4-2*.

<b>HOW TO REPORT A FLOOD</b>	
For blocked sewers, sewer flooding and burst water mains	<b>Thames Water</b> <b>0800 316 9800</b> <a href="#">TWUL online reporting tool</a>
For surface water flooding, groundwater flooding and flooding from ordinary watercourses	<b>Southwark LLFA</b> <a href="#">Flood reporting form</a>
For blocked or polluted rivers, flooding from the sea and flooding from main rivers	<b>Environment Agency</b> <b>0800 80 70 60 (24/7 service)</b>
For blocked private drains and flooding caused by private drains	<b>Property owner / Landowner</b>
For blocked drains and/or gullies on roads adopted by Southwark Council	<b>Southwark Highways</b> <a href="#">Pothole/Street surface repair</a>
For blocked drains and/or gullies on highways managed by Transport for London	<b>Transport for London</b> <a href="#">TfL Street care reporting tool</a>

Figure 4-2 Information on how to report different types of flooding

# 5. Guidance on sustainable solutions

## 5.1 Sustainable flood risk management

It is expected that as the climate changes, there will be a greater risk of flooding due to rising sea levels along with more extreme weather. It is therefore imperative that LLFAs are supported by the National Government to perform their duties and deliver flood risk mitigations to improve resilience for their Local Authority areas.

However, delivering effective FASs can also deliver other advantages, including biodiversity benefits, urban greening, and creating carbon sinks. Actions C10 and D3 aim to ensure that opportunities to support improvements towards Southwark's Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG) are taken. The drivers behind the UGF and BNG help to further support the slowing of surface water and increase attenuation offering mutual benefits for flood risk and environmental improvement. These options will be given strong consideration and where possible adopted within the development of FAS. Sustainable flood risk management within Southwark should aim to achieve the following:

- Make informed investment decisions to reduce the numbers of people and property by targeting high risk areas that have the greatest risk of flooding.
- Utilise space in urban settings to increase water storage to slow the flow of surface water.
- Support successful SuDS that will reduce pressure on sewer systems, working to reduce flood risk and improve water and environmental quality.
- Share knowledge and information with the public on understanding flood risk and how they can take appropriate action to protect themselves, property and businesses.
- Produce effective actions to manage flood risk that can adapt to a changing climate.

Sustainable flood risk management is the responsibility of everyone, from the LLFA to an individual property owner. Flood risk cannot only be managed via LLFA FASs but also needs developers and property owners to make informed decisions when making alterations to help improve resilience within an area. This is why effective communication is crucial and action A4 of the LFRMS has been created to ensure the LLFA helps to improve public awareness and understanding of PFR.

## 5.2 Sustainable Drainage Systems

Sustainable Drainage Systems (SuDS) are designed to manage rainwater as close to the source as possible to relieve pressures on sewer systems by mimicking natural drainage via infiltration and attenuation. SuDS offer multiple benefits such as:

- Reducing flood risk.
- Managing air and water quality and pollution.
- Improving amenity spaces such as creating habitats, recreational areas, or places for biodiversity.
- Aiding groundwater and/or aquifer recharge.
- Improving local environmental education.
- Supporting successful development schemes through aesthetically-pleasing, greening design.

Examples of SuDS include:

- Water harvesting (water butts, blue roofs).
- Infiltration (soakaways, infiltration trenches).
- Detention or attenuation (bioretention, raingardens, retention ponds, geocellular storage).
- Conveyance (swales, conveyance channels).

Details of the various SuDS already installed in Southwark by the LLFA can be found in *Section 6.1* and proposed works in *Section 7.2*.

Slow the flow

### 5.3 Natural Flood Management

Natural Flood Management (NFM) is a method of managing excess water in a way which mimics natural processes, helping to protect and restore the natural environment. NFM aims to reduce the peak flood flow by holding back or delaying water from moving through a system quickly in the event of excessive rainfall. NFM is often a more natural approach than SuDS sourcing more natural materials instead of manmade features.

There are four mechanisms of NFM which are:

1. Increasing flood storage: creating temporary areas where water can be stored during a flood event and then released slowly overtime, for example reconnecting functional floodplains and creating storage ponds.
2. Increasing catchment and channel roughness: increasing the resistance to water flows which will help to slow the flow, for example increasing planting and restoring river meanders.
3. Increasing losses: this means to increase the amount of water infiltrating into the ground or that is lost to the atmosphere via evapotranspiration, for example reducing soil compaction.
4. De-synchronising peak flows from tributaries: slowing the movement of water in one tributary compared to another to reduce the amount of water reaching a main river downstream at one point in time.

Further examples of NFM techniques have been collated by the EA to form an evidence base which highlights the implementation of NFM through case studies, demonstrating the benefits to flood risk management. Detailed guidance for practitioners is also provided within the [NFM manual](#).

Although there are limited opportunities for large scale NFM projects within Southwark due to being a central London borough, it is important to highlight that small scale SuDS and NFM can still be delivered within urbanised development schemes, on private land and on Council-owned land. For example the Herne Hill FAS which saw the implementation of earth bunds and habitat creation in Dulwich Park and Belair Park, see *Section 6.1* for more information.

The Wildfowl and Wetlands Trust (WWT) has been allocated funding from the Thames RFCC to work with local authorities in the Thames region such as Southwark Council to provide expert advice on NFM. More information can be found [here](#). The Southwark LLFA has engaged with the WWT and is exploring the potential for NFM across the borough.



## 5.4 Planning policy and planning applications

### The LLFA's role

The LLFA has a statutory duty to review major planning applications. Clarification on what levels of development are considered a major and minor application for Southwark Council can be found [here](#). The LLFA provide comments on the surface water drainage elements of the proposed development / scheme in addition to checking that appropriate measures have been proposed to manage any flood risks present. Where policy is being achieved the LLFA can recommend approval to the LPA, sometimes with planning conditions.

For major applications the LLFA will review:

- The drainage hierarchy set out in the [London Plan \(2021\)](#) is being adhered to ensure as sustainable features are being included, and that sufficient justification is provided, see *Figure 5-1*.
- Proposed runoff rates are equal to or as close to greenfield runoff rates as possible.
- Calculations are provided for greenfield, existing, and proposed runoff rates for return periods of: 1 in 1-yr, 1 in 30-yr and 1 in 100-yr rainfall events, and that an appropriate [climate change allowance](#) has been applied.
- The required attenuation storage volume to achieve the proposed runoff rate(s), and the proposed attenuation storage volume for the site, both supported by calculations.
- That sufficient maintenance tasks and frequencies have been stated along with a maintenance owner for the proposed features.

The LLFA is not a statutory consultee for minor applications and is therefore not required to undertake a review of these applications or provide any comments. Developments within areas the LLFA consider to be at higher risk of flooding are more likely to be reviewed. However it is at the discretion of the LLFA whether a minor application is reviewed, and this is likely to be dependent upon resourcing and funding.

The Government are considering the enactment of [Schedule 3](#) of the FWMA (the 'SuDS Approving Body') which may change the way Local Authorities assess, approve and adopt drainage assets in the future. This is expected to come into force in 2024 and the LLFA will continue to contribute to how this should be implemented.

### The developer's role

A developer is expected to meet the necessary policy requirements on sustainable drainage systems, these policies include:

- [National Planning Policy Framework \(Paragraph 159-169\)](#)
- [Planning Practice Guidance](#)
- [London Plan \(Policies SI 12 and SI 13\)](#)
- [Southwark's Local Plan \(Policy P68\)](#)
- [Non-Statutory Technical Standards for Sustainable Drainage Systems](#)

The LLFA has also produced a [Developer's Guide for Surface Water Management](#) which helps to establish what the developer must provide to the LLFA when making an application. Pre-application advice can also be sought from the LLFA by making the relevant enquiry via the LPA.

The LLFA requires applicants for all major developments to provide a [Sustainable Drainage Proforma](#) as also aligned with requirements of 32 other London LLFAs.

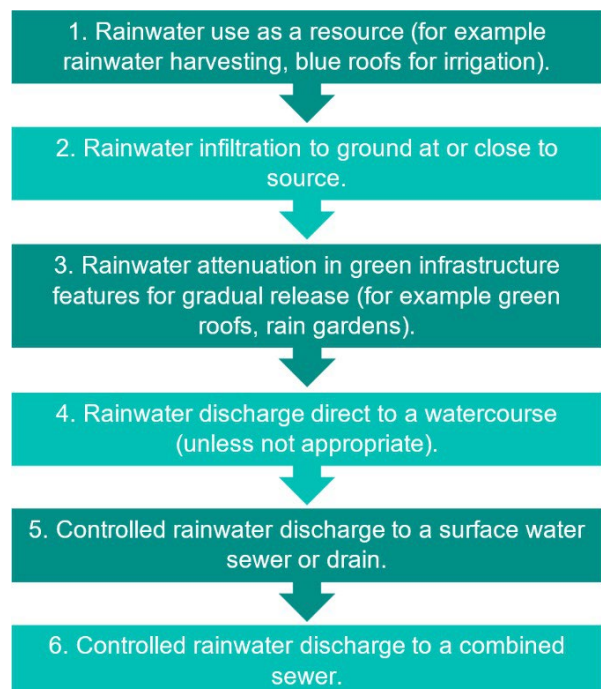


Figure 5-1 The drainage hierarchy as set out in the London Plan (2021)

# 6. What Southwark Council has done to manage flood risk

## 6.4 Flood alleviation schemes and SuDS work

The LLFA have been heavily involved with the delivery of various FASs across the borough in response to flooding reports. Through the successful application for funding, the LLFA has been able to deliver these schemes which have alleviated flooding in high-risk areas. Below are some key schemes that Southwark LLFA has completed since the previous LFRMS.

Further information on funding routes is explained in *Section 7.4*.

### Herne Hill FAS (2015)

<b>Location</b>	SE21 7EB & SE21 7JH
<b>Feature</b>	Attenuation tanks and detention basins
<b>Details</b>	This FAS was implemented in response to widespread flooding that affected the Dulwich and Herne Hill areas in 1984, 2004 and 2007. The scheme involved the construction of earth bunds and the installation of attenuation tanks across three sites: Dulwich Park, Dulwich Sports Ground and Belair Park. It is estimated that the scheme provides approximately £12m of economic benefit, protects over 200 properties at risk of surface water flooding, and protects 80 properties at risk of sewer flooding. In addition to flood benefits, the scheme included the creation of wetlands and wildflower meadows which enhanced local habitats and biodiversity. This scheme was funded by EA Grant in Aid (GiA) funding and funding from TWUL.

### Comber Road SuDS (2015)

<b>Location</b>	SE5 0EW
<b>Feature</b>	Swales and permeable paving
<b>Details</b>	A small swale and an area of permeable paving were installed outside Laing House. This scheme was funded by Southwark Council and the GLA.

### Keppel Road SuDS (2018)

<b>Location</b>	SE1 0FB
<b>Feature</b>	Raingardens
<b>Details</b>	A small-scale SuDS project consisting of three small raingardens along a previously underused alley. This scheme was funded by the Better Bankside project and Southwark Council.

### Coleman Road FAS (2019)

<b>Location</b>	SE5 7TF
<b>Feature</b>	Attenuation tank
<b>Details</b>	This scheme involved the installation of a new surface water pipe which discharges into a large attenuation tank under the playground of St George's C of E Primary School. This scheme received EA GiA funding and was also funded by TWUL and the Southwark Council Community Infrastructure Levy.

### Greener Delawyk SuDS Retrofit (2019)

<b>Location</b>	SE24 9JE
<b>Feature</b>	Raingarden, permeable paving, and de-paving
<b>Details</b>	This scheme made use of several multifunctional SuDS features to create greener, more pleasant spaces for the local residents. An existing roof rainwater downpipe was diverted into a new raingarden, a small area of permeable footway was installed, and existing areas of hardstanding were de-paved and replaced with a lawn / wildflower meadow. This reduced surface runoff to the sewer system, and also enhanced biodiversity and improved air quality. This SuDS retrofit was funded by the GLA Greener City fund, and the Southwark Council Cleaner Greener Safer fund.

## London Bridge SuDS



This small-scale scheme is spread across three sites in the London Bridge Critical Drainage Area: Melior Street, Snowfields, and Lewes House.

The raingardens and planters will intercept highway runoff and slow its flow into Thames Water's historic combined sewer system which is at capacity.

The scheme also sits within the Team London Bridge Business Improvement District and Team London Bridge provided funding and support to the project.



Rain gardens at Snowfields (left) and Melior Street (right) (Credit: Southwark Council)



## Flood Risk Asset Register

The LLFA has updated its Flood Risk Asset Register in 2023. The aim of this was to identify and record all known flood management infrastructure. Maintaining an updated Flood Risk Asset Register is a requirement of the LLFA under the FWMA. The data collated in the Flood Risk Asset Register will be used by teams in Southwark Council, shared with other asset management organisations to identify gaps, and reinforce maintenance obligations.

## Surface Water Modelling – Camberwell

With funding from the EA, the LLFA has completed surface water modelling for the area of Camberwell. This area was identified to be of high-risk from surface water flooding based on the outcomes of the SWMP. The modelling will help to improve the LLFAs understanding of flood risk in Camberwell to inform FAS and SuDS interventions.

## SuDS Opportunity Mapping

The LLFA has also completed an options assessment for SuDS opportunities across the Southwark borough. This analysis looked at a range of factors which may impact the feasibility of SuDS. The outputs show where the most suitable locations are within Southwark for SuDS to be delivered, primarily focusing on areas within Southwark's highways.

## 6.6 Technical updates

The Southwark LLFA maintains an efficient approach to ensuring that it contributes to the development of wider technical understanding on flood risk. This includes responding to consultations and reviews established by other RMAs on flood risk documents and/or modelling.

In recent years the Southwark LLFA has taken part in workshops and provided responses to the consultation on [TWUL's Drainage and Wastewater Management Plan \(DWMP\)](#). A DWMP is a document created by water companies to outline a collaborative long-term strategic plan highlighting the known and expected future risks to drainage and identifying solution strategies to mitigate.

## 6.5 Strategic updates

Since the previous LFRMS both Southwark's SFRA and SWMP have been updated. These are to reflect changes in legislation and updates to modelling of flood risk that have since taken place.

### Strategic Flood Risk Assessment (2017)

A SFRA is required under the [National Planning Policy Framework](#) to support developers and other stakeholders in considering flood risk when making planning decisions. Southwark Council last updated its SFRA in 2017 and this should be updated periodically in response to updated modelling to maintain a comprehensive understanding of flood risk. The outputs of the SFRA are used by the LPA, developers, the EA and others to inform planning choices so that they effectively manage flood risk.

### Thames Flood Risk Management Plan (2021-2027)

A FRMP establishes how RMAs will work together to manage flood risk. These cover a specific area and Southwark is covered under the Thames River Basin District FRMP. The first FRMPs were published in March 2016 and established a set of actions across England for 2015-2021. The majority of actions assigned to the Southwark LLFA were based off of the 2011 SWMP and have since been completed or are in the process of being updated.

### Surface Water Management Plan (2022)

A SWMP is conducted to assess the Risk of Flooding from Surface Water (RoFSW) and its interactions with other types of flooding.

Southwark Council's previous SWMP (2011) identified Critical Drainage Areas (CDAs) which were high risk areas vulnerable to surface water flooding. Following updates to EA guidance the updated [SWMP \(2022\)](#) has adopted a catchment-based approach. This approach means that the whole Southwark borough is divided into basins, and these are then separated into subsequent catchments. These are calculated based on where surface water flows within Southwark.

Southwark's SWMP produced a ten-year action plan detailing how to manage the RoFSW and also produced a ranking of key areas (hotspots) where there is a significant RoFSW. These outputs will be used to inform where future FASs may be delivered.

The Southwark LLFA has is also supporting draft outputs of the EA's National Flood Risk Assessment (NaFRA 2) examining the levels of RoFSW and contributing the locations of recent FASs to feed into final model outputs. The EA are updating this modelling to provide enhanced technical detail in the flood mapping in the area, which Southwark can utilise to update its own technical knowledge, addressing Strategic Objective A of this LFRMS.

## 6.7 Partnership working

### Thames Regional Flood and Coastal Committee (RFCC)

RFCCs are established by the EA under the FWMA and bring together members who have been appointed by Local Authorities and independent members. Each RFCC has the following three main purposes:

- To ensure there are coherent plans for identifying, communicating, and managing flood and coastal erosion risks across catchments and shorelines.
- To encourage efficient, targeted and risk-based investment in FCERM that represents value for money and benefits local communities.
- To provide a link between the EA, LLFAs, other RMA, and other relevant bodies to build an understanding of flood and coastal erosion risks.

### **South-Central Flood Partnership Group**

The South-Central Flood Partnership Group is led by the Southwark LLFA. This is a strategic flood partnership group meeting between the Southwark and Lambeth LLFAs. Members from the Thames Flood Advisors (TFAs), EA and TWUL are also invited to attend. These are quarterly meetings which allow for the sharing of advice and technical knowledge between RMA to support the effective management of flood risk for the South-Central London Region.

Neighbouring boroughs also play a significant role in impacting Southwark's flood risk. Where FASs are completed in locations up-stream of Southwark the outcome is that surface water flows into Southwark will be reduced, helping to lower the risk of surface water flooding. Potential schemes and drainage management processes that could benefit from cross-borough working are encouraged through this forum.

### London Drainage Engineers Group (LoDEG)

LoDEG is an organisation which supports the 33 London Councils in their responsibility for managing flood risk and highway drainage. Quarterly meetings are held and are attended by LLFAs, EA, TWUL, TfL, TFA and others. These meetings serve to share and inform on flood risk management and also raise issues faced by flood risk RMA.

### **Southwark Biodiversity Partnership**

The Southwark Biodiversity Partnership was established in 2004 and connects stakeholders who have an interest in biodiversity. This is led by the Southwark Ecology Team and has quarterly meetings to discuss challenges and opportunities. The Southwark LLFA has recently joined this partnership with the aim of improving how biodiversity is integrated into FASs.

### London Resilience Group

The Southwark Emergency Planning Team lead this group and regularly meet to review and discuss the variety of risks facing London. The Southwark LLFA sits within this group and supports feedback on flooding incidents and how flood risk is being managed within Central London.

### Joint Thames Strategies

The Joint Thames Strategies (JTS) are an approach set out from the TE2100 Plan which supports an integrated landscape planning approach for the River Thames. There are currently three strategies which are preparing to undergo review and updates as part of the JTS refresh. There is however an area in Central London not yet covered by a landscape strategy and the Southwark LLFA is working with other boroughs within this area to help produce a new strategy and bridge this gap.

# 7. What Southwark Council is planning to do to manage flood risk

## 7.4 New action plan

One of the tasks of creating a LFRMS is to produce a new and updated action plan. This is a set of actions linked to each of the strategic objectives and contains specific task areas that the LLFA will be working towards in delivering the LFRMS for the next six-year period (2023-2029).

To produce the LFRMS action plan, a workshop has been carried out with the relevant internal and external stakeholders to discuss their roles in delivering joint actions with the LLFA. Feedback from this workshop has been reflected within the LFRMS and its action plan to ensure that responsibility is taken for each of the actions and that resource is available from each of the stakeholders. These stakeholders have also had the opportunity to review these actions during the public consultation of the LFRMS.

The new action plan can be viewed in *Appendix A1*. The action plan contains action and delivery specifics, and programme details. Delivery details will note who the lead RMA is and if there are any partner RMAs for the action. The programme estimates the timescale for delivering the action and its current status. There is also additional information provided on where each LFRMS action links to relevant legislation and policy.



## 7.5 Flood alleviation schemes

In conjunction with delivering the LFRMS action plan the LLFA aims to deliver a number of FASs in areas at high risk of flooding. These will be selected based on recent strategic updates and modelling as well as areas where significant numbers of flood reports have been received, highlighting the experienced flooding within the area.

### Astley House

<b>Location</b>	SE1 5HU
<b>Feature</b>	Detention basin
<b>Details</b>	This scheme will disconnect the existing roof downpipes on the Astley House building from the sewer and divert surface water flows into a new detention basin, before re-connecting back to the Thames Water sewer. This is to slow the flow of rainwater during storm events. The project is being funded by Southwark Council and Thames Water.

### Feasibility Studies

The LLFA is undertaking an assessment of Southwark's flood risk information to identify potential sites for future schemes. This is taking into account work completed from the SWMP and the recent modelling and SuDS opportunity mapping. Bringing together the recent strategic updates will allow the LLFA to prioritise SuDS / NFM / FAS interventions in the most appropriate locations to reduce the flood risk to Southwark residents, properties and businesses. The delivery of future schemes will feed into various actions in the LFRMS Action Plan and also supports wider objectives, such as those in the FRMP.

## Lost Peck Flood Alleviation and Environmental Improvement Scheme



The Lost Peck FAS aims to provide flood storage in the Peckham Rye Park & Common in order to protect properties from flooding that lie along the Lost Peck River flow path (flowing south to north).

The scheme involves the construction of earth bunds to create two large detention basins.

It is estimated that this FAS will reduce the flood risk for 282 properties, 111 of which will move from a higher flood risk band to a lower one.

The project is predominantly funded by the Environment Agency.



Areas of Peckham Rye Park where the Northern bund (left) and Southern bund (right) will be constructed (*Credit: Southwark Council*)

## 7.6 Key stakeholders

Throughout the process of delivering this LFRMS internal and external RMAs have been made aware of key milestones and have had the opportunity to provide comments and suggestions towards the LFRMS. Stakeholders have been involved in various workshops to discuss what should be included within the LFRMS, and this feedback has been incorporated where agreed with the LLFA.

It is crucial to collaborate well between stakeholders as the delivery of the LFRMS action plan will include shared responsibility between RMAs for some actions.

### Internal stakeholders

Internal stakeholders consist of Southwark Council departments / teams and representatives. These include, but are not limited to, Highways, Emergency Planning, Parks & Ecology, Climate Change Teams and the Local Planning Authority.

### External stakeholders

External stakeholders include any individual or organisation that does not work within Southwark Council. This includes organisations such as the EA, TfL and TWUL, but also covers external representatives from the Thames RFCC and other working groups.

## 7.7 How will these actions be funded?

The LLFA will seek funding from a variety of sources to support the delivery of its LFRMS action plan and in the delivery of forthcoming FASs. Action B3 specifically looks to target funding by monitoring opportunities and evaluating the best options to pursue.

A major source of funding for LLFAs comes from the Department for Environment, Food and Rural Affairs (DEFRA) which provides funding through its FCERM GiA fund. To receive this funding the LLFA must complete an appraisal process which will test if the proposed scheme (or action(s)) will provide any of the following benefits:

1. Benefit properties at risk of flooding
2. Lessen the indirect impacts from flooding (for example, mental health impacts)
3. Achieve wider environmental benefits
4. Improve amenity of an area

LLFAs may apply for this funding to finance FAS design and construction and/or the preliminary feasibility / modelling studies. In conjunction with GiA funding, the LLFA can also apply for Local Levy funding. This funding is managed by the Thames RFCC, *Section 6.4*, and is raised through a levy on Local Authorities. Local levy funding is supported by the EA.

Other avenues of funding may include revenue provided by the Department for Levelling Up, Housing and Communities (DLUHC) which can help to fund general LLFA duties. It is usual practice for the LLFA to submit an internal business case to bid for the amount of funding they require from the DLUHC revenue funding because the funding is not specifically allocated for LLFA use.

There are also funding contributions which can come from developers. These include the [Community Infrastructure Levy \(CIL\)](#) and Section 106 monies. CIL allows local authorities to raise funds from developers undertaking new building projects in their administrative area. This money can then be used to fund a wide range of local infrastructure projects. Section 106 monies are another type of funding which comes from the [Town and Country Planning Act \(1990\)](#) and allows local authorities to seek financial contributions from developers towards the costs of providing community and social infrastructure, this as a result of increased demand due to a new development taking place. Both these sources of funding can support flood mitigation and alleviation schemes.

TWUL also offers funding for projects that will relieve capacity pressures on the TWUL-owned sewer system. The London Bridge SuDS Schemes delivered by Southwark's LLFA were successful in receiving TWUL funding. The EA also have additional funding pots available which prioritise additional environmental benefits, including water quality improvements, therefore it is important that the LLFA works closely with partners to prioritise bidding for funding which, if successful, will increase the likelihood of FAS delivery.

Funding is often seen as one of the most significant barriers to FASs which is why the LLFA is open to opportunities for funding or support towards schemes from third parties including benefitting property owners, community groups and charity organisations. Such routes are known as Partnership Funding, and the FCERM GiA process actively encourages its use to reduce the financial burden on public funding.

# Appendix A1 – Action Plan

# Appendix A2 – SEA

# Appendix A3 – HRA

# Appendix B1 – Legislation and policies

International	
<a href="#">EU Water Framework Directive (2000)</a>	The EU Water Framework Directive (WFD), published in 2000, makes it a requirement for Member States of the EU to improve and maintain the state of all waters, including surface waters and groundwater. All waters are to achieve a “good” ecological status by 2015 or, at the latest, by 2027. The WFD request that water management plans are developed using a river basin approach. The WFD was adopted into UK law in 2003 and will become part of new UK law following the UK’s departure from the European Union.
<a href="#">EU Floods Directive (2007)</a>	The EU Floods Directive dictates how Member States should approach the flood risk management of all types of floods. A three stage process was to be followed. For the initial cycle, by 2011 Member States had to produce Preliminary Flood Risk Assessments (PFRAs) to identify areas where water courses and coast lines are potentially at risk of flooding. By 2015, mapping of flood risk areas showing the extent, assets and number or inhabitants at risk were created. By 2015, Flood Risk Management Plans (FRMPs) for areas at high risk of flooding were produced, including measures to reduce flood risk. The EU Flood Directive was implemented in UK law through the Flood Risk Regulations (FRR) (2009) and will be a continuing law following the UK’s departure from the EU. The cycle restarted in 2016 and Southwark’s LLFA have been involved in updates since.
<a href="#">IPCC Climate Change Report (2021)</a>	The Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report aims to assess the physical science basis of climate change. The headlines from the 2021 report include predictions of +1.5°C temperature change in the next two decades and that climate change is presently affecting every populated region of the globe.
National	
<a href="#">Civil Contingencies Act (2004)</a>	The Civil Contingencies Act is a legislative framework for civil protection in the UK that establishes the roles and responsibilities on organisations that play a role in preparing for and responding to emergencies. Under the Act, Local Authorities and the EA are Category 1 responders. Some of the Local Authority’s duties include putting in place emergency plans, sharing and co-operating with other local responders to enhance efficiency.
<a href="#">The Pitt Review (2007)</a>	Following the extreme flooding that took place in the summer of 2007, a comprehensive review led by Sir Michael Pitt, known as the Pitt Review, was commissioned by the UK Government. The Pitt Review provided 92 recommendations to improve flood risk management in England, notably that County Councils, large metropolitan boroughs, and Unitary Authorities should take lead on the management of flood risk. The Pitt Review recommendations were accepted by the Government and initiated the creation of the FWMA.
<a href="#">Flood Risk Regulations (2009)</a>	The FRR implements the EU Floods Directive in England. Flood risk management, as set out by the framework, requires the production of PFRAs, the identification of flood risk areas, mapping of such areas and FRMPs.
<a href="#">Flood and Water Management Act (2010)</a>	The FWMA aims to provide better, more sustainable management of flood risk and coastal erosion along with improving the sustainability of water resources. The FWMA defines structures and responsibilities for managing flood risk, notably

	with the introduction of LLFAs which impart the role of managing local flood risk to County Councils, large metropolitan boroughs, and Unitary Authorities. The EA is appointed to hold the strategic overview role of all sources of flooding, in addition to managing the flood risk from main rivers and the sea. The FWMA also places a statutory duty on the EA to develop a NFCERMS for England, which all LFRMSs must align with.
<a href="#">UK 25 Year Environment Plan (2018)</a>	The UK's 25 Year Environment Plan sets out the Government's plan to improve the environment within a generation. Key focuses of the plan include: (1) clean air, (2) clean and plentiful water, (3) thriving plants and wildlife, (4) reducing the risks of harm from environmental hazards, (5) using resources from nature more sustainably and efficiently, (6) enhancing beauty, heritage and engagement with the natural environment, (7) mitigating and adapting to climate change, (8) minimising waste, (9) managing exposure to chemicals and (10) enhancing biosecurity.
<a href="#">Flood and Coastal Erosion Risk Management Policy (2020)</a>	The FCERM Policy Statement reflects the government's long-term ambition to increase the resilience to flood and coastal erosion risk nationwide.
<a href="#">National Flood and Coastal Erosion Risk Management Strategy (2020)</a> <a href="#">NFCERMS Action Plan (2021)</a>	The NFCERMS sets out a framework for RMAs involved in managing flood risk in order to increase the nation's flood resilience. The publication of the NFCERMS was followed by an Action Plan aligned with the long-term objectives of the NFCERMS.
<a href="#">National Planning Policy Framework (2021, revised)</a>	The National Planning Policy Framework (NPPF) sets out the planning policies to provide sustainable development and is published by DLUHC. The NPPF provides guidance on developing Local Plans in line with national planning policies. These policies include avoiding and managing risks from flooding, in line with the role of LPAs to prepare local plans and to decide on planning application permissions. The NPPF is supported by Planning Practice Guidance (PPG), including the <a href="#">Flood Risk and Coastal Change PPG</a> , which is revised as necessary.
<a href="#">Environment Act (2021)</a>	The Environment Act is the UK's new framework of environmental protection since departing from the EU. It is intended to provide legal regulations on nature protection, water quality, clean air and other environmental protections. The Environment Act provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction, and also establishes a new environmental watchdog – the Office for Environmental Protection.
<b>Regional</b>	
<a href="#">Thames Catchment Flood Management Plan (2009)</a>	The Thames Catchment Flood Management Plan (CFMP) is a plan which helps RMAs such as the EA to plan and agree the most effective ways to manage flood risk in the future. A CFMP considers all types of inland flooding from rivers, groundwater, surface water and tidal flooding but not directly from the sea (coastal flooding) which is instead covered in Shoreline Management Plans. CFMPs also consider likely effects of climate change, land use change / management and the need for future development.
<a href="#">Mayor of London's Climate Change Adaptation Strategy (2011)</a>	This Mayor of London's Climate Change Adaption Strategy sets out the framework for improving the quality of life in London and for protecting the natural environment. It provides an action plan for making London more sustainable by using three 'pillars': retrofitting London, greening London and cleaner air for London. The strategy presents the understanding of main climate change effects on London as well as analysing the effects on cross-sector issues including health, economy, and infrastructure. The strategy also provides a 'roadmap to resilience' outlining actions, with lead and partner organisations. Since then, the



	Greater London Authority (GLA) have also produced a <a href="#">London Environment Strategy (2018)</a> .
<a href="#">London Regional Flood Risk Appraisal (2018)</a>	The London Regional Flood Risk Appraisal (RFRA) provides an overview of all sources of flooding in London and addresses both its probability and consequences. The evidence of the London RFRA subsequently informs the London Plan and should inform local-level flood risk assessments and local plans.
<a href="#">London Sustainable Drainage Action Plan (2021)</a>	The London Sustainable Drainage Action Plan addresses a specific need to promote the awareness, and the retrofitting, of sustainable drainage systems right across London. It contains a series of actions to make London's drainage system work in a more natural way with the main focus on the retrofitting of sustainable drainage to existing buildings, land and infrastructure. Sector-specific <a href="#">sustainable drainage (SuDS) guidance</a> has been developed as part of the London Sustainable Drainage Action Plan.
<a href="#">The London Plan (2021)</a>	The London Plan is a general Strategic Development Strategy for London. Producing a Strategic Development Strategy is a requirement of the London Mayor established under GLA legislation. The London Plan establishes an integrated economic, environmental, transport and social framework for the development of London for the next 20-25 years.
<a href="#">Thames Estuary 2100 Plan (2023)</a>	The Thames Estuary 2100 (TE2100) Plan was developed by the EA and provides strategic direction for managing flood risk in the Thames Estuary to the end of the century. The TE2100 plan is an adaptive strategy and is reviewed on an interim basis every five years and on a full basis every ten years. The plan considers different long-term options for managing tidal flood risk depending on changes in factors which determine the level of flood risk, including sea level rise.
<b>Local</b>	
<a href="#">Strategic Flood Risk Assessment (2017)</a>	A SFRA is required by the NPPF and provides a strategic overview of all forms of flood risk within a designated area. A SFRA assesses the risk from all sources of flooding, the cumulative effect that development or changing land use could have, and the effect of climate change on the risk of flooding. A SFRA should also identify opportunities to reduce the causes and effects of flooding, including potential areas of land for flood risk management infrastructure. The SFRA provides guidance for the Local Plan, individual planning applications, future flood management, emergency planning and how to adapt to climate change.
<a href="#">Local Plan (2022)</a>	The Local Plan is developed by the LPA and sets out a vision and framework for the future development of the area. Southwark Council's Local Plan sets out policy and guidance to manage growth and guide development within the Southwark borough. It addresses needs and opportunities in relation to housing, the economy, community facilities and infrastructure, as well as conserving and enhancing the natural and historic environment, mitigating, and adapting to climate change and achieving well designed places. The plan is made up of the combination of strategic policies, addressing important priorities for the Southwark borough, and non-strategic policies.
<a href="#">Surface Water Management Plan (2022)</a>	A SWMP is a plan produced by LLFAs that presents the surface water flood risk for an area and forms a strategy on how to manage this with local partners. A SWMP considers flooding from sewers, drains, groundwater, and surface runoff from land, small watercourses and ditches that occur as a result of heavy and / or prolonged rainfall. The SWMP also includes a long-term action plan to manage surface water flood risk which will influence land-use planning, emergency planning and future developments. SWMPs also aim to identify SuDS opportunities to manage surface water flood risk which contributes towards the WFD requirements.

London Borough of Southwark

# Local Flood Risk Management Strategy 2023 - 2029

## Strategic Environmental Assessment



# Executive summary

A Strategic Environmental Assessment (SEA) is a review of a proposed plan or strategy to determine if there is a potential that the delivery of actions will negatively impact local environments. As part of this there are five stages of assessment, this document serves to complete the first stage, Stage A – Screening. This SEA Screening Report has identified and evaluated the Southwark borough's Local Flood Risk Management Strategy (LFRMS), assessing its strategic objectives and associated actions.

To complete the screening assessment a variety of environmental and socio-economic baseline data was collected and reviewed. These factors include:

1. Biodiversity, flora and fauna
2. Infrastructure assets
3. Population
4. Public health
5. Air quality
6. Climate factors
7. Soil and water
8. Historic and cultural environments

From the baseline information gathered, 15 environmental, social and economic issues have been documented which could potentially be exacerbated by the delivery of the LFRMS and its actions. These have been reviewed to determine what associated problems these could have with regards to flood risk management tasks.

Based on these issues a set of eight SEA objectives have been generated which are:

- **SEA 1:** To conserve and enhance green spaces and designated conservation areas to support the security and growth of protected habitats and species.
- **SEA 2:** To support biodiversity net gain across Southwark within developments, supporting local ecological, social and health benefits.
- **SEA 3:** To protect critical infrastructure and ensure that new development appropriately considers and mitigates the impacts of increased flood risk.
- **SEA 4:** To support residents in protecting their properties from flood risk through education and financial support/ advice.
- **SEA 5:** To ensure that social and economic inequalities are addressed by prioritising areas for investment and development effectively.
- **SEA 6:** To improve the physical and mental health of residents by supporting access to green spaces, improving air quality and access to health care.
- **SEA 7:** To effectively support new development and infrastructure in preparing for the impacts of extreme temperature/ weather.
- **SEA 8:** To conserve and enhance heritage features and their environments by protecting them from decay and development pressures where flood risk or water table changes are a threat.

These SEA objectives have subsequently been assessed against the proposed LFRMS strategic objectives. This concluded whether there would be a positive, neutral or negative impact posed by the delivery of the LFRMS actions. It has been concluded that the LFRMS is unlikely to pose any detrimental effect to environmental and socio-economic issues raised within Southwark.

This screening assessment has undergone a statutory consultation process enabling statutory consultees (Environment Agency, Natural England and Historic England) to review and feedback on the scope and results of the SEA Screening Report. Following this the SEA underwent a public consultation alongside the main LFRMS document and other accompanying appendices. Comments received then informed updates to the final versions of the LFRMS documents.

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# Abbreviations

Abbreviation	Definition
FCERM	Flood and Coastal Erosion Risk Management
HRA	Habitats Regulations Assessment
JSNA	Joint Strategic Needs Assessment
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
LNR	Local Nature Reserve
NPPF	National Planning Policy Framework
PFRA	Preliminary Flood Risk Assessment
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SINC	Site of Importance for Nature Conservation
SNAP	Southwark's Nature Action Plan
Southwark borough	The geographical area known as the London Borough of Southwark.
Southwark Council	The local authority who governs the London Borough of Southwark.
Statutory Consultees	Historic England, Natural England and the Environment Agency
SWMP	Surface Water Management Plan
WFD	Water Framework Directive

# 1. Introduction

## 1.1 Purpose of screening

The purpose of conducting this Strategic Environmental Assessment (SEA) is to assess whether any significant environmental issues may be caused by the delivery of the Local Flood Risk Management Strategy (LFRMS) within Southwark.

This investigation is required under the [European SEA Directive \(2001\)](#). This legislation requires a SEA to be undertaken for any prospective plans or strategies which may have the potential to cause environmental damage. This SEA Screening Report will evaluate the LFRMS strategic objectives and their respective actions to determine whether they have the potential to cause environmental issues to worsen. Alternative options or mitigations may be considered for the delivery of the LFRMS in order to reduce any possible negative impacts that are identified.

Screening is undertaken to determine if there will be a significant negative effect on the local or wider environment, including economic, environmental and social factors. If there is found to be a significant negative impact, then progression onto later stages of the SEA process will be required.



## 1.2 Local Flood Risk Management Strategy

### LFRMS summary

The Southwark LFRMS presents how the Lead Local Flood Authority (LLFA) will deliver flood risk management. This is based on the local flood risk for Southwark and is supported by outputs from other strategic documents. In conjunction with the LFRMS a detailed action plan has been produced listing actions the LLFA will take to manage flood risk. A Habitats Regulations Assessment (HRA) Screening Report has also been completed alongside this SEA Screening Report.

### LFRMS strategic objectives

The LFRMS has produced a set of four strategic objectives:

- A. To improve community awareness of local flood risks and the authorities responsible for managing them.
- B. To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.
- C. To support development across Southwark encouraging the integration of Sustainable Drainage Systems (SuDS) within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.
- D. To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.

This document has assessed the LFRMS strategic objectives against each of the eight SEA objectives to determine if the LFRMS and associated actions will have any potential negative effects on economic, environmental and social issues within Southwark.

### 1.3 SEA Screening Report methodology

A full SEA is separated into five stages, a summary of this is set out in *Table 1-1*.

Table 1-1 Summary table of stages in delivering a SEA

	SEA Stages	SEA Tasks
Screening Stage	<b>Stage A:</b> Setting the context and objectives, establishing the baseline and deciding on the scope.	A1: Identifying relevant policies, plans, programmes and environmental protection objectives.
		A2: Collecting baseline information.
		A3: Identifying environmental issues and risks.
		A4: Developing the SEA objectives and framework.
		A5: Consulting on the scope of the SEA.
Appropriate Assessment Stages	<b>Stage B:</b> Developing and refining options and assessing affects.	B1: Testing the plan objectives against SEA objectives.
		B2: Developing strategic alternatives.
		B3: Predicting the effects of the plan, including alternatives.
		B4: Evaluating the effects of the plan, including alternatives.
		B5: Mitigating adverse effects.
	<b>Stage C:</b> Preparing the environmental report.	C1: Preparing the Environmental Report.
	<b>Stage D:</b> Consulting on the draft strategy and the SEA report.	D1: Consulting on the draft strategy and environmental report with the public and consultation bodies.
		D2: Assessing significant changes.
		D3: Making decisions and providing information.
	<b>Stage E:</b> Monitoring the significant effects of implementing the strategy.	E1: Developing aims and methods for monitoring.
	E2: Responding to adverse effects.	

### 1.4 Consultation process

The SEA Screening Report is required to undergo both a statutory consultation and a public consultation. The statutory consultees for the SEA are the Environment Agency (EA), Natural England and Historic England. The consultation questions set out in *Section 1.5* will be asked to the statutory consultees, whereas for the general public consultation a set of overarching questions were provided as part of the consultation strategy that was produced to support the LFRMS. The public consultation took place in Summer 2023. Following the consultations the feedback was reviewed and appropriate changes made to the SEA and other LFRMS documents as necessary.



## 1.5 SEA consultation questions

### Conclusion and further comments

#### Task A1: Legislation, plans and policies

1. Do you feel we have included all relevant policies, documents, plans and legislation that relate to or could affect the LFRMS?
2. If not, what additional documentation do you think should be included, please provide links?

#### Task A2: Baseline data

3. Do you agree that the baseline data we have included is appropriate to the LFRMS that is being developed? If no, please give reason(s).
4. Do you have, or know of, any additional baseline indicators or data that should be added into this SEA Screening Report? Please provide any appropriate links and/or documents.
5. As far as you are aware, is the baseline data correct? If no, please provide any appropriate links and/or documents with correct data.

#### Task A3: Environmental issues affecting Southwark

6. Do you agree that these are the main environmental issues relating to the LFRMS affecting the Southwark borough? If no, what are the main issues you believe should be included?
7. Are there any other environmental issues that you believe should be added into this SEA Screening Report? If so, please give details.
8. Do you consider any of these environmental issues to not affect Southwark? If so, please give details.



#### Task A4: Proposed SEA objectives

9. Do you agree that these proposed SEA objectives are suitable in the context of the Southwark borough?
10. Are there any other SEA objectives that you believe should be included? If so, please give details.

#### Task A5: Screening analysis

11. Do you have any comments on the method for the assessment of the SEA objectives with the LFRMS strategic objectives?
12. Do you agree with the screening analysis of each of the LFRMS strategic objectives? If not, please give reasons as to why you would screen a certain objective differently.

13. Do you have any comments on the conclusions that we have made in this SEA Screening Report?
14. Do you have any additional comments or suggestions for this SEA Screening Report?

# 2. Identification of relevant policies

## 2.1 Task A1 summary

Task A1 is to identify relevant policies, plans and programmes and environmental protection objectives. This has been completed by collating all appropriate policies, documents and legislation that has the potential to effect or influence the LFRMS in relation to the SEAs purpose.

## 2.2 Relevant policies

All relevant plans, policies, strategies, legislation at local, regional, national and international level have been taken into account. These are listed in *Table 2-1*.

Table 2-1 Links to policies, legislation and documents which impact the SEA

<b>International</b>
<a href="#">UNESCO World Heritage Convention (1972)</a>
<a href="#">Convention for the Protection of the Architectural Heritage of Europe (1985)</a>
<a href="#">EU Habitats Directive (1992)</a>
<a href="#">The Valletta Treaty (<i>formally European Convention on the Protection of Archaeological Heritage</i>) (1992)</a>
<a href="#">EU Water Framework Directive (2000)</a>
<a href="#">European Landscape Convention (2000)</a>
<a href="#">European SEA Directive (2001)</a>
<a href="#">EU Floods Directive (2007)</a>
<a href="#">EU Birds Directive (2009)</a>
<a href="#">EU Biodiversity Strategy for 2030 (2020)</a>
<b>National</b>
<a href="#">Ancient Monuments &amp; Archaeological Areas Act (1979)</a>
<a href="#">Wildlife and Countryside Act (1981)</a>
<a href="#">Environmental Protection Act (1990)</a>
<a href="#">Planning (Listed Buildings &amp; Conservation Areas) Act (1990)</a>
<a href="#">Land Drainage Act (1991)</a>
<a href="#">The UK Biodiversity Action Plan (1994)</a>
<a href="#">Civil Contingencies Act (2004)</a>
<a href="#">Natural Environment and Rural Communities Act (2006)</a>
<a href="#">The Pitt Review - Lessons learned from the 2007 summer floods (2007)</a>
<a href="#">The SuDS Manual C753F (2015)</a>
<a href="#">Climate Change Act (2008)</a>
<a href="#">Future Water: The Government's Water Strategy for England (2008)</a>
<a href="#">Flood Risk Regulations (2009)</a>
<a href="#">Flood and Water Management Act (2010)</a>
<a href="#">Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)</a>
<a href="#">National Standards for Sustainable Drainage Systems (2011)</a>
<a href="#">Water Act (2014)</a>
<a href="#">Environmental Permitting Regulations (2016)</a>
<a href="#">DEFRA: 25 Year Environment Plan (2018)</a>
<a href="#">National Flood and Coastal Erosion Risk Management (FCERM) Strategy for England (2020)</a>

<a href="#">Meeting our Future Water Needs: A National Framework for Water Resources (2020)</a>
<a href="#">Environment Act (2021)</a>
<a href="#">National Planning Policy Framework (2012, revised 2021)</a>
<a href="#">National Planning Practice Guidance (2016, revised 2022)</a>
<b>Regional</b>
<a href="#">Thames Catchment Flood Risk Management Plan (2009)</a>
<a href="#">Mayor of London's Climate Change Adaptation Strategy (2011)</a>
<a href="#">Thames Estuary 2100 Flood Risk Management Plan (2012)</a>
<a href="#">Thames River Basin District, River Basin Management Plan (2015)</a>
<a href="#">London Regional Flood Risk Appraisal (2018)</a>
<a href="#">London Environment Strategy (2018)</a>
<a href="#">Zero carbon London: A 1.5°C compatible plan (2018)</a>
<a href="#">The London Plan (2021)</a>
<a href="#">Thames Estuary 2100: 10-Year Review (2022)</a>
<a href="#">Thames Estuary 2100 Plan (2023)</a>
<b>Local</b>
<a href="#">Southwark's Preliminary Flood Risk Assessment (PFRA) (2011) (Addendum 2017)</a>
<a href="#">Southwark's SINC Review Report (2016)</a>
<a href="#">Southwark's Strategic Flood Risk Assessment (SFRA) (2017)</a>
<a href="#">Southwark's Nature Action Plan (SNAP) (2020)</a>
<a href="#">Southwark Tree Management Policy (2020)</a>
<a href="#">Southwark's Climate Change Strategy (2021)</a>
<a href="#">Southwark's Climate Change Action Plan (2021)</a>
<a href="#">Southwark's Joint Strategic Needs Assessment (JSNA) (2022)</a>
<a href="#">Southwark's Local Plan (2022)</a>
<a href="#">Southwark's Surface Water Management Plan (SWMP) (2022)</a>
<a href="#">Southwark's Air Quality Strategy and Action Plan (2023 to 2027)</a>

### 2.3 Task A1 consultation questions

1. Do you feel we have included all relevant policies, documents, plans and legislation that relate to or could affect the LFRMS?
2. If not, which additional documentation do you think should be included?

# 3. Baseline information

## 3.1 Task A2 summary

Task A2 is to collate data and information from a variety of sources to understand the environmental setting within Southwark. This will cover information on biodiversity, flora & fauna, infrastructure, population, public health, climate, soil / water and historical / cultural factors. The SEA Screening Report should review these types of information so that social and economic indicators can also be considered to provide an in-depth assessment of potential impacts that may be posed by the delivery of the LFRMS action plan.

## 3.2 Southwark borough characteristics

Southwark is located within Central London along the south side of the River Thames. The Southwark borough is neighboured by the London Boroughs of Lewisham, Lambeth and Bromley. The topography of Southwark rises further south and slopes downwards towards the River Thames in the North. The Northern half of Southwark is categorised within the EA's Flood Zones 2 & 3.

Rail assets within Southwark include South-eastern railway lines, London Overground rail services, Thames Link rail services and the London Underground Jubilee and Northern Lines. The majority of Southwark is heavily urbanised with several district town centres of Rotherhithe, Peckham, Borough and Dulwich. There are several notable open spaces which include Peckham Rye Park & Common, Burgess Park, Southwark Park and Dulwich Park.

## 3.3 Baseline information

### Biodiversity, flora and fauna

Southwark has 516 hectares of natural green space, including over 215 parks and open spaces. There are also many significant habitats present which include ancient woodland, secondary woodland, lakes, reedbeds, native hedges and meadows.

A great number of important species exist in Southwark which are of international and national importance. These include, bats, reptiles, stag beetles, birds, butterflies, orchids and corky fruited water dropwort ([SNAP, 2020](#)).

There are 90 Sites of Importance for Nature Conservation (SINCs) in Southwark which are categorised into levels of Metropolitan, Borough or Local importance detailed in *Table 3-1*. Examples of Local Nature Reserves (LNRs) include Sydenham Hill Wood and Nunhead Cemetery. Examples of registered parks and gardens include Dulwich Park and Belair Park. Additional sites within these categories can be found by following the links provided in the table below.

Table 3-1 The number of sites with special designations in Southwark

Designation	No. of sites
<a href="#">Total no. SINCs</a>	90
<a href="#">Sites of Metropolitan Importance for Nature Conservation</a>	3
<a href="#">Sites of Borough Importance for Nature Conservation</a>	43
<a href="#">Sites of Local Importance for Nature Conservation</a>	44
<a href="#">Local Nature Reserves</a>	7
<a href="#">Registered parks and gardens</a>	5

Southwark Council understands the value that trees have to offer within an urban environment and aims to protect current trees and woodlands. Trees offer many benefits in terms of tackling the impacts of climate change and air pollution, as well as providing habitats for species and supporting local biodiversity.

## Infrastructure assets

There are a range of critical infrastructure assets within Southwark which must have mitigations in place to protect them in emergencies. Critical infrastructure assets must not have their access or purpose impeded by hazards or developments. The need for access or protections decreases through the levels for designated infrastructure assets as shown in *Table 3-2*.

Table 3-2 The percentage of Southwark assets for each significance band in relation to flood risk

Significance Band	% of no. of Southwark Assets
High	74%
Medium	8%
Low	1%
Very Low	1%
No Drivers	16%

Southwark also has a variety of green infrastructure assets which have the opportunity to offer multiple benefits and should work with the implementation of flood risk management.

Outputs from Southwark's recent [SWMP \(2022\)](#) have produced the number of properties at risk of surface water flooding for a variety of rainfall events. These are shown in *Table 3-3*. This demonstrates the significant amount of property and infrastructure in Southwark which is predicted to be at risk of flooding from surface water.

Table 3-3 The numbers of properties in Southwark at risk for various rainfall events

	Residential	Commercial	Other	Total
1 in 30-year rainfall event	1,674	257	434	2,365
1 in 100-year rainfall event	5,028	832	1,270	7,130
1 in 1000-year rainfall event	16,678	2,861	4,341	23,880

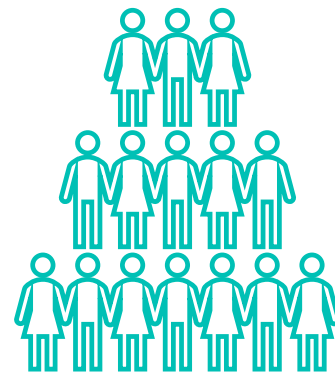
Southwark also has flood defence infrastructure along the banks of River Thames which form part of the Thames Tidal Defence System. This includes walls and embankments as well as flood gates, outfalls and pumps.

## Population

Southwark has a population of around 320,000 people with an average age of 33.9 years ([JNSA, 2022](#)). This is a lower than average age for the population compared to the rest of England. There is a similar male and female population within Southwark of approximately 160,800 males and 159,200 females. It is estimated that Southwark's population will increase at a faster rate than the national average. It is predicted that there will be an increase of 17,000 people living in Southwark by 2030, with largest population increases expected in the Old Kent Road, Canada Water and Elephant & Castle areas, due to redevelopment initiatives.

The population of Southwark is very diverse with residents with a range of ethnicities and backgrounds. The [JNSA \(2022\)](#) estimates that 51% of Southwark residents have a white ethnic background compared to 84% nationally.

Under the Indices of Deprivation, Southwark is considered to be one of the most deprived local authorities in England. Improvement has been noted between 2015 to 2019, however approximately 21% of Southwark's population currently live in communities that are ranked within the most deprived nationally.



## Public health

The [JNSA \(2022\)](#) states that 14% of residents in inner-London have a disability, which would be approximately 44,800 people in Southwark. Mobility, stamina / fatigue and mental health and the three highest ranking types of impairment for residents within Southwark.

The urban health index for Southwark reviewed 68 neighbourhoods categorising them into strong (top 20 areas), neutral and weak (bottom 20 areas). Southwark has a mixture of these categories. All neighbourhoods in the south of Southwark rank as strong, however some central and north-west areas were ranked as weak. This process reviewed 42 social and environmental indicators to assess urban living on residents' health. The full urban health index for Southwark can be viewed [here](#).

## Air quality

There is a big focus on air quality within London, particularly central areas due to significant evidence that shows the impacts of air pollution on health. There are different risks posed by short-term or long-term exposure to air pollution, but long-term exposure has a much greater risk. Long-term exposure could result in the worsening of respiratory conditions such as asthma and chronic respiratory disease, as well as causing premature death.

Poor air quality can also impact on biodiversity (flora and fauna) and buildings ([Air Quality Strategy and Action Plan, 2017](#)). This is due to particulate matter generating acid rain and/or affecting building materials. Sensitive plants and animals could decline due to worsening air quality predicted with the impacts of climate change.

In 2019, Southwark was above the London and England average for percentage of deaths in those aged 30+ due to particulate air pollutions (PM2.5) as stated in the [JNSA \(2022\)](#). The most significant causes of air pollution in Southwark are from road transport and from domestic / commercial fuels mostly from cooking and heating.

## Climate factors

The impacts of climate change are already evident and are expected to worsen. The IPCC found that a global rise above 1.5°C would lead to climate-related risks to human health, livelihoods, food security, human security, water supply and economic growth. London now has a [zero-carbon plan](#) in place to address this temperature increase.

Climate change is likely to harm human health in a variety of ways with increases in deaths due to extreme temperature expected to rise ([Climate Change Strategy, 2021](#)). The risk of insect borne diseases in the UK is also a rising risk caused by climate change.

60% of residents in Southwark live less than ten meters above sea level ([Climate Change Strategy, 2021](#)). The risk of fluvial / tidal flooding is likely to increase due to rising sea levels. Southwark is presently protected by the Thames Tidal Defence system which includes the Thames Barrier and sea wall defences. However these may reduce in effectiveness over time due to the speed at which sea levels are rising. But updates to the EA's Thames Estuary 2100 Plan could help to mitigate these effects.

Approximately 75,000 residents in Southwark face food insecurity, ([Climate Change Strategy, 2021](#)), which means they do not have enough money to buy food. Climate change could increase food insecurity due to increases in prices which could worsen inequality within Southwark.



Figure 3-1 Photograph of Silver Birch trees with the Shard building in Southwark (Credit: Southwark Council)

## Soil and water

There is only a single designated Water Framework Directive (WFD) water body within Southwark which is the Thames Middle water body. The River Thames is the only main river in the Southwark borough and is situated along the northern boundary of Southwark for approximately 7km. The [Thames Middle water body](#) is of moderate ecological status and has the hydro morphological designation of highly modified.

Other watercourses have since been encompassed within sewer networks, for instance the Lost River Peck and Lost River Effra. The WFD does set the target that all water bodies should aim for 'good ecological status' and this should be sort even for non-designated waterbodies.

With the impacts of climate change pressures on water supplies are also increasing. Aquifers and reservoirs are unable to be replenished due to low rainfall during prolonged dry periods. Water scarcity is a growing risk and conserving water becoming an even greater priority.

There are not any nationally or regionally important geological sites within Southwark. Dulwich Mill Pond has previously been identified as an area of potentially local geological importance, in [supplementary planning guidance for Dulwich](#). The underlying geology of Southwark is divided, with the oldest rocks, Upper Chalk Formation, found in the north-east of Southwark. In Bermondsey and Camberwell the rock formation is outcropped; overlying the Upper Chalk Formation is Thanet Sand Formation.

## Historical and cultural environment

There are a variety of historical and cultural assets which have significant value within Southwark. These are designated sites or landmarks which are protected by policies and legislations. The [Southwark Local Plan \(2022\)](#) establishes several specific policies which relate to the protections of these assets.

*Policy 19* – Listed buildings and structures, maintains that development should not harm the significance of a listed building or structure and is required to conserve or enhance the feature.

*Policy 21* – Conservation of the historic environment and natural heritage, states that development should “conserve and enhance the significance of [...] designated and non-designated assets and their settings”, this applies to the assets presented in *Table 3-4* among others.

*Policy 22* – Borough views, states how development should not impede these views and should ensure they are accessible and where possible be enhanced by development.

*Policy 23* – Archaeology, establishes restrictions for development within Archaeological Priority Areas.

Table 3-4 Number and classifications of historical and cultural assets

Type of classification	No. of assets	Example of asset
<a href="#">Grade I listed buildings</a>	4	The George Inn
<a href="#">Grade II listed buildings</a>	878	The St Saviours Southwark war memorial
<a href="#">Grade II* listed buildings</a>	29	The Church of St Augustine
<a href="#">Scheduled ancient monuments</a>	8	The Globe Theatre
<a href="#">Protected linear view</a>	2	Nunhead Cemetery
<a href="#">Other protected views (London Panorama / River Prospect / Townscape View)</a>	3	One Tree Hill
<a href="#">Archaeological Priority Areas</a>	6	APA 1 - North Southwark and Roman Roads
<a href="#">Conservation areas</a>	53	Addington Square
<a href="#">London Squares</a>	7	Trinity Church Square

## Crime

The crime rates experienced in Southwark correlate with those for the whole of London. The most common offences being violence against the person and theft ([JNSA, 2022](#)). Overall from April 2020 to March 2021 over 30,000 offences were recorded in Southwark, which was significantly higher than the London average, but a decline from previous years. The decline is likely to be related to the national lockdowns imposed due to COVID-19.

## Education

Southwark is experiencing a lack of demand for school places, where the supply of school places is now exceeding this demand. This is due to a falling birth rate, net migration from the EU has declined, rising house prices, and changes to benefits. However in this time the standards in schools have risen, in December 2022 98% of Southwark schools were rated by Ofsted as good or outstanding. More information can be found [here](#).



## 3.4 Task A2 consultation questions

- Do you agree that the baseline data we have included is appropriate to the LFRMS that is being developed? If no, please give reason(s).
- Do you have, or know of, any additional baseline indicators or data that should be added into this SEA Screening Report? Please provide any appropriate links and/or documents.
- As far as you are aware, is the baseline data correct? If no, please provide any appropriate links and/or documents with correct data.

# 4. Identification of environmental, social and economic issues

## 4.1 Task A3 summary

Task A3 is to create a list of environmental issues and/or problems based on the baseline criteria collated in Task A2. The purpose of this is to begin to explore the relationship between these issues and flood risk, and therefore how the delivery of the LFRMS may impact these challenges for Southwark.

## 4.2 Local environmental, social and economic issues

Many of the environmental, social and economic issues identified in *Table 4-1* can be specifically linked with climate change because many are either caused by or exacerbated due to climate change. For example, reduction in habitats and decrease in biodiversity, weather extremes and food insecurities.

Table 4-1 Environmental, social and economic issues and their potential associated problems

Key environmental, social and economic issues	Potential associated problems	Proposed LFRMS objective
Degradation to areas of green space and/or conservation designations	<ul style="list-style-type: none"> <li>Loss of habitats and biodiversity</li> <li>Negative impacts to health due to lack of quality green spaces</li> <li>Loss of carbon sinks, rise in poor air quality</li> </ul>	C D
Reduction in important / protected habitats and/or species	<ul style="list-style-type: none"> <li>Degradation of ecology and biodiversity</li> <li>Failure to protect endangered habitats / species</li> <li>Reduction in ecological diversification</li> </ul>	A B C D
Decrease in biodiversity	<ul style="list-style-type: none"> <li>Increase in diseases spread between species</li> <li>Negative impacts on livelihoods of local people and economy</li> <li>Loss of green space</li> <li>Negative impacts to food production (e.g. allotments)</li> </ul>	C D
Increase in the number of critical infrastructure assets at risk from flooding	<ul style="list-style-type: none"> <li>Severe disruption to residents / commuters / tourists in Southwark in event of significant flood</li> <li>Higher risk of loss of life in event of significant flood due to primary and secondary impacts</li> <li>Rise in cost of property repairs and insurance premiums</li> </ul>	A C
Increase in the number of properties at risk of surface water flooding	<ul style="list-style-type: none"> <li>Lack of funding to support residents in protecting their property</li> <li>Greater number of people in need of education surrounding flood risk</li> <li>Greater number of people at risk of displacement</li> <li>Higher insurance premiums</li> </ul>	A C



Key environmental, social and economic issues	Potential associated problems	Proposed LFRMS objective
Geographic inequalities	<ul style="list-style-type: none"> <li>• Pockets of deprivation exist</li> <li>• Increase in hostilities between areas</li> <li>• Flood risk is less of a priority for residents in deprived areas</li> <li>• Lack of investment towards flood risk in deprived areas due to higher social priorities</li> <li>• Rise in crime rates</li> </ul>	A C
Population inequalities	<ul style="list-style-type: none"> <li>• Minority ethnic groups experiencing poorer quality of life compared to those of white ethnic background</li> <li>• Minority ethnic groups tend to live in areas with higher deprivation</li> <li>• Minority ethnic groups are more likely to develop long term conditions and have poorer mental health</li> <li>• Less opportunity in deprived areas to take action to protect properties from flooding</li> <li>• Flood risk is less of a priority for residents in deprived areas</li> <li>• Residents are less likely to have flood insurance in deprived areas, potentially increasing the local numbers of people suffering with disabilities (particularly mental health)</li> <li>• Disparities in education around flood risk and its mitigation</li> </ul>	A C
Increase in population (natural change and population mobility)	<ul style="list-style-type: none"> <li>• Increased pressure on local services</li> <li>• Pressure for increased development</li> <li>• Greater number of people vulnerable to flooding</li> <li>• Possible loss of permeable land due to increased development</li> <li>• Rise in demand for water supplies</li> </ul>	B C
Wider determinants of health	<ul style="list-style-type: none"> <li>• High numbers of children living in poverty</li> <li>• Higher costs of living likely to worsen living situations for residents</li> <li>• Higher rates of food insecurity</li> <li>• Flood risk is less of a priority for residents in deprived areas</li> </ul>	C D
Decrease in air quality	<ul style="list-style-type: none"> <li>• Increase in cases of respiratory health conditions</li> <li>• Greater numbers of vulnerable people putting pressure on health services</li> <li>• Negative impacts on biodiversity due to pH and nutrient levels in soils and water</li> </ul>	C D
More frequent temperature and weather extremes	<ul style="list-style-type: none"> <li>• Greater numbers of residents, property and infrastructure vulnerable to climate extremes</li> <li>• Increased pressure on health and infrastructure services</li> <li>• School facilities need upgrading to cope with extreme weather events</li> <li>• Water supplies unable to replenish fully following drought conditions</li> </ul>	B C D
Increasing food insecurity	<ul style="list-style-type: none"> <li>• Greater number of people living in poverty</li> <li>• More pressure on food banks</li> </ul>	D
Reduction in water and soil quality	<ul style="list-style-type: none"> <li>• Negative impacts to biodiversity and ecology</li> <li>• Risk of impacting groundwater / aquifer sources</li> <li>• Increase in pollution risks when flooding occurs</li> <li>• Reduction in infiltration rates due to soil compaction/ quality</li> <li>• Loss of plants could reduce interception and increase flood risk</li> </ul>	A C D
Degradation of historical and cultural assets / environments	<ul style="list-style-type: none"> <li>• Harm or loss to the significance of heritage / cultural assets</li> </ul>	B C D

Key environmental, social and economic issues	Potential associated problems	Proposed LFRMS objective
Deterioration of the Thames Tidal Defence System	<ul style="list-style-type: none"> <li>• Increased burden on riparian landowners</li> <li>• Could increase level of tidal flood risk to large areas of the borough, currently considered to have a "reduction in risk of flooding from rivers and the sea" in the event of an asset failure</li> </ul>	B D

### 4.3 Task A3 consultation questions

6. Do you agree that these are the main environmental issues relating to the LFRMS affecting the Southwark borough? If no, what are the main issues you believe should be included?
7. Are there any other environmental issues that you believe should be added into this SEA Screening Report? If so, please give details.
8. Do you consider any of these environmental issues to not affect Southwark? If so, please give details.

# 5. SEA objectives

## 5.1 Task A4 summary

Task A4 is to generate a list of SEA objectives based on the environmental issues raised in Task A3. The SEA objectives are also developed based on local knowledge and understanding relating to flood risk management.

## 5.2 SEA objectives

These eight SEA objectives are a set of aims which have been produced to address the environmental, social and economic issues raised in *Section 4.2*. The purpose of these objectives is to support in the assessment of the LFRMS strategic objectives and actions, these SEA objectives will not be specifically delivered. However the aims sought in these objectives are likely to be addressed through the work of delivering the LFRMS and wider strategies produced by Southwark Council.

The SEA objectives will support in the on-going review of the delivery of the LFRMS Action Plan to assess impacts to these local issues. Any outcomes from these actions which warrant further assessment under these specific legislations Southwark Council will do so.

**SEA 1:** To conserve and enhance green spaces and designated conservation areas to support the security and growth of protected habitats and species.

**SEA 2:** To support biodiversity net gain across Southwark within developments, supporting local ecological, social and health benefits.

**SEA 3:** To protect critical infrastructure and ensure that new development appropriately considers and mitigates the impacts of increased flood risk.

**SEA 4:** To support residents in protecting their properties from flood risk through education and financial support/ advice.

**SEA 5:** To ensure that social and economic inequalities are addressed by prioritising areas for investment and development effectively.

**SEA 6:** To improve the physical and mental health of residents by supporting access to green spaces, improving air quality and access to health care.

**SEA 7:** To effectively support new development and infrastructure in preparing for the impacts of extreme temperature/ weather.

**SEA 8:** To conserve and enhance heritage features and their environments by protecting them from decay and development pressures where flood risk or water table changes are a threat.

## 5.3 Task A4 consultation questions

9. Do you agree that these proposed SEA objectives are suitable in the context of the Southwark borough?
10. Are there any other SEA objectives that you believe should be included? If so, please give details.

# 6. Screening analysis of the LFRMS

## 6.1 Task A5 summary

Task A5 is to conduct the analysis of the SEA objectives against each of the LFRMS Strategic Objectives. This is to assess the scope of the SEA to determine if there will be no effect, or a potentially significant effect of delivering the proposed LFRMS actions.

## 6.2 Screening analysis

Each of the LFRMS strategic objectives have been analysed against the SEA objectives. The results of this analysis are displayed in *Table 6-1*, with the criteria applied defined in *Table 6-2*. The outcomes reached have been decided based on the best judgment from a qualitative approach. The justifications for the decisions made are detailed in *Section 6.3*.

None of the LFRMS strategic objectives will negatively impact any of the SEA objectives. There are some neutral outcomes where the LFRMS strategic objective does not relate directly to the SEA objective. The overall analysis shows that there is likely to be a mixture of minor and major positive outcomes from the delivery of the LFRMS to the SEA objectives with no foreseen negative impacts.

Table 6-1 Scoring matrix of LFRMS strategic objectives against the SEA objectives

		SEA Objective Number							
		SEA 1	SEA 2	SEA 3	SEA 4	SEA 5	SEA 6	SEA 7	SEA 8
LFRMS Strategy Objective	A	+	+	+	++	++	+	+	+
	B	+	+	++	0	+	+	+	+
	C	++	++	++	+	++	++	++	+
	D	+	+	+	+	+	+	++	+

Table 6-2 Legend criteria for Table 6-1

++	Major positive effect on SEA objective.
+	Minor positive effect on SEA objective.
0	Neutral effect on SEA objective and/or dependent on implementation.
-	Minor negative effect on SEA objective.
--	Major negative effect on SEA objective.
?	Uncertain

## 6.3 Screening analysis outcomes

Justifications for the decisions made in *Table 6-1* have been described in each of the following tables respectively for each LFRMS strategic objective.

Table 6-3 Justifications for the screening outcomes of LFRMS strategic objective A against the SEA objectives

<b>LFRMS strategic objective A</b> <i>To improve community awareness of local flood risks and the authorities responsible for managing them.</i>		
<b>Outcome</b>	<b>SEA Objective</b>	<b>Justification</b>
Major positive	SEA 4	Raising awareness of flood risk will help residents to identify affordable property flood resilience measures or the LLFA to identify locations where additional funding may be required to deliver targeted flood alleviation schemes (FAS).
	SEA 5	Targeted awareness raising will be made through the delivery of the LFRMS to ensure specific communities are supported effectively.
Minor positive	SEA 1	Improving community awareness of flood risk will help to improve the perception and value of local green spaces to local residents.
	SEA 2	Raising awareness of flood risk mitigations will show residents the importance of also protecting biodiversity and of other additional benefits from natural capital.
	SEA 3	Improvements to community awareness have the potential to feedback to developers on all scales to consider the impacts of flood risk more appropriately.
	SEA 6	This LFRMS strategic objective should offer opportunity to also raise awareness of the benefits of green spaces and how FAS offer multiple benefits such as supporting access to green space and improving air quality.
	SEA 7	Strategic objective A has the potential to offer a minor benefit by sharing knowledge on flood warning systems or extreme weather with developers.
	SEA 8	Supporting communities to better understand their flood risk could support the protection of heritage features.
Minor negative	N/A	None of the SEA objectives are likely to have a minor negative impact by the delivery of LFRMS strategic objective A.
Major negative	N/A	None of the SEA objectives are likely to have a major negative impact by the delivery of LFRMS strategic objective A.
Uncertain	N/A	There were no uncertainties between the SEA objectives and LFRMS strategic objective A.

Table 6-4 Justifications for the screening outcomes of LFRMS strategic objective B against the SEA objectives

<b>LFRMS strategic objective B</b> <i>To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.</i>		
<b>Outcome</b>	<b>SEA Objective</b>	<b>Justification</b>
Major positive	SEA 3	Working closely with the local planning authority will ensure that critical infrastructure is protected with appropriate conditions in place for new developments.

<b>LFRMS strategic objective B</b>		
<i>To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.</i>		
<b>Outcome</b>	<b>SEA Objective</b>	<b>Justification</b>
Minor positive	SEA 1	Liaising with parks and ecology teams will allow coordination on delivering priorities which mutually address conserving green spaces, habitats and species as well as mitigating the impacts of flooding.
	SEA 2	Coordinating between departments will enable mutual opportunities in delivering FASs which also support ecology, social and health benefits.
	SEA 5	Working with other stakeholders will enable mutually beneficial opportunities to take place when delivering FASs which will have the potential to offer social and economic benefits.
	SEA 6	Having improved communication will enable more opportunities for cross-departmental working on FASs which could offer multiple benefits for communities.
	SEA 7	Supporting effective communication in preparing for extreme temperature/ weather will improve the preparedness of residents in Southwark.
	SEA 8	Communicating the risks to heritage and cultural will improve how flood risk management considers these issues.
Neutral	SEA 4	This SEA had very little / no relation to this LFRMS strategic objective.
Minor negative	N/A	None of the SEA objectives are likely to have a minor negative impact by the delivery of LFRMS strategic objective B.
Major negative	N/A	None of the SEA objectives are likely to have a major negative impact by the delivery of LFRMS strategic objective B.
Uncertain	N/A	There were no uncertainties between the SEA objectives and LFRMS strategic objective B.

Table 6-5 Justifications for the screening outcomes of LFRMS strategic objective C against the SEA objectives

<b>LFRMS strategic objective C</b>		
<i>To support development across Southwark encouraging the integration of Sustainable Drainage Systems (SuDS) within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.</i>		
<b>Outcome</b>	<b>SEA Objective</b>	<b>Justification</b>
Major positive	SEA 1	SuDS encourage the creation of green spaces and can help to create new habitats and wildlife corridors through urban environments.
	SEA 2	The implementation of SuDS also encourages additional benefits such as improvements to biodiversity and SuDS can provide improved habitats on existing brownfield land.
	SEA 3	Appropriate measures are in place to ensure that development meets the correct standards in terms of mitigating the risks of flooding, this ensuring that critical infrastructure is protected.
	SEA 5	The selection of SuDS will consider where areas are at high risk of flooding, factors such as high levels of inequalities will also be included in site selection for FAS to support the most vulnerable areas.
	SEA 6	SuDS can often support the improvement or introduction of green spaces into urban environments, therefore helping to provide health and social benefits.
	SEA 7	The implementation of SuDS in development will also appropriately consider the impacts of climate change in terms of flood risk (extreme weather) and extreme temperatures.

**LFRMS strategic objective C**

*To support development across Southwark encouraging the integration of Sustainable Drainage Systems (SuDS) within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.*

Outcome	SEA Objective	Justification
Minor positive	SEA 4	Support/ guidance will be given to property owners to help implement SuDS at a property level helping residents to reduce the risk of flooding to homes and buildings.
	SEA 8	By carefully considering developments there is not likely to be any increased flood risk to surrounding buildings as a result of the development. The implementation of SuDS should help ease local flood risk pressures helping to protect local heritage assets.
Neutral	N/A	None of the SEA objectives are likely to have a neutral impact by the delivery of LFRMS strategic objective C.
Minor negative	N/A	None of the SEA objectives are likely to have a minor negative impact by the delivery of LFRMS strategic objective C.
Major negative	N/A	None of the SEA objectives are likely to have a major negative impact by the delivery of LFRMS strategic objective C.
Uncertain	N/A	There were no uncertainties between the SEA objectives and LFRMS strategic objective C.

Table 6-6 Justifications for the screening outcomes of LFRMS strategic objective D against the SEA objectives

**LFRMS strategic objective D**

*To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.*

Outcome	SEA Objective	Justification
Major positive	SEA 7	Improving knowledge on climate change impacts will ensure that appropriate standards are imposed on developments to consider extreme weather and temperatures.
Minor positive	SEA 1	Working towards resilience against the impacts of climate change will support mutual aims of supporting protected habitats and species.
	SEA 2	Improving resilience to climate change should have secondary benefits of providing biodiversity net gain.
	SEA 3	Planning policy reflecting the need for mitigations against climate change will ensure that development will minimise the impacts of increased flooding.
	SEA 4	Through this LFRMS the LLFA will support the improvement of resilience within Southwark helping to inform residents how to protect their properties.
	SEA 5	Prioritising the area's most at risk from the effects of climate change will aim to support social and economic inequalities being addressed.
	SEA 6	Actions to reduce carbon emissions will help to improve air quality within Southwark, whilst showing the benefits nature can offer to physical and mental health.
	SEA 8	Tackling climate change will help to support water tables in remaining stable.
Minor negative	N/A	None of the SEA objectives are likely to have a minor negative impact by the delivery of LFRMS strategic objective D.
Major negative	N/A	None of the SEA objectives are likely to have a major negative impact by the delivery of LFRMS strategic objective D.

**LFRMS strategic objective D**

*To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.*

Outcome	SEA Objective	Justification
Uncertain	N/A	There were no uncertainties between the SEA objectives and LFRMS strategic objective D.

#### 6.4 Task A5 consultation questions

11. Do you have any comments on the method for the assessment of the SEA objectives with the LFRMS strategic objectives?
12. Do you agree with the screening analysis of each of the LFRMS strategic objectives? If not, please give reasons as to why you would screen a certain objective differently.



# 7. Conclusions and next steps

## 7.1 Conclusions

The outputs of the SEA Screening Report conclude that the LFRMS is unlikely to pose any detrimental effect to environmental issues within Southwark. Findings have identified that the delivery of the LFRMS is likely to favour mutually beneficial outcomes where the SEA objectives have a relation to the LFRMS strategic objectives.

Therefore, it can be concluded that the LFRMS has appropriately considered the impacts of its action plan in regard to local environmental, economic and social issues. The delivery of flood risk management can offer many beneficial outcomes for a range of factors, provided effective and early communication takes place between stakeholders.

From the findings of this SEA Screening Report, it is concluded that progression onto Stage B is not required, and it is not necessary for a full SEA to be completed.

## 7.2 Consultation of the SEA

A statutory consultation has been undertaken to enable necessary stakeholders to review and provide comments on the scope and analysis of the SEA. Responses received have been appropriately applied to the SEA Screening Report as required before the document was released for public consultation. During the public consultation individuals, such as residents and other stakeholders, had the opportunity to review the SEA Screening Report and provide feedback. Relevant feedback has subsequently been incorporated into the final version of the SEA Screening Report and corresponding LFRMS documents.

## 7.3 Final comments consultation questions

13. Do you have any comments on the conclusions that we have made in this SEA Screening Report of the LFRMS?
14. Do you have any additional comments or suggestions for this SEA Screening Report?

London Borough of Southwark

# Local Flood Risk Management Strategy 2023 - 2029

## Habitats Regulations Assessment



# Executive summary

A Habitats Regulations Assessment Screening Report has been undertaken to assess the potential impacts to specific natural environments when delivering the Local Flood Risk Management Strategy (LFRMS). These specific natural environments include sites which are designated under the Conservation of Habitats and Species Regulations (2017) and are referred to as European Sites or Natura 2000 Sites. Included under this designation are Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites.

This Screening Report has determined which European sites should be considered within this investigation. This is based on hydro-connectivity and their proximity to Southwark. No sites are situated within the Southwark borough boundary however four sites external of the borough have been included in this assessment. These are:

- Site 1: Wimbledon Common – SAC
- Site 2: Richmond Park – SAC
- Site 3: Epping Forest – SAC
- Site 4: Lee Valley – SAC & Ramsar

The proposed LFRMS strategic objectives and their associated actions have then been assessed against each site. This is to establish whether there are likely to be any significant negative impacts to these sites caused by the delivery of the LFRMS.

No negative impacts were found to be likely by the delivery of the LFRMS strategic objectives and their associated actions. A harmful effect could include disruption to the natural processes within the site, a reduction in the amount or quality of designated habitats or species, or a limitation to the potential of restoring the designated habitats or species in the future.

The delivery of the LFRMS is instead likely to offer potential enhancement for these designated sites both directly and indirectly. Offering benefits to the designated sites by enhancing their quality or supporting further awareness and/or protections. It is therefore concluded that the HRA for the LFRMS does not require progression onto later tasks and does not require a full assessment.

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## Abbreviations

Abbreviation	Definition
HRA	Habitats Regulations Assessment
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
Ramsar	Ramsar sites are wetlands of international importance designated under the Ramsar Convention.
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SINC	Site of Importance for Nature Conservation
Southwark borough	The geographical area known as the London Borough of Southwark.
Southwark Council	The local authority who governs the London Borough of Southwark.
SPA	Special Protection Area
Statutory Consultees	Natural England

# 1. Introduction

## 1.1 Purpose of screening

The purpose of conducting this Habitats Regulations Assessment (HRA) Screening Report is to assess any potential risks to habitats which may be caused by the delivery of the Local Flood Risk Management Strategy (LFRMS) within Southwark and the surrounding area.

This investigation is required under the [Conservation of Habitats and Species Regulations \(2017\)](#) known also as Habitats Regulations. This legislation explains that a HRA must be conducted to investigate whether a plan or proposal will cause any significant harm to designated European Sites (also known as Natura 2000 sites). These European Sites include designated and proposed Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. Some of these sites may lie outside the borough boundary and are included because they are hydrologically linked.

Additional areas such as locally important sites including, but not limited to, Sites of Importance for Nature Conservation (SINCs), have not been included within this screening analysis. This is because these types of sites are not included under the legislation which governs a HRA, and therefore are not required to be assessed in this report.

Screening is conducted to determine if there will be a significant negative impact to any European Sites when delivering the LFRMS. If there is found to be a significant negative impact, then progression onto later stages of the HRA process will be required including potential monitoring actions.



Figure 1-1 Photograph of deer in Richmond Park a registered SAC  
(Credit: Southwark Council)

## 1.2 Local Flood Risk Management Strategy

### LFRMS summary

The Southwark LFRMS presents how the Lead Local Flood Authority (LLFA) will deliver flood risk management. This is based on the local flood risk for Southwark and is supported by outputs from other strategic documents. In conjunction with the LFRMS a detailed action plan has been produced listing actions the LLFA will take to manage flood risk. A Strategic Environmental Assessment (SEA) Screening Report has also been completed alongside this HRA Screening Report.

### LFRMS strategic objectives

The LFRMS has produced a set of four strategic objectives:

- A. To improve community awareness of local flood risks and the authorities responsible for managing them.
- B. To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.
- C. To support development across Southwark encouraging the integration of SuDS within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.
- D. To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.

Within this document, the LFRMS strategic objectives have been assessed in *Screening analysis* against each of the designated European Sites identified to examine if these objectives and their associated actions will have any potential effects on these areas.

### 1.3 HRA Screening Report methodology

A full HRA is separated into three tasks, a summary of this is set out in *Table 1-1*.

Table 1-1 Summary table of stages in delivering an HRA

HRA Tasks	Task aims
<b>Task 1:</b> Screening	To check if the strategy, plan, or proposal is likely to have a significant effect on a European site's conservation objectives.
<b>Task 2:</b> Appropriate Assessment	To assess the likely significant effects of the proposal in more detail and identify ways to avoid or minimise any effects.
<b>Task 3:</b> Derogation	To consider if proposals that would have an adverse effect on a European site qualify for exemption.

This document will complete Task 1 of the HRA process and determines if progression onto the later tasks will be required further assessment of the LFRMS. This report has undergone a statutory consultation and a public consultation in order to have its assessment and outputs scrutinised. The statutory consultee for the HRA is Natural England.

### 1.4 Consultation process

The HRA Screening Report is required to undergo both a statutory consultation and a public consultation. The consultation questions set out in *Section 1.5* were asked to the statutory consultees, whereas for the general public consultation a set of overarching questions were provided as part of the consultation strategy that was produced to support the LFRMS. The public consultation took place in Summer 2023. Following the consultations the feedback was reviewed and appropriate changes made to the HRA and other LFRMS documents as necessary.

### 1.5 HRA consultation questions

#### Identifying relevant sites

1. Do you feel we have included all of the most relevant Natura 2000 sites which may be significantly affected by the implementation of the Local Flood Risk Management Strategy? If not, please state other sites which you believe we have missed.
2. Do you feel we have included all relevant information for these sites?

#### Screening analysis

3. Do you have any comments on the method for the assessment of the HRA sites against the Local Flood Risk Management Strategy strategic objectives?
4. Do you agree with the screening analysis for each of the objectives? If not, please give reasons as to why you would screen a certain objective differently.

#### Conclusions and further comments

5. Do you have any comments on the conclusions that we have made in this HRA Screening Report of the Local Flood Risk Management Strategy?
6. Do you have any additional comments or suggestions for this HRA Screening Report?



## 2. Site identification

### 2.1 Introduction to the sites

The first stage of the HRA Screening process is to determine which European Sites lie within the Southwark borough boundary, followed by those which are in close enough proximity that they may also be affected by the actions of the LFRMS. A distance of 10km has been chosen, in line with the HRA produced for Southwark's Local Plan, and any sites which fall within this area will be included within *Section 2.3*.

Information for the site identification stage of the HRA Screening Report has been collated from the following sources:

- [Natural England](#)
- [Joint Nature Conservation Committee \(JNCC\)](#)
- [DEFRA's Magic Map facility](#)

A map displaying all the sites investigated is also shown in *Figure 2-1*.

### 2.2 Sites within the Southwark borough boundary

There are no designated European Sites of ecological importance (Natura 2000 sites) within or partially within the Southwark borough boundary.

### 2.3 Sites in proximity to the Southwark borough boundary

There are four sites which are within or partially within a 10km distance of the Southwark borough boundary.

These are:

- Site 1: Wimbledon Common
- Site 2: Richmond Park
- Site 3: Epping Forest
- Site 4: Lee Valley

A full breakdown of information is displayed within the following tables for each designated site respectively. This covers the qualifying habitats and species for the designation and the pressure and/or threats facing them.

Table 2-1 Wimbledon Common SAC (Site 1) information

<b>Site name</b>	Wimbledon Common
<b>Site designation</b>	SAC
<b>EU code</b>	UK0030301
<b>Area (ha)</b>	351.38
<b>Qualifying species and/or habitat features</b>	<ul style="list-style-type: none"> <li>• H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>• H4030 European dry heaths</li> <li>• S1083 Stag beetle, <i>Lucanus cervus</i></li> </ul>
<b>General site character</b>	<ul style="list-style-type: none"> <li>• Inland water bodies (Standing water, Running water) (1%)</li> <li>• Bogs, Marshes, Water fringed vegetation, Fens (0.5%)</li> <li>• Heath, Scrub, Maquis and Garrigue, <i>Phygrana</i> (5%)</li> <li>• Dry grassland, Steppes (45%)</li> <li>• Improved grassland (3.5%)</li> <li>• Broad-leaved deciduous woodland (45%)</li> </ul>
<b>Current pressure and/or threats</b>	<ol style="list-style-type: none"> <li>1. Public access / disturbance, affecting H4010, H4030, S1083</li> <li>2. Habitat fragmentation, affecting S1083</li> <li>3. Invasive species. affecting H4010, H4030, S1083</li> <li>4. Air pollution (impact of atmospheric nitrogen deposition), affecting H4010 and H4030</li> </ol>
<b>Supplementary evidence</b>	<a href="#">European Site Conservation Objectives for Wimbledon Common SAC - UK0030301</a> <a href="#">Site Improvement Plan – Wimbledon Common</a> <a href="#">Wimbledon Common - Special Areas of Conservation</a>



Table 2-2 Richmond Park SAC (Site 2) information

<b>Site name</b>	Richmond Park
<b>Site designation</b>	SAC
<b>EU code</b>	UK0030246
<b>Area (Ha)</b>	846.27
<b>Qualifying species and/or habitat features</b>	<ul style="list-style-type: none"> <li>• S1083 Stag beetle, <i>Lucanus cervus</i></li> </ul>
<b>General site character</b>	<ul style="list-style-type: none"> <li>• Inland water bodies (Standing water, Running water) (1.5%)</li> <li>• Bogs, Marshes, Water fringed vegetation, Fens (0.5%)</li> <li>• Heath, Scrub, Maquis and Garrigue, Phygrana (25%)</li> <li>• Dry grassland, Steppes (18%)</li> <li>• Humid grassland, Mesophile grassland (5%)</li> <li>• Improved grassland (20%)</li> <li>• Broad-leaved deciduous woodland (25%)</li> <li>• Mixed woodland (5%)</li> </ul>
<b>Current pressure and/or threats</b>	No current pressures and/or threats affecting the Natura 2000 feature(s) have been identified on this site.
<b>Supplementary evidence</b>	<a href="#">European Site Conservation Objectives for Richmond Park SAC – UK0030246</a> <a href="#">Site Improvement Plan – Richmond Park</a> <a href="#">Richmond Park - Special Areas of Conservation</a>

Table 2-3 Epping Forest SAC (Site 3) information

<b>Site name</b>	Epping Forest
<b>Site designation</b>	SAC
<b>EU code</b>	UK00012720
<b>Area (Ha)</b>	1604.95
<b>Qualifying species and/or habitat features</b>	<ul style="list-style-type: none"> <li>• H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath</li> <li>• H4030 European dry heaths</li> <li>• H9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>); Beech forests on acid soils</li> <li>• S1083 Stag beetle, <i>Lucanus cervus</i></li> </ul>
<b>General site character</b>	<ul style="list-style-type: none"> <li>• Inland water bodies (Standing water, Running water) (6%)</li> <li>• Bogs, Marshes, Water fringed vegetation, Fens (0.2%)</li> <li>• Heath, Scrub, Maquis and Garrigue, Phygrana (3.8%)</li> <li>• Dry grassland, Steppes (20%)</li> <li>• Broad-leaved deciduous woodland (70%)</li> </ul>
<b>Current pressure and/or threats</b>	<ol style="list-style-type: none"> <li>1. Air pollution (impact of atmospheric nitrogen deposition), affecting H4010, H4030, H9120</li> <li>2. Undergrazing, affecting H4010, H4030</li> <li>3. Public access / disturbance, affecting H4010, H4030, H9120</li> <li>4. Changes in species distributions, affecting H9120</li> <li>5. Inappropriate water levels, affecting H4010</li> <li>6. Water pollution, affecting H4010</li> <li>7. Invasive species, affecting H4010, H9120</li> <li>8. Disease, affecting H9120</li> </ol>
<b>Supplementary evidence</b>	<a href="#">European Site Conservation Objectives for Epping Forest SAC - UK0012720</a> <a href="#">Site Improvement Plan - Epping Forest</a> <a href="#">Epping Forest - Special Areas of Conservation</a>

Table 2-4 Lee Valley SPA &amp; Ramsar (Site 4) information

<b>Site name</b>	Lee Valley
<b>Site designation</b>	SPA & Ramsar
<b>EU code</b>	UK9012111
<b>Area (Ha)</b>	447.87
<b>Qualifying species and/or habitat features</b>	<ul style="list-style-type: none"> <li>• A021 Botaurus stellaris; Great bittern (Non-breeding)</li> <li>• A051 Anas strepera; Gadwall (Non-breeding)</li> <li>• A056 Anas clypeata; Northern shoveler (Non-breeding)</li> </ul>
<b>General site character</b>	<ul style="list-style-type: none"> <li>• Bogs, Marshes, Water fringed vegetation, Fens (4.0%)</li> <li>• Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites) (1.0%)</li> <li>• Inland water bodies (Standing water, Running water) (67.0%)</li> <li>• Humid grassland, Mesophile grassland (8.0%)</li> <li>• Improved grassland (10.0%)</li> <li>• Broad-leaved deciduous woodland (10.0%)</li> </ul>
<b>Current pressure and/or threats</b>	<ol style="list-style-type: none"> <li>1. Water pollution, affecting A021, A051, A056</li> <li>2. Hydrological changes, affecting A021, A051, A056</li> <li>3. Public access/ disturbance, affecting A021, A051, A056</li> <li>4. Inappropriate scrub control, affecting A021, A051, A056</li> <li>5. Fisheries: Fish stocking, affecting A021, A051, A056</li> <li>6. Invasive species, affecting A021, A051, A056</li> <li>7. Inappropriate cutting/ mowing, affecting A021</li> <li>8. Air pollution (risk of atmospheric nitrogen deposition), affecting A021</li> </ol>
<b>Supplementary evidence</b>	<a href="#">European Site Conservation Objectives for Lee Valley SPA - UK9012111</a> <a href="#">Site Improvement Plan - Lee Valley</a> <a href="#">Lee Valley – Special Protection Area &amp; RAMSAR</a>

## 2.4 Identified relevant sites consultation questions

1. Do you feel we have included all of the most relevant Natura 2000 sites which may be significantly affected by the implementation of the Local Flood Risk Management Strategy? If not, please state other sites which you believe we have missed.
2. Do you feel we have included all relevant information for these sites?

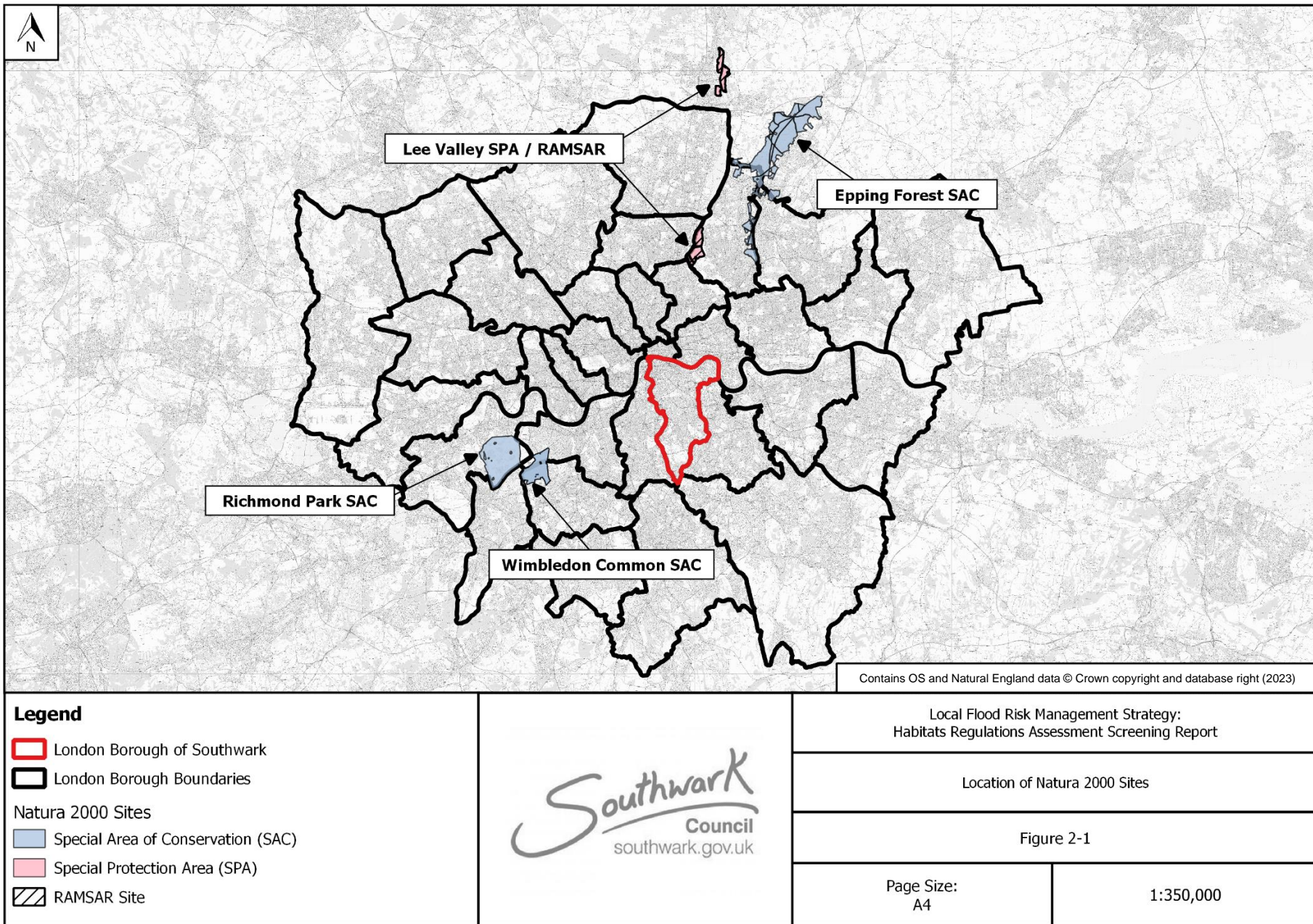


Figure 2-1 Map of selected Natura 2000 sites

# 3. Screening analysis

## 3.1 Screening analysis summary

The purpose of the screening analysis is to assess whether there will be any significant effects to any of the designated sites identified in *Section 2*. To determine this each of the LFRMS strategic objectives will be critiqued against each site individually to determine if the delivery of the LFRMS will cause a negative effect to the site. This will then inform a decision on whether progression onto the later stages of the HRA are necessary.

## 3.2 Screening analysis

*Table 3-1* presents the results of the analysis between the LFRMS strategic objectives and the HRA sites. *Table 3-2* explains the criteria coding used within the scoring matrix. No negative effects are considered to be posed from the delivery of the LFRMS strategic objectives to the HRA sites. Evidence and justification to support these conclusions has been summarised in *Section 3.3*.

Table 3-1 Screening analysis results of HRA sites against LFRMS Strategic Objectives

		HRA Site Number			
		1	2	3	4
LFRMS Strategy Objective	A	0	0	0	0
	B	0	0	0	0
	C	0	0	0	0
	D	0	0	0	0

Table 3-2 Screening analysis criteria summary

0	The strategic objective will have no effect on a Natura 2000 site.
-	The strategic objective could have a potential negative effect on a Natura 2000 site.
--	The strategic objective could have a potential significant negative effect on a Natura 2000 site.
?	Uncertain

### 3.3 Screening analysis outcomes

#### LFRRMS strategic objective A

*To improve community awareness of local flood risks and the authorities responsible for managing them.*

Outcome: No negative effect

There is not expected to be a negative effect from the delivery of LFRRMS strategic objective A and its actions. Reasons for this are as follows:

- Improving community awareness will encourage greater environmental stewardship from individuals.
- Better understanding of the flood risk will help to protect these sites from the negative impacts of flooding.
- Supporting community engagement on flood risk could offer additional opportunities for environmental or conservation work.
- Encouraging residents to manage their own flood risk through measures including, de-paving and increasing landscaped areas in private gardens.

#### LFRRMS strategic objective C

*To support development across Southwark encouraging the integration of Sustainable Drainage Systems (SuDS) within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.*

Outcome: No negative effect

There is not expected to be a negative effect from the delivery of LFRRMS strategic objective C and its actions. Reasons for this are as follows:

- Taking leadership in influencing development to provide better environmental outcomes could impact behaviour in regions where these HRA sites are sited.
- Utilising best practice in improving the natural environment could encourage other authorities to do the same in areas where these HRA sites are sited.

#### LFRRMS strategic objective B

*To collaborate with internal departments, organisations, authorities, and partnership groups to support successful communication in managing flood risk.*

Outcome: No negative effect

There is not expected to be a negative effect from the delivery of LFRRMS strategic objective B and its actions. Reasons for this are as follows:

- This objective aims to improve communication between organisations has potential to support the protection of these sites.
- Monitoring funding opportunities could lead to potential collaborations with these sites in supporting their protection or in offsetting any harm by completing improvements elsewhere.

#### LFRRMS strategic objective D

*To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.*

Outcome: No negative effect

There is not expected to be a negative effect from the delivery of LFRRMS strategic objective D and its actions. Reasons for this are as follows:

- Reducing the carbon emissions released from flood management work will have a positive impact.
- Supporting biodiversity within flood management will encourage others to do the same.

### 3.4 Screening analysis consultation questions

3. Do you have any comments on the method for the assessment of the HRA sites against the Local Flood Risk Management Strategy strategic objectives?
4. Do you agree with the screening analysis for each of the objectives? If not, please give reasons as to why you would screen a certain objective differently.

# 4 Conclusions and next steps

## 4.1 Conclusions

The screening analysis identified four Natura 2000 sites that may be at risk from the implementation of the LFRMS and its associated Action Plan. The pressures and threats to the habitats and species present at these sites were reviewed and analysed to identify the effect which the LFRMS would pose. From this, it has been concluded that there will be no negative effects from the delivery of these strategic objectives and their underlying actions to the identified Natura 2000 sites.

The LFRMS strategic objectives aim to both directly and indirectly enhance and protect natural and water environments. Due to this, there are some opportunities where LFRMS actions could offer positive influences on the HRA sites. For example, by improving community awareness to encourage greater environmental stewardship and by showing leadership in utilising best practice to help improve the natural environment.

It has therefore been concluded that the HRA for the LFRMS does not require progression onto later tasks and does not require a full assessment.

## 4.2 Consultation of the HRA

The HRA Screening Report is required to undergo a statutory consultation with Natural England to review the scope of the HRA Screening Report and its analysis of the sites identified. This was subsequently followed by a public consultation where members of the public were given the opportunity to review the HRA Screening Report and the other documents being produced that make up the LFRMS. The public consultation was completed in Summer 2023. Feedback received from the stakeholders, statutory consultee and public were then collated and applied into final document versions to be published.

## 4.3 Final comments consultation questions

5. Do you have any comments on the conclusions that we have made in this HRA Screening Report of the Local Flood Risk Management Strategy?
6. Do you have any additional comments or suggestions for this HRA Screening Report?



## London Borough of Southwark LFRMS Action Plan

The Action Plan supports the delivery of the London Borough of Southwark LFRMS.  
 It is intended to be used by the Southwark Lead Local Flood Authority. **(FOR EXTERNAL USE)**  
 Version: **2.0**  
 Last Updated: **October 2023**

### LFRMS Strategic Objectives

<b>A</b>	To improve community awareness of local flood risks and the authorities responsible for managing them.
<b>B</b>	To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.
<b>C</b>	To support development across Southwark encouraging the integration of SuDS within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.
<b>D</b>	To apply knowledge on local flood risk to assist in improving Southwark’s resilience to the impacts of climate change.

### Table headings/sections

<b>Actions</b>	Information relating to each action and associated objective.
<b>Delivery</b>	The proposed risk management authorities involved in the delivery of each action.
<b>Programme</b>	Proposed timescales for the action and each action's current status of progress.

### Items

<b>Strategic Objective</b>	Strategic objective letter as defined in the LFRMS document.
<b>Action ID</b>	The individual action ID value.
<b>Action Details</b>	Action description.
<b>Lead Risk Management Authority</b>	The organisation which will lead in the delivery of the action.
<b>Partner Authorities / Departments</b>	The organisations which will support the delivery of the action.
<b>Timescale from 2023</b>	The approximate time period for completing the action from the publication of the LFRMS, or if the action is an ongoing deliverable.
<b>Current Status</b>	The current status of the actions progress in being completed.
<b>Links to Legislation / Policy</b>	Hyperlinks to legislation that are associated with the delivery of this action. FWMA = Flood and Water Management Act 2010 FCERM = Flood and Coastal Erosion Risk Management CCAP = Climate Change Action Plan SWMP = Surface Water Management Plan SNAP = Southwark Nature Action Plan AQAP = Air Quality Action Plan

### Dropdowns

<b>Timescale from 2023</b>	<b>Current Status</b>
Short-term = 0-2 years	<b>Red</b> Action is not currently in progress
Medium-term = 2-4 years	<b>Amber</b> Action is in progress
Long-term = 4-6+ years	<b>Green</b> Action completed
On-going = Continual action	



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Version: 2.0

Last Updated: **October 2023**

Strategic Objective	Actions		Delivery		Programme		Links to Legislation / Policy
	Action ID	Action Details	Lead Risk Management Authority	Partner Authorities / Departments	Timescale from 2023	Current Status	
A To improve community awareness of local flood risks and the authorities responsible for managing them.	A1	Maintain knowledge on changes to flood forecasting services and flood warning systems delivered by the Environment Agency and the Met Office.	Southwark LLFA	Thames Flood Advisors, Environment Agency	On-going	Amber	<a href="#">National FCERM Strategy - Measure A.2</a> <a href="#">National FCERM Strategy - Measure 3.1.1</a> <a href="#">National FCERM Strategy - Measure 3.2.2</a> <a href="#">National FCERM Strategy - Measure 3.2.3</a>
	A2	Communicate with housing associations, community groups, charities etc. to improve local understanding of flood risk and the duties of the LLFA.	Southwark LLFA	Southwark Housing Team, Southwark Emergency Planning Team, Thames Flood Advisors, Neighbouring boroughs	Short-term	Red	<a href="#">National FCERM Strategy - Measure 2.1.1</a> <a href="#">National FCERM Strategy - Measure 2.5.2</a> <a href="#">SWMP Action 14</a>
	A3	Provide support to communities looking to establish local flood groups and community flood plans to improve local resilience to flooding.	Southwark Emergency Planning Team	Southwark LLFA, Neighbouring boroughs	Medium-term	Red	<a href="#">National FCERM Strategy - Measure 3.2.1</a> <a href="#">National FCERM Strategy - Measure 3.2.4</a>
	A4	Communicate and educate local residents and businesses about property-level resistance and resilience measures, encouraging the implementation of small scale measures by the public.	Southwark LLFA	Southwark Emergency Planning Team, Cleaner Greener Safer Team, Thames Flood Advisors, Southwark Housing Team	Medium-term	Red	<a href="#">National FCERM Strategy - Measure 3.1.2</a> <a href="#">National FCERM Strategy - Measure 3.1.3</a> <a href="#">SNAP Action 3.7</a>  <a href="#">CCAP Action A.1.iii</a> <a href="#">SWMP Action 13</a> <a href="#">SWMP Action 14</a>
	A5	Review and consolidate flood risk management webpages, checking useability, external links, and keep flood risk management information up-to-date.	Southwark LLFA	Southwark Website Team	Short-term	Amber	<a href="#">SWMP Action 19</a>
	A6	Ensure flood risk management webpages include current Environment Agency flood warnings and alerts and include updates on main council page during instances of significant flood risk.	Southwark LLFA	Southwark Website Team, Environment Agency	Short-term	Amber	<a href="#">National FCERM Strategy - Measure 3.1.1</a>
	A7	Support on-going community engagement conveying the development of LFRMS actions, SWMP actions and progress on flood alleviation schemes etc.	Southwark LLFA	Southwark Communications Team, Southwark Housing Team, Southwark Climate Change Team, Transport for London	On-going	Red	
	B1	Make relevant Council teams / departments aware of the LFRMS update, providing an update on the roles and responsibilities of the LLFA.	Southwark LLFA	Internal Council Departments	Short-term	Amber	<a href="#">SWMP Action 16</a>  <a href="#">FWMA - Section 6</a>

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Version: 2.0

Last Updated: **October 2023**

Strategic Objective	Actions		Delivery		Programme		Links to Legislation / Policy
	Action ID	Action Details	Lead Risk Management Authority	Partner Authorities / Departments	Timescale from 2023	Current Status	
<p><b>B</b> To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.</p>	B2	Collaborate with partner risk management authorities to identify areas where flood risks could combine to exacerbate risk, and use this to inform drainage and sewerage management plans.	Southwark LLFA	Southwark Highways Team, Thames Water, Environment Agency, Transport for London, Neighbouring boroughs	Medium-term	Amber	<a href="#">National FCERM Strategy - Measure B.2</a>  <a href="#">SWMP Action 1</a> <a href="#">SWMP Action 19</a>
	B3	Work with a range of partners to monitor funding opportunities and to evaluate the best options to pursue.	Southwark LLFA	Thames Flood Advisors, Transport for London	On-going	Amber	<a href="#">National FCERM Strategy - Measure 2.7.3</a> <a href="#">National FCERM Strategy - Measure 2.8.2</a>  <a href="#">CCAP Action A.1.iii</a> <a href="#">SWMP Action 6</a>
	B4	Produce and maintain a list of ongoing / potential flood alleviation schemes prioritising areas based on updated flood risk documents and any recent modelling outputs. Share this with appropriate partnership groups.	Southwark LLFA	Internal Council Departments Neighbouring boroughs	On-going	Amber	<a href="#">FWMA - Section 9</a>  <a href="#">National FCERM Strategy - Measure 2.1.1</a> <a href="#">National FCERM Strategy - Measure 2.1.2</a> <a href="#">National FCERM Strategy - Measure 2.72</a>  <a href="#">SWMP Action 13</a>
	B5	Support the delivery of internal flood group meetings to facilitate efficient use of internal resources, establish policies and share responsibilities for collaborative flood risk management.	Southwark LLFA	Internal Council Departments	On-going	Red	<a href="#">SWMP Action 16</a>
	B6	Support the delivery of South Central Partnership meetings and subsequent meeting actions to facilitate wider engagement and collaborative working to deliver integrated flood risk management.	Southwark LLFA	Members of the South Central Partnership, Thames Flood Advisors, Environment Agency, Thames Water, Transport for London	On-going	Amber	<a href="#">SWMP Action 1</a>
	B7	Review and update risk management authority and key stakeholder contact lists.	Southwark LLFA		On-going	Red	
	B8	Support the delivery of training or information sessions to Council staff on sustainable drainage systems.	Southwark LLFA	Local Planning Authority, Southwark Climate Change Team	Medium-term	Red	<a href="#">SNAP Action 3.2</a>  <a href="#">SWMP Action 16</a>
	B9	Support the effective maintenance of Council adopted drainage systems including but not limited to sustainable drainage systems, gullies, drains and ordinary watercourses.	Southwark Highways Team	Southwark LLFA	Long-term	Red	<a href="#">SWMP Action 9</a>

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Version: 2.0

Last Updated: **October 2023**

Actions			Delivery		Programme		Links to Legislation / Policy
Strategic Objective	Action ID	Action Details	Lead Risk Management Authority	Partner Authorities / Departments	Timescale from 2023	Current Status	
	B10	Support the Highways Team in collaborating with neighbouring boroughs to improve gully maintenance in cross-borough areas, particularly areas which have a recorded history of flooding.	Southwark LLFA	Southwark Highways Team	Long-term	Red	<a href="#">SWMP Action 9</a>
	B11	Assist with updates to Multi-Agency Flood Plan to ensure that new information on local flood risks are included.	Southwark LLFA	Southwark Emergency Planning Team	Medium-term	Amber	
C To support development across Southwark encouraging the integration of SuDS within	C1	Develop and maintain Flood Risk Asset Register to ensure assets that have a significant impact on flood risk are identified and properly maintained.	Southwark LLFA	Southwark GIS Team, Southwark Highways Team	Long-term	Amber	<a href="#">SWMP Action 15</a> <a href="#">SWMP Action 21</a>
	C2	Identify assets that are considered to have a significant effect on local flood risk, and set these assets as high priority areas within appropriate maintenance regimes.	Southwark LLFA	Southwark Highways, Local Planning Authority	Medium-term	Red	<a href="#">SWMP Action 21</a>
	C3	Review threshold criteria for reviewing minor planning applications, and communicate this with Local Planning Authority colleagues.	Southwark LLFA	Local Planning Authority	Long-term	Red	
	C4	Review SWMP outcomes, actions and recommendations in line with updates to data and guidance.	Southwark LLFA, Southwark Highways Team		On-going	Amber	<a href="#">SWMP Action 4</a>
	C5	Ensure that all new developments, particularly those located within high risk hotspots identified within the SWMP, aim to achieve greenfield runoff rates by contributing to measures to reduce surface water flood risk through the incorporation of rainwater harvesting, green / blue infrastructure and sustainable drainage systems.	Southwark LLFA	Local Planning Authority, Southwark Development Management Team	Long-term	Amber	<a href="#">SNAP Action 3.2</a> <a href="#">SWMP Action 11</a> <a href="#">SWMP Action 13</a>
	C6	Keep informed of updates to planning advice for sustainable drainage systems and flood risk in line with the Non-Statutory Technical Standards for sustainable drainage systems and update Southwark's developer guidance on sustainable drainage systems as required.	Southwark LLFA	Local Planning Authority, Southwark Website Team, Highways Team	On-going	Amber	<a href="#">National FCERM Strategy - Measure 2.1.1</a> <a href="#">National FCERM Strategy - Measure 2.1.2</a> <a href="#">National FCERM Strategy - Measure 2.72</a> <a href="#">SWMP Action 13</a>
			Contribute to improving the natural, built, and historic environment by investing in appropriate projects that manage flood risk and work with local environmental groups to utilise best	Southwark LLFA	Southwark Parks Team, Southwark Biodiversity Partnership, Local Environmental Groups/	Medium-term	Red

## London Borough of Southwark LFRMS Action Plan

The Action Plan supports the delivery of the London Borough of Southwark LFRMS.

It is intended to be used by the Southwark Lead Local Flood Authority (LLFA). **(FOR EXTERNAL USE)**

Refer to the 'Instructions' Tab for a description of the contents of the Action Plan.

Version: 2.0

Last Updated: October 2023

Strategic Objective	Actions		Delivery		Programme		Links to Legislation / Policy
	Action ID	Action Details	Lead Risk Management Authority	Partner Authorities / Departments	Timescale from 2023	Current Status	
planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.	C7	practices.		Charities			<a href="#">SNAP Action 3.2</a> <a href="#">SNAP Action 3.4</a> <a href="#">CCAP Action A.1.iii</a> <a href="#">SWMP Action 18</a>
	C8	Identify opportunities for tackling environmental and social issues together by assessing proposed schemes for social impacts and improve awareness in the community to tackle flood risk problems and social issues simultaneously.	Southwark LLFA	Southwark Ecology/ Environment Team, Southwark Housing Team	On-going	Red	<a href="#">National FCERM Strategy - Measure 1.5.3</a>  <a href="#">SWMP Action 7</a>
	C9	Collaborate with the Local Planning Authority to review how basement development applications are assessed regarding flood risk requirements to ensure that proposed basement developments are only carried out in suitable areas and in line with planning policy.	Southwark LLFA	Local Planning Authority, Southwark Development Management Team	Long-term	Amber	<a href="#">SWMP Action 11</a>
	C10	Support the development of urban greening factor requirements within Southwark policies, and encourage that new major developments aim for national target scores in line with national policy requirements.	Southwark LLFA	Local Planning Authority, Southwark Parks Team, Southwark Development Management Team	Long-term	Red	<a href="#">Southwark Local Plan Policy 59</a> <a href="#">London Plan Policy G5</a> <a href="#">London Plan Policy G6</a>
	C11	Review and input into updates to Local Plan Policy to ensure that flood risk policy is strengthened, in-line with national policies and updated to reflect changes in flood risk modelling.	Southwark LLFA	Southwark Development Management Team, Southwark Planning Policy Team	Long-term	Red	<a href="#">Southwark Local Plan</a>
	C12	Collaborate with the Development Management Team to ensure that S106 and CIL funding is obtained and made available to the LLFA to deliver sustainable drainage systems in other areas to developments to support the practice of offsetting when necessary.	Southwark LLFA	Southwark Development Management Team, Southwark Planning Policy Team	On-going	Red	
	D1	Maximise opportunities to reduce carbon emissions associated with flood risk alleviation schemes with the aim of being carbon neutral, considering and reducing the embodied carbon of infrastructure.	Southwark LLFA	Southwark Climate Emergency Team, Environment Agency	Long-term	Red	<a href="#">Southwark Local Plan Policy 14</a> <a href="#">National FCERM Strategy - Measure 3.5.3</a> <a href="#">AQAP Action 6.4</a> <a href="#">AQAP Action 6.7</a> <a href="#">AQAP Action 6.8</a> <a href="#">AQAP Action 8.4</a> <a href="#">CCAP Action A.1.iii</a> <a href="#">CCAP Action D.2.ix</a> <a href="#">SWMP Action 17</a>

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Version: 2.0

Last Updated: **October 2023**

Actions			Delivery		Programme		Links to Legislation / Policy
Strategic Objective	Action ID	Action Details	Lead Risk Management Authority	Partner Authorities / Departments	Timescale from 2023	Current Status	
D To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.	D2	Review updates to the Climate Action Plan associated with annual review and how flood risk management duties can support delivering these actions.	Southwark LLFA	Southwark Climate Change Team, Southwark Emergency Planning Team	Medium-term	Red	<a href="#">CCAP Action Y.1.iv</a>
	D3	Maximise opportunities in improving biodiversity and supporting work towards the urban greening factor when delivering flood alleviation schemes by contributing to net environmental/ biodiversity gain. With the additional aim to improve green space area, and tree coverage where possible.	Southwark LLFA	Southwark Ecology/ Environment Team, Southwark Parks Team, Southwark Planning Policy Team, Southwark Development Management Team, Environment Agency	Long-term	Red	<a href="#">Southwark Local Plan Policy 59</a> <a href="#">Southwark Local Plan Policy 60</a> <a href="#">National FCERM Strategy - Measure 1.4.2</a> <a href="#">National FCERM Strategy - Measure 2.2.1</a> <a href="#">SNAP Action 3.2</a>  <a href="#">London Plan Policy G5</a> <a href="#">London Plan Policy G6</a>
	D4	Review updates to Biodiversity Action Plan and how flood risk management duties can support delivering these actions. In addition to providing necessary input and support for future greening and biodiversity strategies.	Southwark LLFA	Southwark Ecology/ Environment Team	Long-term	Red	<a href="#">National FCERM Strategy - Measure 2.2.2</a>
	D5	Maintain detailed records of instances of flooding, making necessary improvements to flood reporting tool to improve data collection on flooding within Southwark, and support the sharing of flood reports between risk management authorities.	Southwark LLFA	Southwark Emergency Planning Team, Southwark Highways Team, Thames Water, Transport for London	On-going	Amber	<a href="#">National FCERM Strategy - Measure 2.5.1</a>  <a href="#">SWMP Action 2</a> <a href="#">SWMP Action 8</a>
	D6	Review changes to climate change allowances which would be applied to planning applications and modelling for flood alleviation schemes.	Southwark LLFA	Local Planning Authority, Southwark Planning Policy Team, Southwark Climate Change Team	On-going	Amber	<a href="#">CCAP Action D.2.ix</a>  <a href="#">Southwark Local Plan Policy 68</a>
	D7	Using the outputs from the SWMP identify and carry out flood alleviation schemes in high risk areas, and seek funding for delivery where appropriate.	Southwark LLFA	Internal Councill Teams, Neighbouring boroughs, Environment Agency, Thames Water	Long-term	Amber	<a href="#">SWMP Action 2</a> <a href="#">SWMP Action 3</a> <a href="#">SWMP Action 4</a>
	D8	Identify opportunities to improve resilience of critical infrastructure at high risk of flooding by developing and implementing solutions.	Southwark LLFA	Southwark Highways Team, Transport for London, Thames Water, Network Rail, Neighbouring LLFAs	Medium-term	Red	<a href="#">SWMP Action 15</a>
	D9	Work with relevant partners to explore and support the management of riverside defences, including improving awareness of asset	Southwark LLFA	Environment Agency, Riparian land owners, Neighbouring boroughs	Medium-term	Red	<a href="#">Thames Estuary 2100 Plan</a>

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Version: **2.0**

Last Updated: **October 2023**

Actions			Delivery		Programme		Links to Legislation / Policy
Strategic Objective	Action ID	Action Details	Lead Risk Management Authority	Partner Authorities / Departments	Timescale from 2023	Current Status	
		ownership and coordination of maintenance.					<a href="#">Planning Policy Guidance - Flood Risk and Coastal Change</a>
	D10	Monitor new information on properties / assets / infrastructure in terms of their flood risk to improve understandings of the risks from climate change.	Southwark LLFA	Southwark Climate Change Team, Environment Agency	Long-term	Red	
	D11	Support the work of the Streets for People Strategy in improving the greening of streets with greater focus on opportunities to increase sustainable drainage systems (including planting) on main streets.	Southwark LLFA	Southwark Highways Team	Long-term	Red	Streets for People Strategy (2023-2030)

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# **Tustin Estate Regeneration Programme: Interim Equality and Health Impact Assessment Phase 2**

August 2024

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# **Tustin Estate Regeneration Programme: Interim Equality and Health Impact Assessment Phase 2**

August 2024

## Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
A	03/08/2024	PD/GH	EW	JB	First Draft for Client Approval

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# Executive summary

## Overview of the commission

Mott MacDonald have been commissioned by Southwark Council to undertake an Interim Equality and Health Impact Assessment (EHIA) of the Phase 2 redevelopment and use of CPO powers with regards to Tustin Estate (the 'Scheme'), in the London Borough of Southwark. A Full EHIA will follow in late 2024.

## The Interim Equality and Health Impact Assessment

The EHIA process is focussed on the potential effects, including health effects, likely to be experienced by those living and working in the community in light of their 'protected characteristics' under the Equality Act 2010.

The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation.

The EHIA identifies any disproportionate effects (both positive and negative) on those with protected characteristics that may arise from relocation of the business, and the proposed redevelopment. The EHIA sets out any embedded actions that the Council and its project partners have put in place throughout design and development of the Scheme to mitigate any risk.

This Interim EHIA provides an update to the previously submitted EHIAs, specifically assessing the impacts of Phase 2 of the redevelopment and possible use of CPO on local residents, businesses, and the wider community.

## Approach to the Interim EHIA

The Interim EHIA considered the impacts of Phase 2 of the Tustin Estate redevelopment programme and the potential use of CPO powers to facilitate this.

Assessment of equality effects has been undertaken in light of the characterisation of potential effects – including sensitivity of the affected parties to the Scheme, the distribution of those groups within the Site, the nature of any potential effects, and any mitigation measures already in place or proposed to address the effect.

The EHIA has identified several potential equality impacts that could arise from the demolition and redevelopment. These have been split into two broad categories:

- Potential impacts on the residents and users of community space during Phase 2 of the redevelopment

- Potential impacts on residents, businesses, and the wider community following Phase 2 of the redevelopment.

### Findings of the Interim EHIA

The process of research and analysis for this EHIA has identified several impacts that could arise from Phase 2 of the wider Tustin Estate regeneration programme and use of CPO powers to facilitate this. Some of the people living, working and accessing services in the local area are likely to experience these effects differentially or disproportionately as a result of their protected characteristics.

Phase 2 of the regeneration programme is intended to demolish Heversham and Kentmere House in order to facilitate the construction of 295 new homes. New public and green space will also be provided, as well as better signposting and navigation through the site.

Further opportunities for positive equality effects have been identified which are associated with the following scheme elements:

- The delivery of new spaces for use by community resources.
- The delivery of a new and improved public realm with improved access and mobility

Some adverse impacts may arise for residents who have to leave their homes. However, the Council have embedded mitigation measures to help mitigate these impacts.

- In order to further mitigate any remaining equality risk, this EHIA recommends a series of actions which the Council should consider. These include but are not limited to the following:
- Should the CPO be used, residents should be supported through market search assistance to find an alternative property in the local area, if this is desired, which meets their needs.
- Ensure that accessible and inclusive support options are provided for disabled individuals who require support services during relocation.
- Continue to explore options to grow and advocate existing peer support groups such as the Tustin Resident Project Group (RPG). Review accessible provisions within group meetings.
- Liaise with and support the Tustin Residents Association to host free community events to provide a space for original Tustin Estate residents and Phase 2 home residents to meet, mingle, and improve the cohesion of Estate residents

Overall, this assessment has found that Phase 2 of the regeneration has the potential to deliver new and affordable homes, improved living conditions,



improved accessibility of homes and the wider estate, and new public realm and green space. This, coupled with the majority vote in the February 2021 ballot for the redevelopment to go ahead means there is a compelling case in the public interest for the redevelopment and use of CPO powers, if necessary, to allow Phase 2 to go ahead. Whilst this must be weighed against the acknowledged potential risks, the Council has sought to mitigate these through a range of reasonable and proportionate measures focused on engagement, rehousing assistance and compensation options in order to improve the outcomes of the redevelopment for the current and future Estate community.

# 1 Introduction

This EHIA interim report outlines the findings of the impact assessment for Phase 2 of the Tustin Estate Redevelopment and the potential use of CPO powers. The report provides recommendations for mitigation and further enhancement measures where appropriate.

This chapter sets out the purpose and scope of the EHIA, requirements of the Equality Act 2010 ('the Equality Act'), the approach to EHIA, and tasks undertaken throughout this process.

## 1.1 The Equality and Health Impact Assessment

### 1.1.1 Purpose of the Assessment

The purpose of the EHIA is to help Southwark Council ('the Council') understand the potential risks and opportunities of Phase 2 of the Tustin Estate redevelopment programme, and the potential use of CPO powers to facilitate this, with a particular focus on people with characteristics protected under the Equality Act and the health of the local population (including on health inequalities).

Protected characteristics include the following (as defined by the Equality Act): 1 age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation.

This EHIA outlines the findings of the impact assessment for Phase 2 and possible CPO powers and provides recommendations for mitigation and further enhancement where appropriate.

### 1.1.2 Equality Impact Assessment

#### 1.1.2.1 The Public Sector Equality Duty

This EHIA has been undertaken as part of a process supporting the fulfilment of the Council's obligations under current UK equality legislation, and in particular the Equality Act. The Equality Act sets out a Public Sector Equality Duty (PSED), at section 149 and is set out in Figure 1.1 below.

#### Figure 1.1: Article 149 of the Equality Act: The Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

<sup>1</sup> Government Equalities Office/Home Office (2010): 'Equality Act 2010' Available at: [www.legislation.gov.uk](http://www.legislation.gov.uk)

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
  - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The PSED is intended to support good decision-making. It encourages public authorities such as the Council to understand how different people will be affected by their activities. This means services and policies are appropriate and accessible to all and meet different people's needs. The Council must demonstrate that it has shown due regard to the aims of the PSED throughout the decision-making process to deliver the Programme. The process used to do this must take account of the protected characteristics which are identified below in section 1.1.1.1.

### 1.1.2.2 Protected characteristics

An EqIA provides a systematic assessment of the likely or actual effects of policies or proposals on social groups with the following protected characteristics (as defined by the Equality Act):<sup>2</sup>

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<sup>2</sup> Government Equalities Office/Home Office (2010): 'Equality Act 2010'. Available at: [www.legislation.gov.uk](http://www.legislation.gov.uk)

**Table 1.1: Protected Characteristics**

Protected characteristic	Equality and Human Rights Commission (EHRC) definition
Age	A person belonging to a particular age (for example 32-year olds) or range of ages (for example 18 to 30-year olds).
Disability	A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	Marriage is a union between a man and a woman or between a same-sex couple. Couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism). Generally, a belief should affect someone's life choices or the way they live for it to be included in the definition.
Sex	A man, woman or non-binary person.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

An EqIA does this through the following approaches:

- Assessing whether one or more of these groups could experience disproportionate effects (over and above the effects likely to be experienced)

by the rest of the population) as a result of the proposed redevelopment option. An EqIA includes examining both potential positive and negative effects.

- Identifying opportunities to promote equality more effectively.
- Developing ways in which any disproportionate negative effects could be removed or mitigated to prevent any unlawful discrimination and minimise inequality of outcomes.

### 1.1.2.3 Assessing equality impacts

While the PSED does not specify a particular process for considering the likely effects of policies, programmes and projects on different sections of society for public authorities to follow, this process is usually undertaken through some form of equality analysis, which can include EHAs.

Undertaking an EHA helps to demonstrate how a public authority is complying with the PSED by:

- providing a written record of the equality and health considerations which have been taken into account;
- ensuring that decision-making includes a consideration of the actions that would help to avoid or mitigate any negative impacts on particular protected groups; and
- supporting evidence-based and more transparent decision-making.

By understanding the effect of their activities on different people, and how inclusive delivery can support and open opportunities, public bodies can be more efficient and effective. The EHA process therefore helps public bodies to deliver the Government's overall objectives for public services.

## 1.1.3 Health Impact Assessment

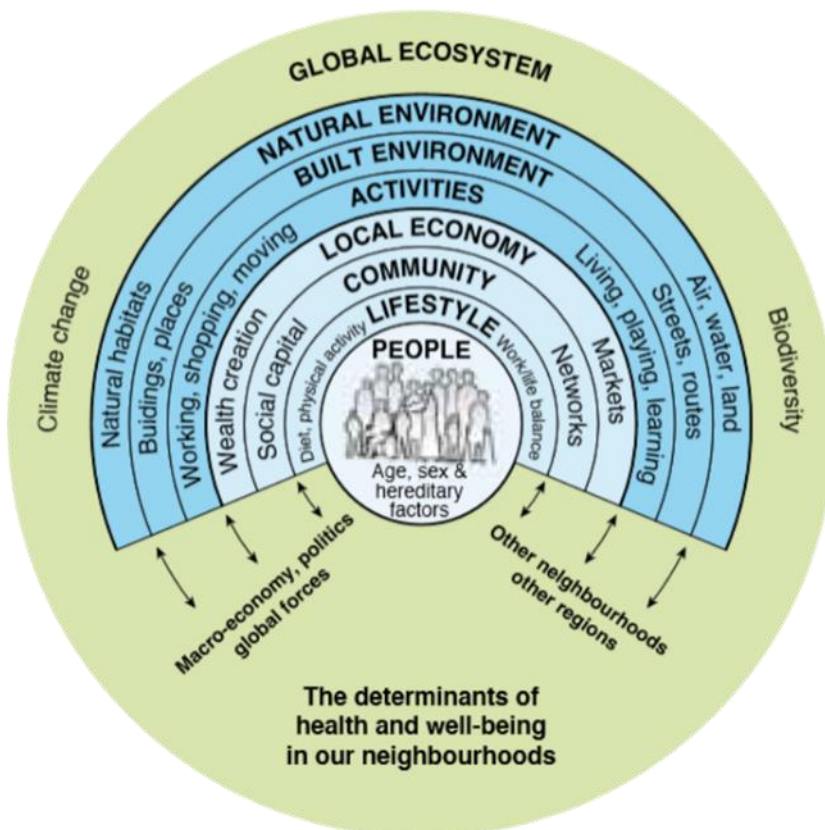
### 1.1.3.1 Assessing health impacts

Health as a component of the EHA will focus on assessing whether certain sections of the population (based on the protected characteristic groups defined above) will experience health impacts disproportionately or differentially when compared to other sections of the population. The HIA component of this assessment identifies potential health risks and opportunities associated with Phase 2 of the regeneration programme and potential use of CPO powers, focussing on key health aspects of the regeneration process (e.g. relocation, construction effects) and how this intersects with health inequalities. The mitigations Southwark has in place to prevent adverse effects on health for vulnerable sections of society are also outlined.

### 1.1.3.2 Determinants of health

The approach to the HIA aspect of this report uses the World Health Organization's (WHO) definition of health as a 'state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'. Health inequity (avoidable differences in health) was considered, introducing a notion of fairness. The figure below highlights the determinants of health in a community context.

**Figure 1.2: Determinants of Health**



Source: Barton and Grant (2006) The health map, based on a public health concept by Whitehead and Dahlgren, The Lancet 1991. Department for Health (2010) Health impact assessment of government policy

## 1.2 Progress of the EHIA process

This EHIA is the fourth EHIA produced for the Tustin Estate redevelopment programme, aligned with the decision-making process on the Estate. The following EHIA's have been undertaken:

- The Initial EHIA comprised a series of tasks undertaken to understand the equality and health effects of the original five scenarios put forward for the renewal of the estate. Once potential effects were identified, they were assessed against the renewal scenario. The initial EHIA was used to inform the residents ahead of the initial ballot in September 2020.

- The Final Option EHIA was intended to provide further detail and analysis on the Final Option that was selected by residents and being taken forward by Southwark Council.
- The 'Hybrid' Planning Application considered to the updates to provides updated detail and analysis of the final chosen masterplan for the renewal.
- Contractor 'Urban Symbiotics' conducted an EHIA assessing the redevelopment of Phase 2 without the use of CPO powers.

This report is an in Interim submission, and will be replaced by a more indepth Full EHIA submission to be completed in late 2024. The Full EHIA submission for Phase 2 and the use of CPO powers will include updated socio-demographic information, as well as undertaking equality surveys with the leaseholders impacted by the use of CPO powers.

## 1.3 Tasks Undertaken

### 1.3.1 Understanding the project

**Discussion with Southwark Council:** Initial discussions were undertaken with the Council to gain a better understanding of the Estate and the approach to Phase 2 of the Programme.

**Site walkover:** A visit to the Estate was undertaken in December 2019. The visit included a viewing of the low-rise blocks on the Estate: Ullswater House, Hillbeck Close, Heversham House, Kentmere House, and Manor Grove; Pilgrims Way Primary School; and the Tustin Community Centre

**Scheme review:** A review of documentation associated with the Scheme, based on information obtained through the above discussions, has been undertaken. This included an overview of consultation summary reports, planning documents including the Statement of Community Involvements, past EHIA's (including that undertaken by Urban Symbiotics), cabinet reports and other pertinent information.

### 1.3.2 Evidence, distribution, and proportionality

**Initial desk-based evidence and literature review:** In order to better understand the potential risks and opportunities arising from the redevelopment, and to help to identify possible mitigation measures and opportunities associated with the programme, relevant published literature from governmental, academic, third sector and other sources were reviewed and updated throughout all EqIA stages. This allowed for the characterisation of potential risks and opportunities typically associated with estate regeneration and relocation, to understand whether they applied in this instance.

**Demographic analysis of the Estate and surrounding area:** At this stage of assessment, the demographic analysis has not been updated. However, the full EHIA (which will be produced in late 2024) will include a detailed socio-

demographic analysis for both the Scheme area and surrounding community to provide contextual evidence on the local populations. This task will create a picture of people living in the local area, through collation of publicly available data on people with protected characteristics, using Scheme area demographic information, compared to borough, London and national statistics.

**Stakeholder engagement:** At this stage of assessment, stakeholder engagement has not been undertaken. However, the full EHIA (which will be produced in late 2024) will utilise a detailed equality and health survey, carried out by trusted sub-contractors to gain an understanding of the characteristics of the residents most likely to be impacted by Phase 2 and possible use of CPO powers. This will support the characterisation of any disproportionate effects on residents.

### 1.3.3 Impact assessment

**Assessment of potential impacts:** Potential impacts were identified and assessed using the research undertaken in the stages above. Assessment of impacts was undertaken in light of the sensitivity of the affected parties to regeneration, relocation, and use of CPO powers, as well as the distribution of people with protected characteristics amongst residents of the Estate. Both adverse and beneficial impacts were identified in the context of the mitigation measure implemented by the Council.

**Action planning and making recommendations:** An action plan has been developed which outlines the responsibilities to involved affected parties following submission of the 'Hybrid' Planning Application EHIA. A series of further recommendations have been developed to help manage the renewal process in a way that minimised the potential for adverse effects where appropriate.

## 1.4 Methodology for identifying and assessing equality and health effects

### 1.4.1 Identifying equality and health effects

Types of equality effects considered: Potential effects arising from the redevelopment will be assessed as either differential or disproportionate.

- **Differential effects:** Differential effects occur where people with protected characteristics are likely to be affected in a different way to other members of the general population. This may be because groups have specific needs or are more susceptible to the effect due to their protected



characteristics. Differential effects are not dependent on the number of people affected.

- **Disproportionate effects:** Disproportionate effects occur where there is likely to be a comparatively greater effect on an equality group than on other sections of the general population. Disproportionate effects may occur if the affected community includes a higher than average proportion of people with a particular protected characteristic, or because people from a particular protected characteristic group are the primary users of an affected resource.

#### 1.4.2 Assessing equality and health effects

The assessment of effects across the EHIA process is predominantly qualitative and outlines the nature of the impact on:

- residents living in the low-rise and tower blocks on Tustin Estate;
- community facilities on Tustin Estate and their service users;
- owners of residential and commercial property on Tustin Estate; and
- the local community.

The assessment considers, where possible and applicable:

- whether the scheme will have a positive or negative effect on the lives of those who live or work in the area;
- the relationship of the effect to the scheme (e.g. direct relationship such as loss of property or indirect relationship such as loss of access to services);
- the duration, frequency and permanence of the impacts;
- the severity of the impact and the amount of change relative to the baseline; and
- the capacity of the affected groups to absorb the impacts (their resilience), including their access to alternative facilities, resources or services.

## 2 Tustin Estate Improvement Programme

This chapter sets out the context of Tustin Estate and the Scheme. It provides background to the Estate including its history and current situation, as well as outlining the previous EHIA's which have been undertaken. This chapter will also outline the plans for Phase 2 of the redevelopment as well as use of Compulsory Purchase Order powers.

### 2.1 Scheme context

Southwark Council is the biggest social landlord in London and has committed to delivering a target of 11,000 new council homes for social rent by 2043. Tustin Estate is also subject to the Southwark Planning policy framework, including the Old Kent Road Area Action Plan which establishes a minimum target of 20,000 new homes and 10,000 new jobs in the area.

It has launched a 'Great Estates' programme, with the aim of guaranteeing that every estate is clean, safe, and cared for, and to give residents the opportunity to improve their estate. Tustin Estate is intended to be a leading example of this programme.

#### 2.1.1 Overview: Tustin Estate

Tustin Estate is a five-hectare brick-built housing estate located in the London Borough of Southwark, on the Southwark and Lewisham border. Constructed in the 1960s and 1970s, the Estate is made up of 526 properties spread over six low-rise blocks and three 20 storey towers; a one form entry Primary School, retail units, Tustin Community Centre, open space and resident parking. Many of the blocks are in need of significant reinvestment; and major renovation works have been completed on the three tower blocks as part of a separate improvement programme.

Over the last eight years plans have been underway to redevelop the low rise blocks on the Estate using a resident first approach. In February 2021 there was an overwhelming positive resident's ballot for these plans which are now going ahead. The new Tustin Estate redevelopment will deliver 690 homes over 10+ years in four phases. Houses will be a mix of council homes, affordable homes, key worker housing and private homes.

As of summer 2024, Phase 1 is nearing completion. Once complete, these will consist of 167 homes offering rehousing options to the existing residents. These are to be delivered as two blocks of flats ranging from 5 to 13 storeys, and two rows of terraced houses (14 in total).

This Interim EHIA will focus on the blocks which are scheduled for demolition as part of Phase 2: Herversham House and Kentmere House. The use of CPO

powers is only being considered for residents of Heversham House, as it has the largest proportion of leasehold tenancies. As of August 2024, the single resident leaseholder in Kentmere House had verbally agreed to take possession of a property in the Phase 1 homes.

The tenancy breakdown of the Phase 2 blocks as supplied in August 2024 is outlined in the table below:

**Table 2.1: Phase 2 Tenancy Breakdown**

<b>Estate Block</b>	<b>Count of Tenant/Leaseholder</b>
<b>Heversham House</b>	<b>93</b>
Complex	4
Non-Resident Leaseholder	9
Resident Leaseholder	8
Temporary Accommodation	15
Tenant	57
<b>Kentmere House</b>	<b>34</b>
Complex	1
Resident Leaseholder	1
Temporary Accommodation	10
Tenant	22

Source: Southwark Council, 2024

### 2.1.2 Overview of Phase 2

Phase 2 focuses on Heversham House and the adjacent Kentmere House. The Scheme will deliver 295 new homes, consisting of:

- 144 Build to Rent homes
- 151 affordable homes, consisting of 51 keyworker homes, 90 social rent homes and 10 Shared Equity homes
- The new homes will be a mixture of maisonnettes and one to three bedroom flats across four buildings, flanking the new Tustin Common park area.
- During the delivery of Phase 2, there will also be additional outdoor and indoor amenity space for residents including play space and an open space.
- The delivery of Phase 2 is anticipated to commence once Phase 1 has been completed and existing residents have moved in, which is currently scheduled for mid-2025.

### 2.1.2.1 Commitments to residents

- The Council has made the following commitments<sup>3</sup> in line with the Tustin Manifesto, which has been drawn up by the Tustin Community Association, discussions with the Resident Project Group and resident input:
- **Energy and cost efficient:** New homes will have a meter reading for heating, water and electricity bills with all buildings designed to be as efficient as possible to minimise costs on utility bills.
- **Council rent levels:** All new homes will have council rate levels. The levels of rent are determined by property values, and as the new builds will be of higher value, the rent will be proportionally higher.
- **Adaptable homes:** A commitment that tenants and homeowners will be able to move into a dedicated Over 55s Block. These homes will be wheelchair accessible, adaptable and flexible to meet resident needs, larger balconies and communal facilities such as living rooms.
- **High standards and high quality:** All new homes will be built to the latest standards as set out in current Building Regulations, planning policy and Southwark New Homes Design Guide. For existing residents all new homes will be as big, or bigger, than their current home and it will also have a large outdoor private space.
- **Provision of parking:** Resident car owners who currently have a parking permit will have a parking permit for the redeveloped estate.
- **Community safety:** New buildings and spaces are designed to reduce the opportunities for crime and anti-social behaviour. Homes are designed to give views onto green spaces, with new entry halls to buildings with improved lighting and security.
- 
- Preliminary plans of apartment layouts include an oversized space designed for wheelchair users, oversized balconies with views to greenery, large bathroom and an open space kitchen/living room.

### 2.1.2.2 Commitment to relocated tenants

At the start of the Tustin Estate project, Southwark Council made a number of commitments to council tenants and resident leaseholders on the estate.

The following considerations have been made to accommodate residents during the Phase 2 redevelopment:

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<sup>3</sup> These commitments represent a guarantee from the Council and apply to residents who have been a resident on the Estate 12 months before the Resident Ballot.

- Tenants and leaseholders will be treated equally within allocation priority. The Council allocate priority based on ground floor need and by the date in which the resident originally moved into the Estate.
- Within Phase 2 all existing residents will be allocated homes before any additional homes are allocated to other people on the housing register. If residents can't afford a property, or don't have enough equity to buy a new home on the Estate, the Council will offer to rehouse residents as a council tenant if they cannot afford to remain a leaseholder. This is determined via a financial assessment.
- Residents are entitled to home loss compensation. This is a statutory payment set in law. Tenants get a payment of £6,500 (this is reviewed annually).
- Residents are entitled to disturbance costs. Residents will be reimbursed for reasonable costs related to removals costs, adjustments to curtains and carpets and disconnection and connection of services such as phones, TV and the redirection of post.
- Residents that live in Bowness House will be able to remain in their current home until the Phase 2 homes are ready. However residents of Heversham or Kentmere House will need to move out of their current home and into a temporary home that the Council will provide in Phase 1 while the Phase 2 homes are built.
- All residents will have access to a dedicated support team. The team will help individuals understand the proposals, and the best options for each individual. This team will support vulnerable residents with all aspects of their move and liaise with family members as necessary.
- Council homes will be allocated according to need. Individual need will be discussed and confirmed with individuals after planning permission has been agreed. If needs change after this time this can be updated with the dedicated support team.
- A dedicated Tustin local lettings system will be used to prioritise moves based on housing need, medical need and existing housing arrangements such as gardens or location within a block.
- All council tenant households in properties to be demolished (will not need to bid for a new home (under Homesearch)). These households will be pre-allocated a new home on the Tustin Estate after planning permission has been granted. Residents will choose from a booklet which home they want to move into in line with their need. This means that ahead of time, households will know: the exact home they will be moving to; they will know the timetable for building that home; and will be able to choose finishes for their new home and meet their neighbours.
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### 2.1.3 Compulsory Purchase Order

Section 226 (1) (a) of the Town and Country Planning Act 1990 authorises a local authority to exercise its compulsory purchase powers. This is the case if acquiring the land in question will facilitate the carrying out of development, redevelopment, or improvement on, or in relation to, the land being acquired, and it is not certain that they will be able to acquire it by agreement.<sup>4</sup>

Additionally, a local authority must not exercise the power under section 226(1)(a) of the 1990 Act unless they think that the development, redevelopment, or improvement is likely to contribute to the achievement of any one or more of the following objectives:

- the promotion or improvement of the **economic** well-being of their area.
- the promotion or improvement of the **social** well-being of their area.
- the promotion or improvement of the **environmental** well-being of their area.<sup>5</sup>

Part of the function of this EHIA report is to provide evidence related to the Council's equality duties in relation to the use of its CPO powers, and to provide a consideration of potential equality impacts, both negative and positive, associated with the scheme.

As a last resort where negotiation is not possible, the Council intends to use its CPO powers to help facilitate the acquisition of land and new rights over land. The purpose of this is to assemble land to facilitate the comprehensive delivery of the scheme. This will require all leases and licences to be transferred to the Council prior to the scheme taking place, and all tenants to be notified of this arrangement.

The Council is currently in the process of undertaking negotiations for acquisitions of interests; however, it may be necessary to pursue the Compulsory Purchase Order to ensure the delivery of the scheme. This process will continue in parallel with acquisition negotiations to ensure that the Council is able to acquire all necessary interests within a reasonable timescale.

#### 2.1.3.1 Commitment to leaseholders

At the start of the Tustin Estate project, Southwark Council made a number of commitments to resident leaseholders on the estate. This included that every resident leaseholder who wants to stay on the rebuilt Tustin Estate will be offered a new leasehold home that can be bought via shared ownership, shared

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<sup>4</sup> Ministry of Housing, Communities & Local Government (2019) Guidance on Compulsory purchase process and the Crichton Down Rules

<sup>5</sup> Legislation UK (1990): 'Town and Country Planning Act 1990'

equity or an equity loan with the council. Currently, 8 leaseholders have chosen a new home on the rebuilt Tustin Estate.

The Council has appointed independent surveyors to inspect and value the properties, and leaseholders have appointed their own surveyors to act for them. The leaseholders reasonable legal and surveyors' professional fees are borne by the Council. To date, the Council has successfully acquired 12 of the 28 leaseholds in Heversham House via the buyback programme.

The following considerations have been made to accommodate residents during the Phase 2 redevelopment:

- Tenants and leaseholders will be treated equally within allocation priority. The Council allocate priority based on ground floor need and by the date in which you originally moved into the Estate.
- Within Phase 2 all existing residents will be allocated homes before any additional homes are allocated to other people on the housing register. If residents can't afford a property, or don't have enough equity to buy a new home on the Estate, the Council will offer to rehouse residents as a council tenant if they cannot afford to remain a leaseholder. This is determined via a financial assessment.

### 2.1.3.2 Engagement

The Council have maintained strong ties to the leaseholders during the Scheme, in order to improve transparent communication surrounding the redevelopment. The Council has been negotiating with leaseholders in Heversham House since the point the landlord offer was agreed in March 2021 with the intention to acquire all interests by agreement. The Council are committed to consulting residents on proposals for the new development throughout the process, using a range of methods so residents can influence the delivery.

In addition to this, residents have and will continue to remain updated upon Phase 2 redevelopment via the Resident Project Group<sup>6</sup> and Tustin newsletters. The newsletters have been issued monthly from September 2019-current and provide regular consultation updates about the future of the Estate and details of resident drop-ins or future engagement events. Newsletters additionally signpost a number of useful services, including numbers to contact if residents are struggling with mental health and maintenance problems. The Council have

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<sup>6</sup> There's a Tustin Resident Project Group (RPG) which is mainly made up of residents in the low-rise blocks and some residents from the towers. The group works with the Council to monitor and consult on the Tustin Estate Low Rise Programme.

further instructed an independent company, TerraQuest, to communicate CPO arrangements to residents.

## 2.2 Background to Tustin Estate Redevelopment Programme

The following section provides a summary of the Tustin Estate redevelopment programme prior to this Interim EHIA.

### 2.2.1 Renewal scenarios

#### 2.2.1.1 Initial options

Options for the Programme were developed by Common Grounds, taking account of feedback from Tustin Estate residents, the Council and other consultants involved in the process to date.

Five scenarios were initially considered for the redevelopment of the Estate:

- Option 1 simply involved the maintenance of the Estate with no new builds
- Option 2 and 3 required part refurbishment/part demolition of the Estate and new builds
- Option 4 required the complete demolition and rebuild of the Estate
- Option 5 required almost complete demolition of the estate, with the exception of Manor Grove, which would be maintained and infilled with new homes.

#### 2.2.1.2 Residents Ballot

In September 2020, residents were asked to rank the options in order of preference in a ballot. Option 4, which would see the full redevelopment of the Estate, including Manor Grove, was the favoured option of all blocks on the Estate with the exception of Manor Grove residents. Manor Grove is where all freeholders on the Estate live.

The decision on which option to take forward was based on the results of the options survey, its alignment with council policies and aims, and supporting information in the Cost Benefit Analysis and the EHIA. It was determined that the Final Option for the Estate was Option 5 - the complete demolition and re-provision of all blocks with the exception of Manor Grove. The Manor Grove homes would be retained and refurbished, with infill housing established. The decision to proceed with Option 5 was based on taking all of the above information into account, and because it allows for the benefits of both Option 4 and Option 5 to be realised.

The Final Option was taken to a ballot of residents in February 2021, with the option to vote Yes or No on the Final Option. The majority of residents (87% of a 64% turnout) voted Yes to take forward the Final Option and redevelop the Estate.



## ‘Hybrid’ Planning Application

After the Residents Ballot voted Yes to take forward the redevelopment of the Estate, Southwark’s Cabinet approved the delivery plan including appointing a design team to develop a Masterplan for planning submission. The ‘Hybrid’ Planning Application for with full submission for Phase 1 was submitted and approved in 2022.

## Phase 2 Planning Application

The Planning Application for Phase 2 of the Scheme was submitted in August 2024.

## 2.3 Policy context

### 2.3.1 National policy

**National Planning Policy Framework:** At a national level, the project will support the core principles of the National Planning Policy Framework as outlined below:

- 60. Planning policies and decisions should aim to deliver a sufficient supply of homes where **specific housing requirements** are addressed to meet as much of an areas identified housing need as possible, including an appropriate **mix of housing** types for the local community.
- 61. Planning policies and decisions should reflect the size, type and tenure of **housing needed for different groups** in the community. The groups should include those who require affordable housing, families with children, older people and people with disabilities.
- 66. Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least **10%** of the total number of homes to be available for **affordable home ownership**.
- 96. Planning policies and decisions should aim to achieve healthy, **inclusive and safe places** which:
  - a) **promote social interaction, neighbourhood centres, street layouts** that allow for easy pedestrian and cycle connections within and between neighbourhoods
  - b) **are safe and accessible**, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion
- 97. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
  - a) plan positively for the **provision and use of shared spaces, community facilities** (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of

worship) and other local services to enhance the sustainability of communities and residential environments

- 98. Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.
- 102. **Access to a network of high-quality open spaces** and opportunities for sport and physical activity is important for the **health and well-being of communities**, and can deliver wider benefits for nature and support efforts to address climate change.

### 2.3.2 Regional policy

**The London Plan:** At a regional level, the London Plan sets out the economic, environmental and social framework for the development of Greater London. It consists of strategic approaches that will be guided by policy. Policies relevant to the project are set out below:

- Policy SD1 Opportunity areas:
  - B2) Support development which creates employment opportunities and **housing choice for Londoners**.
  - B3) Plan for and provide the necessary social and other infrastructure to **sustain growth** and create **mixed and inclusive communities**, working with infrastructure providers where necessary.
  - B9) Ensure planning frameworks are informed by **public and stakeholder engagement and collaboration** at an early stage and throughout their development.
- Policy D5 Inclusive design:
  - B) Development proposal should achieve the highest standards of **accessible and inclusive design**. They should:
    - B1) be designed taking into account London's diverse population.
    - B2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion.
    - B3) be convenient and welcoming **with no disabling barriers**, providing independent access without additional undue effort, separation or special treatment.
    - B4) be able to be entered, used and exited safely, easily and with dignity for all.
    - B5) be designed to incorporate safe and dignified emergency evacuation for all building users.
- Policy D6 Housing quality and standards:

- A) Housing development should be of **high-quality design** and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- Policy D7 Accessible housing:
  - A1) At least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’.
- Policy S1 Developing London’s social infrastructure:
  - E) New **facilities should be easily accessible by public transport**, cycling and walking and should be encouraged in high streets and town centres.
- Policy G1 Green infrastructure:
  - A) London’s network of **green and open spaces**, and green features in the built environment, **should be protected and enhanced**.
  - D) Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network.
- Policy G4 Open space:
  - A2) Include appropriate designations and policies for the **protection of open space** to meet needs and address deficiencies.
  - A4) Ensure that open space, particularly green space, included as part of development remains publicly accessible
- Policy T2 Healthy Streets:
  - A) Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.
  - B2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.

### 2.3.3 Local policy

**The Southwark Plan:** The scheme will directly contribute to several of the Council’s local strategic priorities, a summary of which is found below:

- **SP1 Homes for All:** The Council aims to build more homes, increasing the supply of different types of properties (private, housing association and council ownership) to **meet the needs of households of different sizes, on different incomes and with a variety of specific needs**.
  - P1 Social rented and intermediate housing

- P7 Housing for older people
- P8 Wheelchair accessible and adaptable housing
- **SP2 Southwark Together:** The Council aims to revitalise places and neighbourhoods to create new opportunities for residents and local businesses, to promote wellbeing and reduce inequalities so that people can have better lives in stronger communities. This includes regeneration in areas where people are vulnerable or face greater disadvantage, by **investing in the prevention and tackling causes of inequality**. Developments being designed for diverse communities will ensure accessibility, inclusivity and interaction in the area. This will create a **place where everyone can benefit from all activities**, including play spaces, leisure activities, and the natural environment, enabling all residents to feel proud of their home and create a sense of belonging in the community.
- **SP5 Thriving neighbourhoods and tackling health inequalities:** The Council aims to maintain and **improve the health and wellbeing of residents**, encouraging healthy lives by tackling the causes of ill health and inequalities. This will be achieved through increasing green spaces, introducing active design and improving access to healthcare, voluntary organisations and community health facilities.
  - P47 Community uses
- **SP6 Climate Emergency:** The council aims to provide spaces for people to connect with nature to address the climate emergency. By working with local people to deliver a clean, green and safe borough, the living environment will improve, reducing the poor air quality that can have significant health impacts.
  - P65 Improving air quality
- **Southwark Housing Strategy:** At a local level, the Southwark Housing Strategy sets out the vision and objectives for housing across the borough.
- Southwark's goal for housing is: "To provide a mix of homes to help Southwark's economy grow, while enabling existing communities to have a future in the borough". This will help the borough to respond to fundamental issues in Southwark: **affordability, quality, security and encouraging pride and responsibility**.
- The strategy states the need to build more homes with high standards of design that ensure all residents are kept warm, dry and safe.
- The strategy includes a plan to **work with local residents** to achieve this vision. This includes working in partnership to tackle antisocial behaviour by designing out crime from new developments while protecting access to communal areas and facilities.

## 3 Review of existing evidence

This chapter presents a summary of the evidence of risks and opportunities. It includes existing evidence of risks and opportunities associated with Phase 2 of the Tustin Estate Regeneration Programme and associated protected characteristic groups who may be disproportionately affected, based on the initial desk-based review.

### 3.1 Existing published evidence

The below table summarises the existing evidence of risks and opportunities and associated protected characteristic groups, as identified in the 2010 Equality Act, who may be disproportionately affected prior to consideration of any mitigation measures in place. The table does not summarise actual equality effects but rather the potential risks and opportunities that arise from regeneration and housing redevelopment schemes. Risks are defined as potential adverse effects resulting from the scheme, and opportunities are defined as potential benefits. A full assessment of potential equality effects, based on the risks and opportunities identified below, is provided in Chapter 5. Protected characteristic groups include those defined in Chapter 1.

- Key potential impacts that have been identified are presented in this chapter, with a detailed literature review provided in Appendix B.

**Table 3.1: Evidence Summary**

**Effects on residents during the renewal process****Affected groups****Relocation and loss of social cohesion:**

The renewal process can involve temporary or permanent relocation of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood.

This can lead to increased stress and anxiety in **children** who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. **Disabled people and pregnant people** may also experience negative health impacts from this, including increased stress and anxiety.

- Children
- Older people
- Disabled people
- Pregnant people
- People from ethnic minority backgrounds
- People from minority faith groups

**Loss of access to community resources:**

Redevelopment can result in the closure and/or relocation of existing community resources that are operating on the site. Any loss in access to these community resources due to closure or relocation away from the area can contribute to feelings of isolation and loneliness amongst local people. This is particularly the case where essential service, such as education and healthcare institutions, are lost. This may have adverse effects for a number of groups. **Children** can be adversely impacted by a loss of their social networks which may impact their development; whilst **older people** are at risk of community severance and social isolation. **Disabled people** are more likely to be lonely than the general population and may be disproportionately impacted by the closure of services.

- Children
- Older people
- Disabled people
- Minority religious and faith groups

**Access to finance as a result of relocation:**

Redevelopment often requires residents to relocate. Residents who do not have a right to return to sites after redevelopment has taken place have to find long term housing. Access to finance is likely to be problematic for those at risk of financial exclusion, and those who experience issues accessing the appropriate mainstream financial services associated with relocation, such as bank accounts, mortgages and loans.

- Young people not in employment
- Older people
- Disabled people
- Women
- People from ethnic minority backgrounds
- Lone parents
- Low income households

**Expenses associated with relocation:**

Relocation of residents can lead to an increase in financial outgoings due to the costs associated with moving and obtaining new housing. Such expenses are likely to be problematic for those at risk of financial exclusion.

- Young people
- Older people
- Disabled people
- People from ethnic minority backgrounds
- Women

## Effects on residents during the renewal process

## Affected groups

### Access to housing:

#### Appropriate and accessible housing

Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with **children, disabled people** requiring adaptable and accessible housing, and people seeking affordable housing.

A lack of suitable housing can lead to families living in overcrowded properties. Overcrowding can lead to negative impacts on children's health, putting them at increased risk of developing respiratory conditions, infections, psychological problems, SIDS, and stress.

Health effects caused by poor housing, such as respiratory disease, is more likely to impact upon **older people**.

- Children
- Disabled people
- People from ethnic minority backgrounds
- Women

#### Affordable housing

The need for residents to relocate can cause difficulty in accessing affordable housing. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who have trouble trying to access appropriate and mainstream financial services, such as bank accounts, loans, and mortgages. This is also exacerbated by the increasing unaffordability of homeownership for many people in England and Wales in recent years

### Health effects associated with relocation:

Relocation can have a negative impact on an individual's mental health and well-being. Relocation can create a great deal of stress and anxiety amongst **children, young people and older people** due to the need to adapt to new routines, facilities and surroundings.

Health effects may also result from social isolation due to housing relocation, such as poorer mental health, obesity, alcoholism, and a greater risk of hospitalisation.

- Children
- Older people
- Ethnic minority
- Pregnancy and maternity

### Accessibility and mobility in the surrounding area:

Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.

- Children
- Disabled people
- Older people

### Safety and security:

In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behaviour and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.

- Young people
- Disabled people
- People from ethnic minority backgrounds
- LGBTQ+ people
- Men
- Older people
- Women
- Children



## Effects on residents during the renewal process

## Affected groups

### Information and communication:

The process of regeneration often requires two-way communication between residents and the council and or housing authorities in order for residents to understand the options available to them. The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the methods of communication used.

- Older people
- Disabled people
- People from ethnic minority backgrounds

## Impacts on local people after delivery of Phase 2

### Improved housing provision:

Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption.

Appropriate and accessible housing:

Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home. **Children** living in cold homes are more than twice as likely to suffer from a variety of respiratory problems than children living in warm homes. Cold housing can negatively affect children's educational attainment, emotional wellbeing and resilience. Effects of cold housing are also evident among **older people** in terms of higher mortality risk, physical health and mental health.

Affordable housing:

Certain groups are more likely to struggle to find affordable housing. Only 1 in 7 disabled people own their own homes; whilst 40% of people from ethnic minority backgrounds live in low income homes. New social housing and affordable housing could impact these groups more, particularly in London.

- Children
- Older people
- People from ethnic minority backgrounds
- Disabled people

### Improved access, mobility and navigation:

Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area.

Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.

- Children
- Older people
- Disabled people

**Effects on residents during the renewal process****Affected groups****Improvements in public realm and green space:**

Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is important to ensuring people feel that are a part of their community. Regeneration can improve access and mobility for vulnerable groups. In addition, increased green space has been shown to impact positively on both physical and mental health.

Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of **older people**. Green space can also have a positive role in a **child's** cognitive development and their mental health.

- Older people
- Disabled people
- People from ethnic minority backgrounds
- Children

**Provision of community facilities and improved social cohesion:**

Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They are safe spaces for communities who often face barriers to participation in society.

An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social spaces such as sports facilities can also improve the wellbeing of children and reduce crime.

- Children
- Older people
- Disabled people
- People from ethnic minority backgrounds
- Pregnant people
- LGBTQ+ people

**New employment and business opportunities:**

Redevelopment and regeneration can support job creation, promoting economic growth. Improved opportunities to access employment and education can address issues of inequality and improve social mobility by removing barriers to employment, faced by marginalised groups such as older people, disabled people, and those from ethnic minority backgrounds.

- Older people
- Disabled people
- People from ethnic minority backgrounds
- Women
- Young people

**Safety and security:**

In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behaviour and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.

- Young people
- Disabled people
- People from ethnic minority backgrounds
- LGBTQ+ people
- Men
- Older people
- Women
- Children



## 4 Area profile and proportionality

This chapter is split into three sections: providing an overview of the socio-demographic profile of the Estate, an overview of community resources and businesses on the Estate.

It should be noted that the data analysed is not representative of ONS Census 2021 statistics or updated OS AddressBase data.

An updated area profile review will be outlined within the Full EHIA, to be produced in late 2024.

### 4.1 Overview of the socio-demographic profile of the area

The area profile summary below provides a demographic characterisation of the area in which Tustin Estate falls. The baseline compares the socio-demographic profile of the Estate with the London Borough of Southwark, the Greater London region, and England. The summary includes analysis of protected characteristic groups under the Equality Act 2010 and the current socio-economic context of the area. In comparing these regions, where the Estate deviates by more than 3%, the difference is considered to be significant and is reported as such.

The data used in the baseline is the most current publicly available data from the Office of National Statistics. Where there are higher proportions of certain groups on the Estate, this is written in **bold text**.

A more detailed breakdown of the baseline can be found in Appendix A.

**Table 4.1: Socio-demographic summary**

Protected Characteristic	Estate comparison with Southwark, Greater London and England <sup>7</sup>
Age	<ul style="list-style-type: none"> <li>Population of <b>children</b> (under 16) is consistent with other areas.<sup>8</sup></li> <li>Population of <b>young people</b> (16-24) is consistent with other areas.</li> </ul>

<sup>7</sup> To determine the population within the Estate code point data was used. Code point data is a point representing a postcode area (there are multiple within the Estate boundary). Each code point is assigned with Lower Super Output Area (LSOA) data from the LSOA that the point falls in. An LSOA is the smallest geographical area (an average of 1,500 residents and 650 households) for which most population data is published (beyond Census data).

<sup>8</sup> When comparing populations between areas, where the Estate differs by more than 3%, the difference is considered to be significant and is reported this way – e.g. <3% is consistent with other areas and >3% is higher or lower than other areas.

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	<ul style="list-style-type: none"> <li>● Population of working age people (16-64) living on the Estate (71%) is broadly in line with that of Southwark (73%) but higher than Greater London and England (67% and 62% respectively).</li> <li>● Population of <b>older people</b> (65+) is consistent with other areas.</li> </ul>
Disability <sup>9</sup> :	<ul style="list-style-type: none"> <li>● The population of <b>disabled people</b> living on the Estate is higher (16%) than Southwark or Greater London (14%), but in line with England (18%).</li> </ul>
Gender reassignment	No information is publicly available for the Estate
Marriage and civil partnerships	Population of those who are married or in a civil partnership is lower than or consistent with other areas.
Pregnancy and maternity	The general fertility rate (live births per 1000 women aged 16-44) and total fertility rate (avg. number of children born per woman) is lower than other areas; number of live births as a proportion of the total population is consistent with other areas.
Race	<ul style="list-style-type: none"> <li>● 76% of people who live on the Estate are from an <b>ethnic minority background</b>. This is significantly higher than the proportion of people from a ethnic minority background who live in Southwark (60%), Greater London (55%) and England (20%).</li> <li>● The largest ethnic minority group on the Estate are those from a Black African background (28%). This This is significantly higher than the proportion in Southwark (16%), Greater London (7%), and England (2%).</li> <li>● All other ethnic minority groups on the Estate are consistent with other areas</li> <li>● There are lower proportions of White British people when compared to other areas.</li> </ul>
Religion	<ul style="list-style-type: none"> <li>● 59% of people who live on the Estate identify as Christian. This is higher than the Christian population in Southwark (53%).% <b>but the same as Greater London (59%)</b>.</li> </ul>

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<sup>9</sup> Defined here as 'People whose day to day activities are limited in any way as a result of being disabled or because of a long-term health condition'

	<ul style="list-style-type: none"> <li>• Populations of people from other religious and faith groups are consistent with other areas.</li> </ul>
Sex	The population of men and women is consistent with other areas.
Sexual orientation	No information is publicly available for the Estate
Local economy	<ul style="list-style-type: none"> <li>• The employment rate in Southwark (78%) is higher than England (75%).</li> <li>• Median income for full-time workers in Southwark is higher than both London and England, at £39,183 per annum, compared to £36,797 and £30,661, respectively.</li> </ul>
Deprivation	<ul style="list-style-type: none"> <li>• The Site has a higher proportion of those living in the most deprived quintile (25%), compared with Southwark, Greater London, and England (21%, 16%, and 20% respectively).</li> <li>• A considerably higher number of people (75%) live in the second most deprived quintile, compared with Southwark (47%), Greater London (32%) and England (21%).</li> </ul>
Health	<ul style="list-style-type: none"> <li>• Southwark has poorer rates of health behaviour in terms of childhood obesity, with high child obesity (27%) compared to the figure for England (22%).</li> <li>• Adults who are social care users in Southwark reportedly feel lonelier than those elsewhere in London – Southwark reports higher loneliness amongst adult social care users than any other borough. When compared to England, only 34% of respondents reported having as much social contact as they would like compared to 46%.</li> </ul>

## 4.2 Overview of community resources within the Estate

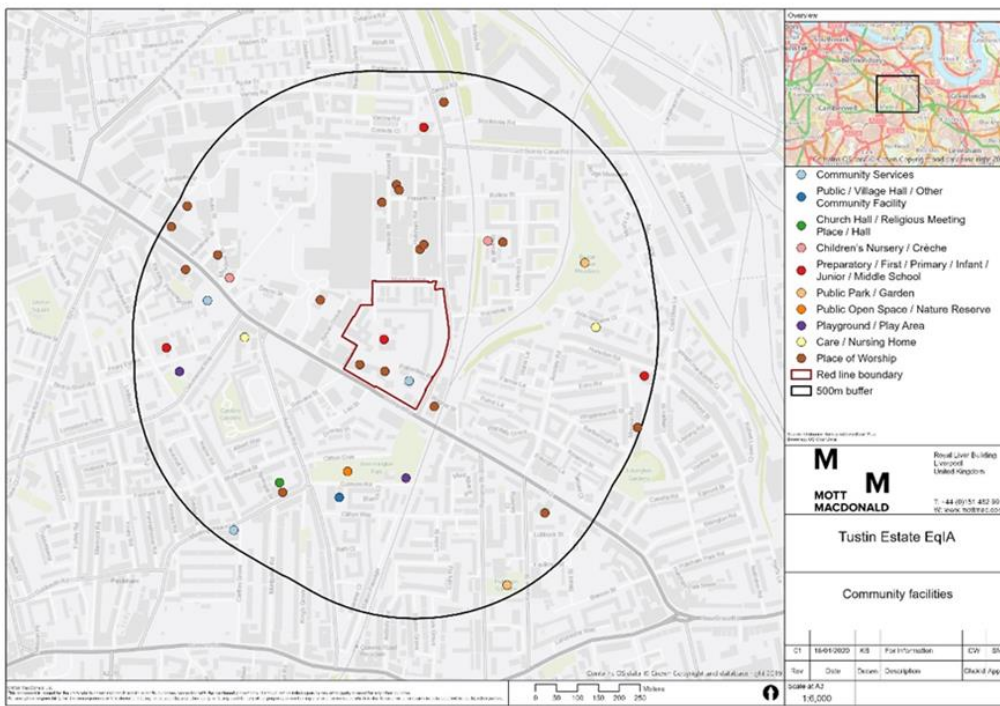
There are a number of community facilities and resources located both within, and in close proximity to, Tustin Estate which are likely to be accessed by protected characteristic groups, or if they were to be lost, would potentially adversely affect protected characteristic groups. Within the Estate boundary, there are two Christian faith groups which are likely to be affected by the project. Children are likely to be impacted by relocation of the Pilgrims Way Primary School and day care / learning centre. There is also the Tustin Estate Community Centre, which is

available for use by all residents of the current Estate. Table 4.2 below lists the community facilities located within the Estate boundary.

**Table 4.2: Community facilities within and surrounding the Estate**

Name	Category	Address
Day care / learning centre	Education	803 Old Kent Road
Pilgrims Way Primary School and Nursery	Infant School	Manor Grove
Tustin Community Centre	Community Services	Windermere Point
Divine Prophetic Interdenominational Ministries	Faith group	801 Old Kent Road
Redeemed Assemblies	Faith group	821 Old Kent Road

**Map 4.1: Community facilities within and surrounding the Estate**



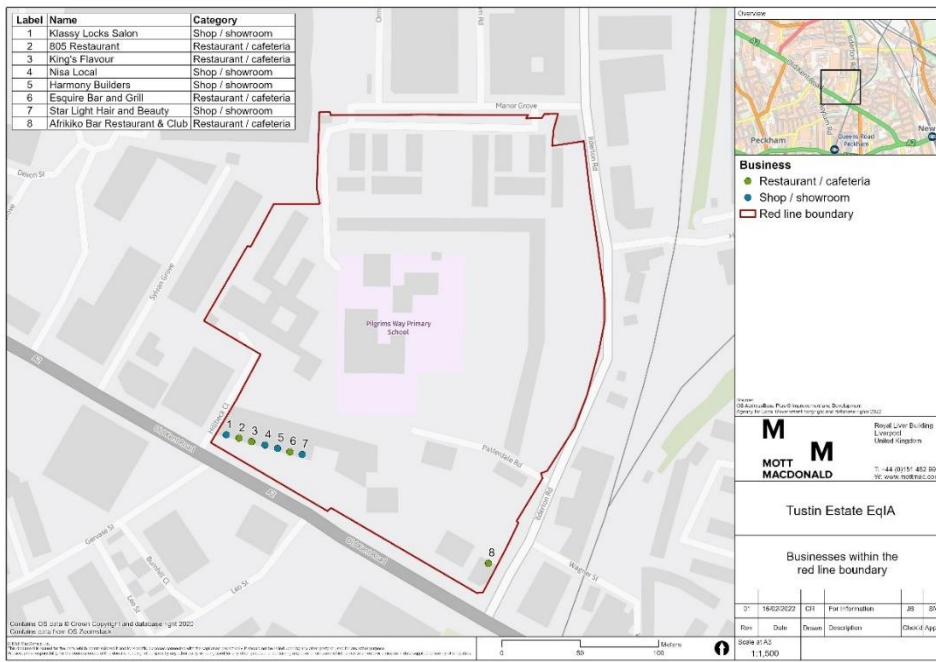
Source:OS AddressBase

### 4.3 Overview of businesses within the Estate

There are a number of commercial units located on the Estate facing Old Kent Road in Bowness House. The businesses include two restaurants, a takeaway, a convenience store, an accountancy and a hair and beauty salon. These may be affected by any demolition and rebuild option on the Estate, which could have equality impacts on owners and employees, and potentially local residents.

Map 4.2 maps and labels the businesses located within the Estate boundary.

Map 4.2: Businesses within the Estate



Source: OS AddressBase

## 5 Impact Assessment

This section identifies the potential impacts that could arise for people with protected characteristics, as a result of Phase 2 of the redevelopment of the Estate and potential use of CPO powers. In line with previous EHAs conducted for this scheme, it includes a coloured rating system to demonstrate the overall impact pre and post mitigation.

The impacts are split into two sections. Table 5.1 assesses the impact on residents and community resources during Phase 2; whilst Table 5.2 assesses the impact on the community after Phase 2 is complete.

### 5.1 Overview: assessing equality risks and opportunities

The scale below has been used to identify the extent of both risks and opportunities. Where there is more than one impact, the rating summarises the overall impact. Please note that the rating following mitigation captures where there may be possible further mitigation measures that could be put in place by the Council to further reduce the effect, or the impact has been reduced for identified protected characteristic groups to a level that is no worse than that experienced by the rest of the population.



1. Major risk	X X X
2. Moderate risk	X X
3. Minor risk	X
4. Neutral	0
5. Minor opportunity	✓
6. Moderate opportunity	✓✓
Major opportunity	✓✓✓

## 5.2 Impact on residents and community resources during Phase 2

The following table describes the potential impacts during the delivery of Phase 2 and the use of CPO powers on protected characteristic groups, with a focus on impacts for residents and local community resources during the delivery of Phase 2. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Existing measures Southwark Council has in place to mitigate or enhance impacts are set out, and the impacts are rated on their effects before and after mitigation. Finally, recommendations are made as to how Southwark can further mitigate risk or enhance opportunity.

**Table 5.1: Impacts on residents and community resources during renewal**

Potential equality and health risks	Without mitigation	With mitigation	Existing Southwark Council mitigations or enhancements	Recommendations	Overall equality impact

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<p><b>Relocation and loss of social cohesion:</b></p> <p>Redevelopment of housing estates can involve the temporary or permanent resettlement of residents as a result of demolition of their existing homes. This could increase the distance of residents from family, friends, or places of social connection, such as community centres or schools. Relocation may therefore result in a loss of social cohesion for residents.</p> <p>The evidence review highlights that certain groups can be differentially impacted by this change. The groups include children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds and people from minority faith groups.</p> <p>Disabled people and people from ethnic minority groups are</p>	<b>XXX</b>	<b>0</b>	<ul style="list-style-type: none"> <li>• A phasing plan has been developed to limit the number of temporary moves to a maximum of two, with residents only making one move in most circumstances. However, residents of Heversham House and Kentmere House will have to be temporarily rehoused in the Phase 1 homes whilst their new permanent home is built. This means residents will remain on the Estate.</li> <li>• Residents will not have to bid for a home, and will be able to choose one in line with need. Ahead of time, residents will know the exact home they will be moving to; they will know the timetable for</li> </ul>	<ul style="list-style-type: none"> <li>• The following recommendations are outlined to enhance equality impacts and mitigate risks further:</li> <li>• Work proactively and constructively through a range of channels, including face to face engagement where possible with residents, keeping up-to-date records of changing needs and circumstances, particularly if residents who will be most affected by refurbishment and/or relocation in order to remediate</li> </ul>	<p>There is a potential for adverse effects amongst certain equality groups as a result of a loss of social cohesion linked to relocation.</p> <p>As the evidence review highlights, children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds and people from minority faith groups could be differently adversely impacted.</p> <p><b>As disabled people and individuals from an ethnic minority background</b> are disproportionately represented within the population they may also experience disproportionate adverse impacts.</p> <p>However, the existing mitigations listed in</p>
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<p>disproportionately represented in the population of the local area.</p>			<p>building that home; and will be able to meet their neighbours in advance of the move</p> <ul style="list-style-type: none"> <li>• All residents will have access to a dedicated support team. The team will help individuals understand the proposals, and the best options for each individual. This team will support <b>vulnerable residents with all aspects of their move</b> and liaise with family members as necessary.</li> </ul>	<p>feelings of social isolation.</p> <ul style="list-style-type: none"> <li>• Temporary housing should adhere to accessibility guidelines and consider the environmental needs of tenants- e.g. elderly residents should avoid being allocated in temporary accommodation near busy roads.</li> </ul>	<p>Column 3, including that residents can be rehoused on the Estate whilst their new home is built, limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
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<p><b>Loss of community resources:</b>                  Redevelopment of housing estates and local communities can result in the closure or relocation of existing community resources which operate on the Site. Pilgrims Way Primary School will be demolished as part of the Scheme                  Loss in access to community resources due to closure or relocation away from the local area may have adverse effects for a number of groups, including disabled people, older people, children and those from religious and faith groups. The loss of community resources to maintain social links can contribute to feelings of isolation and loneliness in older people and disabled people. Demolition and resource relocation could also adversely affect access to child social networks.                  Disabled people are disproportionately represented</p>	<p><b>XXX</b></p>	<p><b>0</b></p>	<ul style="list-style-type: none"> <li>● Pilgrim’s Way school will remain open during the renewal process, so there will be no requirement for pupils to change schools while the new school is being built.</li> <li>● Public realm works to be staggered to ensure there is always access to green and recreational space.</li> <li>● Temporary amenity space will be provided throughout the redevelopment process.</li> </ul>	<ul style="list-style-type: none"> <li>● The following recommendations are outlined to enhance equality impacts and mitigate risks further:</li> <li>● Work proactively and constructively through a range of channels, including face to face engagement where possible with residents, keeping up-to-date records of changing needs and circumstances, particularly if residents who will be most affected by refurbishment and/or relocation in order to remediate</li> </ul>	<p>There is a potential for adverse effects amongst certain equality groups as a result of a loss of community resources.</p> <p>As the evidence review highlights, disabled people, older people, children and those from religious and faith groups could be differently adversely impacted.</p> <p>As disabled people are disproportionately represented within the population they may also experience disproportionate adverse impacts.</p> <p>However, the existing mitigations listed in Column 3, including that the primary school will remain open in its existing building, limit any adverse impacts. Consideration</p>
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<p>in the population of the local area.</p>				<p>feelings of social isolation.</p> <ul style="list-style-type: none"> <li>● Maintain continuity in access to community resources (e.g. churches and play areas) where possible. If this is not possible, consider pop-up spaces for these uses.</li> <li>●</li> </ul>	<p>should also be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
<p><b>Access to finance as a result of relocation:</b></p> <p>The need to relocate as a result of redevelopment schemes can require residents to access new means of finance to accommodate the relocation.</p> <p>Should access to additional finances (such as loans or mortgages) be necessary as a result of the relocation, those at</p>	<b>XX</b>	<b>X</b>	<ul style="list-style-type: none"> <li>● Resident freeholders, leaseholders, and tenants are entitled to a Disturbance Payment to cover any costs reasonably incurred in moving home or purchasing a property under the CPO compensation guidance.</li> </ul>	<ul style="list-style-type: none"> <li>● The following recommendations are outlined to enhance equality impacts and mitigate risks further:</li> <li>● Should the CPO be used, residents should be supported</li> </ul>	<p>There is a potential for adverse effects amongst certain equality groups as a result of issues accessing the finance required to finance relocation.</p> <p>As the evidence review highlights, young people not in employment, lone parents, disabled people,</p>

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<p>risk of financial exclusion are more likely to be negatively impacted. Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, young people not in employment, lone parents, disabled people, women, ethnic minority groups and older people are more likely to experience barriers in accessing additional finances.</p> <p>Disabled people and people from ethnic minority groups are disproportionately represented in the population of the local area.</p>			<ul style="list-style-type: none"> <li>• Under the CPO compensation guidance, resident freeholders and leaseholders are entitled to receive home loss compensation at 10% of the market value of the property.</li> <li>• A number of options are available to leaseholders on the site, including shared ownership or shared equity loan. For leaseholders who cannot meet the equity requirements for these, council tenancies will be available, subject to financial appraisal.</li> <li>• Southwark Council commitment to work with leaseholders and freeholders to ensure</li> </ul>	<p>through market search assistance to find an alternative property in the local area, if this is desired, which meets their needs.</p> <ul style="list-style-type: none"> <li>• Work proactively and constructively through a range of channels, including face to face engagement where possible, keeping up-to-date records of changing needs and circumstances—particularly those who are most affected by financial exclusion.</li> </ul>	<p>women, ethnic minority groups and older people are more likely to experience barriers in accessing additional finances and may therefore differentially experience adverse impacts.</p> <p>As disabled people and people from ethnic minority groups are disproportionately represented in the local area, these groups may also experience disproportional adverse impacts.</p> <p>However, the existing mitigations listed in Column 3, limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p>
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			that no household is worse off as a result of renewal.		With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.
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<p><b>Expenses associated with relocation:</b></p> <p>The need to relocate as a result of redevelopment schemes can require residents to finance costs associated with moving.</p> <p>Relocation can lead to an increase in their financial outgoings due to costs associated with moving and securing new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture.</p> <p>The costs are more likely to impact those who are low income, such as young people, older people, disabled people, ethnic minority groups, and women.</p> <p>As before, disabled people and people from ethnic minority groups are disproportionately represented in the population of the local area.</p>	<p><b>XX</b></p>	<p><b>X</b></p>	<ul style="list-style-type: none"> <li>• Resident freeholders, leaseholders, and tenants are entitled to a Disturbance Payment to cover any costs reasonably incurred in moving home or purchasing a property under the CPO compensation guidance.</li> <li>• Should a resident's home require demolition, a Home Loss Payment (sum in recognition of home loss) and a Disturbance Payment would be made to Council tenants and homeowners. The Home Loss Payment would be a one-time payment, whilst the Disturbance Payment may be made more than once where</li> </ul>	<ul style="list-style-type: none"> <li>• The following recommendations are outlined to enhance equality impacts and mitigate risks further:</li> <li>• Should the CPO be used, residents should be supported through market search assistance to find an alternative property in the local area, if this is desired, which meets their needs.</li> <li>• Work proactively and constructively through a range of channels, including face to face engagement where possible,</li> </ul>	<p>There is a potential for adverse effects amongst certain equality groups as a result of expenses associated with relocation.</p> <p>As highlighted in the evidence review, groups more likely to be low income such as young people, older people, disabled people, ethnic minority groups, and women, may experience adverse differential impacts.</p> <p>As disabled people and people from ethnic minority groups are disproportionately represented in the local area, these groups may also experience disproportional adverse impacts.</p> <p>However, the existing mitigations listed in</p>
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			<p>necessary to facilitate multiple moves. This includes reimbursement of funds for removals, disconnection and reconnection of cooker/washing machine, redirection of mail, BT Telephone Installation, cable TV/TV installation and reasonable adjustments to carpets and curtains.</p> <ul style="list-style-type: none"> <li>• Additional costs for freeholders resulting from the works to the wider estate as well as costs related to services and utilities will be set out in detail as the earliest opportunity.</li> <li>• Council tenants will receive information regarding the</li> </ul>	<p>keeping up-to-date records of changing needs and circumstances—particularly those who are most affected by financial exclusion.</p> <ul style="list-style-type: none"> <li>•</li> </ul>	<p>Column 3 , limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts. With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
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			indicative rent and council tax of each property size before the selection process.		
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<p><b>Access to housing</b></p> <p><b>Appropriate and accessible housing:</b></p> <p>Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children, people requiring adaptable and accessible housing, people seeking affordable housing and large intergenerational ethnic minority households.</p> <p>The residents of Heversham and Kentmere House who will remain on the Estate will be temporarily rehoused within the Phase 1 accommodation whilst Phase 2 is built.</p> <p>All existing residents will be required to relocate once their properties have been acquired by the Council. This relocation will take place either voluntarily or via the Council's CPO.</p>	<b>XXX</b>	<b>X</b>	<ul style="list-style-type: none"> <li>● Residents will be supported to access homes that meet their needs and preferences.</li> <li>● A mix of housing sizes and typologies will be available in the redevelopment, to provide for different housing needs.</li> <li>● These homes will be wheelchair accessible, adaptable and flexible to meet resident needs, larger balconies and communal facilities such as living rooms.</li> <li>● Those with special housing needs to be prioritised throughout the rehousing process.</li> <li>● All tenanted homes will be adapted for</li> </ul>	<ul style="list-style-type: none"> <li>● The following recommendations are outlined to enhance equality impacts and mitigate risks further:</li> <li>● The Council should continue to communicate proactively with residents through a range of channels, including face-to-face engagement where possible, keeping up-to-date records of changing needs and circumstances, particularly those who are most affected by a change to accessible and</li> </ul>	<p><b>Appropriate and accessible housing:</b></p> <p>There is a potential for adverse effects amongst certain equality groups as a result of difficulties accessing appropriate and accessible housing.</p> <p>As listed in the evidence review, families with children, intergenerational families from ethnic minority backgrounds and disabled people are likely to be differentially impacted.</p> <p>As disabled people and people from ethnic minority groups are disproportionately represented in the local area, these groups may also experience disproportional adverse impacts.</p> <p>However, the existing mitigations listed in</p>
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<p>Disabled people are more likely to face barriers to accessing the appropriate mobility aids within properties and are more likely to face resistance from Councils to agree funding for mobility aids that will increase independent living. In addition, ethnic minority groups are more likely to live in intergenerational houses due to cultural norms. Furthermore, individuals from an ethnic minority background are more likely to face barriers to accessing appropriate housing that meets the needs for the number of individuals living in one property.</p> <p><b>Affordable housing:</b> Where renewal schemes require the resettlement of residents, rent charges, council tax charges and service charges have the potential to increase for residents. As the</p>			<p>residents needs as required.</p> <ul style="list-style-type: none"> <li>• New homes will have a meter reading for heating, water and electricity bills with all buildings designed to be as efficient as possible to minimise costs on utility bills.</li> <li>• Residents will not have to bid for a home, and will be able to choose one in line with need. Ahead of time, residents will know the exact home they will be moving to; they will know the timetable for building that home; and will be able to meet their neighbours in advance of the move</li> <li>• All residents will have access to a dedicated support team. The</li> </ul>	<p>appropriate housing such as families with children</p> <ul style="list-style-type: none"> <li>• Early estimates of changes to rent and service charges as a result of the redevelopment should be communicated to residents as soon as possible.</li> </ul>	<p>Column 3 limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts. With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p> <p><b>Affordable housing:</b> There is a potential for adverse effects amongst certain equality groups as a result of issues accessing affordable housing. As highlighted by the evidence review, young people, women, disabled people, older people who are retired, and LGBTQ+</p>
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<p>new builds will be of higher value, the rent will be proportionally higher.</p> <p>Young people, women, disabled people, older people who are retired, and LGBTQ+ people are most likely to face financial issues when securing alternative housing.</p> <p>The population of the LIA is disproportionately represented by disabled people (16%) and individuals from an ethnic minority background (76%), who are likely to differentially experience these effects. Furthermore, these groups are likely to be disproportionately impacted by any changes.</p>			<p>team will help individuals understand the proposals, and the best options for each individual. This team will support <b>vulnerable residents with all aspects of their move</b> and liaise with family members as necessary.</p> <ul style="list-style-type: none"> <li>• A dedicated Tustin local lettings system will be used to prioritise moves based on housing need, medical need and existing housing arrangements such as gardens or location within a block.</li> </ul>		<p>people may differentially experience adverse impacts.</p> <p>As disabled people are disproportionately represented in the local area, they may also experience disproportional adverse impacts.</p> <p>However, the existing mitigation listed in Column 3 limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
<p>Health effects as a result of relocation</p>	<p>XX</p>	<p>X</p>	<ul style="list-style-type: none"> <li>• A phasing plan has been developed to limit the number of</li> </ul>	<ul style="list-style-type: none"> <li>• The following recommendations are outlined to</li> </ul>	<p>Potential adverse effect</p>

<p>The Scheme has the potential to impact upon the health of local people due to the effects of relocation. Home relocation can have a negative impact on mental health and well-being, particularly for ethnic minority groups, children, young people, older people, disabled people and pregnant people. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood.</p> <p>Health effects may arise as a result of the stress of relocation, the environmental effects of demolition and construction processes and/or as a result from social isolation due to housing relocation.</p> <p>The population of the LIA is disproportionately represented by disabled people (16%), who are likely to differentially experience these effects. Furthermore, these groups are likely to be disproportionately impacted by any changes.</p>			<p>temporary moves to a maximum of two, with residents only making one move in most circumstances. However, residents of Heversham House and Kentmere House will have to be temporarily rehoused in the Phase 1 homes whilst their new permanent home is built. This means residents will remain on the Estate.</p> <ul style="list-style-type: none"> <li>• Resident leaseholders are entitled to a Disturbance Payment to cover any costs reasonably incurred in moving home or purchasing a property under the CPO compensation guidance.</li> <li>• Resident property owners are entitled to</li> </ul>	<p>enhance equality impacts and mitigate risks further:</p> <ul style="list-style-type: none"> <li>• If possible, permanently rehouse residents within the Phase 1 homes they are being temporarily moved to</li> <li>• Ensure that accessible and inclusive support options are provided for disabled individuals who require support services during relocation.</li> <li>• Limit the amount of times individuals are moved, where possible, to reduce stress.</li> </ul>	<p>There is a potential for adverse effects amongst certain equality groups as a result of health effects associated with relocation.</p> <p>As highlighted in the evidence review, older people, disabled people, people from ethnic minority backgrounds, children and pregnant people may be differentially adversely impacted by this. This is a particular concern for older people, as there is a serious risk of mortality when relocation older people.</p> <p>As disabled people and people from ethnic minority groups are disproportionately represented within the population they may also experience</p>
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			<p>receive home loss compensation at 10% of the market value of the property under the CPO compensation guidance.</p> <ul style="list-style-type: none"> <li>• The Council have begun engagement with leaseholders to reach agreement on the properties</li> <li>• Public realm works to be staggered to ensure there is always access to green and recreational space.</li> <li>• Temporary amenity space will be provided throughout the redevelopment process.</li> <li>• Environmental effects to be mitigated through considerate construction practices</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to explore options to grow and advocate existing peer support groups such as the Tustin Resident Project Group (RPG). Review accessible provisions within group meetings.</li> <li>• The Council should continue to communicate proactively with residents through a range of channels, including face-to-face engagement where possible, keeping up-to-date records of changing needs and</li> </ul>	<p>disproportionate adverse health impacts.</p> <p>Whilst the mitigations listed in Column 3 do help to mitigate some risk, consideration should also be given to the recommendations in Column 4 to further manage any impacts, particularly allowing residents to permanently remain within their Phase 1 temporary homes.</p> <p>Whilst the Council have taken measures to mitigate this risk, there remains the potential for adverse health impacts on older people in particular.</p>
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			<p>and environmental management planning.</p> <ul style="list-style-type: none"><li>• Dedicated resident support continues to be available online and in person where needed.</li></ul>	<p>circumstances, particularly those who are most affected by a change to accessible and appropriate housing such as families with children.</p>	
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<p><b>Safety and security:</b></p> <p>In the lead up to renewal, and during the decanting and demolition of properties in the area, properties will be vacated. This could attract unwanted activity including anti-social behaviour and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.</p> <p>The effects of crime are likely to differentially impact protected characteristic groups who are more likely to be vulnerable to attacks including disabled people, young people, LGBTQ+ people and people from ethnic minority groups. The groups may be more likely to experience harassment or antisocial behaviour, and therefore are more likely to experience the effects of unwanted antisocial behaviour</p>	X	O	<ul style="list-style-type: none"> <li>• New buildings and spaces are designed to reduce the opportunities for crime and anti-social behaviour. Homes are designed to give views onto green spaces, with new entry halls to buildings with improved lighting and security.</li> </ul>	<ul style="list-style-type: none"> <li>• The following recommendations are outlined to enhance equality impacts and mitigate risks further:</li> <li>• Ensure best practices for enhancing safety and preventing crime are considered throughout the planning and construction process.</li> <li>• Ensure a process is in place for reporting and addressing incidents of Anti-Social Behaviour (ASB) within the Estate.</li> <li>• Monitor the security of the</li> </ul>	<p>There is a potential for adverse effects amongst certain equality groups as a result of changes to feelings of safety and security during the demolition and construction process.</p> <p>As highlighted in the evidence review, groups who are more likely to be vulnerable to harassment such as disabled people, young people, LGBTQ+ people and people from ethnic minority groups, may experience adverse impacts differentially.</p> <p>As disabled people and people from ethnic minority groups are disproportionately represented within the population they may also experience</p>
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<p>within vacant areas and buildings.</p> <p>Disabled people and people from ethnic minority groups are disproportionately represented in the population of the local area.</p>				<p>Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.</p>	<p>disproportionate adverse impacts.</p> <p>However, the existing mitigation listed in Column 3, limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
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<p><b>Accessibility and mobility in the surrounding area:</b></p> <p>Evidence suggests that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic on local roads, reducing parking (as construction vehicles may use existing parking facilities), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.</p> <p>Disabled individuals who utilise mobility aids, or require extra space to navigate, may struggle with narrowed paths during the construction process of renewal, limiting their accessibility to facilities in the area. This can create feelings of isolation and poor mental wellbeing. Older people, and</p>	<p>XXX</p>	<p>X</p>	<ul style="list-style-type: none"> <li>● Resident car owners who currently have a parking permit will be re- provided with a parking permit for the redeveloped estate. Blue badge parking permits will also be re-provided.</li> <li>● All residents will have access to a dedicated support team. The team will help individuals understand the proposals, and the best options for each individual. This team will support <b>vulnerable residents with all aspects of their move</b> and liaise with family members as necessary.</li> </ul>	<ul style="list-style-type: none"> <li>● The following recommendations are outlined to enhance equality impacts and mitigate risks further:</li> <li>● As with health impacts, good access and mobility would be maintained through the creation of a CEMP, which would set out arrangements for any necessary diversions, which should provide well-signed routes that limit extra travelling distances. The CEMP should also ensure that access is</li> </ul>	<p>There is potential for adverse effects amongst certain equality groups as a result of changes to accessibility and mobility in the surrounding area.</p> <p>Disabled people, older people, and parents with pushchairs are more likely to be impacted by blocked or narrow pathways and may experience differential adverse impacts.</p> <p>As disabled people are disproportionately represented within the population they may also experience disproportionate adverse impacts.</p> <p>However, the existing mitigations listed in Column 3, limit any adverse impacts. Consideration should also</p>
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<p>parents with pushchairs may also be impacted by blocked pedestrian routes.</p> <p>Disabled people are disproportionately represented in the population of the local area.</p>				<p>maintained through measures such as such as limiting pavement obstructions and maintaining disabled parking. The CEMP should specifically consider the needs of protected characteristic groups who may have limited mobility.</p>	<p>be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
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<p><b>Information and communication:</b></p> <p>Complex material and information on the regeneration may present a challenge to those who have different information and communication needs.</p> <p>Individuals who have a <b>disability</b>, people who do may face barriers to engaging with engagement materials regarding Estate regeneration. Furthermore, this could disadvantage and cause distress/confusion amongst individuals.</p> <p>The population of the LIA is disproportionately represented by <b>disabled people</b> (16%), who are likely to differentially experience these effects. Furthermore, these groups are likely to be disproportionately impacted by any changes.</p>	<b>XX</b>	<b>O</b>	<ul style="list-style-type: none"> <li>• All residents will have access to a dedicated support team. The team will help individuals understand the proposals, and the best options for each individual. This team will support vulnerable residents with all aspects of their move and liaise with family members as necessary.</li> </ul>	<ul style="list-style-type: none"> <li>• The following recommendations are outlined to enhance equality impacts and mitigate risks further:</li> <li>• Accessible format consultation materials, including but not limited to, easy read, different community languages, audio, and braille, should be available if requested.</li> <li>• Access to information and communication should be available in a number of formats, including online, telephone</li> </ul>	<p>There is potential for adverse effects amongst certain equality groups.</p> <p>Individuals who have a <b>disability</b> may face barriers to engaging with engagement materials. Furthermore, as this equality group is disproportionately represented within the local population, the construction phase has the potential to create adverse effects in relation to accessibility and mobility in the surrounding area for disabled people.</p> <p>However, with the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
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				<p>and one to one meetings, to ensure that all residents have safe access to information and support services</p> <ul style="list-style-type: none"><li>● Information should be provided in a clear and easy to understand way and communicated in a timely manner. This includes keeping website information up to date.</li></ul>	
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### 5.3 Impacts on the community following delivery of Phase 2

The following table describes the potential impacts following delivery of Phase 2 and the use of CPO powers on protected characteristic groups, with a focus on impacts for residents and local community resources during the delivery of Phase 2. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Existing measures Southwark Council has in place to mitigate or enhance impacts are set out, and the impacts are rated on their effects before and after mitigation. Finally, recommendations are made as to how Southwark can further mitigate risk or enhance opportunity.

**Table 5.2: Impact on community following delivery of Phase 2**

Potential equality and health risks	Without mitigation	With mitigation	Existing Southwark Council mitigations or enhancements	Recommendations	Overall equality impact
<p><b>Improved housing provision: Appropriate and accessible housing</b></p> <p>Phase 2 of the scheme provides a key opportunity to improve housing provision for the local population, with a total of 295 homes provided. The housing</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> <li>• Large uplift in new homes.</li> <li>• 51 homes available for key workers</li> <li>• All homes built in Phase 2 available for rent to the wider community, as all</li> </ul>	<p>The Council should:</p> <ul style="list-style-type: none"> <li>• Ensure rental fees and service charges for proposed properties should be shared with the local</li> </ul>	<p>There is potential for major beneficial impacts for certain equality groups as a result of improved housing provision.</p> <p>Improved housing provision is likely to bring affordable, accessible,</p>

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<p>will meet a range of local needs, including flats for families, and flats with flexible accessibility.</p> <p>The evidence review found that improved housing provision will improve both physical and mental health and wellbeing outcomes for those that live in housing that is adequately warm. The provision of an adequate level of accessible housing (accessible homes and a diverse selection of accommodation types) will also benefit the local population. As a result, older people, children and young people, disabled people and those from an ethnic minority background are likely to benefit from improved housing stock in the local area. Disabled people and people from an ethnic minority background make up a disproportionately high section of the population of the local area.</p>			<p>existing eligible residents of the Tustin Estate were rehoused on Phase 1.</p> <ul style="list-style-type: none"> <li>• All new homes built to new building, space and accessibility standards.</li> <li>• Potential health effects of overcrowding are addressed.</li> <li>• Private external space for every home (garden, patio or balcony) to capture health benefits of access to outdoor space.</li> <li>• New homes designed to maximise natural daylight and views</li> <li>• Energy efficiency improvements to address potential health effects of cold housing.</li> </ul>	<p>community as far in advance of scheme operation as possible to ensure concerns regarding affordability are heard.</p>	<p>and appropriate homes for local people.</p> <p><b>Older people, children, young people, disabled people, women, and LGBTQ+</b> people are likely to differentially benefit from these new homes. As people from <b>ethnic minority groups and disabled people</b> are disproportionately represented in the local community, these groups are also likely to disproportionately benefit.</p> <p>Benefits can be maximised by implementing the recommendations in Column 4.</p> <p>Overall, there is likely to be a major positive impact on equality groups due to improved housing</p>
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<p><b>Affordable housing</b></p> <p>The Scheme aims to provide affordable housing. 144 of the Phase 2 homes are expected to be available for private let, with 90 available at social rent.</p> <p>As stated in the literature review, young people, women, disabled people, and LGBTQ+ people are most likely to face financial issues when securing alternative housing. As stated above, disabled people and people from an ethnic minority background make up a disproportionately high section of the population of the local area.</p>			<ul style="list-style-type: none"> <li>● Mixture of shared and private external space in blocks .</li> <li>● Housing to suit different needs, including family homes</li> <li>● Large uplift in new homes.</li> <li>● All new homes will meet the Wheelchair User Dwelling Standards, and 10% will meet the Adaptable Dwellings Standard.</li> </ul>		<p>provision after delivery of Phase 2.</p>
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<p><b>Improved access, mobility and navigation:</b></p> <p>Phase 2 of the scheme will open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age or disability, using principles of inclusive design. Phase 2 will include the delivery of better external lighting for safety and visibility, clear and secure routes, the prioritisation of pedestrians on routes through the estate, as well as better signage</p> <p>There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. These include children, older people, and disabled people.</p>	<p>✓✓✓</p>	<p>✓✓✓</p>	<ul style="list-style-type: none"> <li>• Better external lighting for safety and visibility.</li> <li>• Clearer and more secure routes for people passing through the estate.</li> <li>• New estate priorities pedestrians, with clear separate pedestrian routes and new access to existing routes</li> <li>• Improved signage for wayfinding</li> <li>• Secure and controlled parking.</li> <li>• New benches.</li> </ul>	<p>The Council should:</p> <ul style="list-style-type: none"> <li>• Ensure safe, secure, and lit pedestrian routes through the Estate are available to residents as construction continues on the Estate after Phase 2</li> <li>• Ensure the design of movement networks and public spaces specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design.<sup>10</sup></li> </ul>	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of improvements to access, mobility and navigation after Phase 2 is delivered.</p> <p><b>Children, older people, and disabled people</b> are likely to differentially benefit from these improvements as a result of their specific needs (as demonstrated in the literature review). As <b>disabled people</b> are disproportionately represented within the population of the local area, this group is also likely to differentially benefit.</p> <p>Benefits can be maximised by implementing the</p>
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					<p>recommendations in Column 4.</p> <p>Overall, there is likely to be a major positive impact on equality groups due to improved access, mobility, and navigation after delivery of Phase 2.</p>
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<sup>10</sup> Design Council (2006) 'The Principles of Inclusive Design'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf>  
Department for Transport (2005) 'Inclusive mobility' Available at: <https://www.gov.uk/government/publications/inclusive-mobility>  
Department for Transport (2007) 'Manual for Streets'. Available at: <https://www.gov.uk/government/publications/manual-for-streets>

<p><b>Improved public realm and green space:</b></p> <p>Phase 2 of the Scheme will result in the creation of new and improved outdoor and green space for the residents of, and those local to, the Tustin Estate EqIA. Improvements to the space include interim landscaping, as well as a new network of green spaces around the new buildings. Phase 2 will also deliver enhanced bike storage and EV charging points for the residents of the new buildings, and new communal outdoor space will be provided throughout the new development. As highlighted in the literature review, these improvements to the public realm are likely to benefit children, older people, disabled people, those from ethnic minority backgrounds and women.</p>	<p>✓✓✓</p>	<p>✓✓✓</p>	<ul style="list-style-type: none"> <li>● New network of green spaces across the development</li> <li>● Interim landscaping Enhanced bicycle storage provision to facilitate active travel, promoting healthier lifestyles.</li> <li>● Electric charging points for vehicles.</li> <li>● New communal outdoor space in blocks.</li> </ul>	<p>The Council should:</p> <ul style="list-style-type: none"> <li>● Continue to involve the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people.</li> <li>● Ensure access to adequate green and play space is maintained for residents as construction on</li> </ul>	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of improvements public realm and green space after Phase 2 is delivered.</p> <p><b>Children, older people, disabled people, women and people from ethnic minority backgrounds</b> are likely to differentially benefit from these improvements as a result of their specific needs (as demonstrated in the literature review). As <b>disabled people and people from ethnic minority backgrounds</b> are disproportionately represented within the population of the local area, these groups is also likely to differentially benefit.</p>
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				<p>the Estate continues after Phase 2</p> <ul style="list-style-type: none"><li>• The Council and its advisors should ensure that improvements to public space (including the pedestrian environment and play spaces on the Site) appropriately consider best practice in accessible and inclusive design. This would also help to address stakeholder concerns around inclusivity in the design of the public realm.</li></ul>	<p>Benefits can be maximised by implementing the recommendations in Column 4.</p> <p>Overall, there is likely to be a major positive impact on equality groups due to improved public realm and green space after delivery of Phase 2.</p>
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				<ul style="list-style-type: none"><li>● It is recommended that the Council works with local schools and community groups to support an active and healthy lifestyle and improved wellbeing through active play spaces.</li></ul>	
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<p><b>Provision of community resources and improved social cohesion:</b></p> <p>Phase 2 of the scheme will deliver a series of new community infrastructure, including several key resources. The new homes delivered as part of Phase 2 will include mixed shared communal space, both indoor and outdoor, to improve social cohesion and reduce isolation. Residents will have the opportunity to help manage community spaces.</p>	<p>✓✓✓</p>	<p>✓✓✓</p>	<ul style="list-style-type: none"> <li>• A mix of shared communal spaces in new blocks.</li> <li>• Increased access to community resources such as the community garden.</li> <li>• Possibility of tenants managing community spaces.</li> <li>• New outdoor communal space in blocks, and interim landscaping, to improve social cohesion and reduce isolation after the COVID- 19 pandemic.</li> </ul>	<p>The Council should:</p> <ul style="list-style-type: none"> <li>• Continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements.</li> <li>• Ensure analysis is undertaken to understand on any potential pressure on public services that could result from redevelopment (eg. extra</li> </ul>	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of improvements to the provision of community resources and improved social cohesion after Phase 2 is delivered.</p> <p><b>Children, older people, disabled people, pregnant people, LGBTQ+ people, and people from ethnic minority backgrounds</b> are likely to differentially benefit from these improvements as a result of their specific needs (as demonstrated in the literature review). As <b>disabled people and people from ethnic minority backgrounds</b> are disproportionately</p>
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				<p>pressure on schools and health care services).</p> <ul style="list-style-type: none"> <li>● Best efforts should be made to ensure that the pricing of services offered by businesses within the Scheme are affordable for local people.</li> <li>● Liaise with and support the Tustin Residents Association to host free community events to provide a space for original Tustin Estate residents and Phase 2 home residents to meet, mingle, and improve the</li> </ul>	<p>represented within the population of the local area, these groups is also likely to differentially benefit.</p> <p>Some potential for adverse impacts is possible on social cohesion after Phase 2 as a result of the new community moving on to the Estate. The recommendations in Column 4 should be implemented in order to minimise any issues and maximise social cohesion.</p> <p>Overall, there is likely to be a major positive impact on equality groups due to improved provision of community resources and improved social cohesion after delivery of Phase 2.</p>
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				cohesion of Estate residents.	
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<p><b>New employment opportunities:</b></p> <p>Redevelopment of the Site may act as a catalyst for promoting local economic growth and supporting job creation. The construction phase of the scheme will also provide temporary employment opportunities those in the construction sector.</p> <p>Such job opportunities are likely to positively impact protected characteristic groups more likely to face unemployment including ethnic minority groups, older people, disabled people and young people. Likewise, employment opportunities in the construction industry are likely to benefit men who are more likely to work in construction.</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> <li>• Construction employment onsite (varying by the amount of construction required for the job).</li> </ul>	<ul style="list-style-type: none"> <li>• The Council should:</li> <li>• The Council and its advisors should develop a range of suitable proposals that maximise the employment, apprenticeship and training opportunities created by the Scheme for local residents both at the construction stage and after the Scheme is complete.</li> <li>• Work with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to</li> </ul>	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of new employment opportunities after Phase 2 is delivered.</p> <p><b>Older people, young people, disabled people, people from ethnic minority backgrounds, and men</b> are likely to differentially benefit from employment opportunities as they are more likely to struggle with unemployment (as demonstrated in the literature review). As <b>disabled people and people from ethnic minority backgrounds</b> are disproportionately represented within the population of the local</p>
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				<p>unemployment e.g. ethnic minority groups, disabled people, young people.</p>	<p>area, these groups is also likely to differentially benefit.</p> <p>Overall, there is likely to be some positive impact on equality groups due to new employment opportunities in the new commercial space after delivery of Phase 2.</p>
<p><b>Safety and security:</b></p> <p>Feelings of safety and security amongst the local population are likely to be impacted during both the construction and operation phases of the Scheme.</p> <p>During the redevelopment, the construction process may attract unwanted activity such as anti-social behaviour and crime. This may result in the local population feeling unsafe and fearful of their own security.</p>	<p>✓✓✓</p>	<p>✓✓✓</p>	<ul style="list-style-type: none"> <li>• Better external lighting for safety and visibility.</li> <li>• Clearer and more secure routes for people passing through the estate</li> <li>• Estate to promote safety and security through new design.</li> <li>• Paths and green spaces overlooked by houses to create feeling of safety.</li> </ul>	<p>It is recommended that the council ensure that during the construction and operation phases of the scheme:</p> <ul style="list-style-type: none"> <li>• Sufficient and adequate lighting and CCTV is provided in and around the regeneration site.</li> <li>• There is an available contact advertised for</li> </ul>	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of changes to feelings of safety and security after Phase 2 is delivered. As <b>disabled people and people from ethnic minority backgrounds</b> are disproportionately represented within the population of the local area, these groups are</p>

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<p>However, the overall improvements made to the public realm and management of the Site during redevelopment may reduce crime and in turn have a positive effect.</p> <p>The effects of crime are likely to differentially impact protected characteristic groups who are more likely to be vulnerable to attacks including disabled people, young people, LGBTQ+ people and people from ethnic minority groups.</p> <p>The population of the LIA is disproportionately represented by ethnic minority groups (62% of the population), who are furthermore more likely to be impacted by effects of the scheme.</p>			<ul style="list-style-type: none"> <li>• Designed to Secured by Design Standards.</li> </ul>	<p>individuals to contact surrounding any queries of the safety/security of the site.</p> <ul style="list-style-type: none"> <li>• Continue with all measures to improve feelings of safety and security as construction continues, recognising that people will be living on the Estate</li> </ul>	<p>also likely to experience differential impacts.</p> <p>The impacts are likely to be adverse whilst construction continues (during Phase 2 and beyond) and beneficial within the Phase 2 areas once these are open.</p> <p>The recommendations in Column 4 should be implemented in order to minimise any issues during construction and maximise feelings of safety.</p> <p>Overall, there is likely to be some positive impact on equality groups due to changes to feelings of safety and security after delivery of Phase 2.</p>
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## 6 Conclusion and action plan

### 6.1 Conclusion

This Interim EHIA has identified a number of risks, opportunities and potential impacts that could arise for those with protected characteristics, as a result of the Compulsory Purchase Order and construction and future delivery of Phase 2 of the Tustin Estate Redevelopment Scheme. The details of these impacts are set out in detail in Chapter 6 Impact Assessment.

Overall, this assessment has found that Phase 2 of the regeneration has the potential to deliver new and affordable homes, improved living conditions, improved accessibility of homes and the wider estate, and new public realm and green space.

The assessment also identifies that the use of a CPO, if required, will allow the delivery of improved housing, an improved public realm and improved community space and facilities for local people. There is therefore a compelling case in the public interest for the use of a CPO to allow for the redevelopment to improve outcomes for the local community.

In this case, the Council has sought to mitigate any potential adverse effects through a series of reasonable and proportionate measures focused on rehousing assistance and compensation plans in order to improve the outcomes of the redevelopment for the current and future Estate community.

### 6.2 Action plan

The following action plan seeks to establish activities and responsibilities following the planning application to continue to identify and address equality issues where they arise. It is the responsibility of Southwark Council to implement any recommendations and mitigations identified:



**Table 6.1: Tustin Estate recommended action plan**

Recommendation	Potential impact addressed	Timeframe	Responsibility
<p>Work proactively and constructively through a range of channels, including face to face engagement where possible with residents, keeping up-to-date records of changing needs and circumstances, particularly if residents who will be most affected by refurbishment and/or relocation.</p>	<ul style="list-style-type: none"> <li>● Loss of social infrastructure and access to community resources</li> <li>● Difficult accessing finance (e.g. costs associated with moving home)</li> <li>● Appropriate and accessible and housing</li> </ul>	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council, especially engagement teams</p>
<p>Maintain continuity in access to community resources (e.g. churches and play areas) where possible. If this is not possible, consider pop-up spaces for these uses.</p>	<ul style="list-style-type: none"> <li>● Loss of social infrastructure and access to community resources</li> </ul>	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council</p>
<p>Temporary housing should adhere to accessibility guidelines and consider the environmental needs of tenants- e.g. elderly residents should avoid being allocated in temporary accommodation near busy roads. If possible, permanently rehouse residents within the Phase 1 homes they are being temporarily moved to.</p>	<ul style="list-style-type: none"> <li>● Loss of social infrastructure and access to community resources</li> </ul>	<p>Early 2025 (period of resident movement)</p>	<p>Southwark Council</p>

Recommendation	Potential impact addressed	Timeframe	Responsibility
Early estimates of changes to rent and service charges as a result of the redevelopment should be communicated to residents as soon as possible.	<ul style="list-style-type: none"> <li>● Difficult accessing finance (e.g. costs associated with moving home)</li> <li>● Appropriate and accessible and housing</li> <li>● Improved housing provision</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council
Ensure that accessible and inclusive support options are provided for disabled individuals who require support services during relocation.	<ul style="list-style-type: none"> <li>● Health effects</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council
Continue to explore options to grow and advocate existing peer support groups such as the Tustin Resident Project Group (RPG). Review accessible provisions within group meetings.	<ul style="list-style-type: none"> <li>● Health effects</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
Ensure best practices for enhancing safety and preventing crime are considered throughout the planning and construction process.	<ul style="list-style-type: none"> <li>● Safety and security</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council
Ensure a process is in place for reporting and addressing incidents of Anti-Social Behaviour (ASB) within the Estate.	<ul style="list-style-type: none"> <li>● Safety and security</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
<p>Monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.</p>	<ul style="list-style-type: none"> <li>● Safety and security</li> </ul>	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council</p>
<p>Creation of a CEMP, which would set out arrangements for any necessary diversions, which should provide well-signed routes that limit extra travelling distances.</p>	<ul style="list-style-type: none"> <li>● Accessibility and mobility in the surrounding area</li> </ul>	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council</p>
<p>Accessible format consultation materials, including but not limited to, easy read, different community languages, audio, and braille, should be available if requested.</p>	<ul style="list-style-type: none"> <li>● Information and communication</li> </ul>	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council, especially engagement teams</p>
<p>Access to information and communication should be available in a number of formats, including online, telephone and one to one meetings, to ensure that all residents have safe access to information and support services as COVID- 19 restrictions continue.</p>	<ul style="list-style-type: none"> <li>● Information and communication</li> </ul>	<p>Ongoing during redevelopment period until completion (2028)</p>	<p>Southwark Council, especially engagement teams</p>

Recommendation	Potential impact addressed	Timeframe	Responsibility
Information should be provided in a clear and easy to understand way and communicated in a timely manner. This includes keeping website information up to date.	<ul style="list-style-type: none"> <li>Information and communication</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
Ensure safe, secure, and lit pedestrian routes through the Estate are available to residents as construction continues on the Estate after Phase 2.	<ul style="list-style-type: none"> <li>Improved access, mobility and navigation</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council and contractors
Ensure the design of movement networks and public spaces specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design.	<ul style="list-style-type: none"> <li>Improved access, mobility and navigation</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council and contractors
Continue to involve the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people.	<ul style="list-style-type: none"> <li>Improved public realm and green space</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
Ensure access to adequate green and play space is maintained for residents as construction on the Estate continues after Phase 2.	<ul style="list-style-type: none"> <li>Improved public realm and green space</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council and contractors

Recommendation	Potential impact addressed	Timeframe	Responsibility
The Council and its advisors should ensure that improvements to public space (including the pedestrian environment and play spaces on the Site) appropriately consider best practice in accessible and inclusive design. This would also help to address stakeholder concerns around inclusivity in the design of the public realm.	<ul style="list-style-type: none"> <li>Improved public realm and green space</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council
It is recommended that the Council works with local schools and community groups to support an active and healthy lifestyle and improved wellbeing through active play spaces.	<ul style="list-style-type: none"> <li>Improved public realm and green space</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
Continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements.	<ul style="list-style-type: none"> <li>Provision of community resources and improved social cohesion</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
Ensure analysis is undertaken to understand on any potential pressure on public services that could result from redevelopment (eg. extra pressure on schools and health care services).	<ul style="list-style-type: none"> <li>Provision of community resources and improved social cohesion</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council
Best efforts should be made to ensure that the pricing of services offered by businesses within the Scheme are affordable for local people.	<ul style="list-style-type: none"> <li>Provision of community resources and improved social cohesion</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
Liaise with and support the Tustin Residents Council to host free community events to provide a space for original Tustin Estate residents and Phase 2 home residents to meet, mingle, and improve the cohesion of Estate residents.	<ul style="list-style-type: none"> <li>● Provision of community resources and improved social cohesion</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
The Council and its advisors should develop a range of suitable proposals that maximise the employment, apprenticeship and training opportunities created by the Scheme for local residents both at the construction stage and after the Scheme is complete.	<ul style="list-style-type: none"> <li>● New employment opportunities</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council
Work with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. ethnic minority groups, disabled people, young people.	<ul style="list-style-type: none"> <li>● New employment opportunities</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council
Sufficient and adequate lighting and CCTV is provided in and around the regeneration site.	<ul style="list-style-type: none"> <li>● Safety and security</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council and contractors
There is an available contact advertised for individuals to contact surrounding any queries of the safety/security of the site.	<ul style="list-style-type: none"> <li>● Safety and security</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
Continue with all measures to improve feelings of safety and security as construction continues, recognising that people will be living on the Estate.	<ul style="list-style-type: none"> <li>● Safety and security</li> </ul>	Ongoing during redevelopment period until completion (2030)	Southwark Council



## A. Area profile and proportionality

This appendix is split into three sections. Section A.1 provides an overview of the socio-demographic profile of the Estate (the study area outlined in Chapter 2). An overview of community resources is provided in Section A.2. Section A.3 provides the results of socio-demographic monitoring for the area which has been collated through a review of the Starting the Conversation questionnaire administered by Southwark Council.

It should be noted that this socio-demographic summary is based off of the previous EHIA, and will be updated at the next stage.

### A.1 Socio-demographic profile of the area

The area profile below provides a wider contextual demographic characterisation of the area in which the Estate falls. The data includes the current social and economic context of the area and relevant comparators, namely the London Borough of Southwark, the Greater London region, and England. In comparing these regions, where the Estate deviates by more than 3%, the difference is considered to be significant and is reported as such.

The demographic data<sup>11</sup> has been sourced from publicly available data and only applies to the resident population.

#### A.1.1 Age

The tables and figures below show the population for key age groups within the Estate and the above comparator areas. The figures show both the proportion and density of each age group within the different areas.

##### A.1.1.1 Children (under 16 years)

The table below indicates that the proportion of people under the age of 16 on the Estate is broadly in line with Southwark, Greater London, and England (18% compared with 19%, 21% and 19% respectively).

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<sup>11</sup> In order to calculate statistics for the Estate, codepoint data was used, which includes a point representing each postcode area. Lower Super Output (LSOA) data is shared between the codepoints that fall within each LSOA, and is summed up for where the codepoints fall within the Estate.

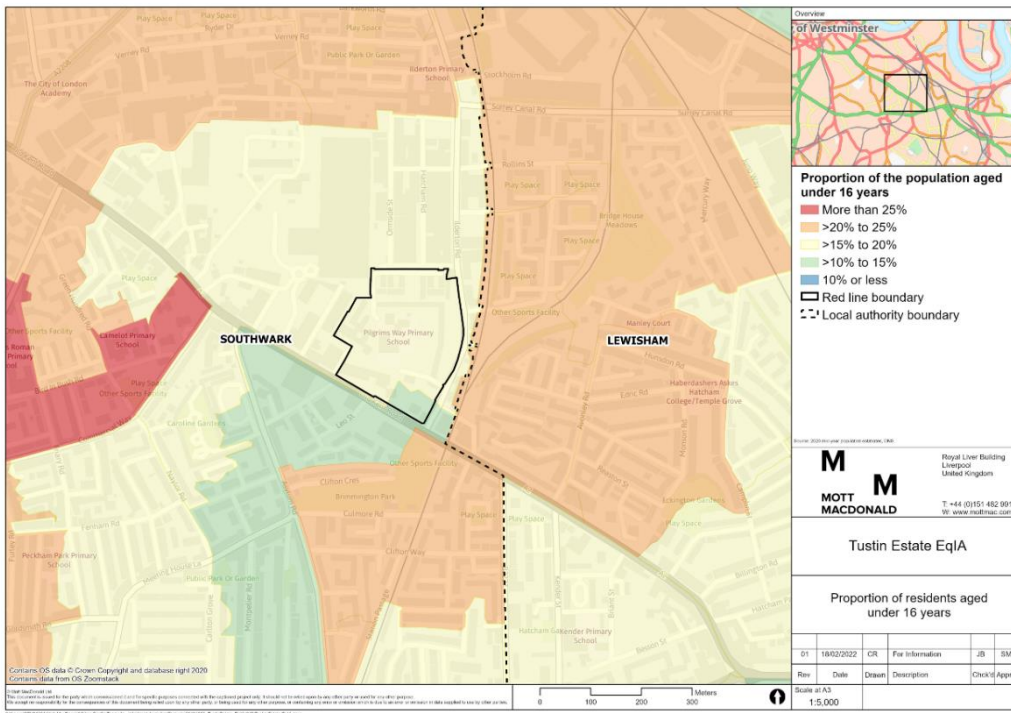
**Table A.1: Children (under 16 years)**

Location	Total population, 2020	Children (under 16 years)	%
Estate	1,190	211	18%
Southwark	320,017	60,065	19%
Greater London	9,002,488	1,853,207	21%
England	56,550,138	10,852,240	19%

Source: ONS 2020 mid year population estimates

The following figure, Map A.1, illustrates that the proportion of children within the Estate ranges between 11% to 20% of the population; lower than most surrounding areas but higher than the area south of the Estate.

**Map A.1:**

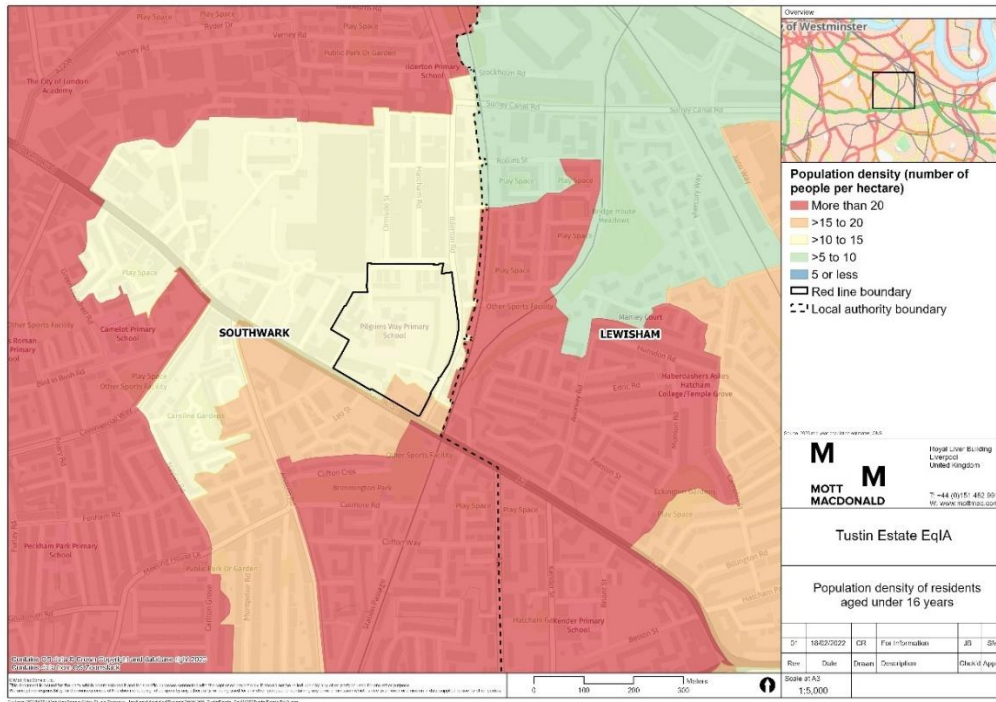


**Proportion of children under 16 within the Estate**

Source: Mott MacDonald

Map A.2, below, illustrates that the density of children within the Estate is lower than most of the surrounding areas, with a density of 11 to 15 children per hectare through most of the Estate.

**Map A.2: Population density of children under 16 within the Estate**



Mott MacDonald

Source:

**A.1.1.2 Young people (16-24 years)**

Table A.2 shows that the proportion of young people aged 16-24 within the Estate (10%) is broadly in line with Southwark, Greater London and England (11%, 10% and 11% respectively).

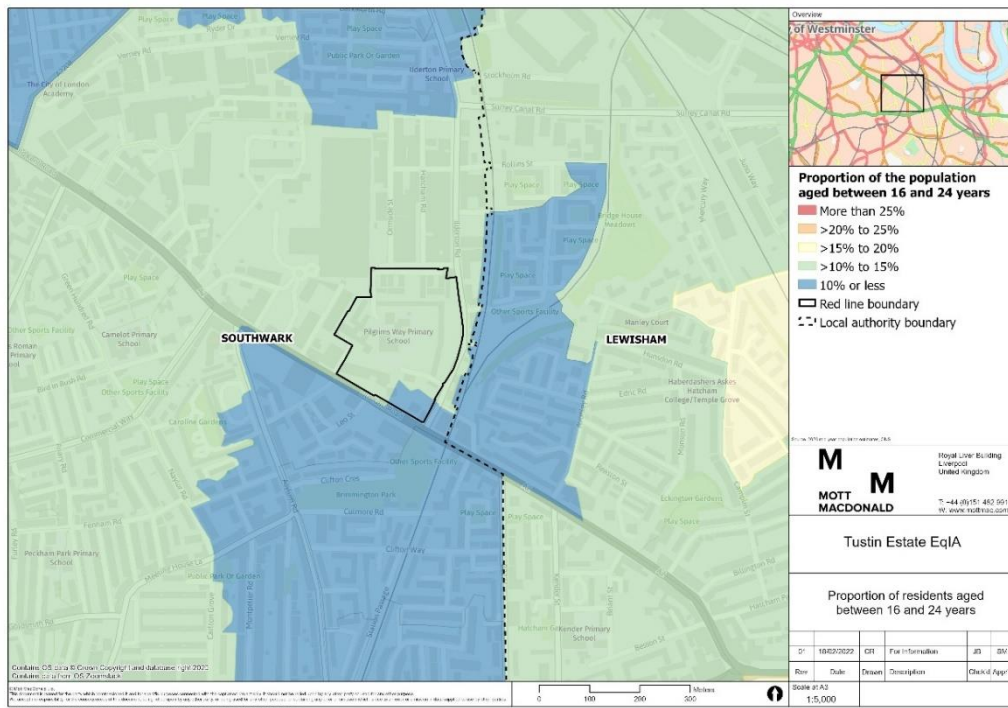
Table A.2: Young people (16-24 years)

Location	Total population, 2020	Young people (16-24 years)	%
Estate	1,190	118	10%
Southwark	320,017	33,947	11%
Greater London	9,002,488	930,728	10%
England	56,550,138	5,950,637	11%

Source: Office of National Statistics (2020) Mid- year population estimates

Map A.3, below, demonstrates that proportions of young people aged 16-24 within the Estate are less than 15% across the Estate. This is broadly in line with most of the surrounding areas, with slightly lower proportions to the north and south.

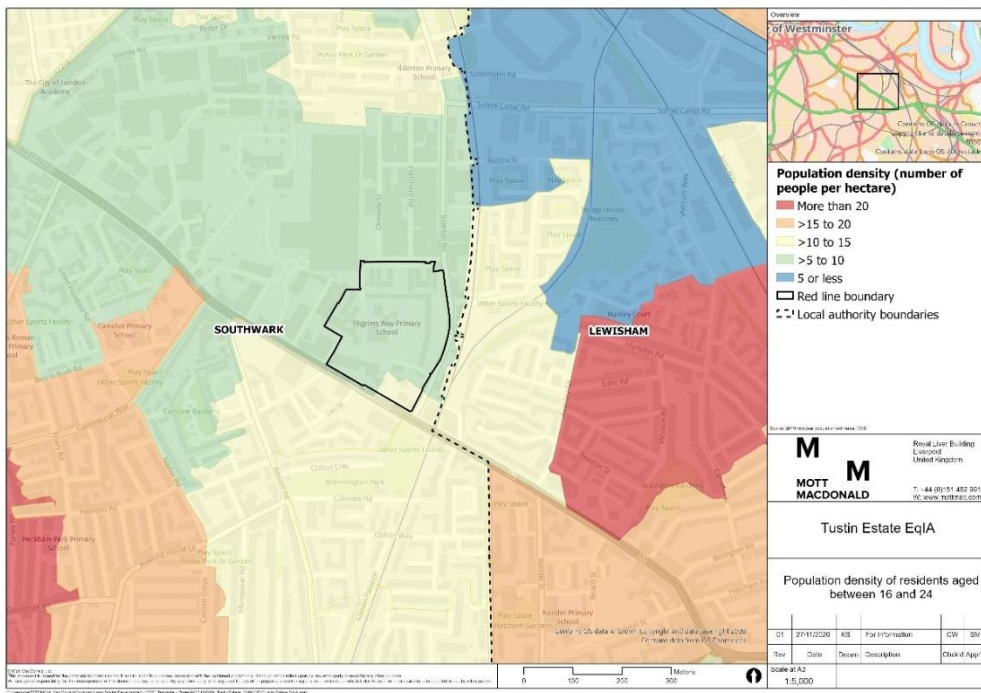
**Map A.3: Proportion of young people aged 16-24 within the Estate**



Source: Mott MacDonald

Map A.4 illustrates that there are lower population densities of young people aged 16-24 across the Estate when compared to surrounding areas, with approximately 6 to 10 young people per hectare across the estate.

**Map A.4: Population density of young people aged 16-24 within the Estate**



Source: Mott MacDonald

**A.1.1.3 Working aged people (16- 64)**

The percentage of working age people (aged between 16 and 64) on the Estate (71%) is broadly in line with that of Southwark (73%) but higher than Greater London and England (67% and 62% respectively).

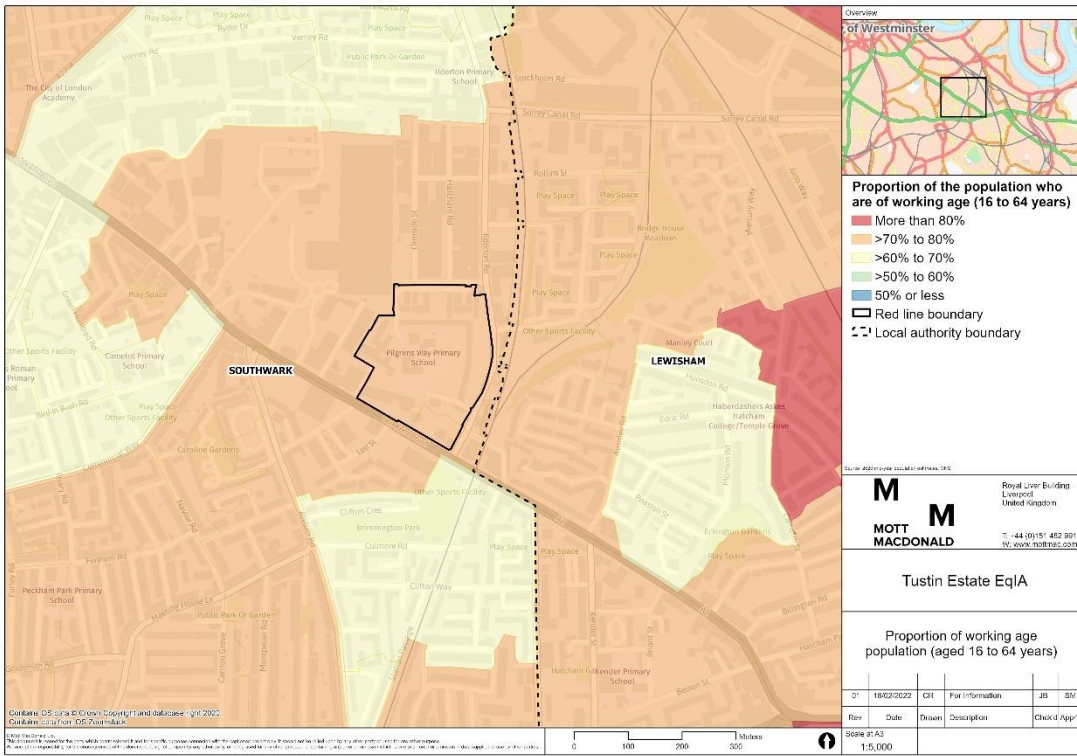
Table A.3: Working age population

Location	Total population, 2019	Working age population	%
Estate	1,190	844	71%
Southwark	320,017	232,014	73%
Greater London	9,002,488	6,050,828	67%
England	56,550,138	35,233,879	62%

Source: ONS 2020 mid-year population estimates and 2011 Census

Map B.5, below, demonstrates that the proportion of working age residents on the Estate is between 71% and 80%, in line with most surrounding areas.

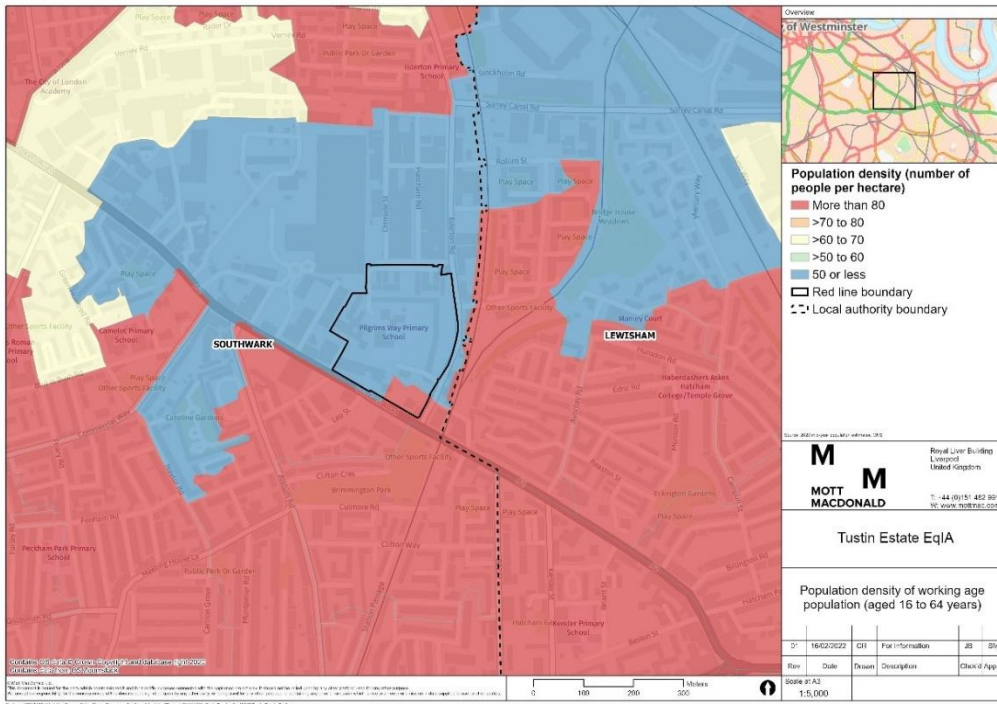
**Map A.5: Proportion of residents between 16 and 64**



Source: Mott MacDonald

Map A.6, demonstrates that there is a lower density of working age people on the Estate when compared to surrounding areas. Most of the Estate has a density of less than 50 working age people per hectare. However, in a small area in the south east this density rises to more than 80 working age people per hectare.

**Map A.6: Population density of working aged people**



Source: Mott MacDonald

**A.1.1.4 Older people (over 65 years)**

The percentage of older people over 65 years within the Estate (11%) is broadly in line with Southwark and Greater London (9% and 12% respectively), but significantly lower than England as a whole (18%).

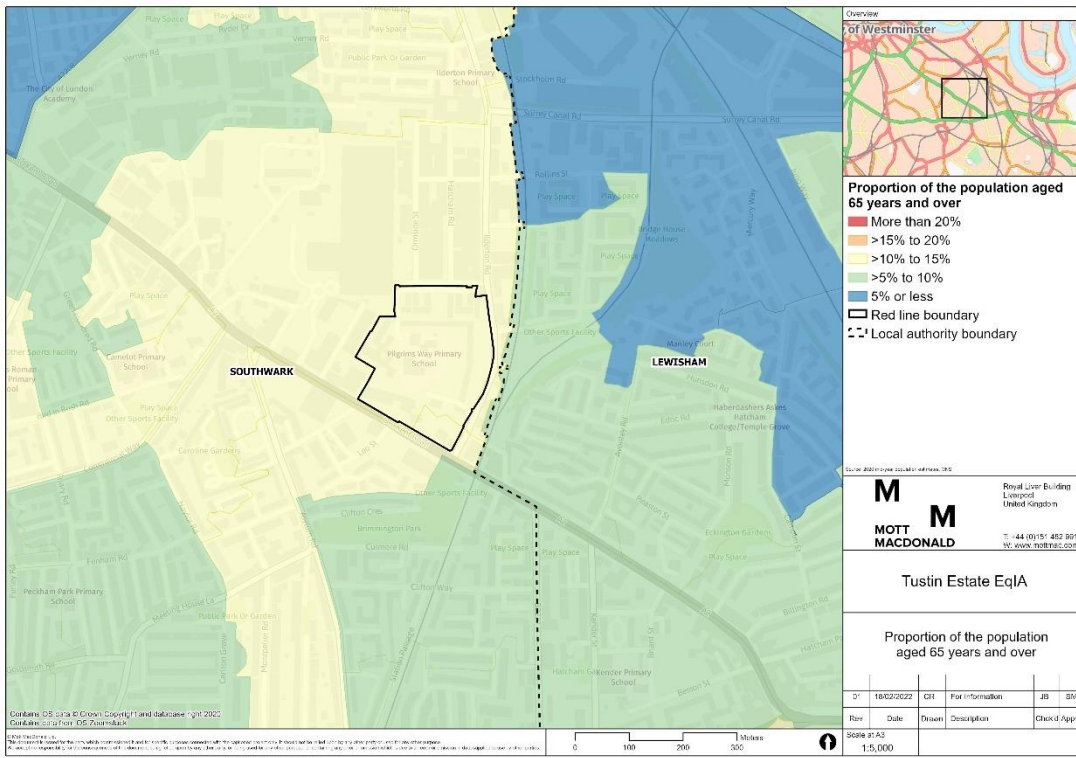
**Table A.4: Older people (65+ years)**

Location	Total population, 2020	Older people (65+ years)	%
Estate	1,190	135	11%
Southwark	320,017	27,938	9%
Greater London	9,002,488	1,098,453	12%
England	56,550,138	10,464,019	18%

Source: Office for National Statistics (2020) Mid-year population estimate

Map A.7, below, demonstrates that that proportions of older people over 65 years within the Estate, ranging between 11% and 15%, is in line with the proportion of older people living in the areas immediately surrounding the Estate.

**Map A.7: Proportion of residents aged 65 and over**

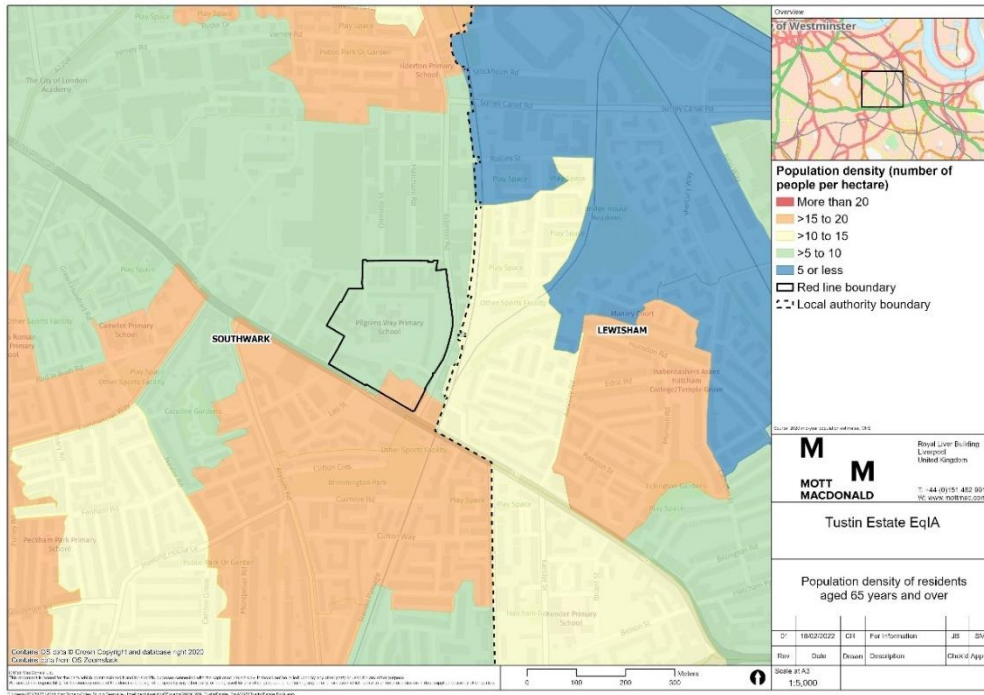


Source: Mott MacDonald

Map A.8, below, indicates that the density of older people within the Estate, which ranges from 6 to 10 people per hectare for most of the Estate, is higher than some surrounding areas but lower than others. There are higher densities of older people to the east and south of the Estate, ranging between 11 to 20 people per hectare, but lower densities of older people to the west and north-west of the Estate (five or less).



**Map A.8: Population density of people aged over 65 years**



Source: Mott MacDonald

**A.1.2 Disabled people**

The table below shows the proportion of disabled people living in the Estate, Southwark, Greater London, and England.

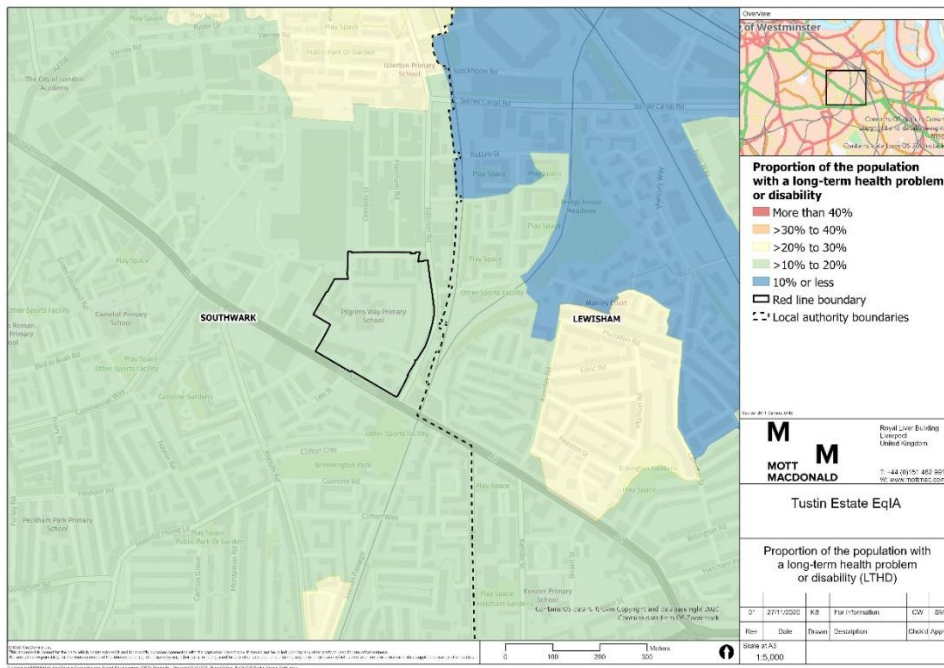
There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Southwark and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). People in existing poor health with long-term conditions that limit their day-to-day activities may be more sensitive to changes such as increased air pollutants from construction.

**Table A.5: Population with a long-term health problem or disability limiting day-to-day activities**

Disability	Estate	Southwark	Greater London	England
Limited a lot	8%	7%	7%	8%
Limited a little	9%	7%	7%	9%
Not limited	84%	86%	86%	82%

Source: Office of National Statistics (2011) Census data

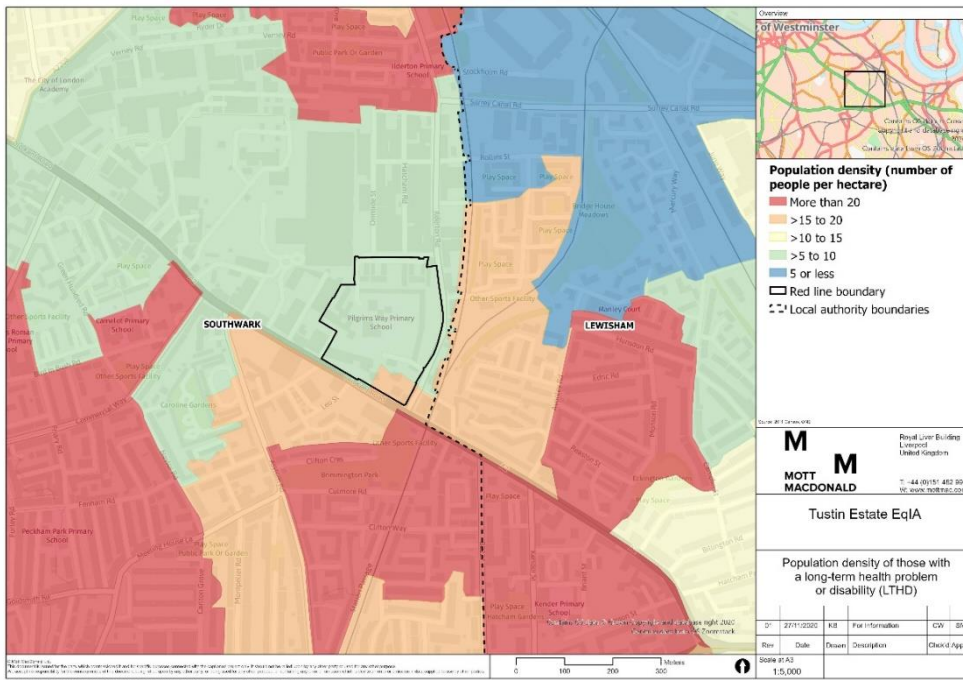
Map A.9, below, shows that the proportion of people in the Estate living with a long-term health condition or disability ranges from 11% to 20%, broadly in line with most surrounding areas.



**Map A.9: Proportion of resident with a long-term health condition or disability**

Source: Mott MacDonald

**Map A.10: Population density of people within the Estate with a long-term**



**health problem or disability**

Source: Mott MacDonald

**A.1.3 Gender reassignment**

There are no Census or other data for the number of gender variant people with the Estate, Southwark, Greater London, or England. Data on gender identity is currently limited as there are still a number of methodological challenges obtaining this data such as privacy and acceptability; complexity; accuracy; terminology; small sample universe, and the scope of information required.<sup>12</sup> The ONS, though, has estimated that the size of the Trans community in the UK could range from 65,000 to 300,000.<sup>13</sup>

<sup>12</sup> Office for National Statistics (date unknown): 'Gender identity update'

<sup>13</sup> Office for National Statistics (2009): 'Trans Data Position Paper'.

### A.1.4 Marriage and civil partnership

The total proportion of those who are married or in a civil partnership that live within the Estate (30%) is lower than Southwark, Greater London, and England (29%, 40%, and 47% respectively).

The table below shows that there is a lower percentage of married people within the Estate (25%), compared to Southwark (29%). However, both the Estate and Southwark's percentage of married people are considerably lower than both Greater London, and England (40% and 47% respectively). The proportion of people in a civil partnership in the Estate (0.5%) is broadly in line with that in Southwark, Greater London and England (0.9%, 0.4% and 0.2% respectively). The proportion of people on the Estate who are separated, but still legally married, (6%) is broadly in line with figures in Southwark, Greater London and England (4%, 3% and 3% respectively).

**Table A.6: Population married or in a civil partnership**

Location	All usual residents aged 16+, 2011	Married	%	In a civil partnership	%	Separated (still legally married or in a civil partnership)	%
Estate	870	270	31%	4	0.5%	54	6%
Southwark	234,901	66,997	29%	2,159	0.9%	10,080	4%
Greater London	6,549,173	2,608,345	40%	27,425	0.4%	211,500	3%
England	42,989,620	20,029,369	47%	100,288	0.2%	1,141,196	3%

Source: Office for National Statistics 2011 Census

### A.1.5 Pregnancy and maternity

Table A.7, below, shows that live births in Southwark, as a proportion of the total population (1.3%), are broadly in line with Greater London and England figures (1.3% and 1.1% respectively). Estate level data is not available for pregnancy and maternity.

**Table A.7: Live births by mother's usual area of residence**

<b>Births</b>	<b>Southwark</b>	<b>Greater London</b>	<b>England</b>
Female population aged between 16 and 44	80,405	1,978,845	10,581,832
Total population	320,017	9,002,488	56,550,138
Live births by mothers' usual area of residence	3,557	111,688	585,195
Live births by mothers' usual area of residence (%)	1.3%	1.3%	1.1%

Source: Office of National Statistics 2020 mid-year population estimates.

Table A.8 below shows that the General Fertility Rate (all live births per 1000 women aged 16 to 44) in Southwark (44.2) is lower than that of the general fertility rate in Greater London (56.4) and England (55.3). The Total Fertility Rate in Southwark (1.18) is lower than the total fertility rate in Greater London (1.54) and England (1.59).

**Table A.8: General and total fertility rates**

<b>Fertility Rate</b>	<b>Southwark</b>	<b>Greater London</b>	<b>England</b>
General fertility rate (all live births per 1000 women aged 16 to 44)	44.2	56.4	55.3
Total fertility rate (average number of children born per woman)	1.18	1.54	1.59

Source: ONS 2020 mid-year population estimates and Live births in England and Wales : birth rates down to local authority areas 2018

### **A.1.6 Race and ethnicity**

The table below provides a breakdown of the race and ethnicities of residents on the Estate compared with Southwark, Greater London, and England. The proportion of those from an Ethnic Minority background (76%) is considerably higher than Southwark (60%), Greater London (55%) and England (20%). The largest ethnic minority group on the Estate are those from a Black African background (28%). This is higher than the proportion in Southwark (16%), Greater London (7%), and England (2%).

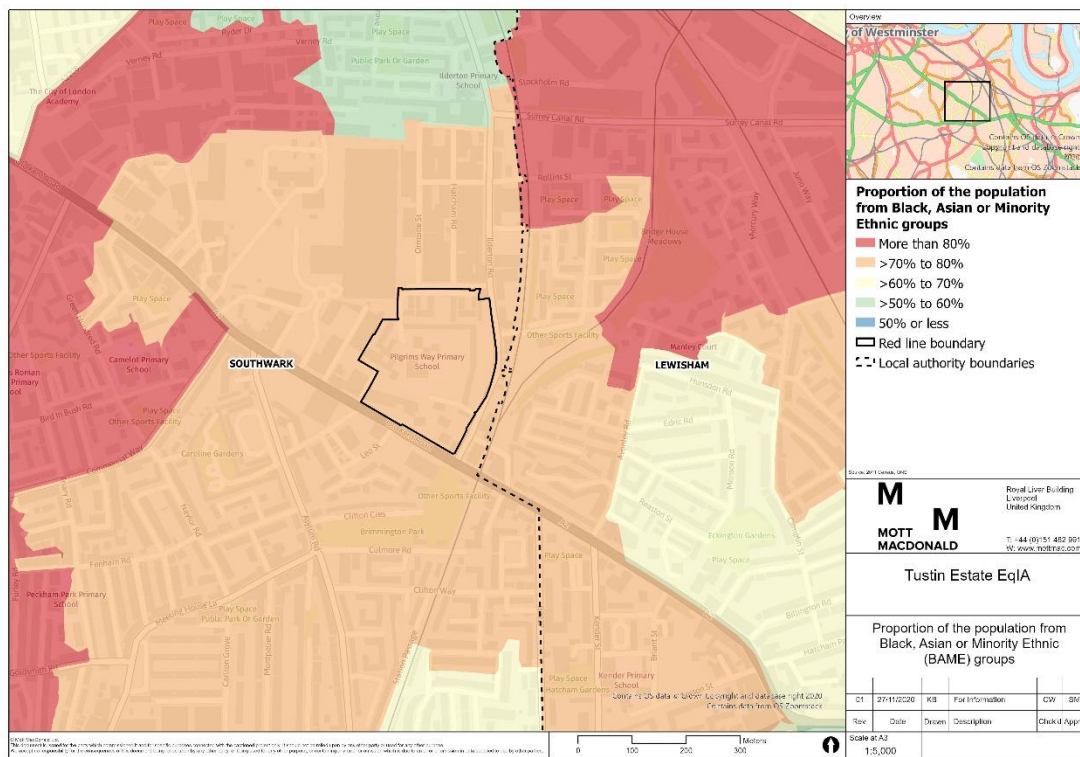
**Table A.9: Population by race and ethnicity**

Race and ethnicity	Estate	Southwark	Greater London	England
White British	24%	40%	45%	80%
Ethnic minority	76%	60%	55%	20%
Irish	2%	2%	2%	1%
Gypsy or Irish Traveller	0.1%	0.1%	0.1%	0.1%
Other White	12%	12%	13%	5%
White and Black Caribbean	3%	2%	1%	0.8%
White and Black African	2%	1%	0.8%	0.3%
White and Asian	0.5%	1%	1%	0.6%
Other mixed	2%	2%	1%	0.5%
Indian	1%	2%	7%	3%
Pakistani	0.3%	0.6%	3%	2%
Bangladeshi	0.6%	1%	3%	0.8%
Chinese	2%	3%	2%	0.7%
Other Asian	3%	3%	5%	2%
Black African	28%	16%	7%	2%
Black Caribbean	8%	6%	4%	1%
Other Black	6%	4%	2%	0.5%
Arab	1%	0.8%	1%	0.4%
Any other ethnic group	4.5%	2%	2%	0.6%

Source: Office for National Statistics 2011 Census

Map A.11 below illustrates that people from an ethnic minority background represent three quarters of the population within the Estate and in surrounding areas. There are similar proportions of people from an ethnic minority background within the Estate compared to surrounding area, with nearly all areas containing proportions between 71% and 80%.

### Map A.11: Proportion of people from an Ethnic Minority background



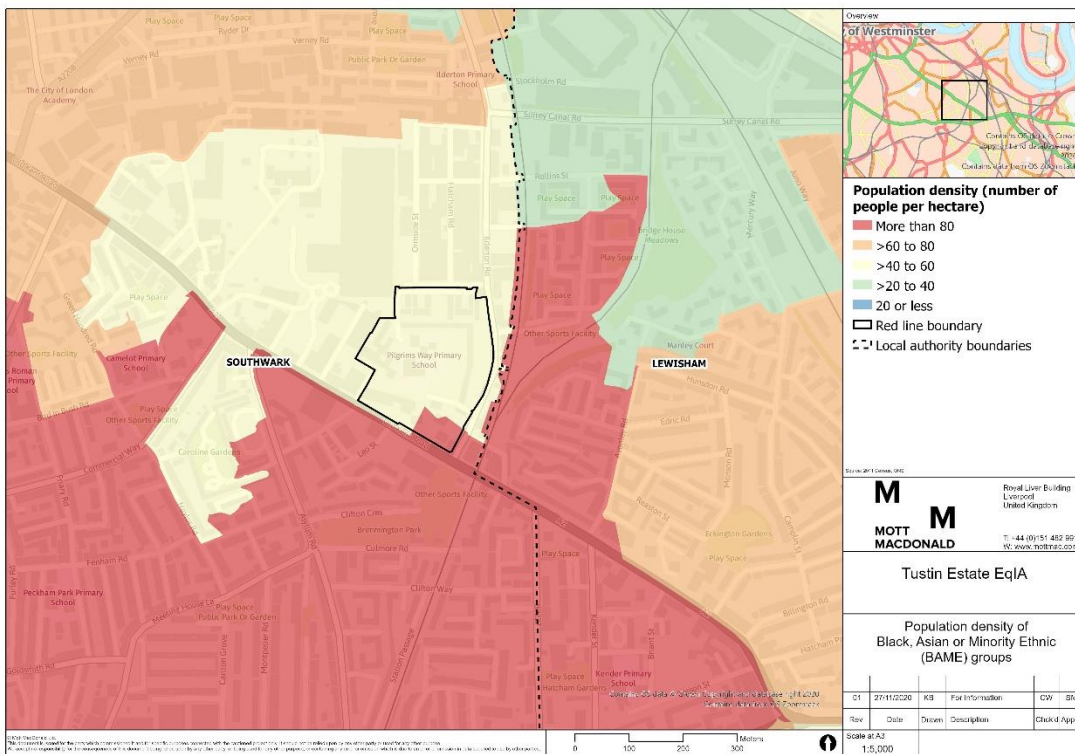
#### within the Estate

Source: Mott MacDonald

Map A.12, below, indicates that there is a lower density of people from an ethnic minority background within the Estate when compared to surrounding areas. Most of the Estate has a density of between 41 to 60 people from an ethnic minority background per hectare. A small area of the Estate in the south has a higher density of people per hectare (80 people per hectare).

To the north and west of the Estate the density is similar to the Estate. To the south and east of the Estate there is a higher density of people per hectare.

**Map A.12: Population density of people from an Ethnic Minority**



**background within the Estate**

Source: Mott MacDonald

**A.1.7 Religion and belief**

The table below provides a religious profile of the Estate, compared with Southwark, Greater London, and England. The Estate has a higher Christian population (59%) compared to Southwark (53%) and Greater London (48%) but is in line with that of England (59%). Proportions of people from minority faith groups are broadly in line with those for Southwark, Greater London and England.



**Table A.10: Population by religion or belief**

Religion and belief	Estate	Southwark	Greater London	England
Christian	59%	53%	48%	59%
Minority Faith*				
Buddhist	1%	1%	1%	0.5%
Hindu	0.4%	1%	5%	2%
Jewish	0.1%	0.3%	2%	0.5%
Muslim	11%	9%	12%	5%
Sikh	0.4%	0.2%	2%	0.8%
Other Religion	0.7%	0.5%	0.6%	0.4%
No Religion	17%	27%	21%	25%
Religion Not Stated	9%	9%	8%	7%

Source: Office for National Statistics 2011 Census

### A.1.8 Sex

The following table shows the proportion of the population who are male and female on the Estate, compared to Southwark, Greater London and England. Proportions of males (52%) and females (48%) that live within the Estate are broadly in line with other areas.

**Table A.11: Population by Sex**

Sex	Estate	Southwark	Greater London	England
Male	53%	50%	50%	49%
Female	47%	50%	50%	51%

Source: ONS 2020 mid-year population estimates

### A.1.9 Sexual orientation

There is no data available on this protected characteristic for the study area. However, emerging experimental statistics relating to sexual identity are available nationally and at a regional level.

In 2017, estimates from the Annual Population Survey (APS)<sup>14</sup> showed that 93% of the UK population identified as heterosexual or straight and 2% of the population identified themselves as lesbian, gay or bisexual (LGB). This comprised of:

<sup>14</sup> Source: Office for National Statistics (2017): See: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2016>

- 1.3% identifying as gay or lesbian
- 0.7% identifying as bisexual
- A further 0.6% of the population identified themselves as “other”, which means that they did not consider themselves to fit into the heterosexual or straight, bisexual, gay or lesbian categories.
- A further 4.1% refused or did not know how to identify themselves.

## A.2 Community resources

There are a number of community facilities and resources located both within, and in close proximity to, Tustin Estate. Within the estate, these include a primary school, two faith groups, a daycare/learning centre, and a community centre. Table A.13 lists the community facilities located within the Estate boundary.

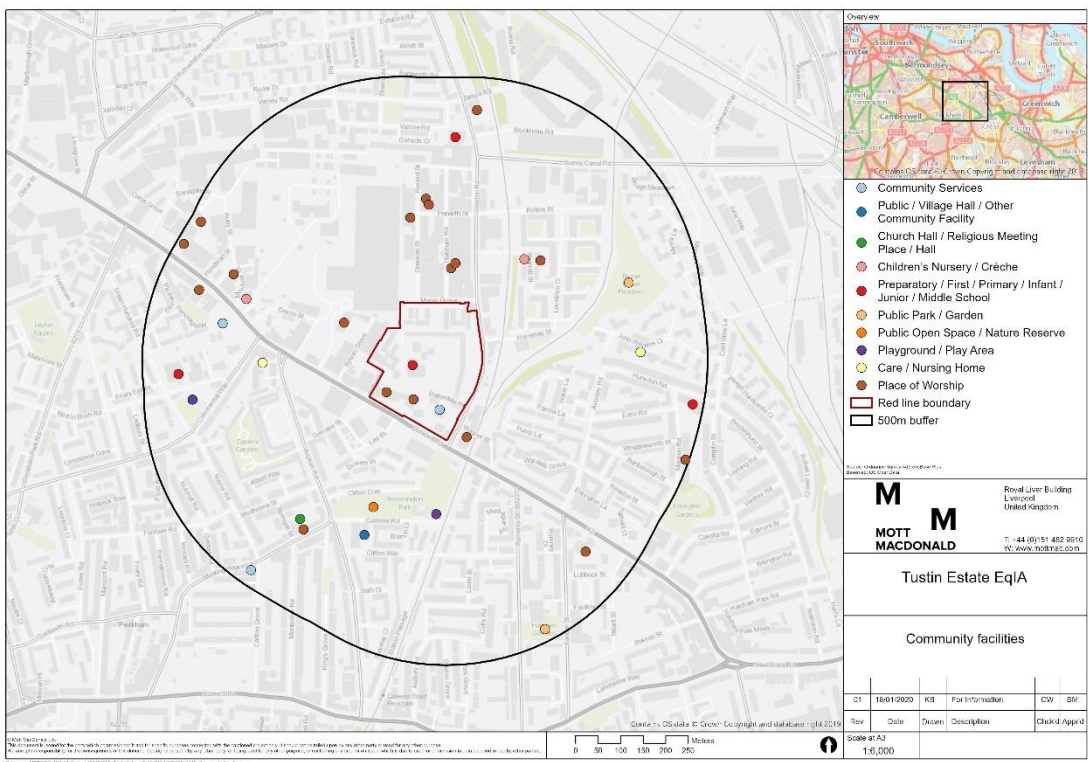
**Table A.12: List of community facilities within the Estate**

Name	Category	Address
Day care / learning centre	Education	803 Old Kent Road
Pilgrims Way Primary School	Infant School	Manor Grove
Divine Prophetic Interdenominational Ministries	Church	
Redeemed Assemblies	Church	
Tustin Community Centre	Community Services	Windermere Point

Source: AddressBase

Map A.13 below maps the location of community resources and facilities within and surrounding the estate, which are likely to be accessed by protected characteristic groups, or if they were to be lost, would potentially adversely affect protected characteristic groups. Within the Estate boundary, there are two Christian churches which will predominately be used by members of that faith. Children are likely to be impacted by the relocation of the Pilgrims Way Primary School and the day care/learning centre. There is also the Tustin Estate Community Centre, which is available for use by all residents of the current estate.

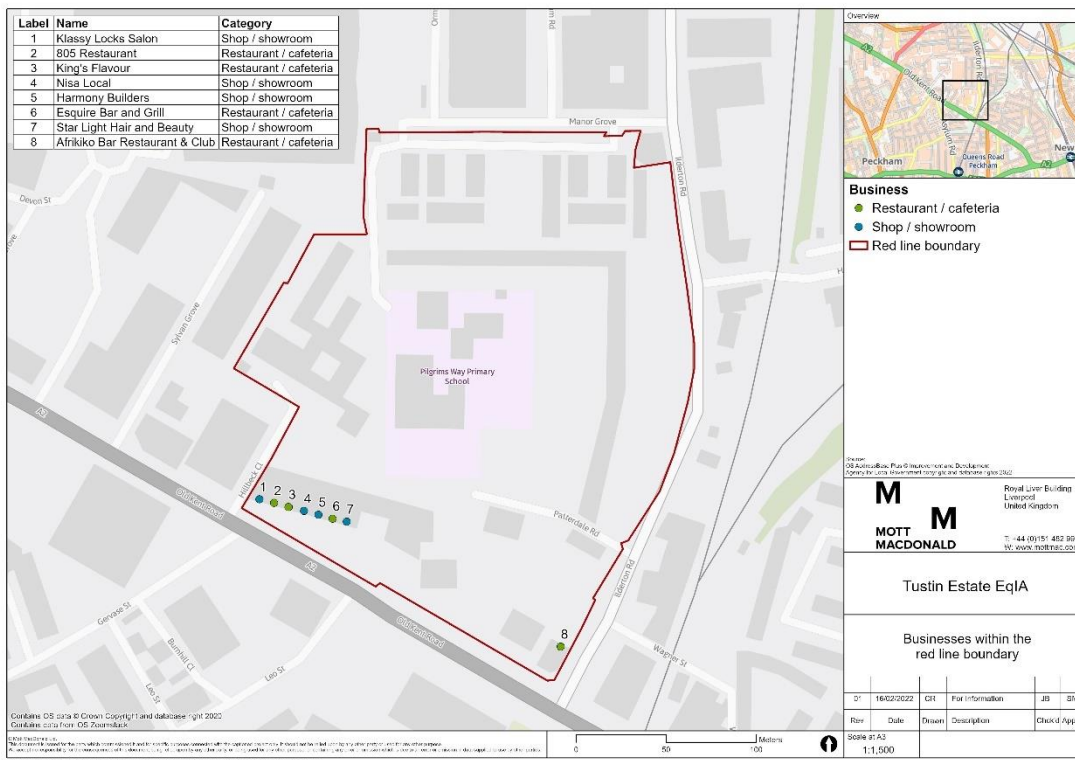
**Map A.13 : Community resources within and around the Estate**



Source: AddressBase

**A.3 Businesses**

There are a number of commercial units located on the Estate facing Old Kent Road in Bowness House. The businesses occupying these units are mapped and labelled in Map A.15 below. The businesses include two restaurants, a convenience store, one hair and beauty salon, one take away and an accountancy. These may be affected by any demolition and rebuild option on the Estate, which could have equality impacts on owners and employees, and potentially local residents.



### Map A.14 : Businesses within the Estate

Source: Southwark Council business information

## A.4 Health profile

The following presents a human health overview for the Estate. Where Estate-level information is not available, data is shown for the wider Borough.

### A.4.1 Local economy

Good quality employment and local economic conditions are important determinants of health. The following table highlights employment, unemployment and proportion of those claiming Jobseeker’s Allowance (JSA) and those claiming Universal Credit (UC). The claimant count combines all those claiming benefit principally for the reason of being unemployed.

**Table A.13: Employment and unemployment**

Location	Claimants as a % of working age population	Unemployment rate (%)	Employment rate (%)
Southwark	4%	5%	78%
Greater London	3%	5%	74%
England	2%	4%	75%

Source: Nomis Labour Market Profile (2018-2020) \*data for the Estate is not available.

Unemployment in the local area is in line with Greater London and England, as is the proportion of people claiming Job Seekers Allowance (JSA) or Universal Credit. The employment rate in Southwark (78%) is higher than England (75%).

**Table A.14: Median annual pay**

Location	Full-time workers (£)	Part-time workers (£)
Southwark	39,183	10,585
Greater London	36,797	10,699
England	30,661	10,521

Source: Nomis Labour Market Profile (2019) \*data for the Estate is not available.

Median income for full-time workers in Southwark is higher than both London and England, at £39,183 per annum, compared to £36,797 and £30,661, respectively. For part-time workers, income is broadly in line with that of London and England, at £10,585 per annum, compared to £10,699 in London and £10,521 in England.

#### A.4.2 Deprivation

The index of Multiple Deprivation (IMD) brings together data covering seven different aspects or 'domains' of deprivation into a weighted overall index for each Lower-layer Super Output Area (LSOA) in England. The scores are then used to rank the LSOAs nationally and to calculate an IMD score for each local authority area. These are then divided into deciles or quintiles, with 1 being the most deprived 20% of LSOAs, and 5 the least deprived 20% of LSOAs (in the case of quintiles).

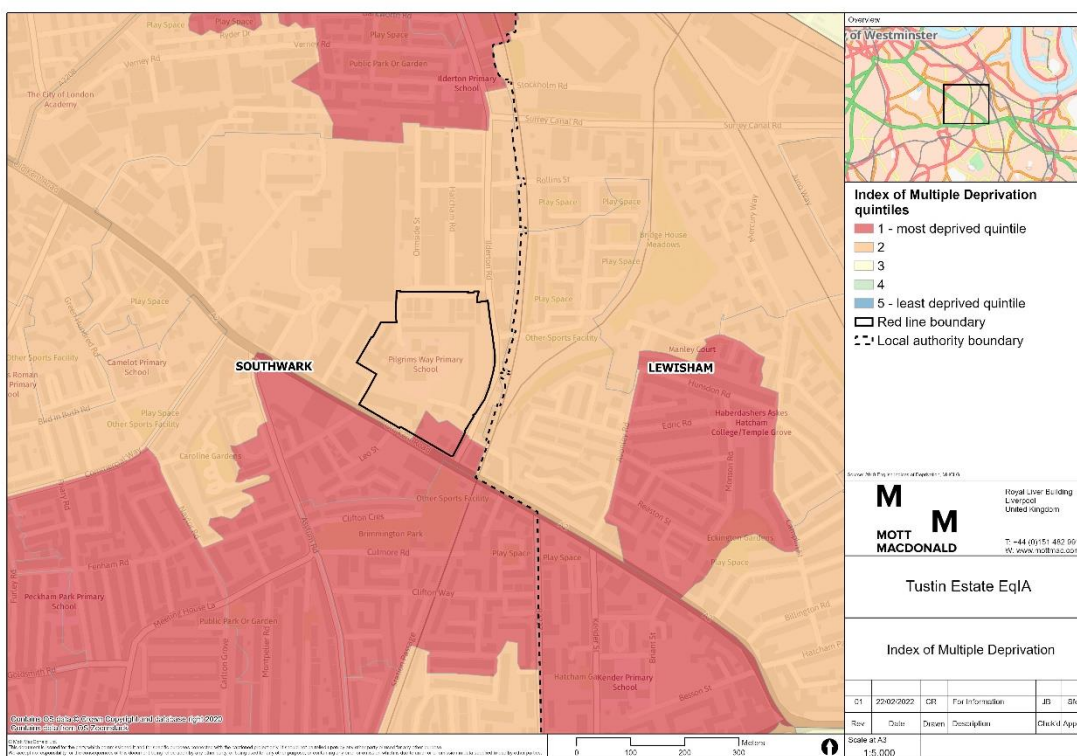
The following table shows the proportion of the population of the Site who live in each deprivation quintile. The Site falls within an area of higher deprivation, where the entire population lives within the most or second most deprived quintile. The Site has a higher proportion of those living in the most deprived quintile (25%), compared with Southwark, Greater London, and England (21%, 16%, and 20% respectively). A considerably higher number of people (75%) live in the second most deprived quintile, compared with Southwark (47%), Greater London (32%) and England (21%).

There is evidence to suggest that people living in the most deprived areas in England spend more time in ill health compared the rest of the population.

**Table A.15: Population by deprivation**

Location	Most deprived quintile (%)	Second most deprived quintile (%)	Third most deprived quintile (%)	Fourth most deprived quintile (%)	Least deprived quintile (%)
Site	25%	75%	0%	0%	0%
Southwark	21%	47%	21%	8%	3%
Greater London	16%	32%	23%	17%	12%
England	20%	21%	20%	20%	19%

Source: ONS 2020 mid-year population estimates and 2019 Indices of Multiple Deprivation



**Map A.15: Index of Multiple Deprivation**

Source: Mott MacDonald

**A.4.3 Human health**

The table below provides an overview of the health of the population in Southwark. Figures for the Estate are unavailable. Consideration has been given to conditions and impairments that may be exacerbated by the improvement programme construction and design, including potential impacts

such as relocation and associated social cohesion impacts, an increase in air pollution or noise, or loss/gain of public open space and recreation facilities.

**Table A.16: Human health indicators**



Category	Indicator	Southwark	Southwark %	England	England %
Physical activity	Percentage of physically active adults (PHE 2019 estimates)	-	72%	-	66%
	Obese children (Year 6) (PHE 2019)	-	27%	-	22%
Cardiovascular and respiratory health	Emergency hospital admissions for Chronic Obstructive Pulmonary Disease (COPD) per 100,000	613	-	415	-
	Under 75 mortality rates from cardiovascular diseases (PHE 2019) per 100,000	88	-	72	-
	Under 75 mortality rates from all respiratory diseases (PHE 2019) per 100,000	31	-	29	-
	Mortality rate for deaths involving COVID-19 (2020) per 100,000	177.3		140.1	
Mental health	Social isolation: % of adult social care users who have as much social contact as they would like (18+ years) (PHE 2019/20)	-	34%	-	46%
	% reporting depression or anxiety (PHE 2020)	-	14%	-	14%

Category	Indicator	Southwark	Southwark %	England	England %
Life expectancy	Male life expectancy at birth	79	-	79	-
	Female life expectancy at birth	83	-	83	-

Source: Public Health England (2017-2019)

Southwark has better rates of healthy behaviours in terms of levels of physical activity with a larger proportion of physically active adults (72%) compared to England (66%). However, Southwark has poorer rates of health behaviour in terms of childhood obesity, with high child obesity (27%) compared to the figure for England (22%).

There is likely a higher prevalence of those with respiratory and cardiovascular conditions in Southwark when compared to England, as mortality and hospital admissions from these diseases are higher. Mortality due to COVID-19 in 2020 was also higher in Southwark than in England.

Adults who are social care users in Southwark reportedly feel lonelier than those elsewhere in London – Southwark reports higher loneliness amongst adult social care users than any other borough. When compared to England, only 34% of respondents reported having as much social contact as they would like compared to 46%. However, those reporting depression or anxiety in Southwark is in line with England.

Male healthy life expectancy is broadly in line with the national average. Female healthy life expectancy is (number of years a person can expect to live in good health) higher than the national average. Healthy life expectancy at birth is an overall measure of how social, economic and environmental conditions in an area are affecting a population.

## B. Literature Review

This chapter sets out the finding of the desk-based review process, providing a literature review of the potential effects of the renewal on people with protected characteristics. All potential risks and opportunities of a typical housing renewal project have been considered. Section B.1 discusses the potential effects on residents and community resources associated with rehousing and section B.2 sets out the wider regeneration impacts on community. All are segmented into key thematic areas and summarised in Chapter 4.

### B.1 Impacts on residents and community resources during renewal

#### B.1.1 Loss of social cohesion associated with relocation

The redevelopment process can involve the temporary or permanent resettlement of residents and the demolition of housing and community resources. As a result, this could potentially lead to the risk of loss of social cohesion and temporary or permanent access to this amenity provision, which can furthermore increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can impact on all parts of the community, but can have a disproportionately negative effect on **children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds and people from minority faith groups**.

The instability caused by involuntary relocation has the potential to be particularly disruptive to **children**. Such disruption can be attributed to stress and anxiety relating to changing schools and the need to adapt to new routines, staff, facilities and peers. It is generally accepted that children develop better in stable environments with a degree of routine; sudden and dramatic disruptions can be both stressful and affect feelings of security, as has been evidenced in the COVID-19 pandemic.<sup>15</sup>

**Children with autism spectrum conditions** may also find new routines, expectations, and social relationships of a new school environment to be

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<sup>15</sup> Lionetti, F., Spinelli, M., Moscardino, U., Ponzetti, S., Garito, M., Dellagiulia, A., . . . Pluess, M. (2022). The interplay between parenting and environmental sensitivity in the prediction of children's externalizing and internalizing behaviors during COVID-19. *Development and Psychopathology*, 1-14. Available at: <https://doi.org/10.1017/S0954579421001309>

especially challenging, which can have further negative effects on educational attainment and wellbeing.<sup>16</sup>

**Children from low-income** families may be particularly impacted by relocation due to loss of local informal childcare support. A study from the Joseph Rowntree Foundation showed that informal childcare support from grandparents was one important factor in enabling parents to work, generating income and preventing families from going without daily necessities.<sup>17</sup>

Furthermore, relocation can also have negative mental health effects on children and adolescents for a number of reasons, including: weakened social ties, disturbed social networks, household disruption, social isolation and a reduction in parent-child interactions.<sup>18</sup>

The loss of long-standing community links risks creating feelings of isolation, particularly amongst **older people**. Age UK research indicates that physical isolation, a lack of social resources and a removal of familiarity can all contribute to feelings of isolation and loneliness amongst older people.<sup>19</sup> This in turn can lead to negative health outcomes such as poorer mental health, a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism) and a greater risk of hospitalisation.<sup>20</sup> Loneliness increases the likelihood of mortality by 26 per cent among those over the age of 65 and raises the risk of developing conditions, such as high blood pressure, heart disease and stroke.<sup>21</sup> The link between older people and the likelihood of experiencing feelings of isolation and loneliness indicates that this group may be disproportionately negatively impacted by relocation. This can equally be the case for older people remaining in or very close to an area being redeveloped.<sup>22</sup>

The impact of the COVID- 19 pandemic has already had an impact on feelings of social isolation amongst **older people**. In the UK, from March 2020, almost nine million people over the age of 70 were advised by the Government to 'strictly adhere' to social distancing rules, only leaving their home for essential

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<sup>17</sup> Joseph Rowntree Foundation (2016) 'Falling short: the experience of families living below the minimum income standard'. Available at: <https://www.jrf.org.uk/report/falling-short-experiences-families-below-minimum-income-standard>

<sup>18</sup> Morris, T, Manley D, Northstone, K, Sabel, C, (2017): 'How do moving and other major life events impact mental health? A longitudinal analysis of UK children'

<sup>19</sup> Age UK (2015) 'Evidence Review: Loneliness in Later Life'. Available at: "[https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health-wellbeing/rb\\_june15\\_loneliness\\_in\\_later\\_life\\_evidence\\_review.pdf](https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health-wellbeing/rb_june15_loneliness_in_later_life_evidence_review.pdf)"[https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health-wellbeing/rb\\_june15\\_loneliness\\_in\\_later\\_life\\_evidence\\_review.pdf](https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health-wellbeing/rb_june15_loneliness_in_later_life_evidence_review.pdf)

<sup>20</sup> IoTUK (2017): 'Social Isolation and Loneliness in the UK' Available at: <https://iotuk.org.uk/social-isolation-and-loneliness-report/>

<sup>21</sup> Age UK (2015): 'Campaign to end loneliness: threat to health'.

<sup>22</sup> Age UK (2015): 'Loneliness and Isolation evidence review'

purposes. Restrictions have increased social isolation and feelings of loneliness for older people.<sup>23</sup>

Relocation has the potential to cause stress, anxiety and uncertainty for **disabled people**. Changes, both minor and major, to some disabled people's routines and surroundings may adversely affect feelings of security and comfort. For example, research shows that people on the autism spectrum, tend to prefer set routines (such as traveling via the same routes) and rigid structures (such as preferences to room layouts or objects) as they can help to bring order to their daily life so that they know what is going to happen and when.<sup>24</sup>

Findings from the Jo Cox Commission on Loneliness found that over half of **disabled people** say they are lonely, with around one in four feeling lonely every day.<sup>25</sup> The report also states that forming and maintaining social connections can be a challenge for disabled people, including those with sensory impairments, learning disabilities, autism, physical and mobility impairments, mental health conditions, dementia, head and brain injury, neurological conditions, cancer and HIV. As disabled people can experience more barriers to forming social connections the loss of existing local social connections through residential displacement or loss of social resources could lead to disabled people experiencing further loneliness and isolation.

Relocation can also create stress, anxiety and uncertainty for **disabled people** regarding the accessibility of their new home. A report published by the EHRC identifies that across all housing tenures, there is a severe shortage of accessible housing. For example, one in three disabled people living in private rented properties live in unsuitable accommodation. This figure is one in five for disabled people living in social housing, and one in seven for disabled people who own their own home. Overall, in England, only 7% of homes offer the basic four accessibility features to make a home fully accessible (level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level).<sup>26</sup> This suggests that disabled people are more likely to be concerned about the accessibility of their new home compared to other residents. Additionally, a report by Leonard Cheshire Disability highlights that only 4% of those with mobility impairments who have looked for accessible homes said they were easy to find. In addition, they also found that some disabled people have also experienced difficulties in terms of local authorities

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<sup>23</sup> Wu, Bei (2020): 'Social isolation and loneliness among older adults in the context of COVID-19: a global challenge'. Available at: <https://ghrp.biomedcentral.com/articles/10.1186/s41256-020-00154-3>

<sup>54</sup> National Autistic Society (2016) 'Obsessions, repetitive behaviour and routines'. Factsheet. Available at: <https://www.autism.org.uk/about/behaviour/obsessions-repetitive-routines.aspx>

<sup>25</sup> Sense for the Jo Cox Commission on Loneliness (2017) 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

<sup>26</sup> DCLG (2015). 'English Housing Survey: Adaptations and Accessibility Report' Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/539541/Adaptations\\_and\\_Accessibility\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf)

being reluctant to fund adaptations that would allow them to live independently.<sup>27</sup>

The disruption of social networks caused by relocation may also cause negative health outcomes for people with **mental health conditions and autism**, many of whom depend on social networks to maintain their standard of living.<sup>28</sup>

People with mental health problems may be disproportionately impacted by stress and anxiety, especially if relocation is unexpected or accompanied by financial stress.<sup>29</sup> Research from Wilding found that increased rates of mental ill health are associated with involuntary residential relocation.<sup>30</sup>

The impact of the COVID-19 pandemic and restrictions throughout 2020 have also had a negative impact on feelings of social isolation amongst disabled people. In May 2020 the Office for National Statistics found that nearly two thirds of disabled people said that COVID-19 concerns were affecting their wellbeing, compared with half of non-disabled people. One of the main reasons cited was feelings of loneliness or isolation.<sup>31</sup>

**Ethnic minority** and **minority faith** communities are also likely to experience adverse effects as a result of relocation. It has been identified that these groups may be more reliant on social networks, faith and cultural facilities. They are likely to have concerns over loss of social networks and facilities, as well as fears of isolation, harassment or language barriers in new locations.<sup>32</sup> Ethnic minority communities also tend to experience greater difficulty in accessing

<sup>27</sup> Leonard Cheshire Disability (2014): 'The hidden housing crisis' Available at: <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

<sup>28</sup> National Autism Society. (2017): 'Moving house' URL: <https://www.autism.org.uk/movinghouse> 56

<sup>29</sup> Wilding et al., (2018): 'Place and preference effects on the association between mental health and internal migration within Great Britain' Health and Place. 52(1), pp 180-187

<sup>30</sup> Wilding et al., (2018): 'Place and preference effects on the association between mental health and internal migration within Great Britain' Health and Place. 52(1), pp 180-187

<sup>31</sup> ONS (2020): 'Coronavirus and the social impacts on disabled people in Great Britain: May 2020'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/coronavirusandthesocialimpactsongreatbritain/may2020>

<sup>32</sup> Della Puppa, Francesco and King. Russell (2019). 'The new 'twice migrants': motivations, experiences and disillusionments of Italian-Bangladeshis relocating to London.' Journal of Ethnic and Migration Studies, 45(11). Available at: <https://doi.org/10.1080/1369183X.2018.1438251>

health care when compared to other sections of the population, and rehousing may exacerbate the issue.<sup>33</sup>

Evidence has suggested that women who move home while **pregnant** tend to experience an increase in stress and depression levels above and beyond that of women who move home when not pregnant.<sup>34</sup> Evidence also suggests that the stress and physical exercise involved with relocation can slightly increase the risk of miscarriage, preterm delivery, small for gestational age new-borns, low birthweight, preeclampsia / gestational hypertension and can exacerbate deep vein thrombosis which pregnant women are more at risk of.<sup>35</sup>

A 2015 survey carried out by the Care Quality Commission assessed the impact that having the same midwife had on pregnant women. The results showed that women who had the same midwife throughout pregnancy had more positive midwifery experiences than those who did not. The most negative experiences occurred with those who wanted to see the same midwife but were unable to.<sup>36</sup> Should relocation result in the need to make changes to preestablished antenatal services and relationships, this could negatively impact pregnant individuals.

### B.1.2 Loss of community resources

The loss of facilities where children can socialise, and play could be particularly detrimental to **children** living in the local area. Demolition and resource relocation could adversely affect access to child social networks. Evidence suggests that early years provision plays an important role in a child's development and that free play in early childhood is a vital experience through which child learn social, conceptual and creative skills, as well as increasing their knowledge and understanding of the world.<sup>37</sup>

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<sup>33</sup> BME Health Forum (2010) 'Good Access in Practice: Promoting community development in the delivery of healthcare'. Available at: [http://bmehf.org.uk/files/9013/6536/5135/Good\\_Access\\_in\\_Practice\\_final.pdf](http://bmehf.org.uk/files/9013/6536/5135/Good_Access_in_Practice_final.pdf)

<sup>34</sup> Tunstall, H., Pickett, K. and Johnsen, S. (2010): 'Residential mobility in the UK during pregnancy and infancy: Are pregnant women, new mothers and infants 'unhealthy migrants'?'

<sup>35</sup> NHS (2016): 'Deep vein thrombosis'; Royal College of Physicians and Faculty of Occupational Medicine (date unknown): 'Advising women with a healthy, uncomplicated, singleton pregnancy on: heavy lifting and the risk of miscarriage, preterm delivery and small for gestational age'

<sup>36</sup> Care Quality Commission (2015): '2015 survey of women's experiences of maternity care'. Available at: [https://www.cqc.org.uk/sites/default/files/20151215b\\_mat15\\_statistical\\_release.pdf](https://www.cqc.org.uk/sites/default/files/20151215b_mat15_statistical_release.pdf)

<sup>37</sup> Nation Children's Bureau (2007): 'Free Play in Early Childhood'

As demolition proceeds, local amenities and services (such as shops, community centres and health facilities) may decide to close. Some community resources may be included in the demolition process. The loss of these resources can have a disproportionately negative effect on older people remaining in the neighbouring areas, who may find it more challenging to travel to new services outside of their neighbourhood.<sup>38</sup> Furthermore, for local businesses, the loss of their traditional customer base following the relocation of residents can force closures, further reducing the choice of services available to people in the community, with older people among the most likely to be affected. Research from Age UK found that reduced access to community facilities can, have serious negative effects on mental health and wellbeing, and increase rates of cardiovascular disease in older people.<sup>39</sup>

Community severance is defined as and when an individual is cut off from amenities and social facilities within the local community.<sup>40</sup> Whilst anyone can suffer from community severance, compared to the general population, **older people** are particularly vulnerable.<sup>41</sup> As a result of the development, local residents may find that local amenities such as shops, health and community facilities begin to close. As a result of this, residents will need to find new facilities elsewhere, which may not be as close or convenient as the ones used previously. This may reduce the availability and choice of services for vulnerable older residents that may find it challenging to access services further away. The impacts of reduced access to community facilities may have caused reduced mental health and wellbeing and increase rates of cardiovascular disease in older people<sup>42</sup>, including social isolation and increased mortality rates.<sup>43</sup>

As a result of the redevelopment, community resources will be relocated or close. The loss of community facilities used by children can lead to; weakened social ties, disturbed social networks, household disruption, social isolation and a reduction in parent-child interactions.<sup>44</sup>

The loss of community resources may have a disproportionate impact on **disabled people**. Findings from the Jo Cox Commission on loneliness found that over half of disabled people say they are lonely, with around one in four feeling lonely every day.<sup>45</sup>

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<sup>38</sup> A. Power (2008) 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability'. Available at: <https://www.sciencedirect.com/science/article/pii/S0301421508004709>

<sup>39</sup> Age UK (2015): 'Campaign to end loneliness: Threat to health'

<sup>40</sup> Age UK. (2015): 'Loneliness and Isolation evidence review'

<sup>41</sup> Age UK (2015): 'Campaign to end loneliness: Threat to health'

<sup>42</sup> Age UK (2015): 'Campaign to end loneliness: Threat to health'

<sup>43</sup> Gough et al (2021) 'Community participation of community dwelling older adults: a cross-sectional study'

<sup>44</sup> Morris, T, Manley D, Northstone, K, Sabel, C, (2017) 'How do moving and other major life events impact mental health? A longitudinal analysis of UK children'

<sup>45</sup> Sense for the Jo Cox Commission on loneliness (2017) 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>



The report also found that for those with a range of impairments, including those with sensory impairments, learning disabilities, autism, physical and mobility impairments, mental health conditions, dementia, head and brain injury, neurological conditions, cancer and HIV; forming and maintaining social connections can be a challenge.<sup>46</sup> Due to these difficulties, those who are disabled may be disproportionately impacted by a loss of community and social resources that will be relocated or closed as a result of the development. This could lead to an increase in community severance, isolation and loneliness within this demographic.

For **disabled people, particularly those who are autistic**, the relocation and potential closure of community resources from the Site may cause significant negative impacts. This may result in the breakdown of social relationships associated with a community resource, and consequently, a disruption of the social networks which many rely on to maintain their standard of living. Changes, both to their routines and surroundings may adversely affect feelings of security and comfort, highlighting how people with autism may be disproportionately impacted. Similarly, for those with dementia or Alzheimer's, learning about and interpreting new environments can be difficult, and relocation can create feelings of dissonance, confusion and discomfort.<sup>47</sup>

As the construction phase of the redevelopment begins, local amenities including places of worship and community centres may decide to prematurely close or relocate. The Site is currently home to a large number of places of worship. The closure and reprovision of these places of worship as a result of the scheme will disproportionately impact those who are from **religious** communities. Dislocation from cultural and/or religious communities can be concerning for residents belonging to these groups, and relocation can raise fears of isolation, harassment or language barriers in new locations and neighbourhoods, and loss of facilities.<sup>48</sup>

**Older people** remaining in local areas may be adversely impacted by these changes to local social infrastructure as they find it challenging to access new places of worship relocated to outside their local area.<sup>49</sup> Religious institutions are also important to upkeep within local communities, as they contribute towards social cohesion and wellbeing. Research outlines that Mosques can help the cognitive wellbeing of **older individuals**, as opportunities such as Arabic learning lessons can help healthy mental functioning. Minority religious communities also contribute towards helping raise awareness and prevention of

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<sup>46</sup> Sense for the Jo Cox Commission on Loneliness (2017) 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

<sup>47</sup> Son, G. R., Therrien, B., & Whall, A. (2002). 'Implicit memory and familiarity among elders with dementia'. Journal of Nursing Scholarship, 34(3), 263-267. Available at: <https://emosandcrane.co.uk/resources/Journal%20of%20Nursing%20Scholarship%20-%20Implicit%20Memory%20and%20Familiarity%20Among%20Elders%20with%20Dementia.pdf>

<sup>48</sup> BME Health Forum (2010) 'Good Access in Practice: Promoting community development in the delivery of healthcare'.

<sup>49</sup> A. Power (2008) 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability'

diseases such as Hepatitis, providing awareness whereby cultural or language barriers exist.<sup>50</sup> Health inequalities amongst South Asian ethnic groups are higher, therefore religious institutions that disproportionately represent these groups are significant in providing opportunities for equality.

### B.1.3 Access to finance as a result of relocation

Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, certain groups are particularly vulnerable to financial exclusion, including **young people** not in employment, **disabled people, lone parents, ethnic minority groups and older people**, as it has been found that social exclusion can lead to financial vulnerability.<sup>51</sup>

**Young people**, particularly those not in employment, tend to have a lower basic income and fewer savings than the other age groups and are therefore vulnerable to financial exclusion.<sup>52</sup> The rising cost of housing and deposits is also problematic for many young people due to the gap between income and house prices. Consequently, home ownership amongst 16-24-year-olds represent only 0.7% of homeowners in 2022, with many young people now choosing to rent privately.<sup>53</sup> This means that as a group, they may be adversely impacted by the financial implications of relocation.

**Older people**, especially those who have paid off a previous mortgage or have no recent experience of moving home, have less financial flexibility and savings than those in full time employment.<sup>54</sup> Relocation may therefore cause older people to make use of their savings and investments to secure a new home, further impacting their financial independence and stability. Should older people lack savings to assist with relocation, the range of home ownership options is likely to be narrow.

Those from **ethnic minority backgrounds** are more likely to have limited experience of institutional loan finance.<sup>55</sup> Further, they may have less access to commercial loans due to a poor credit rating or their location in 'high risk'

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<sup>50</sup> Public Health England (2017) 'Healthy living: mosques' Available at: [Healthy living: mosques - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>51</sup> Fernández-Olit, B., Paredes-Gázquez, J.D. & de la Cuesta-González, M. (2018). 'Are Social and Financial Exclusion Two Sides of the Same Coin? An Analysis of the Financial Integration of Vulnerable People.' Soc Indic Res 135, 245–268. Available at: <https://doi.org/10.1007/s11205-016-1479-y>

<sup>52</sup> Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'.

<sup>53</sup> House of Lords (2016): 'Library Note: Impact of the shortage of housing on young people'. Available at: <https://researchbriefings.files.parliament.uk/documents/LLN-2016-0056/LLN-2016-0056.pdf>; Statista Research Department (2023): 'Age distribution of home owners in England 2022' Available at: <https://www.statista.com/statistics/321065/uk-england-home-owners-age-groups/>

<sup>54</sup> Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'.

<sup>55</sup> House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'.

postcodes. In terms of housing affordability, in 2017 it was reported that rents are less affordable for most ethnic minority groups when compared to White British households.<sup>56</sup> Two-fifths of people from an ethnic minority background live in low-income households,<sup>57</sup> further suggesting the cost of relocating has the potential to be problematic.

**Women** are disproportionately represented among lone parent households. Around 90% of single parents are women and have the highest poverty rate amongst working- age adults, with 43% living in poverty (rising to 51% in London).<sup>58</sup> This makes the risk of financial exclusion higher as women who are single parents are more likely to spend a higher portion of their income on housing costs. This can increase the risk of homelessness, with single mother families accounting for one quarter of all homeless households in London in 2019.<sup>59</sup>

**Disabled people** may be impacted by the availability of affordable homes when moving to new areas, as they are more likely to live in poverty.<sup>60</sup> Indeed, rising numbers of disabled people are becoming homeless - up 53% in 2019 alone.<sup>61</sup> Disabled people are less likely to be able to own their own home and are more likely to rent social housing than those who are not disabled.<sup>62</sup> Whilst some shared ownership homes are specifically designed to be accessible for disabled people, only 1.1% of households who purchased a shared ownership home in London in 2017/18 included a disabled household member, likely due to the cost.<sup>63</sup>

**Disabled people** who live in social housing could experience particularly acute effects. The 'removal of the spare room subsidy' or 'bedroom tax' in 2013 has had a disproportionate impact on disabled people in social housing; two thirds of those affected have a disability. Research shows that disabled people have found it difficult to take up proposed mitigation measures, such as taking up work, working longer hours or downsizing, and thus have had their income

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<sup>56</sup> Shelter (2017) 'BAME homelessness matters and is disproportionately rising – time for the government to act'. Available at: <http://blog.shelter.org.uk/2017/10/bame-homelessness-matters-and-is-disproportionately-rising-time-for-the-government-to-act/>

<sup>57</sup> The Poverty Site (2017). See: <http://www.poverty.org.uk/06/index.html>

<sup>58</sup> Department for Work and Pensions (2015) 'Low income'

<sup>59</sup> Mayor of London (2020): 'Housing in London - 2020'. Available at: <https://data.london.gov.uk/dataset/housing-london>

<sup>60</sup> Joseph Rowntree Foundation (2019): 'Poverty rates in families with a disabled person'. Available at: <https://www.jrf.org.uk/data/poverty-rates-families-disabled-person>

<sup>61</sup> The Independent (2019). 'Homelessness amongst ill and disabled people rises 53% in a year, figures show'. Available at: <https://www.independent.co.uk/news/uk/home-news/homeless-disabled-ill-rough-sleeping-housing-crisis-a9251756.html>

<sup>62</sup> Office for National Statistics (2019): 'Disability and housing, UK - 2019'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019>

<sup>63</sup> Office for National Statistics (2019): 'Disability and housing, UK - 2019'. Available at: Mayor of London (2020) 'Intermediate housing: Equality Impact Assessment'. Available at: [https://www.london.gov.uk/sites/default/files/intermediate\\_housing\\_-\\_equality\\_impact\\_assessment\\_for\\_part\\_1\\_consultation\\_response\\_report.pdf](https://www.london.gov.uk/sites/default/files/intermediate_housing_-_equality_impact_assessment_for_part_1_consultation_response_report.pdf)

reduced by £12 to £22 per week, depending on the number of spare bedrooms. These changes have resulted in increased poverty and adverse effects on health, well-being and social relationships of disabled residents in social housing.<sup>64</sup>

#### B.1.4 Expenses associated with relocation

In addition to access to finance, other costs associated with relocation can have major impacts on certain groups. Research by The Health Foundation UK shows that **young people** are more likely to find housing unaffordable.<sup>65</sup> Additionally, the research found that in 2020, 15% of people aged 16–24 and 13% of people aged 25–34 spent more than a third of their income on housing costs in comparison to 1% of 35–44-year-olds and 8% of 45–54-year-olds. The reason for this is due to older working-age groups generally having higher incomes and therefore a higher likelihood to have lower housing costs due to home ownership status.

**Older people** are also vulnerable as there may be additional expenses they will have to cover when relocating. In the last 10 years, the affordability of housing has improved across all age groups apart from people over 55 years old.<sup>66</sup> More specifically, the proportion of 55–64-year-olds with unaffordable housing has increased by 25%. Thus, older people can be particularly vulnerable to relocation due to the additional expenses that they would have to cover.

People from **ethnic minority backgrounds** tend to have higher relative housing costs as compared to white British people. Research from 2019/20 has found that the cost for people in all minority ethnic groups are 13 – 19% higher than those of white British people.<sup>67</sup>

For **people with low incomes** (the bottom 20% or quintile of the income distribution), costs associated with housing could adversely affect their standard of living. Research shows that 26% of households on the lowest incomes spent more than a third of their income on housing costs in 2019/20.<sup>68</sup> In comparison, only 3% of those in the top income quintile spent more than a third of their income on housing costs. This is largely due to housing being less affordable for people on the lowest incomes. Additionally, this inequality is also partly due

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<sup>64</sup> Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. *Journal of Public Health*, 38(2), 197-205.

<sup>65</sup> The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

<sup>66</sup> The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

<sup>67</sup> The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

<sup>68</sup> The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

to there being more people renting either private or social homes in the lower income quintiles, for whom housing tends to be less affordable.

### B.1.5 Access to finance and expenses as a result of relocation

Relocation can increase residents' financial outgoings due to the costs of moving and obtaining new housing. These costs may include removal services, the need to adapt to a new home or buy new furniture. Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, certain groups are particularly vulnerable to financial exclusion, including **young people** not in employment, **disabled people**, **lone parents**, **ethnic minority groups and older people**, as it has been found that social exclusion can lead to financial vulnerability.<sup>69</sup>

#### Young people

**Young people**, especially those not in employment, tend to have a lower basic income and less savings compared to other age groups, making them vulnerable to financial exclusion.<sup>70</sup> The rising costs of housing and deposits is challenging for many young people due to the gap between income and house prices. Consequently, home ownership amongst 16-24-year-olds represents only 0.7% of homeowners in 2022, with many young people now choosing to rent privately.<sup>71</sup> Research by The Health Foundation UK found that in 2020, 15% of people aged 16–24 and 13% of people aged 25–34 spent more than a third of their income on housing costs in comparison to 1% of 35–44-year-olds and 8% of 45–54-year-olds.<sup>72</sup> A reason for this may be due to older working-age groups often having higher incomes, with a higher likelihood to have home ownership status and lower housing costs. As a result, **young people** may be adversely impacted by the financial implications of relocation.

#### Older people

**Older people**, particularly those who have paid off a previous mortgage or have no recent experience of moving home, have less financial flexibility and savings

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<sup>69</sup> Fernández-Olit, B., Paredes-Gázquez, J.D. & de la Cuesta-González, M. (2018). 'Are Social and Financial Exclusion Two Sides of the Same Coin? An Analysis of the Financial Integration of Vulnerable People.' Soc Indic Res 135, 245–268. Available at: <https://doi.org/10.1007/s11205-016-1479-y>

<sup>70</sup> Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'.

<sup>71</sup> House of Lords (2016): 'Library Note: Impact of the shortage of housing on young people'. Available at: <https://researchbriefings.files.parliament.uk/documents/LLN-2016-0056/LLN-2016-0056.pdf> ; Statista Research Department (2023): 'Age distribution of home owners in England 2022' Available at: [Impact of the Shortage of Housing on Young People \(parliament.uk\)](https://www.statista.com/chart/11205/016-1479-y)

<sup>72</sup> The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

than those in full time employment.<sup>73</sup> Relocation may cause older people to use their savings to access new housing, threatening their financial independence and stability. This reiterates evidence presented to the House of Commons Communities and Local Government Committee, demonstrating that relocation may also impact people who have savings and investments.<sup>74</sup> Those without savings are also likely to have a negative experience when relocating, due to a narrow range of home ownership options.

**Older people** are also more vulnerable to additional expenses they will have to cover when relocating. Over the last 10 years, the affordability of housing has improved across all age groups apart from people over 55 years old. In turn, the proportion of 55–64-year-olds with unaffordable housing has increased by 25%.<sup>75</sup> Therefore, this group faces specific vulnerabilities due to relocation as a result of the expenses this process incurs.

### Ethnic minority groups

Individuals from **ethnic minority backgrounds** are more likely to have limited experience of institutional loan finance.<sup>76</sup> In terms of housing affordability, in 2017 it was reported that rent is less affordable for most ethnic minority groups when compared to White British households.<sup>77</sup> Two-fifths of people from an ethnic minority background live in low-income households, and tend to have higher relative housing costs as compared to white British people.<sup>78</sup> Research from 2019/20 has found that the cost for people in all minority ethnic groups are 13 – 19% higher than those of white British people.<sup>79</sup> Altogether, this suggests that costs of relocating can be disproportionately detrimental for this group.

### Lone parents

Women are disproportionately represented among lone parent households. Around 90% of single parents are women and this group has the highest poverty rate amongst working-age adults, with 43% living in poverty (rising to

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<sup>73</sup> Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'.

<sup>74</sup> House of Commons Communities and Local Government Committee (2011) '*Regeneration Sixth Report of Session 2010–12*'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

<sup>75</sup> The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

<sup>76</sup> House of Commons Communities and Local Government Committee (2011) '*Regeneration Sixth Report of Session 2010–12*'.

<sup>77</sup> Shelter (2017) 'BAME homelessness matters and is disproportionately rising – time for the government to act'. Available at: <http://blog.shelter.org.uk/2017/10/bame-homelessness-matters-and-is-disproportionately-rising-time-for-the-government-to-act/>

<sup>78</sup> The Poverty Site (2017). See: <http://www.poverty.org.uk/06/index.html>

<sup>79</sup> The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

51% in London).<sup>80</sup> This increases their risk of financial exclusion as **women** who are single parents are more likely to spend a higher portion of their income on housing costs. This can increase the risk of homelessness, with single mother families accounting for one quarter of all homeless households in London in 2019.<sup>81</sup>

### Disabled people

**Disabled people** may be vulnerable to the impacts of relocation due to the availability of affordable homes when moving to new areas, as they are more likely to live in poverty.<sup>82</sup> In fact, rising numbers of disabled people are becoming homeless – increasing by 53% in 2019.<sup>83</sup> Disabled people are less likely to be able to own their own home and are more likely to rent social housing than those who are not disabled.<sup>84</sup> Whilst some shared ownership homes are specifically designed to be accessible for disabled people, only 1.1% of households who purchased a shared ownership home in London in 2017/18 included a disabled household member, likely due to the cost.<sup>85</sup>

### Low-income households

For people with low incomes, costs associated with housing could adversely affect their standard of living. In 2019/2020, 26% of households on the lowest incomes spent more than a third of their income on housing costs.<sup>86</sup> In comparison, only 3% of those in the top income quintile spent more than a third of their income on housing costs. This is largely a consequence of housing being less affordable for people on the lowest incomes. Additionally, this inequality is also a result of more people renting either private or social homes in the lower income quintiles, for whom housing tends to be less affordable.

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<sup>80</sup> Gingerbread (2019). 'Single parents- facts and figures'. Available at: <https://www.gingerbread.org.uk/what-we-do/media-centre/single-parents-facts-figures/> ; Gingerbread (2020). 'Living standards and poverty. Available at: <https://www.gingerbread.org.uk/policy-campaigns/living-standards-and-poverty/>

<sup>81</sup> Women's Budget Group (2019) *A home of her own*. Available at: [WBG19-Housing-Report-full-digital.pdf](https://www.wbg.org.uk/wp-content/uploads/2019/06/WBG19-Housing-Report-full-digital.pdf)

<sup>82</sup> Joseph Rowntree Foundation (2019): 'Poverty rates in families with a disabled person'. Available at: <https://www.jrf.org.uk/data/poverty-rates-families-disabled-person>

<sup>83</sup> The Independent (2019). 'Homelessness amongst ill and disabled people rises 53% in a year, figures show'. Available at: <https://www.independent.co.uk/news/uk/home-news/homeless-disabled-ill-rough-sleeping-housing-crisis-a9251756.html>

<sup>84</sup> Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019>

<sup>85</sup> Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: Mayor of London (2020) 'Intermediate housing: Equality Impact Assessment'. Available at: [https://www.london.gov.uk/sites/default/files/intermediate\\_housing\\_equality\\_impact\\_assessment\\_for\\_part\\_1\\_consultation\\_response\\_report.pdf](https://www.london.gov.uk/sites/default/files/intermediate_housing_equality_impact_assessment_for_part_1_consultation_response_report.pdf)

<sup>86</sup> The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

### B.1.6 Access to affordable, appropriate and accessible housing

As renewal processes often involve the rehousing of residents, issues may arise regarding sourcing suitable accommodation that meets the needs of a variety of groups:

#### Women

Around 90% of single parents are women and they have the highest poverty rate amongst working- age adults, with 43% living in poverty (rising to 51% in London) <sup>87</sup>. This increases their risk of financial exclusion as women who are single parents are more likely to spend a higher portion of their income on housing costs. This can increase the risk of homelessness, with single mother families accounting for one quarter of all homeless households in London in 2019. <sup>88</sup>

#### LGBTQ+ people

Members of the LGBTQ+ community may also be affected by the availability of affordable housing when relocating to a new area. Research conducted within the World Habitat Report <sup>89</sup> states that personal experiences and wider institutional failings cause LGBTQ+ groups to disproportionately experience housing issues. One in five LGBTQ+ renters have experienced discrimination from a landlord or letting agent due to their gender identity or sexual orientation, which can in turn increase barriers to safe, secure and affordable housing. <sup>90</sup>

#### Children

There is an established relationship between the availability of housing and poor living conditions for **children**. In England, it is estimated that one in five children live in overcrowded, unaffordable or inadequate houses. Out of this number, 1.3 million children need social housing, with it being the only suitable and affordable form of housing. <sup>91</sup> Children who live in overcrowded accommodation have an increased risk of developing respiratory conditions, infections and psychological problems. <sup>92</sup> Overcrowding can also increase children's risk of injury, for example, bed sharing, which is more likely to occur in overcrowded houses, has been identified as a factor contributing to

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<sup>87</sup> Gingerbread (2019). 'Single parents- facts and figures'. Available at: <https://www.gingerbread.org.uk/what-we-do/media-centre/single-parents-facts-figures/> ; Gingerbread (2020). 'Living standards and poverty. Available at: <https://www.gingerbread.org.uk/policy-campaigns/living-standards-and-poverty/>

<sup>88</sup> Women's Budget Group (2019) *A home of her own*. Available at: [WBG19-Housing-Report-full-digital.pdf](#)

<sup>89</sup> World Habitat Report (no date) 'Left out: Why many LGBTQ+ people aren't accessing their right to housing in the UK' Available at: [Layout 1 \(thinkhouse.org.uk\)](#)

<sup>90</sup> HQN (2022) 'One in five LGBTQ+ private renters 'experienced discrimination' from a landlord or letting agent' Available at: [One in five LGBTQ+ private renters 'experienced discrimination' from a landlord or letting agent - HQN \(hqnetwork.co.uk\)](#)

<sup>91</sup> National Housing Federation (2021) *1 in 5 children in need of a new home*. Available at: [National Housing Federation - 1 in 5 children in need of a new home](#)

<sup>92</sup> House of Commons Communities and Local Government Committee (2011) '*Regeneration Sixth Report of Session 2010-12*'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>



Sudden Infant Death Syndrome (SIDS).<sup>93</sup> Overall, overcrowded, poor living conditions can negatively impact a child's emotional and physical health.<sup>94</sup>

## Disabled people

**Disabled people**, particularly those with a mobility impairment, often experience difficulties when trying to find new housing. Only 4% of those with mobility impairments have easily found accessible homes. Additionally, some disabled people have also experienced difficulties with local authorities being reluctant to fund adaptations that would support their independence.<sup>95</sup> A published report from the Equality and Human Rights Commission found a severe shortage of accessible housing, with one in three disabled people privately renting living in unsuitable accommodation. This figure is one in five for disabled people living in social housing, and one in seven for **disabled people** who own their own home. Only 7% of UK homes offer the basic four accessibility features to make a home fully liveable; level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level.<sup>96</sup>

**Disabled people** may be impacted by the availability of affordable homes when moving to new areas as they are more likely to live in poverty.<sup>97</sup> **Disabled people are** also less likely to be able to own their own home and are more likely to rent social housing than those who are not disabled.<sup>98</sup> People living with a disability in social housing can experience particularly acute effects. The 'removal of the spare room subsidy' or 'bedroom tax' in 2013 has had a disproportionate impact on disabled people in social housing as two thirds of those affected have a disability. Research shows that disabled people have found it difficult to take up proposed mitigation measures, such as taking up work, working longer hours or downsizing, and thus have had their income reduced by £12 to £22 per week, depending on the number of spare bedrooms. These changes have resulted in increased poverty and adverse effects on

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<sup>93</sup> The Child Safeguarding Practice Review Panel (2020) 'Out of routine: A review of sudden unexpected death in infancy (SUDI) in families where the children are considered at risk of significant harm'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

<sup>94</sup> National Children's Bureau (2016): 'Housing and the health of young children: Policy and evidence briefing for the VCSE sector'. Available at: <https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf>

<sup>95</sup> Leonard Cheshire Disability (2014): 'The hidden housing crisis' Available at: <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

<sup>96</sup> Department for Communities and Local Government (2015): 'English Housing Survey: Adaptations and Accessibility Report'

<sup>97</sup> Mayor of London (2020): 'Housing in London- 2020'. Available at: <https://data.london.gov.uk/dataset/housing-london>

<sup>98</sup> The Independent (2019). 'Homelessness amongst ill and disabled people rises 53% in a year, figures show'. Available at: <https://www.independent.co.uk/news/uk/home-news/homeless-disabled-ill-rough-sleeping-housing-crisis-a9251756.html>

health, well-being and social relationships of disabled residents in social housing.<sup>99</sup>

### Ethnic minority groups

Research from the English Housing Survey has shown that people belonging to **minority ethnic households** are more likely to live in overcrowded housing compared to the white British population. The highest rates of overcrowding were in Bangladeshi (22.5%), Arab (17.1%), black African (16.3%) and Pakistani (13.5%) households compared to white British households (1.7%).<sup>100</sup> Ethnic minority groups may also be impacted by the availability of affordable housing when relocating. Rent is less affordable for most ethnic minority groups compared to white British households. For example, after housing costs 53% of Bangladeshi households and 49% of Pakistani households live in low-income households.<sup>101</sup> Therefore, it is possible that ethnic minority groups could experience difficulties in accessing accommodation that meets their needs.

### Older people

When relocating, a lack of affordable or suitable housing is more likely to adversely affect older people (and particularly pensioners) who have lower average incomes than working-age people. Research from Age UK found that 1.9 million (16%) of pensioners in the UK live in relative poverty, with private tenants and social rented sector tenants most at risk.<sup>102</sup> A lack of financial means can make relocation more challenging, with limited affordable housing options available.

Older people are also more likely to need specialist housing which meets their needs. Projections suggest that 38,000 new homes for older people are needed, increasing significantly from the current average of 8,000.<sup>103</sup> As such, older people may find it more challenging to relocate to appropriate housing.

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<sup>99</sup> Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. *Journal of Public Health*, 38(2), pp. 197-205

<sup>100</sup> Ministry of Housing, Communities and Local Government (MHCLG) (2023) *English Housing Survey*. Available at: [Overcrowded households - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://www.gov.uk/government/statistics/overcrowded-households)

<sup>101</sup> Shankley, W. and Finney, N. (2020) *Ethnic minorities and housing in Britain*, Byrne, B., Alexander, C., Khan, O., Nazro, J., Shankley, W. (eds.) Ethnicity and Race in the UK. Bristol University Press: Policy Press.

<sup>102</sup> Age UK (2024) *Poverty and financial disadvantage in later life*. Available at: [poverty-and-financial-disadvantage-in-later-life-briefing-2024.pdf \(ageuk.org.uk\)](https://www.ageuk.org.uk/~/media/ageuk/2024/04/poverty-and-financial-disadvantage-in-later-life-briefing-2024.pdf)

<sup>103</sup> National Housing Federation (2024) *Developing specialist housing for older people: opportunities and barriers*. Available at: <https://www.housing.org.uk/globalassets/files/supported-housing/2pp-new-opfhg-a4-v1.pdf>

## B.1.7 Health effects

### B.1.7.1 Health effects associated with relocation

Relocation can have a negative impact on an individual's mental health and well-being, as measured by the SF-12 Mental Health Composite Score<sup>104</sup> and Warwick-Edinburgh Mental Wellbeing Scale test.<sup>105</sup> These tests have shown that relocation can create increased levels of depression and anxiety.<sup>106</sup> The associated impacts have been found to be more severe when there is a lack or perceived lack of control over the decision.

## Children

**Children and young people** are especially vulnerable to the disruption caused by involuntary relocation. This process can cause stress and anxiety among this group when adapting to new routines. Research has found that relocation can increase children's inactivity; as the travel distance to school increases, the transportation mode choice of children can change from active transportation such as cycling or walking, to sedentary transportation, such as vehicular transport.<sup>107</sup>

## Older people

As noted above, for **older people**, the loss of community connections can result in negative health outcomes. For example, feelings of isolation and loneliness can lead to poor mental health and a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism) and a greater risk of hospitalisation.<sup>108</sup> The charity Mind, has described the negative effects of relocation on sleep and overall mental wellbeing.<sup>109</sup> The term 'relocation stress syndrome' highlights the negative effects from the stress of relocating, such as anxiety, depression and loneliness amongst elderly people.<sup>110</sup>

## Ethnic minority

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<sup>104</sup> The SF-12 is a multipurpose short form survey with 12 questions, all selected from the SF-36 Health Survey (Ware, Kosinski, and Keller, 1996). The questions are combined, scored, and weighted to create two scales that provide glimpses into mental and physical functioning and overall health-related-quality of life.

<sup>105</sup> The Warwick-Edinburgh Mental Well-being scale was developed to enable the monitoring of mental wellbeing in the general population and the evaluation of projects, programmes and policies which aim to improve mental wellbeing. WEMWBS is a 14 item scale with 5 response categories, summed to provide a single score ranging from 14-70. The items are all worded positively and cover both feeling and functioning aspects of mental wellbeing.

<sup>106</sup> Cleland, C., Kearns, A., Tannahill, C. and Ellaway, A. (2016). The impact of life events on adult physical and mental health and well-being: longitudinal analysis using the GoWell health and well-being survey. Available at: <https://bmcr.esnotes.biomedcentral.com/articles/10.1186/s13104-016-2278-x>

<sup>107</sup> Department for Transport (2020): 'National Travel Survey 2019?'

<sup>108</sup> IoTUK (2017): 'Social Isolation and Loneliness in the UK'. Available at: [Microsoft Word - Social Isolation and Loneliness Landscape UK v6.docx \(catapult.org.uk\)](#)

<sup>109</sup> Mind (2021) 'Housing and mental health' Available at: [How can housing affect mental health? - Mind](#)

<sup>110</sup> Wiyono, H., Sukartini, T. and Mundakir, M. (2019) 'An overview of loneliness, anxiety and depression level of elderly suspected relocation stress syndrome', *The 9<sup>th</sup> International Nursing Conference*, pp.609-612.

Individuals belonging to ethnic minority backgrounds often rely on social networks for their wellbeing compared to other groups.<sup>111</sup> Research suggests that community organisations are considered places for promoting health and wellbeing by sharing health messages which can be shared across these communities.<sup>112</sup>

## Pregnancy and maternity

Relocation can also have adverse health effects on those who are **pregnant**. Evidence suggests that disruption to prenatal care can have detrimental health impacts on a pregnant person.<sup>113</sup> Disruptions in prenatal care have resulted in clinically elevated depression, anxiety, and pregnancy-related anxiety symptoms.<sup>114</sup> If relocation changes preestablished prenatal services and relationships, this could negatively impact pregnant individuals.

### B.1.7.2 Health and wellbeing of the population

**Children** may also be disproportionately affected by changes in noise pollution, due to ongoing cognitive development occurring throughout the demolition and construction stages of a scheme.<sup>115</sup> As they are less likely to have the skills to cope with changes in their environment, this can exacerbate any stress they experience. Similarly, **older people** suffering from dementia may feel overwhelmed with sensory stimulation, causing stress and confusion. Additionally, research has linked noise pollution to several adverse outcomes for older people, including cardiovascular diseases, sleep disturbance, tinnitus, and stress.<sup>116</sup>

**Older people and disabled people** are more likely to be impacted by the changes in air quality that are associated with the demolition and construction phase of the redevelopment. Older people are more likely to have respiratory or cardiovascular illness when compared to other groups, making them more susceptible to the effects of air pollution. Those with COPD (Chronic Obstructive Pulmonary Disorder) are particularly at risk.<sup>117</sup> Disabled people with

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<sup>111</sup> Baskin, C., et al. (2020) 'Community-centred interventions for improving public mental health among adults from ethnic minority populations in the UK: a scoping review', *The British Medical Journal*, 11 (4). Available at: [Community-centred interventions for improving public mental health among adults from ethnic minority populations in the UK: a scoping review | BMJ Open](#)

<sup>112</sup> Baskin, C. (2020) Black and Minority Ethnic adults: a scoping review of UK mental health and wellbeing community interventions. Available at: [PowerPoint Presentation \(nih.ac.uk\)](#)

<sup>113</sup> Frontiers in Global Women's Health (2021): 'Prenatal Care Disruptions and Associations With Maternal Mental Health During the COVID-19 Pandemic'

<sup>114</sup> Frontiers in Global Women's Health (2021): 'Prenatal Care Disruptions and Associations With Maternal Mental Health During the COVID-19 Pandemic'

<sup>115</sup> Gupta, A. et al (2018): 'Noise Pollution and Impact on Children Health'. Available at: <https://link.springer.com/article/10.1007/s12098-017-2579-7>

<sup>116</sup> World Health Organisation (2011): 'Burden of disease from environmental noise Quantification of healthy life years lost in Europe'. Available at: [http://www.who.int/quantifying\\_ehimpacts/publications/e94888.pdf?ua=1](http://www.who.int/quantifying_ehimpacts/publications/e94888.pdf?ua=1)

<sup>117</sup> Asthma UK (2017). 'Pollution'. Available at <https://www.asthma.org.uk/advice/triggers/pollution/>

heart or lung conditions are also at an increased risk of becoming ill and needing treatment as a result of air pollution.<sup>118</sup>

There are also associated health effects related to demolition and construction on **pregnancy and maternity**. Air pollution exposure during pregnancy can have significant impacts on maternal health, being linked to an increased risk of pre-eclampsia, a serious cardiovascular condition in pregnancy.<sup>119</sup> Antenatal exposure to air pollution can affect the lung development of a baby whilst in the womb. This suggests that exposure to significant levels of air pollution can increase the risk of premature birth and low birth weight.

Exposure to air pollution during infancy can result in neurodevelopment and long-term cognitive health problems.<sup>82</sup> In addition, research from Asthma UK highlights that air pollution is more detrimental to children when compared to other age groups with the condition. This is because children have faster breathing rates and lungs that are still developing.<sup>120</sup>

### B.1.8 Safety and security

In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behaviour and crime such as increased vandalism, arson, break-ins and other damage to neighbouring homes.<sup>121</sup> As a result, feelings of safety are important to consider during the regeneration process.

#### Disabled people

Research has found that in urban areas, active travel routes are associated with an increased perception of risk, often due to poor lighting or a lack of people using the route. This perception of crime can impact disabled people who are at a higher risk of being a victim or witnessing a crime. This reiterates research which has highlighted that **groups who were more likely to have had contact with their local police as a victim or witness include men, disabled people, people from ethnic minority groups and younger people aged 16-34.**<sup>122</sup>

<sup>118</sup> Department for Environmental Food and Rural Affairs (2013): 'Guide to UK Air Pollution Information Resources'. Available at: [1307241318\\_Guide\\_to\\_UK\\_Air\\_Pollution\\_Information\\_Resources.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/130724/1318_Guide_to_UK_Air_Pollution_Information_Resources.pdf) (defra.gov.uk)

<sup>119</sup> Pedersen M. et al. (2014) Ambient air pollution and pregnancy-induced hypertensive disorders: a systematic review and meta-analysis, *Hypertension*, 64 (3), pp. 494- 500. Available at: [Ambient air pollution and pregnancy-induced hypertensive disorders: a systematic review and meta-analysis - PubMed \(nih.gov\)](https://pubmed.ncbi.nlm.nih.gov/25411111/)

<sup>120</sup> British Lung Foundation (2016): 'How air pollution affects your children's lungs'. Available at: <https://www.blf.org.uk/support-for-you/signs-of-breathing-problems-in-children/air-pollution>

<sup>121</sup> Power, A. (2010): 'Housing and sustainability: demolition or refurbishment?' Available at [https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1406191156\\_060618\\_Guide\\_to\\_UK\\_Air\\_Pollution\\_Information\\_Resources-issue\\_2-FINAL.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1406191156_060618_Guide_to_UK_Air_Pollution_Information_Resources-issue_2-FINAL.pdf) <https://www.icevirtuallibrary.com/doi/abs/10.1680/udap.2010.163.4.205>

<sup>122</sup> Future Thinking, (2018), 'Attitudes to safety and security: annual report 2017-2018', TfL Compliance, Policing and on-street services.

Therefore, it should be considered that changes to public spaces can have a disproportionate effect on feelings of safety for this group.

## LGBTQ+

Research has found that three in ten LGBTQ+ people might choose to adapt behaviour when deciding whether to walk down a certain street.<sup>123</sup> This relates to an increase in hate crimes related to sexual orientation rising by 25%.<sup>124</sup> Therefore, it should be noted that people's sexual orientation may impact their feelings of safety in public urban areas.

## Women

Demolition during regeneration can affect perceptions of safety. Changes to safety procedures, such as lighting and clear signage influence women's decision-making when in public.<sup>125</sup> When walking in a badly lit neighbourhood, women were considerably more likely to report feeling 'very unsafe' when compared to men; 48% compared to 19%.<sup>126</sup> With almost two-thirds of women in the UK feeling unsafe when walking alone,<sup>127</sup> the environment of public areas can play a large role in the perceived accessibility of places for this group. Therefore, it is important to maintain safety features in areas undergoing regeneration, especially when communities remain in the area.

### B.1.9 Accessibility and mobility in the area

Evidence suggests that during renewal, construction can affect the accessibility and mobility of the local area.<sup>128</sup> Increased traffic from construction vehicles can reduce parking availability, block access to homes, shops, bus stops, pavements and safe routes, as well as negatively affecting wayfinding.

## Children

Increased road traffic levels and roadworks may reduce **children's** access to community and recreational facilities. This can have negative impacts on

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<sup>123</sup> Bachmann, C and Gooch, B. (2017): 'LGBT in Britain: Hate Crime and Discrimination'

<sup>124</sup> Home Office (2019): 'Hate crime, England and Wales, 2018/2019'

<sup>125</sup> Department for Transport (2020) 'TAG Unit A4.1: Social Impact Appraisal'

<sup>126</sup> Neighbourhood Watch (2013): 'Street lighting and perceptions of safety survey, November 2013'

<sup>127</sup> Plan International (2016): 'Almost two thirds of women feel unsafe walking alone after dark'

<sup>128</sup> Ancaes, P. R., Jones, P. and Mindell, J. S. (2015) Community Severance: Where Is It Found and at What Cost? *Transport Reviews*, 36 (3), pp. 293- 317. Available at: [Full article: Community Severance: Where Is It Found and at What Cost? \(tandfonline.com\)](https://doi.org/10.1080/03081079.2015.1054444)

children's wellbeing as open spaces away from home and school can encourage psychical activity, reducing obesity and improving physical health.<sup>129</sup>

### Disabled people

National Travel Survey data shows disabled people are generally more likely to experience travel difficulties in the daily trips that they make.<sup>130</sup> Wheelchair users may struggle with narrowed paths during the construction process of renewal, limiting their accessibility to facilities in the area. This can create feelings of isolation and poor mental wellbeing. The presence of vehicular traffic during construction can also act as a barrier for disabled people. Disabled people who travel by car are more likely to report difficulties due to congestion and roadworks, especially where the severity of the disability increases.<sup>131</sup>

### Older people

During renewal and construction, community facilities in a housing estate can be relocated and public transport services can be changed. Older people may find it difficult to travel to new locations, which may be further away from their home, or navigate new routes. Altogether, this can heighten feelings of loneliness and isolation.<sup>132</sup>

## B.1.10 Information and communication

Regeneration often involves complex material and information which may present a challenge to those who have different information and communication needs. This includes but is not limited to people with learning disabilities, people with low literacy levels, older people, people with visual or hearing impairments and people who use English as a second language. Evidence suggests that the following processes can ensure that information documents are fully accessible to everyone and reduce concerns regarding access to information:<sup>133</sup>

- information should avoid jargon;
- pictures should be included to support the text information;
- the format, layout and length of document should be carefully considered;

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<sup>129</sup> Hiscock, R. and Mitchell, R. (2011) What is needed to deliver places that provide good health to children? Available at: ["The lack of play and green space for children in disadvantaged areas is very significant" \(edphis.org.uk\)](https://www.edphis.org.uk)

<sup>130</sup> Department for Transport (2020): 'National Travel Survey 2019?'

<sup>131</sup> Department for Transport (2017) 'Disabled people's travel behaviour and attitudes to travel' Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/647703/disabled-peoples-travel-behaviour-and-attitudes-to-travel.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647703/disabled-peoples-travel-behaviour-and-attitudes-to-travel.pdf)

<sup>132</sup> NatCen (2019): 'Transport, health and wellbeing: an evidence review for the Department for Transport'

<sup>133</sup> Change (2015) How To Make Information Accessible: A guide to producing easy read documents'. Available at: [How-to-make-info-accessible-guide-2016-Final \(changepeople.org\)](https://www.changepeople.org/)

- easy read, braille, audio and large print should be provided upon request;
- information should be translated into people's first language upon request.
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## B.2 Impact on community following regeneration

### B.2.1 Improved housing provision

The relocation of residents during renewal can have positive outcomes. Residents can be relocated to areas with more green space and better air quality. The regeneration of the site will improving housing provision, increasing capacity and quality.

#### Children

Relocation can improve standards of living for **children** as they move to better quality homes that are more energy efficient. **Children** are disproportionately vulnerable to the effects of fuel poverty, with those living in cold homes twice as likely to suffer from a variety of respiratory illnesses compared to children living in warm homes.<sup>134</sup> Cold housing can negatively impact children's educational attainment and emotional wellbeing.<sup>135</sup> In such instances, relocation can improve outcomes for children.

#### Older people

Effects of cold housing are also evident among **older people**. On average, this group spend 80% of their time at home, making them more susceptible to cold or damp related health problems. Cold living conditions can exacerbate existing conditions such as arthritis and rheumatism, increase levels of minor illnesses such as colds and flu, harm mental health and ultimately increase mortality rates.<sup>136</sup> Relocation can improve housing standards, improving the psychical and mental wellbeing of this group.

#### Ethnic minority groups

In England, **ethnic minority households** are more likely to live in fuel poverty, at 19.1% in 2021 compared to 12.6% of White households (including White ethnic households).<sup>137</sup> Therefore, relocation to housing with improved energy efficiency may benefit this group.

#### Disabled people

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<sup>134</sup> Marmot Review Team. (2011). 'The Health Impacts of Cold Homes and Fuel Poverty'

<sup>135</sup> Liddell, Save The Children (2008) *The impact of Fuel Poverty on Children*. Available at: [Fuel Poverty FINAL \(savethechildren.org.uk\)](https://www.savethechildren.org.uk)

<sup>136</sup> The Housing and Ageing Alliance (2013) 'Policy Paper: Health, Housing and Ageing', Available at [www.housingling.org/HAA/](http://www.housingling.org/HAA/)

<sup>137</sup> Department for Business, Energy and Industrial Strategy (2022): 'Fuel Poverty'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/fuel-poverty/latest>



According to Scope, a disability charity, long-term impairments or conditions can increase energy costs. In particular, those with limited mobility often consume more energy and have reported needing more heating to stay warm.<sup>138</sup> 38% of households considered 'fuel poor' have a disabled resident.<sup>139</sup> Research from the Office for National Statistics have found that more than half (55%) of **disabled people** struggle to afford their energy bills, compared to 40% of non-disabled adults.<sup>140</sup> This suggests that relocation may offer benefits to disabled people with their quality of housing.

### B.2.2 Safety and security

During the demolition in the renewal process, sites may be vacated and fall into disrepair. This leaves the area and vulnerable groups remaining in the community at risk of anti-social behaviour and crime such as vandalism, arson and trespassing.<sup>141</sup> Existing research has identified a number of groups included in the 2010 Equality Act who are more likely to be victims or witnesses of crime:<sup>142</sup>

- **Men** are more likely to be victims of violent crime than women.<sup>143</sup>
- **Younger people** aged 16 to 24 are more likely to be victims of crime than those in older age groups.<sup>144</sup>
- **People with disabilities** are more likely to be victims of violent crime than those without disabilities.<sup>145</sup>
- **Mixed and Asian ethnic groups** are more likely to have said they were victim of crime compared to white people.<sup>146</sup>
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<sup>138</sup> Scope (2018) 'Out in the Cold', Available at <https://www.scope.org.uk/Scope/media/Images/Out-in-the-cold.pdf>

<sup>139</sup> Scope (2018): 'Out in the cold'. Available at: <https://www.barrowcadbury.org.uk/wp-content/uploads/2018/03/Out-in-the-cold-Scope-report.pdf>

<sup>140</sup> Office for National Statistics (2021) Disability, England and Wales: Census 2021. Available at: [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/disabilityandlongtermhealth/briefingsandreports/articles/disability-england-and-wales)

<sup>141</sup> Smirniotis, C., Henderson, M., Bailey, B.A. and Kagawa, R.M.C. (2022) 'Crime and Building Rehabilitation or Demolition: A Dose-Response Analysis', *International Journal of Environmental Research and Public Health*, 19 (20). Available at: [IJERPH | Free Full-Text | Crime and Building Rehabilitation or Demolition: A Dose-Response Analysis \(mdpi.com\)](https://www.mdpi.com/1660-4726/19/20/3987)

<sup>142</sup> Ipsos MORI (2016): 'Public views of policing in England and Wales'. Available at: <https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Publications/sri-public-views-of-policing-in-england-and-wales.pdf>

<sup>143</sup> ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/the-nature-of-violent-crime-in-england-and-wales)

<sup>144</sup> ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/the-nature-of-violent-crime-in-england-and-wales)

<sup>145</sup> ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/the-nature-of-violent-crime-in-england-and-wales)

<sup>146</sup> Gov.uk (2019) 'Victims of crime'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest>

- In addition, the fear of crime is also more prevalent amongst protected characteristic groups, affecting mental health and wellbeing.<sup>147</sup> It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as **children, older people, ethnic minority groups and women**.<sup>148</sup>

### B.2.3 New employment and business opportunities

Redevelopment and regeneration can support job creation, promoting economic growth.<sup>149</sup> Improved opportunities to access employment and education can address issues of inequality and improve social mobility by removing barriers to employment, faced by marginalised groups such as **older people, disabled people, and those from ethnic minority backgrounds**.

#### Women

These opportunities also have the potential to positively affect **young people and women**. There are notable barriers women face in employment, such as, the gender pay gap, underrepresentation in leadership roles and gender norms which all enforce discrimination.<sup>150</sup> Job creation offers women new opportunities to find a range of work which reflects their skills and expertise, allowing them more options in accessing suitable employment.

#### Young people

Recent statistics show that in 2023 11.9% of **young people** were not in education, employment or training (NEET).<sup>151</sup> Furthermore, it has been found that young people are four times more likely to be unemployed than their adult counterparts aged 25-64.<sup>152</sup> This highlights that young people can be disproportionately benefitted by employment opportunities from redevelopment. Additionally, analysis of national unemployment trends highlights that the rate of national unemployment is disproportionately high for **ethnic minority** groups in

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<sup>147</sup> Lorenc, T., Petticrew, M., Whitehead, M., Neary, D., Clayton, S., Wright, K., Thomson, H., Cummins, S., Sowden, A. and Renton, A. (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence', *BMC Public Health*, 13 (496). Available at: [Fear of crime and the environment: systematic review of UK qualitative evidence \(nih.gov\)](#)

<sup>148</sup> Lorenc, T et al (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC366893/>

<sup>149</sup> Communities and Local Government (2012) 'Regeneration to enable growth: A toolkit supporting community-led regeneration'. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/5983/2064899.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/5983/2064899.pdf)

<sup>150</sup> Hanek, K.J. and Garcia, S.M. (2022) 'Barriers for women in the workplace: A social psychological perspective', *Social and Personality Psychology Compass*. Available at: [Barriers for women in the workplace: A social psychological perspective - Hanek - 2022 - Social and Personality Psychology Compass - Wiley Online Library](#)

<sup>151</sup> GOV.UK (2024) NEET age 16 to 24. Available at: [NEET age 16 to 24, Calendar year 2023 - Explore education statistics - GOV.UK \(explore-education-statistics.service.gov.uk\)](#)

<sup>152</sup> UK Government (2018) 'Unemployment'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

comparison to white British people<sup>153</sup>, furthering the opportunities renewal can have on groups with protected characteristics.

#### B.2.4 Improved access, mobility and navigation

Aging and being disabled can lead to a decline in physical or cognitive functions, resulting in decreased social activity and narrowing of social networks.<sup>154</sup> Leisure activities are considered to be effective mediators between social relationships and wellbeing of **older people** and **disabled people**. This is because leisure is scientifically proven to help people overcome their stress resulting from a chronic condition or negative life event. Leisure activities provide disabled and old people with social support, and further mediate their stress-health relationship. Availability of leisure services and facilities could therefore benefit older and disabled people, who are in a greater need for social interaction than the general population.<sup>155</sup>

#### B.2.5 Improvements in public realm and urban green space

The ability to access public spaces and green environments is important for all members of society, to improve their sense of belonging<sup>156</sup> and physical wellbeing.<sup>157</sup> Specifically, green spaces have been shown to improve attention, lower muscle tension and improve emotional state.<sup>158</sup> However, it has been found that participation in public spaces, including green spaces, is variable, with some disabled people, older people, children and those belonging to ethnic minority communities having particular difficulties in assessing these arenas.<sup>159</sup> Regeneration can be used as an opportunity to improve accessibility and social mobility.

#### Older people

A report from TfL has found that unmaintained public areas, such as poor upkeep of streets and lack of rest areas, increase the difficulty **older people** experience when navigating public spaces and may increase levels of

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<sup>153</sup> Runnymede Trust. (2016): 'Ethnic Inequalities in London: Capital for All'.

<sup>154</sup> Wray et al. (2014): 'Social relationships, leisure activity and health in older adults' Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4467537/>

<sup>155</sup> Liu et al. (2018): 'Social interaction patterns of the disabled people in asymmetric social dilemmas' Available at: <https://www.frontiersin.org/articles/10.3389/fpsyg.2018.01683/full>

<sup>156</sup> White, M.P., Alcock, I., Wheeler, B.W. and Depledge, M.H. (2013) 'Would You Be Happier Living in a Greener Urban Area? A Fixed-Effects Analysis of Panel Data', *Psychological Science*, 24 (6). Available at: [Would You Be Happier Living in a Greener Urban Area? A Fixed-Effects Analysis of Panel Data - Mathew P. White, Ian Alcock, Benedict W. Wheeler, Michael H. Depledge, 2013 \(sagepub.com\)](https://www.sagepub.com/journalsPermissions.nav?path=/journals/psychological-science/article/10.1177/0956797613500000)

<sup>157</sup> World Health Organisation (2016) *Urban green spaces and health*. Available at: [Urban green spaces and health \(who.int\)](https://www.who.int/urban-green-spaces-and-health)

<sup>158</sup> Brown, K. (2012): 'Integrating green and blue spaces into our cities: Making it happen'. [https://www.researchgate.net/publication/334391615\\_Integrating\\_green\\_and\\_blue\\_spaces\\_into\\_our\\_cities\\_Making\\_it\\_happen/link/5d2721c692851cf44079a21e/download?\\_tp=eyJjb250ZXh0Ijp7InBhZ2UiOiJwdWJsaWNhdGlvbilsInByZXZpb3VzUGFnZSI6bnVsbH19](https://www.researchgate.net/publication/334391615_Integrating_green_and_blue_spaces_into_our_cities_Making_it_happen/link/5d2721c692851cf44079a21e/download?_tp=eyJjb250ZXh0Ijp7InBhZ2UiOiJwdWJsaWNhdGlvbilsInByZXZpb3VzUGFnZSI6bnVsbH19)

anxiety around travel.<sup>160</sup> Environmental barriers, such as poor signage, lots of noise and uneven pavements can be a concern for older people and prevent their access to outside spaces.<sup>161</sup> Social contact can be encouraged through urban green space, promoting cohesion and a sense of community. This is particularly important for the health and wellbeing of **older people**, having been shown to increase mortality rates.<sup>162</sup> Opportunities to improve this can be achieved through regeneration, highlighting the beneficial impacts this process can have on older people.

## Disabled people

Similarly, **disabled people** can find public spaces difficult to access. Vehicular traffic and inaccessible design can create a barrier for disabled people when interacting within their communities.<sup>163</sup> This may increase their rates of social isolation, harming their mental wellbeing. Renewal provides opportunities to use inclusive design, ensuring that all individuals are able to feel that they are active members of their community. This includes basic tasks such as using local shops or meeting up with people in a shared space outside close to home.

## Ethnic minority communities

Evidence suggests that **ethnic minority groups** visit greenspace 60% less than the rest of the adult English population.<sup>164</sup> This puts them at greater physical and mental health risks, and results in social exclusion. Furthermore, this group tend to have less access to green space

than areas which are predominately white. For example, wards with an ethnic minority population of less than 2% have six times as much green space as wards where the ethnic minority population is over 40%.<sup>165</sup> Increasing the provision of green space will provide opportunities for this group to access spaces that encourage socialisation and improvements to overall well-being. Research has also shown that individuals belonging to ethnic minority communities in urban environments perceive themselves as vulnerable due to previous victimisation or harassment. As a result, maintaining the public realm through regeneration efforts can help to ensure all residents feel safe.

## Children

**Children** are also likely to benefit from increased green space in urban environments. During early childhood, children gain vital social, conceptual and creative skills through outdoor free play.<sup>166</sup> A study by University College London found that access to green space has a positive impact on cognitive functioning for **children**.<sup>167</sup> Further research suggests that in early childhood, children gain vital social, conceptual and creative skills through outdoor free play.<sup>168</sup> According to Public Health England, there is a

<sup>160</sup> TfL (2016): 'Older Londoners' perceptions of London streets and the public realm: Final report'

<sup>161</sup> Phillips, J., Walford, N., Hockey, A., Foreman, N. and Lewis, M. (2013) 'Older people and outdoor environments: Pedestrian anxieties and barriers in the use of familiar and unfamiliar spaces', *Geoforum*, 47. Available at: [Older people and outdoor environments: Pedestrian anxieties and barriers in the use of familiar and unfamiliar spaces - ScienceDirect](#)

<sup>162</sup> World Health Organisation (2016): 'Urban green spaces and health, a review of evidence'. Available at: [http://www.euro.who.int/\\_data/assets/pdf\\_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1](http://www.euro.who.int/_data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1)

<sup>163</sup> House of Commons Women and Equalities Committee (2017): 'Building for Equality: Disability and the Built Environment'.

<sup>164</sup> Haqqani, N. (2022) *Ethnic Minority Inclusion and Participation in Urban Greenspace: Good practices of UK Friends Groups*. Available at: [NFPGS-Ethnic-Diversity-and-Friends-Groups-Research-Report-9.2022.pdf \(natfedparks.org.uk\)](#)

<sup>165</sup> Commission for Architecture and the Built Environment (2010): 'Community green: Using local spaces to tackle inequality and improve health'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/community-green-full-report.pdf>

<sup>166</sup> Charan, G.S., Kalia, R., Khurana, M.S. and Narang G.S. (2024) 'From Screens to Sunshine: Rescuing Children's Outdoor Playtime in the Digital Era', *Journal of Indian Association for Child and Adolescent Mental Health*, pp. 11- 17. Available at: [From Screens to Sunshine: Rescuing Children's Outdoor Playtime in the Digital Era - Gopal Singh Charan, Raman Kalia, Mandeep Singh Khurana, Gursharan Singh Narang, 2024 \(sagepub.com\)](#)

<sup>167</sup> UCL (2018): 'Greener neighbourhoods may be good for children's brains'.

<sup>168</sup> Nation Children's Bureau (2007): 'Free Play in Early Childhood'

positive association between green living environments and mental health outcomes in **children**, such as improved emotional wellbeing, reduced stress, improved resilience, and higher health-related quality of life.<sup>169</sup> **Children** in London can experience difficulties accessing green space compared to the general population as there are significant deficiencies in green space in the city. The positive impact the creation green space can have on **children** in this location is disproportionate.

### B.2.6 Provision of community facilities and changes to social cohesion

Community facilities provide necessary opportunities for social connection and wellbeing across a range of vulnerable groups such as, **children, older people, disabled people, people from an ethnic minority background, Pregnant people and members of the LGBTQ+ community**<sup>170</sup>. For example, socialisation has been found to have a positive effect on the loneliness of older people, in turn providing health benefits for this demographic.<sup>171</sup> Regeneration can improve the provision of community spaces, positively impacting these groups who often face barriers to participation.

Improved provision of affordable sports facilities has been linked to reduced crime rates and anti-social behaviour amongst young people.<sup>172</sup> Therefore, facilities improved by regeneration can support personal development, self-regulation and problem-solving skills. This shows that development can have significant positive impacts on this group.

### B.2.7 New employment and business opportunities

Redevelopment and regeneration can support job creation, promoting economic growth.<sup>173</sup> Improved opportunities to access employment and education can address issues of inequality and improve social mobility by removing barriers to employment, faced by marginalised groups such as **older people, disabled people, and those from ethnic minority backgrounds**.

These opportunities also have the potential to positively affect **young people and women**. There are notable barriers women face in employment, such as, the gender pay gap, underrepresentation in leadership roles and gender norms

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<sup>169</sup> Public Health England (2020): 'Improving access to greenspace: A new review for 2020'.

<sup>170</sup> Assembly, N. I. (2010). 'Barriers to Sports and Physical Activity Participation'.

<sup>171</sup> National Institute on Aging (2024) Loneliness and Social Isolation – Tips for Staying Connected. Available at: [Loneliness and Social Isolation — Tips for Staying Connected | National Institute on Aging \(nih.gov\)](https://www.nia.nih.gov/health/loneliness-and-social-isolation-tips-for-staying-connected)

<sup>172</sup> Youth Endowment Fund (2021) Sports Programmes- Toolkit technical report. Available at: [Sports-Programmes-Technical-Report.pdf \(youthendowmentfund.org.uk\)](https://www.youthendowmentfund.org.uk/wp-content/uploads/2021/07/Sports-Programmes-Technical-Report.pdf)

<sup>173</sup> Communities and Local Government (2012) 'Regeneration to enable growth: A toolkit supporting community-led regeneration'. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/5983/2064899.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/5983/2064899.pdf)

which all enforce discrimination.<sup>174</sup> Job creation offers women new opportunities to find a range of work which reflects their skills and expertise, allowing them more options in accessing suitable employment.

Recent statistics show that in 2023 11.9% of **young people** were not in education, employment or training (NEET).<sup>175</sup> Furthermore, it has been found that young people are four times more likely to be unemployed than their adult counterparts aged 25-64.<sup>176</sup> This highlights that young people can be disproportionately benefitted by employment opportunities from redevelopment. Additionally, analysis of national unemployment trends highlights that the rate of national unemployment is disproportionately high for **ethnic minority** groups in comparison to white British people<sup>177</sup>, furthering the opportunities renewal can have on groups with protected characteristics.

### B.2.8 Safety and security

During the demolition in the renewal process, sites may be vacated and fall into disrepair. This leaves the area and vulnerable groups remaining in the community at risk of anti-social behaviour and crime such as vandalism, arson and trespassing.<sup>178</sup> Existing research has identified a number of groups included in the 2010 Equality Act who are more likely to be victims or witnesses of crime:<sup>179</sup>

- **Men** are more likely to be victims of violent crime than women.<sup>180</sup>
- **Younger people** aged 16 to 24 are more likely to be victims of crime than those in older age groups.<sup>181</sup>

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<sup>174</sup> Hanek, K.J. and Garcia, S.M. (2022) 'Barriers for women in the workplace: A social psychological perspective', *Social and Personality Psychology Compass*. Available at: [Barriers for women in the workplace: A social psychological perspective - Hanek - 2022 - Social and Personality Psychology Compass - Wiley Online Library](#)

<sup>175</sup> GOV.UK (2024) NEET age 16 to 24. Available at: [NEET age 16 to 24, Calendar year 2023 - Explore education statistics - GOV.UK \(explore-education-statistics.service.gov.uk\)](#)

<sup>176</sup> UK Government (2018) 'Unemployment'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

<sup>177</sup> Runnymede Trust. (2016): 'Ethnic Inequalities in London: Capital for All'.

<sup>178</sup> Smirniotis, C., Henderson, M., Bailey, B.A. and Kagawa, R.M.C. (2022) 'Crime and Building Rehabilitation or Demolition: A Dose-Response Analysis', *International Journal of Environmental Research and Public Health*, 19 (20). Available at: [IJERPH | Free Full-Text | Crime and Building Rehabilitation or Demolition: A Dose-Response Analysis \(mdpi.com\)](#)

<sup>179</sup> Ipsos MORI (2016): 'Public views of policing in England and Wales'. Available at: <https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Publications/sri-public-views-of-policing-in-england-and-wales.pdf>

<sup>180</sup> ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

<sup>181</sup> ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

- **People with disabilities** are more likely to be victims of violent crime than those without disabilities.<sup>182</sup>
- **Mixed and Asian ethnic groups** are more likely to have said they were victim of crime compared to white people.<sup>183</sup>
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- In addition, the fear of crime is also more prevalent amongst protected characteristic groups, affecting mental health and wellbeing.<sup>184</sup> It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as **children, older people, ethnic minority groups and women**.<sup>185</sup>

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<sup>182</sup> ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

<sup>183</sup> Gov.uk (2019) 'Victims of crime'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest>

<sup>184</sup> Lorenc, T., Petticrew, M., Whitehead, M., Neary, D., Clayton, S., Wright, K., Thomson, H., Cummins, S., Sowden, A. and Renton, A. (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence', *BMC Public Health*, 13 (496). Available at: [Fear of crime and the environment: systematic review of UK qualitative evidence \(nih.gov\)](https://doi.org/10.1186/1471-2325-13-496)

<sup>185</sup> Lorenc, T et al (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3666893/>





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