



Old Kent Road Area Action Plan
Proposed Submission Version
October 2024
Equalities Impact Assessment

EQIA Document 01: Executive Summary

Old Kent Road Area Action Plan 2024 appendices: Document Locator	
No.	Title
Appendix A	Old Kent Road AAP 2024
Appendix B	Consultation Plan
Appendix C	Consultation Report
Appendix D	Integrated Impact Assessment
Appendix E	Habitats Regulations Assessment
Appendix F	Equalities Impact Assessment, comprising:
	- EQIA Document 01: Executive Summary
	- EQIA Document 02: Summary of the EQIA
	- EQIA Document 03: Equalities Impact Assessment
Appendix G	Health Impact Assessment

Executive Summary

Introduction

1. This Equalities Impact Assessment (EQIA) considers the equalities impacts of the consolidated version of the Old Kent Road Area Action Plan (AAP). It is a document that will continue to be reviewed by The Council –under its statutory duty– at each stage of the Regulation 19 process, through Examination in Public, and post AAP adoption, to reflect any changes in context.
2. The following paragraphs provide the Executive Summary to the EQIA, covering:
 - the objectives of the proposed Old Kent Road AAP 2024 within the framework set by the Southwark Plan 2022;
 - the Purpose of an Equalities Assessment on Planning Policy;
 - the Approach and Structure of the Equalities Impact Assessment;
 - equalities Issues in Southwark; and
 - how the Council seeks to resolve these issues in planning policy.

Objectives of the Old Kent Road AAP

3. As set out in the Southwark Plan 2022, the Council will lead the way in London to build more homes of every kind in borough and to use every tool at our disposal to increase the supply of all different kinds of homes. Our target is for 50% of all new homes as social rented and intermediate homes. We will ensure that all new homes in Southwark are of such good quality that you will not know whether you are visiting homes in private, housing association or council ownership. Proposed policies AAP3 and AAP4 of the Old Kent Road AAP build on this Local Plan commitment, setting out how the proposed 20,000 new homes will be delivered at a more geographically-specific scale, often in co-location with non-residential uses, and how this will be supported by commensurate infrastructural investment.
4. As set out in the Southwark Plan 2022, the Council will continue to revitalise our places and neighbourhoods to create new opportunities for residents and local businesses, to promote wellbeing and reduce inequalities so that people have better lives in stronger communities. Exemplary design (in terms of homes, urban design, public spaces, the townscape as a whole and sustainability) are promoted principally in proposed policies AAP10, AAP11 and AAP12 of the Old Kent Road AAP. These aspire to create healthy, safe, attractive and sustainable places that everyone can be proud of.
5. As set out in the Southwark Plan 2022, the Council will give the borough's young people the best start in life in a safe, stable and healthy environment where they have the opportunity to develop, make choices and feel in control of their lives and future. Proposed policies AAP15 and AAP16 of the Old Kent Road AAP build on this; they set out, amongst other things, how schools will be expanded if necessary and how our young people will be able to access social outlets and sports facilities.
6. As set out in the Southwark Plan 2022, the Council will work to make sure that the borough maintains a strong economy where all of our existing and new residents,

businesses and workers benefit. Proposed policies AAP5, AAP6 and AAP7 of the Old Kent Road AAP build on this commitment, setting out how the proposed 10,000 new jobs will be delivered across the Opportunity Area, while putting in place mitigation to ensure the ecosystem of existing SMEs is protected and supported.

7. The Southwark Plan 2022 commits to maintaining and improving the health and wellbeing of our residents, encouraging healthy lives by tackling the causes of ill health and inequalities. Health and wellbeing underlie all of the proposed AAP policies, but is most directly addressed and promoted in AAP8, AAP9, AAP12, AAP13, AAP14
8. The Southwark Plan 2022 sets out to lead the way in providing spaces for people to connect with nature, making people feel safe, create cleaner streets, increasing recycling and reducing landfill waste, and addressing the Climate Emergency. The Old Kent Road AAP build on this framework through a number of its proposed policies, most notably AAP9, AAP13 and AAP14.

Purpose of an Equalities Assessment on Planning Policy

9. The Council is required by UK Law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals in accordance with the Equality Act 2010 and on Human Rights that replaces all previous equality legislation into one overarching act.
10. The Town and Country Planning Association sets out in 'Beyond Box-Ticking: A Short Guide to meaningfully assessing Local Plan policy impacts on equality and inclusion' that an equalities assessment should:
 - recognise that planning policies and decisions impact different people differently;
 - have regard to the multiple groups in society who are both under-represented in engagement with planning processes and often at most risk of being negatively affected by planning outcomes
11. Local planning authorities should, therefore, assess the potential impacts of draft policies on different groups at an early stage, and adjust policies accordingly over time.
12. Those who are those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:
 - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.

Approach and Structure of the Equalities Impact Assessment

13. This document sits under the Integrated Impact Assessment (IIA). The IIA is a master document that covers all sustainability assessment works, comprising:
 - the Sustainability Appraisal (SA)
 - the Strategic Environmental Assessment (SEA),
 - the Health Impact Assessment (HIA); and
 - the Equalities Impact Assessment (EQIA).
14. This document is a separate Equalities Analysis (EQIA) that distils and considers the key equalities impact of each of the policies proposed in the Old Kent Road AAP.
15. The equalities impact of the Old Kent Road Area Action Plan has been assessed at every stage of the plan. This is achieved with the Integrated Impact Assessment and Equalities Impact Assessment.
16. This document assesses the proposed submission version of the Old Kent Road Area Action Plan against the protected characteristics highlighting where there is a positive impact, negative impact or neutral impact. Each AAP policy and sub area has been assessed for its equalities impact.
17. This Executive Summary (EQIA Document 01) has been compiled to highlight the key equalities issues in the Old Kent Road Opportunity Area. This document sets out:
 - the Purpose and Context of the Equalities Assessment;
 - key equalities issues in the Old Kent Road; and
 - how Southwark Council is responding to these equalities issues.
18. The 'Summary of the EQIA' (EQIA Document 02) provides a high level summary of equalities impacts arising from AAP policies and sub areas assessed against the three strands of the Public Sector Equalities Duty. It also includes summary tables to set out the data supporting the need in the borough.
19. The 'Equalities Impact Assessment' (EQIA Document 03) holds the more in-depth assessment of each policy and its potential impact on each protected characteristic. It identifies where there is a positive, negative or neutral impact and its impact on health. It also details the indicators in the Integrated Impact Assessment (IIA) that inform the impact of these policies.
20. The 'Supporting Datasets' (EQIA Document 04) highlights national and regional data, as well as the data held by Southwark Council that informs the creation and evolution of these policies.
21. The 2020 draft of the Old Kent Road AAP contained a fifth document as part of its EAI; this was a 'Covid-19 Statement on Equalities'. It outlined the uncertainty of Covid-19 and recognises that there are potential additional impacts on each protected characteristic and those who are more vulnerable of Covid-19. Given that the principal period of the pandemic was over 4 years ago, it is not considered necessary to support the 2024 version of the Old Kent Road AAP EQIA with a Covid-19 Statement.

Equalities Issues in Southwark

22. As set out in the Supporting Datasets, the Old Kent Road Opportunity Area is very diverse in terms of demographic, needs and characteristics. Planning policy must, therefore, respond to a wide range of issues and needs to deliver the best outcomes for all, while also reducing the negative impacts of development on people.
23. Equalities issues in the Old Kent Road Opportunity Area surround a number of key issues.
24. The first of these is community uses, namely the protection and retention of floorspace and ensuring high quality new provision. We need to make sure that the provisions and facilities meet the needs of community groups and are genuinely accessible.
25. We need to safeguard the borough's four existing Gypsy and Traveller sites where there is an identified need for them, as well as making provision for the identification of new sites to meet any identified need for additional Gypsy and Traveller accommodation. This need will continue to be monitored.
26. We need to consider non-conventional housing, namely the delivery of Homes of Multiple Occupation (HMOs), housing for older people, homes for those with specialist needs and supported living. The delivery of larger conventional family homes will also be important to monitor, given the current high levels of demand outstripping supply.
27. The delivery of affordable rooms within student housing developments will also need to be monitored, balancing this against the borough's pipeline of affordable conventional housing, the latter being something student housing schemes can also contribute to.
28. In terms of employment, there are equalities issues surrounding the delivery of affordable workspace, protection and support for Small and Medium Enterprises (SMEs) and small shops, and the delivery of accessible education and training.
29. In terms of the environment, there are equalities issues in relation to equality of access to good quality green space for all and the prevalence of poor air quality in certain areas of the borough, and the health and wellbeing implications.
30. This highlights key tensions in the delivery of interventions to meet these requirements, namely around the negotiation of additional requirements to meet specialist needs, as these are not as feasible or viable in some cases.

How is Southwark Council responding to resolve these issues in planning policy?

31. The Old Kent Road AAP has been assessed at each stage against the protected characteristics. Amendments have been made accordingly to ensure the delivery of affordable housing, greater provision of affordable workspace, protection of green and open space and improvement of air quality.

32. These key issues are targeted more widely by Southwark Council as a whole through the delivery of 'Regeneration that Works for all'. This ensures that a Social Regeneration Charter is created for each area in Southwark. These aim to deliver improved social aspects, pride of place and cohesion with a system-wide approach to improving life opportunities, good health and wellbeing for all. It also invests in communities, in employment and community resources aims to increase inclusivity and accessibility, and community collaboration. This Council-wide agenda also aims to reduce inequalities to tackle a wide range of factors that impact on equality with a targeted approach to ensure the regeneration benefits are for all and to make more welcome neighbourhoods.
33. Consultation is addressed more widely in the Statement of Community Involvement and Developers Charter. This aims to create a more transparent and more easily understandable and accessible plan-making and decision-taking process for members of the public to be involved in. It also requires larger planning applications to provide a consultation plan demonstrating that the developer has properly consulted on their development.
34. The plan-making and decision-making process and how the OKRAAP is engaged with is set out in the Statement of Community Involvement.