



# Old Kent Road Area Action Plan Proposed Submission Version October 2024

## **Equalities Impact Assessment**

# EQIA Document 03: Equalities Impact Assessment

Old Kent Road Area Action Plan 2024 appendices: Document Locator		
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Appendix A	Old Kent Road AAP 2024	
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#### **Guidance notes**

#### Things to remember:

- 1. Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the effect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:
  - Decision-makers are aware of the general equality duty's requirements;
  - The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken;
  - We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process;
  - We have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty;
  - We review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty;
  - We take responsibility for complying with the general equality duty in relation to all their relevant functions - responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf; and
  - We consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.
- 2. Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:
  - Consider all the protected characteristics and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies);
  - Use equality analysis to inform policy as it develops to avoid unnecessary additional activity;
  - Focus on understanding the effects of a policy on equality and any actions needed as a result, not the production of a document;
  - Consider how the time and effort involved should relate to the importance of the policy to equality;
  - Think about steps to advance equality and good relations as well as eliminate discrimination;
  - Use good evidence (where it isn't available, take steps to gather it, where practical and proportionate);
  - Use insights from engagement with employees, service users and others who can help provide evidence for equality analysis;
  - Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision

might affect different communities in Southwark and to consider any implications for equality and diversity.

- 3. The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present within divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.
- 4. Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments. Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and <a href="https://www.southwarkadvice.org.uk">www.southwarkadvice.org.uk</a>).
- 5. Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health and wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

### Section 1: Equality analysis details and contents

Proposed policy/decision/business plan to	Old Kent Road Area Action Plan
which this equality analysis relates	

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Department		Finance	Division	Planning	
Date of analysis		April to August 2024			
Sign-off	Colin Wilson	Position	Head, Strategic Applications and Old Kent Road Planning and Growth	Date	TBC

#### Section 2: Brief description of policy/decision/business plan

#### The Old Kent Road Area Action Plan

- 6. The Old Kent Road Area Action Plan (AAP) will, once adopted, form part of the Development Plan for the borough of Southwark. It will sit alongside the Local Plan, Area Action Plans, Adopted Policies Map, Adopted Neighbourhood Plans and the London Plan.
- 7. This site specific policy document aims to manage the growth and development of the Old Kent Road Opportunity Area (OA) to nurture and develop the thriving businesses, arts and cultural communities. It aims to be innovative and guide new development to provide urgently needed housing and jobs. The plan proposes colocating residential uses with industrial and commercial uses, applying innovative architectural and environmental design to ensure new and existing businesses can co-exist with new homes.
- 8. By virtue of the location, connections and existing uses, evolving character and development potential, the Old Kent Road OA is well placed to absorb growth. This is recognised by the London Plan, which identifies the Old Kent Road OA in two major growth areas: Central London and the Bakerloo Line Extension (BLE) Growth Corridor.
- 9. The efficient delivery of quality development in the Old Kent Road OA will accelerate Community Infrastructure Levy (CIL) payments and other financial contributions towards the cost of the BLE.
- 10. The Old Kent Road AAP and the Southwark Plan must be in conformity with the London Plan and the National Planning Policy Framework (NPPF). The Old Kent Road AAP is also an Opportunity Area Planning Framework which may be endorsed by the Mayor of London.

#### The Equalities Analysis

- 11. This Equalities Assessment will assess the following policies:
  - Vision
  - Strategy
  - AAP1: The Masterplan
  - AAP2: Bakerloo Line Upgrade and Extension
  - AAP3: Homes for AllAAP4: Student Homes
  - AAP5: Businesses and Workspace The Bow Tie
  - AAP6: Life Sciences
  - AAP7: Town Centres, Leisure and Entertainment
     AAP8: Movement People, Place, Experience
  - AAP9: The Greener Belt Parks and Healthy Streets
     AAP10: Tall Buildings The Stations and the Crossings
  - AAP11: Character and Heritage

- AAP12: Design

- AAP13: Climate Emergency

- AAP14: Water management, air and noise quality

- AAP15: Great Start in Life

- AAP16: Child and Youth Provision

- Sub Area 1

- Sub Area 2

- Sub Area 3

- Sub Area 4

- Sub Area 5

#### Summary of overall assessment

- 12. The Old Kent Road AAP aims to co-ordinate development in the Old Kent Road OA to ensure it delivers direct benefits to local people, specifically regarding the provision of affordable housing and jobs for all.
- 13. In terms of socioeconomic background, the Old Kent Road AAP aims to improve the quantity and quality of affordable housing and employment to help those who are disadvantaged.
- 14. In terms of youth provision and community uses, the Old Kent Road AAP aims to deliver more spaces for community uses and improve the provision of educational facilities.
- 15. These interventions have positive impacts for all protected characteristics and cumulatively reduce inequality.

#### Section 3: Service users and stakeholders

Service users and stakeholders		
Key users of the department or service	<ul> <li>Members of the public;</li> <li>Councillors;</li> <li>Developers;</li> <li>Local Authorities;</li> <li>Housing Associations;</li> <li>Greater London Authority;</li> <li>Transport for London;</li> <li>Thames Water;</li> <li>Metropolitan Police;</li> <li>LBS Chief Executive's Department;</li> <li>LBS Children's and Adult's Services Department;</li> <li>LBS Environment and Leisure Department;</li> <li>LBS Finance and Governance Department;</li> <li>LBS Flood and Drainage Department;</li> <li>LBS Housing and Modernisation Department;</li> <li>LBS Public Health.</li> </ul>	
Key stakeholders were/are involved in this policy/decision/business plan	<ul> <li>Members of the public;</li> <li>Councillors;</li> <li>Developers;</li> <li>Local Authorities;</li> <li>Housing Associations;</li> <li>Greater London Authority;</li> <li>Transport for London;</li> <li>Thames Water;</li> <li>Metropolitan Police;</li> <li>LBS Chief Executive's Department;</li> <li>LBS Children's and Adult's Services Department;</li> <li>LBS Environment and Leisure Department;</li> <li>LBS Finance and Governance Department;</li> <li>LBS Flood and Drainage Department;</li> <li>LBS Housing and Modernisation Department;</li> <li>LBS Public Health.</li> </ul>	

#### Section 4: Pre-implementation equality analysis

- 16. This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.
- 17. The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the Council's declared intention to reduce health inequalities in the borough.

#### **AGE**

Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Societal and economic issues	Health issues
Potential impacts (positive and negative) of proposed policy	Potential impacts (positive and negative) of proposed policy

#### Vision

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

Furthermore the Vision recognises the need for more innovative approaches to supporting the positive growth of communities by encouraging integration of different age groups. One example is the benefits of co-location of nurseries and older person's accommodation to reduce social isolation.

#### Vision

Three key components of the Vision are:

- delivering the Greener Belt;
- delivering the Bakerloo Line Extension; and
- revitalising and diversifying the Old Kent Road into a thriving Healthy High Street;

all of which seek to promote sustainable transport behaviours amongst all age groups within the local population. This will have direct positive health impacts.

The Greener Belt strategy, in providing a network of generous open spaces and walking and cycling routes, seeks to promote health and wellbeing for all age groups. This will be particularly beneficial for younger people amongst whom there are higher than average levels of obesity in the Old Kent Road OA.

The Vision also recognises how good design and co-location of certain uses can provide wider societal benefits for mental health and wellbeing, especially for the elderly.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

#### Strategy

The Strategy demonstrates positive social impacts through these key objectives:

- the co-location of nurseries, primary schools and older people's accommodation;
- the provision of older people's specialist housing (such as the over-55s housing at the Tustin Estate); and
- a new network of youth facilities (including supporting the existing facilities at 231 Old Kent Road and Leyton Square).

These will all promote intergenerational wellbeing and foster good relations. The network of youth facilities will provide social spaces that encourage young people from all backgrounds to mix.

#### Strategy

The Strategy aims to enhance the environment and encourage physical activity to improve wellbeing for all, regardless of age. This demonstrates positive health impacts.

The 20,000 new homes, 10,000 new jobs and other major infrastructure that the Strategy seeks to deliver will produce carbon emissions and generate environmental conditions (noise, dust etc.) that could present negative health impacts for people of all ages. The age groups most vulnerable to these impacts are the young and the elderly<sup>1</sup>. However, when the full range of mitigation secured across the various policies (examples being construction environmental management plans, emission minimisation through sustainable design, delivering biodiversity net gain, and achieving air quality neutrality) is taken account of, there would be an overall positive impact.

#### **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for

#### **AAP1: The Masterplan**

AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and

<sup>&</sup>lt;sup>1</sup> 'United Nations Environment Programme - Young and old, air pollution affects the most vulnerable', accessible from <a href="https://www.unep.org/news-and-stories/blogpost/young-and-old-air-pollution-affects-most-vulnerable">https://www.unep.org/news-and-stories/blogpost/young-and-old-air-pollution-affects-most-vulnerable</a>

housing, employment, infrastructure and community uses. This ensures greater access to housing, jobs and local services for all age groups.

improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all age groups.

# AAP2: Bakerloo Line Upgrade and Extension

AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. These upgrades will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. This ensures equality of access to opportunity, amenities and services for all age groups.

# AAP2: Bakerloo Line Upgrade and Extension

New and improved public transport infrastructure will reduce reliance on private motor vehicles, in turn improving air quality and health outcomes for all age groups.

#### AAP3: Homes for all

AAP3 demonstrates positive impacts by building 10% of new homes as accessible and helping vulnerable people find the right housing to meet their needs so they can live independently. In the latter respect, the policy expressly references the need to deliver dedicated over-55s housing within the OA. This improves the provision/availability of specialist fit-forpurpose modern housing for mature citizens. This is particularly relevant to the Old Kent Road OA, where of all seven indices of deprivation, the 2019 IMD found "quality of living environment" to be the poorest performing metric in this location

#### AAP3: Homes for all

AAP3, by seeking to deliver high quality housing for those of all ages, including specialist (sometime managed) forms of housing for mature citizens, will provide comfortable living environments where residents feel a greater sense of security in their home. This has positive benefits for mental wellbeing, and improves quality of life.

#### **AAP4: Student homes**

AAP4 demonstrates positive economic impacts by encouraging investment from higher education providers, who make a significant contribution to the

#### **AAP4: Student homes**

There are no specific identifiable positive or negative impacts on health arising from AAP4.

borough's economy and labour market. PBSA can also bring indirect benefits by increasing spend in local businesses. This benefits those of working age.

The policy also positively impacts young adults by ensuring high quality housing options are available to the borough's student population.

AAP4 places a strong focus on ensuring the student demographic is integrated with the existing and future residential communities. This will help promote good neighbourhood relations between, for example, children in their mid-teens and university-age young people. Many developments consented and built in the OA incorporate co-working space for the students that is also available for a charge to remote-working professionals; this hybrid customer base brings people of working age into contact with the student demographic. This brings a positive age-related social impact.

There are more general mental and physical health benefits in widening access to high quality (safe, comfortable, professionally managed, community-oriented etc.) housing for the borough's student population.

# AAP5: Businesses and workspace - The Bow Tie

AAP5 demonstrates positive socioeconomic impacts for people of working age by making provisions for current business occupiers of the Old Kent Road OA. The policy ensures that current and future businesses are considered in the regeneration of Old Kent Road OA.

# AAP5: Businesses and workspace - The Bow Tie

There are no specific identifiable positive or negative impacts on health arising from AAP5.

#### **AAP6: Life sciences**

The aim of AAP6 is for the Old Kent Road OA to play a key role in establishing south central London as a world-recognised district for life sciences expertise and innovation. This will have positive impacts for those of working age because it will complement and support existing business in the life sciences and related sectors, while also bringing new life sciences business to

#### AAP6: Life sciences

There are no specific identifiable positive or negative impacts on health arising from AAP6.

the area, expanding and diversifying the local jobs market. Importantly, these new employment opportunities for local working-age people will be in in a higher skilled and paid sector.

# AAP7: Town centres, leisure and entertainment

AAP7 aims to transform town centres. This illustrates positive impacts for those of all ages because it aims to deliver a range of shops and amenities to meet daily needs, clustered in two key locations benefiting from high public transport accessibility and high quality and inclusive public realm. By locating essential amenities together it improves accessibility for all ages.

The policy promotes the provision of increased seating to provide resting points for people of all ages and abilities, making it easier for people to get out and engage in town centre social life without necessarily needing to spend money. The policy also seeks to deliver a greater provision of leisure facilities through the night- and well as the day-time, thereby better meeting the wide-ranging needs of all age groups.

The town centre strategy seeks to retain/re-provide the various large supermarkets that line the Old Kent Road high street. In part, this is to safeguard the continued operation of free-to-access public toilets within these large retail premises (something that Policy P35 of the Southwark Plan also requires for main town centre uses that are 1,000 sq.m or more GIA). The provision of public toilets makes for a more comfortable and dignified town centre experience for all, in particular older citizens. This has positive social impacts.

# AAP8: Movement - People, Place and Experience

# AAP7: Town centres, leisure and entertainment

AAP7 seeks to deliver a new NHS health hub to serve the area's growing population. This will bring major benefits for all age groups, providing integrated primary health, community health and social care support. In promoting a shift towards co-ordinated and holistic care in this way, AAP7 responds to the increase in the number of people in the borough with multiple long-term conditions, in part a consequence of the ageing population.

AAP8: Movement - People, Place and Experience

AAP8 demonstrates positive societal impacts for all, but especially young people in its aim to deliver cycle routes where unaccompanied 12 year olds can confidently cycle, such as the Trim Trail in Sub-Area 3, which will improve their sense of independence.

Improved access to sustainable forms of public transport will also positively impact older residents; this is because it will make it easier for them get out into, and play a more active socioeconomic role in, the local community.

AAP8 demonstrates positive impacts for health because it encourages a change in travel habits to more active modes of travel, which will promote healthier lifestyles for all age groups. By delivering dedicated cycle lanes and more crossing points in the OA, the policy will also improve cyclist and pedestrian safety across all age groups.

Furthermore, a reduction in vehicle dependence and supporting a shift to electric vehicles will improve air quality (because it involves less combustion), which in turn will reduce the risk of respiratory related illness, especially in the more vulnerable age groups (i.e. the young and the elderly).

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 aims to illustrate positive impacts by delivering new play spaces in the Old Kent Road OA, as part of the Council's promise to have a top quality playground in every neighbourhood<sup>2</sup>. This encourages children to play and be active in a safe environment.

More generally, the provision of new and improved parks and open spaces across the OA will have social benefits for all age groups by reducing social isolation and fostering interaction.

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers positive health benefits for all because it creates greens spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing for people of all ages. This should have positive impacts for young people in particular, amongst whom there are higher levels of obesity.

# AAP10: Tall buildings strategy - The Stations and the Crossings

AAP10 illustrates positive impacts for all by ensuring tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.

# AAP10: Tall buildings strategy - The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

<sup>&</sup>lt;sup>2</sup> 'Southwark Council's Delivery Plan 2022-2026', accessible from <a href="https://moderngov.southwark.gov.uk/documents/s108711/Appendix%201%20Council%20Delivery%2">https://moderngov.southwark.gov.uk/documents/s108711/Appendix%201%20Council%20Delivery%2</a> OPlan.pdf

#### **AAP11: Character and heritage**

AAP11 illustrates positive impacts, as it conserves key landmarks and valuable historical buildings. This ensures that areas remain legible and easily navigable, and that the area as a whole remains familiar, which is particularly important for the elderly. Legible and easy-to-navigate urban environments are also beneficial for young people to gain independence and familiarity with the place they live in, which again brings positive social impacts.

#### AAP11: Character and heritage

There are no specific identifiable positive or negative impacts on health arising from AAP11.

#### AAP12: Design

AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road OA but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all ages. This ensures greater accessibility for all.

The focus the policy gives to increased permeability and enhanced frontages will make non-vehicular movement through the Old Kent Road OA easier. The policy also aims to create places that are less hostile and more appealing with a greater sense of safety, which will be socially beneficial for all age groups.

#### AAP12: Design

There are no specific identifiable positive or negative impacts on health arising from AAP12.

More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all age groups lead healthier lifestyles.

#### **AAP13: Climate Emergency**

AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:

- improving air quality;
- creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and

#### AAP13: Climate Emergency

There are no specific identifiable positive or negative impacts on health arising from AAP13. There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing for people of all ages.

reducing global warming.

All of the aforementioned have beneficial impacts for local residents of all ages.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive impacts for all ages by ensuring development has met high environmental standards and promotes more active, public and sustainable travel modes to reduce pollution. Young children and the elderly are more susceptible to the effects of poor air quality and low environmental quality.

This policy aims to improve the conditions across the OA to ensure a cleaner, greener, and safer environment for all ages.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.

It also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely.

The policy also reinforces high standards of residential design to ensure that homes, including homes colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all age groups within the local population.

#### AAP15: Great start in life

AAP15 demonstrates positive impacts for all by providing accessible and affordable access to youth facilities. The aim of this policy is to support the freedom of children and young people to occupy and move around the public realm independently. This encourages greater community cohesion and supports children and young people's

#### AAP15: Great start in life

AAP15 demonstrates positive health impacts for children and young people by improving school grounds and outdoor areas where they can play, exercise and engage with habitats and food growing. Locating places of education away from main roads helps to reduce the risk of developing respiratory illness or difficulties later in life.

independence improving their development, teaching and learning.

#### AAP16: Child and youth provision

AAP16 demonstrates positive impacts by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm where children and young people can congregate and exercise, which promotes social cohesion within and between age groups.

#### AAP16: Child and youth provision

AAP16 demonstrates positive health impacts by providing new and improved existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— amongst young people.

#### Sub area and site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have positive impacts for all.

#### Sub area and site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to –and delivery of new–green and open spaces within the sub areas will have positive health impacts for all.

#### Sub Area 1

Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. In particular, this will have positive economic impacts for those of working age. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.

The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian

#### Sub Area 1

There are no specific identifiable impacts on health for Sub Area 1.

More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all ages groups, not least children who will benefit from safer and healthier environments for play and recreation. This has positive mental and physical health effects.

friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts on all ages.

The community facility at 231 Old Kent Road, which has now been operational for over five years, will have particular positive social impacts for young people.

#### Sub Area 2

In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities —which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11— will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts inter- and intra- all age groups.

The proposed partial closure of Marlborough Grove (outside Phoenix Primary School) to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for those who have a disability (as well as their carers and families). Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.

#### Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

#### Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be

#### Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

ORK13 is the site allocation identified for a potential new school; however, this is very much a fall-back option, the preferred option (as set out in AAP16) being to expand existing schools as necessary to meet demand. After years on ongoing dialogue between the Council and local schools, the 'Great Start in Life' policy in its 2024 iteration seeks to avoid school place overprovision arising. Overprovision would result in under-admission, which could cause school closure and pupil displacement. This would be disruptive to family life and run counter to the community cohesion aspirations that run through the AAP as a whole. In this regard, Sub-Area 3 demonstrates positive impacts on the school-age population.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.

#### Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been

#### Sub Area 4

An example of how this Sub-Area seeks to generate positive health impacts for different groups includes the new high quality over-55s housing at the Tustin Estate.

undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.

#### Sub Area 5

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated; this has positive impacts in particular for the working age population.

#### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5.

# Equality information on which above analysis is based

Health data on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

- Appendix 3 'Baseline data Facts and Figures' to the Integrated Impact
  Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
  Submission; and
- Appendix 9 'Baseline Indicators Table' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.

Where references are made in the above analysis to any equality information and health data not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).

It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of age, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9
- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16

- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9. AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

#### Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

#### **DISABILITY**

A person has a disability if s/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.

Societal and economic issues	Health issues
Potential impacts (positive and negative) of proposed policy	Potential impacts (positive and negative) of proposed policy
Vision	Vision

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

Furthermore, the Connecting Communities strand of the Vision

Three key components of the Vision are:

- delivering the Greener Belt;
- delivering the Bakerloo Line Extension; and
- revitalising and diversifying the Old Kent Road into a thriving Healthy High Street;

all of which seek to promote sustainable transport behaviours amongst all groups within the local population. This will have direct positive health impacts.

recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population. Other forms of co-location particularly relevant to those with a disability include co-locating nurseries and older person's accommodation to help reduce social isolation amongst the elderly.

The Greener Belt vision, in linking together the area's green spaces and creating new cycle- and pedestrian-friendly links across the OA, will provide opportunities for disabled people to make sustainable journeys more easily and comfortably, which has positive physical and mental health impacts.

The Vision also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable and those demographic groups that experience higher levels of social isolation.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

#### Strategy

Rates of unemployment and poverty are higher amongst disabled people while rates of private home ownership are lower. Thus, the strategy of providing at least 5,000 social rented homes in the period to 2042, of which a proportion will be wheelchair user homes, will have positive impacts for this particular demographic.

Town centres are particularly important for disabled people in terms of local participation and social integration<sup>3</sup>. The Strategy, in seeking to creating two revitalised district town centres along the course of the Old Kent Road high street, will mean all disabled residents of the OA are within a short journey time

#### Strategy

The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling--promotes a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.

In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for those with a disability living in the Old Kent Road OA.

<sup>&</sup>lt;sup>3</sup> 'Mayor of London's High Street Adaptive Strategies', accessible from: https://www.london.gov.uk/sites/default/files/ggbd\_high\_streets\_adaptive\_strategies\_web\_compressed\_0.pdf

of a local shopping, leisure and recreational hub. This will have positive social impacts.

The 20,000 new homes, 10,000 new jobs and other major infrastructure that the Strategy seeks to deliver will produce carbon emissions and generate environmental conditions (noise, dust etc.) that could present negative health impacts for people with disabilities and other pre-existing medical conditions. However, when the full range of mitigation secured across the various policies (examples being construction environmental management plans, emission minimisation through sustainable design, delivering biodiversity net gain, and achieving air quality neutrality) is taken account of, there would be an overall positive impact.

#### **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure, services and community uses.

AAP1 gives focus to the co-location approach and the revitalisation of the high street to provide two town centre hubs (the latter seeking to cluster services, shopping and leisure/recreation outlets). Both of these masterplan elements are particularly important for the disabled, who are more likely to encounter difficulty accessing services in person compared with non-disabled people, with travel (both in terms of time and ease) being a contributing factor<sup>4</sup>.

# AAP2: Bakerloo Line Upgrade and Extension

#### AAP1: The Masterplan

The Greener Belt strategy --which seeks to provide a network of enhanced and new outdoor spaces and routes across the OA that are well-designed and accessible-- will enable those who use a wheelchair or are less ambulant due to disability to move around as freely and easily as cyclists and those on foot. It will also bring those with disabilities into greater contact with nature, which has proven mental health benefits<sup>5</sup>.

AAP2: Bakerloo Line Upgrade and Extension

<sup>&</sup>lt;sup>4</sup> 'Disabled people's access to products and services, Great Britain: February to March 2022', accessible from:

 $<sup>\</sup>underline{\text{https://www.ons.gov.uk/people population and community/health and social care/disability/articles/disable} \underline{\text{dpeople saccess to products and services great britain/february to march 2022 \# main-points}}$ 

<sup>&</sup>lt;sup>5</sup> 'Nature: How connecting with nature benefits our mental health', accessible from: https://www.mentalhealth.org.uk/sites/default/files/2022-06/MHAW21-Nature-research-report.pdf

AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure.

Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure, fully accessible to all irrespective of physical or mental impairment, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.

The pre-BLE public transport intervention of the 'Bakerloop Bus' will improve public transport accessibility for all, including those with a disability. This is particularly important in the Old Kent Road OA, as it suffers from some of the lowest Public Transport Accessibility Level ratings in the borough.

The provision of step-free tube stations, platforms and rolling stock as part of the BLE will make taking public transport a more comfortable and dignified experience for disabled people. The 'Bakerloop Bus' will also be disabled friendly. In seeking to provide modern and inclusive public transport infrastructure, AAP2 has positive mental health impacts for this particular protected group.

#### AAP3: Homes for all

Overarching policies regarding housing for those with disabilities in the Southwark Plan 2022 apply.

AAP3 demonstrates positive impacts by reiterating the Southwark Plan policy to build 10% of new homes as accessible and adaptable homes for wheelchair users and homes for people with physical and mental health needs. This improves the provision/availability of specialist housing for those with a disability. This is particularly relevant to the Old Kent Road OA, where of all seven indices of deprivation, the 2019 IMD found "quality of living environment" to be the poorest performing metric in this location.

#### AAP3: Homes for all

AAP3, by ensuring specific provision is made for those with disability, contributes to a greater sense of security and independence in the home, which has positive benefits for mental wellbeing. The policy (and the corresponding Southwark Plan policy) requires homes to be distributed amongst non-wheelchair dwellings within new developments, in part to encourage resident interaction. This helps foster community and reduce sense of isolation. This is particularly important with regards to those who have a disability, for whom levels of

More generally, AAP3 seeks to deliver positive social impacts for disabled people by ensuring new homes provide high quality living environment through things like:

- generous room sizes (for ease of movement);
- appropriate fit-out specifications (for the practicality of day-to-day life); and
- pleasant spatial qualities such as high ceilings, good levels of acoustic insulation and large windows (all of which can aid mental health).

chronic loneliness are higher than the rest of the population<sup>6</sup>.

#### **AAP4: Student homes**

AAP4 demonstrates positive impacts by requiting new PBSA developments to provide at least 5% of the homes as wheelchair accessible and adaptable. Furthermore, in encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between disabled people and the wider community.

# AAP5: Businesses and workspace - The Bow Tie

AAP seeks to deliver 10,000 new jobs across the OA, bringing greater employment opportunities for local adults, including those with a disability. This would be a positive economic impact on this demographic group.

#### AAP6: Life sciences

AAP6 may have positive impacts for disabled people by bringing new life sciences businesses to the area,

#### **AAP4: Student homes**

In placing emphasis on high quality design, AAP4 seeks to ensure PBSA provides comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor amenity space for PBSA occupiers. All of these measures help support mental wellbeing and physical activity amongst disabled students.

## AAP5: Businesses and workspace - The Bow Tie

There are no specific identifiable positive or negative impacts on health arising from AAP5 for disabled people.

#### AAP6: Life sciences

There are no specific identifiable positive or negative impacts on health arising from AAP6 for disabled people.

<sup>&</sup>lt;sup>6</sup> 'Fear of mental health crisis as loneliness rises dramatically amongst disabled people', accessible from <a href="https://www.sense.org.uk/media/latest-press-releases/loneliness-rises-dramatically-among-disabled-people">https://www.sense.org.uk/media/latest-press-releases/loneliness-rises-dramatically-among-disabled-people</a>; 'Outcomes for disabled people in the UK: 2021', accessible from: <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcom-esfordisabled-people-intheuk/2021">https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcom-esfordisabled-people-intheuk/2021</a>

expanding and diversifying the local jobs market.

# AAP7: Town centres, leisure and entertainment

AAP7 demonstrates positive impacts for all because it aims to transform the high street into a new destination which connects neighbourhoods on both sides of the Old Kent Road high street. These improvements in connectivity will enhance legibility and, along with the intention to deliver more seating within the town centre, will make the Old Kent Road area more sociable and easier to navigate. This will bring positive social benefits.

# AAP7: Town centres, leisure and entertainment

In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation, levels of which are higher amongst the disabled than the non-disabled. It will, therefore, have positive mental health benefits.

# AAP8: Movement - People, Place and Experience

With regard to disability, AAP8 demonstrates positive impacts by requiring new development to deliver blue badge parking for residents and visitors. This ensures greater accessibility and mobility for those who are wheelchair users as well as their carers and families.

The policy, in seeking to enhance public transport availability and accessibility through initiatives such as the Bakerloop Bus and the BLE, as well as improving public realm more generally, would help close the transport accessibility gap. Research has found that this brings fiscal benefit by helping to move disabled people off benefits and into work, which is particularly important in the Old Kent Road where unemployment levels are higher than the borough average<sup>7</sup>.

# AAP8: Movement - People, Place and Experience

One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution

All of the above will be especially advantageous for disabled people for whom health outcomes are poorer and the risk of developing health conditions (such as depression, asthma and other respiratory illness, diabetes, stroke or obesity) is twice as high as non-disabled people<sup>8</sup>.

<sup>&</sup>lt;sup>7</sup> 'The Transport Accessibility Gap', accessible from <a href="https://www.motabilityfoundation.org.uk/media/iwaidhxk/motability\_transport-accessibility-gap-report\_march-2022\_final.pdf">https://www.motabilityfoundation.org.uk/media/iwaidhxk/motability\_transport-accessibility-gap-report\_march-2022\_final.pdf</a>

<sup>&</sup>lt;sup>8</sup> 'World Health Organisation – Disability statistics', accessible from <a href="https://www.who.int/news-room/fact-sheets/detail/disability-and-health">https://www.who.int/news-room/fact-sheets/detail/disability-and-health</a>

The focus AAP9 gives to creating new and improved connections that better link the high street with existing and proposed residential communities will help reduce some of the barriers to social interaction faced by disabled people.

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 demonstrates positive impacts by prioritising the wellbeing of existing and future residents. By creating a network of green and open spaces, the policy increases accessibility to open space for all to ensure equality of access and opportunity.

# AAP10: Tall buildings strategy: The Stations and the Crossings

AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.

#### AAP11: Character and heritage

AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.

#### AAP12: Design

AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road OA but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for people with disabilities, with thought given to wayfinding and hazard reduction (tactile

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers positive health benefits for all because it creates green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing for all groups, including the disabled.

# AAP10: Tall buildings strategy: The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

#### AAP11: Character and heritage

There are no specific identifiable positive or negative impacts on health arising from AAP11.

#### AAP12: Design

There are no specific identifiable positive or negative impacts on health arising from AAP12.

More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.

paving, detectable kerbs, clutter-free pavements). Using the latest technology and materials to achieve these goals is promoted. This ensures greater accessibility for all. The focus the policy gives to increased permeability and enhanced frontages will produce less hostile and more appealing places with a greater sense of safety, which will be socially beneficial for those with a disability.

#### **AAP13: Climate emergency**

AAP13 demonstrates positive impacts for all by ensuring new development reduces carbon emissions by holistically thinking about design, construction, building operation, whole life cycle and transport. This has secondary impacts by:

- improving air quality;
- creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and
- reducing global warming.

All of the aforementioned have beneficial impacts for all local residents, including those with disabilities for whom rates of poverty and poorer health outcomes are higher than the non-disabled.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive impacts for all by ensuring development has met high environmental standards and promotes more active, public and sustainable travel modes to reduce pollution. Those with a disability are more susceptible to the effects of poor air quality and environments that are unsafe and/or not fully accessible. This policy aims to improve these conditions to ensure a cleaner, greener, safer environment for all.

#### AAP13: Climate emergency

There are no specific identifiable positive or negative impacts on health arising from AAP13.

There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.

The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely.

Furthermore, it reinforces high standards of residential design to ensure that homes, including homes colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population, including the disabled.

#### AAP15: Great start in life

AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.

#### AAP16: Child and youth provision

AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background and irrespective of any disability. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.

The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This

#### AAP15: Great start in life

AAP15 demonstrates positive health impacts for children and young people, including those with disabilities, by improving school grounds and outdoor areas where they can play, exercise and engage with habitats and food growing. Locating places of education away from main roads helps to reduce the risk of developing respiratory illness or difficulties later in life.

#### AAP16: Child and youth provision

AAP16 demonstrates positive health impacts by providing new and improved existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of any disability.

makes accessing such facilities easier for those who are less mobile. It also encourages greater community cohesion, which has positive social impacts.

#### Sub area and site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have positive impacts for all.

#### Sub Area 1

Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.

#### Sub Area 2

Sub Area 2 demonstrates positive impacts through the delivery of new uses accessible for all that provide opportunities for education (e.g. those required by site allocation OKR10) and leisure (e.g. LEX, and those within site allocation OKR11). These facilities will promote community cohesion by creating community spaces for residents to meet, congregate and exercise. This has positive impacts for all by creating accessible community spaces.

#### Sub area and site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to –and delivery of new–green and open spaces within the sub areas will have positive health impacts for all.

#### Sub Area 1

There are no specific identifiable positive or negative impacts on health for Sub Area 1.

More generally, the investment in new parks and various street reconfigurations will make people of all ages, but in particular those with disabilities, feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

#### Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations (all of which will be designed to be fully accessible) will make disabled people feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for those who have a disability (as well as their carers and families). Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement amongst disabled people in social and community life.

#### Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

#### Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.

#### Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing

#### Sub Area 4

There are no specific identifiable positive or negative impacts on health for Sub Area 4.

More generally, the investment in new parks and various street reconfigurations (all of which will be designed to be fully accessible) will make disabled people feel more confident about (a) spending their businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible. recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

#### Sub Area 5

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.

#### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5.

More generally, the focus on enhancing permeability and linking into the Low Line (all of which will be designed to be fully accessible) will make disabled people feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

# Equality information on which above analysis is based

Health data on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

- Appendix 3 'Baseline data Facts and Figures' to the Integrated Impact
  Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
  Submission; and
- Appendix 9 'Baseline Indicators Table' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.

Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).

It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of disability, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9
- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16

- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9. AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

#### Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

#### **GENDER REASSIGNMENT**

The process of transitioning from one gender to another.

Societal and economic issues	Health issues
Potential impacts (positive and negative) of proposed policy	Potential impacts (positive and negative) of proposed policy
Vision	Vision

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive

#### Vision

The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts

It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable and those

growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population.

demographic groups that experience higher levels of social isolation<sup>9</sup>.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

#### Strategy

The Strategy demonstrates positive social impacts by aiming to shield people from negative experiences such as feeling unsafe. One example is by creating multifunctional neighbourhoods featuring amongst other things youth facilities, shops, services and leisure opportunities; these places will help to promote feelings of security for all.

#### Strategy

The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.

In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all, regardless of gender identity.

#### **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.

#### AAP1: The Masterplan

AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA

<sup>&</sup>lt;sup>9</sup> 'Loneliness and Social Isolation among Transgender and Gender Diverse People', accessible from <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10217806/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10217806/</a>

	more generally, which will impact positively on all.
AAP2: Bakerloo Line Upgrade and Extension	AAP2: Bakerloo Line Upgrade and Extension
AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.	There are no specific identifiable positive or negative impacts on health arising from AAP2.
AAP3: Homes for all	AAP3: Homes for all
AAP3 demonstrates positive impacts for all because it ensures that high quality housing standards will be maintained for all. This means residents can take pride in and feel responsible for their own homes.	AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life <sup>10</sup> .
AAP4: Student homes	AAP4: Student homes
In encouraging PBSA developments to provide communal and community-facing facilities, AAP4 promotes good relations between those undergoing gender reassignment and the wider community. This has positive social impacts.	There are no specific identifiable positive or negative impacts on health arising from AAP4.
AAP5: Businesses and workspace - The Bow Tie	AAP5: Businesses and workspace - The Bow Tie
AAP seeks to deliver 10,000 new jobs across the OA, bringing greater	

<sup>&</sup>lt;sup>10</sup> 'Loneliness and Social Isolation among Transgender and Gender Diverse People', accessible from: https://www.mdpi.com/2227-9032/11/10/1517

employment opportunities for local adults, including those undergoing gender reassignment. This would be a positive economic impact on this demographic group.

There are no specific identifiable positive or negative impacts on health arising from AAP5.

#### AAP6: Life sciences

#### AAP6 may have positive impacts for those undergoing gender reassignment by bringing new life sciences business to the area, expanding and diversifying the local jobs market.

#### AAP6: Life sciences

There are no specific identifiable positive or negative impacts on health arising from AAP6 for people undergoing gender reassignment.

# AAP7: Town centres, leisure and entertainment

# AAP6 demonstrates positive impacts for all because it aims to create activity throughout the Old Kent Road OA in both the north and south town centres. This will improve the experience of pedestrians and create a vibrant and lively town centre, with expanded social opportunities for all.

# AAP7: Town centres, leisure and entertainment

In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation, levels of which are higher amongst those undergoing gender reassignment. It will, therefore, have positive mental health benefits.

# AAP8: Movement - People, Place and Experience

# AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.

# AAP8: Movement - People, Place and Experience

AAP8 demonstrates positive impacts for health because it encourages a change in travel habits to more active modes of travel which will encourage healthier lifestyles for all. Furthermore, vehicle reduction will improve air quality as there is less combustion, which is reduce the risk of respiratory related illness, especially in those who are more vulnerable.

# AAP9: The Greener Belt - Parks and healthy streets

# AAP9 delivers a new network of green links and streets across the Old Kent

# AAP9: The Greener Belt - Parks and healthy streets

There are no specific health impacts arising from AAP9. However, more

Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.

generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.

# AAP10: Tall buildings strategy - The Stations and the Crossings

AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.

# AAP10: Tall buildings strategy - The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

#### AAP11: Character and heritage

AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.

#### **AAP11: Character and heritage**

There are no specific identifiable positive or negative impacts on health arising from AAP11.

#### AAP12: Design

AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road OA but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.

The policy also aims to create places that are less hostile and more appealing with a greater sense of safety, which will be socially beneficial for all, including those undergoing gender reassignment.

#### AAP12: Design

There are no specific identifiable positive or negative impacts on health arising from AAP12.

More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.

#### **AAP13: Climate Emergency**

AAP13 demonstrates positive impacts for all by ensuring new development

#### **AAP13: Climate Emergency**

responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:

- improving air quality;
- creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and
- reducing global warming.

All of the aforementioned have beneficial impacts for all, including those undergoing gender reassignment.

There are no specific identifiable positive or negative impacts on health arising from AAP13.

There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.

# AAP14: Water management, air and noise quality

AAP14 demonstrates positive impacts for all because it sets out an ambitious environmental strategy to create opportunities for using environmental technology to create a place with environmental excellence.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.

The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population, including those undergoing gender reassignment.

## AAP15: Great start in life

## AAP15: Great start in life

AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.

AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. It also encourages greater contact with nature, which has proven mental health benefits.

## AAP16: Child and youth provision

AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.

The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community cohesion, which has positive social impacts.

## AAP16: Child and youth provision

AAP16 demonstrates positive health impacts by providing new and improved existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of gender identity.

### Sub area and site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.

## Sub Area 1

## Sub area and site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to –and delivery of new–green and open spaces within the sub areas will have positive health impacts for all.

## Sub Area 1

Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.

The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.

There are no specific identifiable positive or negative impacts on health for Sub Area 1.

More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.

## Sub Area 2

In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities —which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11— will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion.

The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will

## Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

foster greater engagement in social and community life.

### Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

#### Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.

## Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.

## Sub Area 4

There are no specific identifiable positive or negative impacts on health for Sub Area 4.

### Sub Area 5

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience,

### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5

making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.

# **Equality information on which above analysis is based**

## Health data on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

- Appendix 3 'Baseline data Facts and Figures' to the Integrated Impact
   Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
   Submission; and
- Appendix 9 'Baseline Indicators Table' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.

Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).

It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of gender reassignment, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9
- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16
- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

## Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

## 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.

## Societal and economic issues

# Potential impacts (positive and negative) of proposed policy

#### Vision

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

The Vision places great emphasis on the AAP delivering a family friendly environment with housing, youth facilities, schools, parks, leisure and health centers. This emphasis is a direct response to the findings of the baseline data, which show the Old Kent Road area to, amongst other things, perform corporately poorly for childhood obesity and living environment. The Vision will have positive impacts particularly for those who are pregnant or on maternity, as it will not only provide immediate day-to-day socioeconomic facilities and opportunities, but it will also engender

### **Health issues**

Potential impacts (positive and negative) of proposed policy

### **Vision**

The vision recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable and those demographic groups that experience higher levels of social isolation.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making the area's existing open spaces more attractive and easily accessible to all, while also delivering brand new parks alongside new active travel routes. These positive benefits will be experienced by those who pregnant or on maternity / raising families.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact

long-term confidence about the OA being somewhere positive to raise a family.

Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population. that it has, when well-designed and welcoming, on mental wellbeing.

## Strategy

The Strategy seeks to deliver positive impacts for those who are pregnant or on maternity in its aim to deliver a range of housing types to suit need, all designed to a high standard.

It also seeks to deliver a new NHS health hub to serve the area's growing population. This will bring major benefits for all, providing integrated primary health, community health and social care support. This will directly positively benefit those who are pregnant or on maternity.

## Strategy

The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.

In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.

## **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.

## **AAP1: The Masterplan**

AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all.

## AAP2: Bakerloo Line Upgrade and Extension

AAP2: Bakerloo Line Upgrade and Extension

AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.

There are no specific identifiable positive or negative impacts on health arising from AAP2.

### AAP3: Homes for all

AAP3 demonstrates positive impacts by aiming to build at least 4,000 new family homes, and ensuring that vulnerable residents are helped to find the right housing so they can live as independently as possible.

**AAP4: Student homes** 

In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between any pregnant or maternity-taking residents and the wider community.

## AAP5: Businesses and workspace - The Bow Tie

AAP5 seeks to deliver 10,000 new jobs across the OA, bringing greater employment opportunities for local adults, including those who are pregnant. This would be a positive

### AAP3: Homes for all

The policy aims to meet family housing need with a range of housing types. AAP3, by making this provision for those who are pregnant and have families, contributes to a greater sense of security in the home. This has positive benefits for mental wellbeing and improves quality of life.

### **AAP4: Student homes**

In placing emphasis on high quality design, AAP4 seeks to ensure PBSA provides comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor amenity space for PBSA occupiers. All of these measures help support mental wellbeing amongst any pregnant or maternity-taking residents.

## AAP5: Businesses and workspace - The Bow Tie

There are no specific identifiable positive or negative impacts on health arising from AAP5 for those who are pregnant or on maternity.

economic impact on this demographic group.

### **AAP6: Life sciences**

AAP6 may have positive impacts for those who are pregnant by bringing new life sciences business to the area, expanding and diversifying the local jobs market.

## AAP7: Town centres, leisure and entertainment

AAP7 demonstrates positive impacts for all because it aims to transform the high street into a new destination which connects neighbourhoods on both sides of the Old Kent Road high street. These improvements in connectivity will enhance legibility and, along with the intention to deliver more seating within the town centre, will make the Old Kent Road area more sociable and easier to navigate. This will bring positive social benefits.

# AAP8: Movement - People, Place and Experience

AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible. both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, including for example those who are less mobile because of pregnancy or those using pushchairs. There are potentially knock-on positive impacts in terms of socioeconomic participation and opportunities.

### **AAP6: Life sciences**

There are no specific identifiable positive or negative impacts on health arising from AAP6 for those who are pregnant or taking maternity

## AAP7: Town centres, leisure and entertainment

In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.

# AAP8: Movement - People, Place and Experience

One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution

All of the above will be especially advantageous for parents and unborn/newborn children, the latter being more susceptible to developing health conditions (such as asthma and

other respiratory illness) from air
quality <sup>11</sup> .

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.

On example of this is AAP9's aims to make the Old Kent Road a healthier street; this includes improving the pedestrian experience for all, and ensuring pavement widths are suitable for buggies and wheelchair users, and people walking with young children.

# AAP9: The Greener Belt - Parks and healthy streets

There are no specific health impacts arising from AAP9. However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.

# AAP10: Tall buildings strategy - The Stations and the Crossings

AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.

# AAP10: Tall buildings strategy - The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

## AAP11: Character and heritage

AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.

## **AAP11: Character and heritage**

There are no specific identifiable positive or negative impacts on health arising from AAP11.

## AAP12: Design AAP12: Design

<sup>11 &#</sup>x27;Air pollution during pregnancy and lung development in the child', accessible from <a href="https://www.sciencedirect.com/science/article/abs/pii/S1526054216300823#:~:text=Exposure%20to%20air%20pollution%20during%20pregnancy%20has%20also%20been%20linked,the%20development%20of%20childhood%20asthma</a>

AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.

There are no specific identifiable positive or negative impacts on health arising from AAP12.

More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.

## **AAP13: Climate Emergency**

AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:

- · improving air quality;
- creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and
- reducing global warming.

All of the aforementioned have beneficial impacts for all, including those who are pregnant or on maternity

## **AAP13: Climate Emergency**

There are no specific identifiable positive or negative impacts on health arising from AAP13.

There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.

# AAP14: Water management, air and noise quality

AAP14 aims to illustrate positive impacts by ensuring development has met high environmental standards and promoting more active, public and sustainable travel modes to reduce pollution. Pregnant women are more susceptible to the effects of poor air quality and low environmental quality. This policy aims to improve these conditions to ensure a cleaner and greener environment.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.

The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes

colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population, including those who are pregnant or on maternity.

#### AAP15: Great start In life

AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.

## AAP15: Great start In life

AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. It also encourages greater contact with nature, which has proven mental health benefits.

## AAP16: Child and youth provision

AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.

The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community

## AAP16: Child and youth provision

AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy, active lifestyle for all, and also promotes improved mental and physical wellbeing.

cohesion, which has positive social impacts.

### Sub area and site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.

## Sub Area 1

Sub area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.

The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.

### Sub Area 2

In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities —which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and

### Sub area and site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to –and delivery of new–green and open spaces within the sub areas will have positive health impacts for all.

### Sub Area 1

There are no specific identifiable positive or negative impacts on health for Sub Area 1.

More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.

### Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.

The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.

their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

## Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

## Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way. This is all part of the overarching Vision to make the Old Kent Road area family friendly.

## Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly

## Sub Area 4

There are no specific identifiable positive or negative impacts on health for Sub Area 4.

accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.

### Sub Area 5

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.

### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5.

# Equality information on which above analysis is based

Health data on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

- Appendix 3 'Baseline data Facts and Figures' to the Integrated Impact
   Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
   Submission; and
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Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).

It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of pregnancy and maternity, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9

- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16
- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

## Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### **RACE**

Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, nationality (including citizenship), ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others

Societal and economic issues	Health issues
Potential impacts (positive and negative) of proposed policy	Potential impacts (positive and negative) of proposed policy
Vision	Vision
The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport	The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts
infrastructure in the form of the Bakerloop Bus and other travel	It also recognises how high quality and community-oriented design, as well as
enhancements (for Phase 1) and the BLE (Phase 2).	the co-location of certain uses, can provide wider societal benefits for

Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population. mental health and wellbeing, especially for the most vulnerable.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

## **Strategy**

This demonstrates positive impacts because it recognises regeneration may sometimes be criticised as gentrification or social cleansing. The Strategy aims to create delivery of direct benefits to the existing communities regardless of race. Examples include:

- the delivery a range of housing types to suit need –including over 4,000 larger homes that better respond to the needs of larger intergenerational families – all designed to a high standard and in mixed-tenure developments;
- revitalised town centres, offering services and leisure/recreational outlets:
- a network of youth facilities providing social spaces that encourage young people from all backgrounds to mix

all of which will promote inter-racial and intra-racial good relations, while also expanding socioeconomic opportunities for residents, workers and visitors of the OA irrespective of race.

## **Strategy**

The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.

In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.

## **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for

## **AAP1: The Masterplan**

AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and

housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.

improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all. It will also ensure those who currently live in the area (approximately 65% of whom are non-white) see benefits commensurate with the scale of change the AAP will bring.

# AAP2: Bakerloo Line Upgrade and Extension

AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.

## AAP2: Bakerloo Line Upgrade and Extension

There are no specific identifiable positive or negative impacts on health arising from AAP2.

## AAP3: Homes for all

AAP3 demonstrates positive impacts for all by ensuring a diversity of types and tenures of homes to meet needs of those across the community. This ensures that residents can remain close to their families and communities.

## AAP3: Homes for all

AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life.

## AAP4: Student homes

In encouraging PBSA developments to provide communal and communityfacing facilities, the policy promotes good relations between all, irrespective of race.

## **AAP4: Student homes**

In placing emphasis on high quality design, AAP4 seeks to ensure PBSA provides comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor

amenity space for PBSA occupiers. All
of these measures help support mental
wellbeing amongst residents.

## AAP5: Businesses and workspace - The Bow Tie

AAP5 demonstrates positive impacts for all ages by making provisions for current business occupiers of Old Kent Road. This ensures that current and future businesses are considered in the regeneration of Old Kent Road, which is particularly important with respect of the protected characteristic of race given the higher than average number of BME business owners and employees in the OA.

New development has the potential to displace existing businesses, with small-to-medium enterprises being the most at risk; this could result in negative impacts, particularly those from BME backgrounds given that over 65% of those living in the Old Kent Road ward are non-white. Mitigation is secured within the AAP (and the Southwark Plan 2022) through business relocation and affordable workspace policies.

## AAP5: Businesses and workspace - The Bow Tie

There are no specific identifiable positive or negative impacts on health arising from AAP5.

### AAP6: Life sciences

AAP6 may have positive impacts for all by bringing new life sciences business to the area, expanding and diversifying the local jobs market.

## AAP6: Life sciences

There are no specific identifiable positive or negative impacts on health arising from AAP6.

## AAP7: Town centres, leisure and entertainment

AAP7 illustrates positive impacts for all by making provisions for smaller local shops and community facilities in two town centres, making these hubs easily accessible by non-vehicular forms of transport from all neighbourhoods within the OA. This ensures greater

## AAP7: Town centres, leisure and entertainment

In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.

accessibility for all to a range of shops, services and recreational/leisure outlets.

# AAP8: Movement - People, Place and Experience

AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.

## AAP10: Tall buildings strategy - The Stations and the Crossings

AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.

## AAP11: Character and heritage

## AAP8: Movement - People, Place and Experience

One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution. This has positive impacts for all.

# AAP9: The Greener Belt - Parks and healthy streets

There are no specific health impacts arising from AAP9. However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.

## AAP10: Tall buildings strategy - The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

## **AAP11: Character and heritage**

AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all. In turn, this guards against perceptions among the OA's existing communities that their neighbourhoods and places of cultural value are being eroded by regeneration.

There are no specific identifiable positive or negative impacts on health arising from AAP11.

## AAP12: Design

AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.

## AAP12: Design

There are no specific identifiable positive or negative impacts on health arising from AAP12.

More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.

## **AAP13: Climate Emergency**

AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:

- improving air quality;
- creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and
- reducing global warming.

All of the aforementioned have beneficial impacts for all.

## **AAP13: Climate Emergency**

There are no specific identifiable positive or negative impacts on health arising from AAP13.

There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.

# AAP14: Water management, air and noise quality

AAP14 aims to illustrate positive impacts by ensuring development has met high environmental standards and promoting more active, public and sustainable travel modes to reduce

# AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding. pollution. This policy aims to improve these conditions to ensure a cleaner and greener environment.

The focus AAP14 gives to the 'Agent of Change' principle ensures that SMEs, of which there are a large number in the Old Kent Road OA operated by BME individuals, are not prejudiced by new development. This ensures sufficient mitigation is in place to guard against the negative economic impacts that might otherwise arise.

The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes co-located with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population.

### AAP15: Great start in life

AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.

### AAP15: Great start in life

AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. This has particular positive impacts in relation to race, given that approximately half of hospital admissions for asthma in London occur in children from black, Asian and minority ethnic backgrounds, compared to 28% of white children 12.

The policy also encourages greater contact with nature, which has proven mental health benefits.

AAP16: Child and youth provision

AAP16: Child and youth provision

<sup>&</sup>lt;sup>12</sup> 'Shocking inequality in children with asthma admitted to hospital in London', accessible from <a href="https://www.london.gov.uk/increaseinasthmaadmissions">https://www.london.gov.uk/increaseinasthmaadmissions</a>

AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.

The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community cohesion, which has positive social impacts.

AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of race.

This has particular positive impacts in relation to race, given that children from black, Asian and minority ethnic backgrounds are more likely to be overweight or be living with obesity by the age of 4/5 and 10/11 years old, compared to white children<sup>13</sup>.

### Sub area and site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.

### Sub area and site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to –and delivery of new–green and open spaces within the sub areas will have positive health impacts for all.

## Sub Area 1

Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.

## Sub Area 1

There are no specific identifiable positive or negative impacts on health for Sub Area 1.

More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.

<sup>&</sup>lt;sup>13</sup> 'Overweight children', accessible from <a href="https://www.ethnicity-facts-figures.service.gov.uk/health/diet-and-exercise/overweight-children/latest/">https://www.ethnicity-facts-figures.service.gov.uk/health/diet-and-exercise/overweight-children/latest/</a>

The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.

### Sub Area 2

In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities —which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11— will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.

The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.

### Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

## Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces

#### Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way. In particular, these interventions may help tackle the higher than average rates of childhood obesity experienced by the youth population of the Old Kent Road area.

### Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all.

Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible. This is especially relevant to 'Race', given the high number of BME employees and business owners in the Sub Area.

#### Sub Area 4

There are no specific identifiable positive or negative impacts on health for Sub Area 4.

### Sub Area 5

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.

### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5.

Equality information on which above analysis is based	Health data on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

- Appendix 3 'Baseline data Facts and Figures' to the Integrated Impact
  Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
  Submission; and
- Appendix 9 'Baseline Indicators Table' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.

Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).

It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of race, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9
- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16
- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8. AAP13
- IIA017: AAP1, AAP2

## Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

## **RELIGION AND BELIEF**

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

#### Societal and economic issues

## Potential impacts (positive and negative) of proposed policy

#### Vision

The Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population. Particularly relevant to religion and belief include re-providing existing faith premises as part of mixed-use redevelopments (applying the Agent of Change principle).

Indirectly, the uplift in land values associated with the regeneration brought by the AAP has the potential to displace places of worship, as these are particularly vulnerable due to often occupying low-rent premises on shortterm leases. The OA has a particularly large number of faith premises per head of the population, relative to the rest of the borough. Many of these serve nonwhite communities. While such displacement would have negative impacts, the Southwark Plan and AAP require relocation strategies to be prepared by developers setting out how the affected faith group(s) will be accommodated elsewhere in adequate premises.

### **Health issues**

Potential health impacts (positive and negative) of proposed policy

### **Vision**

The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts

It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

## Strategy

### Strategy

This demonstrates positive impacts because it recognises regeneration may sometimes be criticised as gentrification or social cleansing. The Strategy aims to create delivery of direct benefits to the existing communities regardless of religion or belief. Examples include:

- the delivery a range of housing types to suit need –including over 4,000 larger homes that better respond to the needs of larger intergenerational families– all designed to a high standard and in mixed-tenure developments;
- revitalised town centres, where places of worship form part of the mix of facilities;
- a network of youth facilities providing social spaces that encourage young people from all backgrounds to mix

all of which will promote inter-faith and intra-faith good relations, while also expanding socioeconomic opportunities for residents, workers and visitors of the OA irrespective of religion or belief.

The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.

In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.

The recognition of existing communities and delivering benefits direct to them ensures the sense of place in the OA is preserved and this will contribute to a greater sense of security and community. This will improve wellbeing for all.

## **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.

## **AAP1: The Masterplan**

AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all.

## AAP2: Bakerloo Line Upgrade and Extension

AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure

## AAP2: Bakerloo Line Upgrade and Extension

There are no specific identifiable positive or negative impacts on health arising from AAP2.

such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. This ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.

## AAP3: Homes for all

AAP3 demonstrates positive impacts for all by ensuring a diversity of types and tenures of homes to meet needs of those across the community. This ensures that residents can remain close to their families and communities.

## **AAP4: Student homes**

In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between all, irrespective of religion or belief.

## AAP5: Businesses and workspace - The Bow Tie

AAP5 demonstrates positive impacts for all ages by making provisions for current business occupiers of Old Kent Road. This ensures that current and future businesses are considered in the regeneration of Old Kent Road.

### AAP6: Life sciences

AAP6 may have positive impacts for all by bringing new life sciences business

### AAP3: Homes for all

AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life.

## **AAP4: Student homes**

In placing emphasis on high quality design, AAP4 seeks to ensure PBSA provides comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of dedicated communal internal facilities for PBSA occupiers, which could include prayer/reflection rooms or other places that promote inter-faith and intra-faith dialogue. This would support mental wellbeing amongst residents.

## AAP5: Businesses and workspace - The Bow Tie

There are no specific identifiable positive or negative impacts on health for AA5.

### **AAP6: Life sciences**

There are no specific identifiable positive or negative impacts on health arising from AAP6.

to the area, expanding and diversifying the local jobs market.

## AAP7: Town centres, leisure and entertainment

AAP7 illustrates positive impacts for all by making provisions for smaller local shops and community facilities in two town centres, making these hubs easily accessible by non-vehicular forms of transport from all neighbourhoods within the OA. This ensures greater accessibility for all to a range of shops, services and recreational/leisure outlets.

## AAP7: Town centres, leisure and entertainment

In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.

# AAP8: Movement - People, Place and Experience

AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.

# AAP8: Movement - People, Place and Experience

One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution. This has positive impacts for all.

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.

# AAP9: The Greener Belt - Parks and healthy streets

There are no specific health impacts arising from AAP9. However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.

## AAP10: Tall buildings strategy - The Stations and the Crossings

AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.

# AAP10: Tall buildings strategy - The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

## AAP11: Character and heritage

AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all. In turn, this guards against perceptions among the OA's existing communities that their neighbourhoods and places of cultural value are being eroded by regeneration.

## **AAP11: Character and heritage**

There are no specific identifiable positive or negative impacts on health arising from AAP11.

## AAP12: Design

AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.

## AAP12: Design

There are no specific identifiable positive or negative impacts on health arising from AAP12.

More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.

## **AAP13: Climate Emergency**

AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:

- improving air quality;
- creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and
- reducing global warming.

## **AAP13: Climate Emergency**

There are no specific identifiable positive or negative impacts on health arising from AAP13.

There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.

All of the aforementioned have beneficial impacts for all.

# AAP14: Water management, air and noise quality

AAP14 aims to illustrate positive impacts by ensuring development has met high environmental standards and promoting more active, public and sustainable travel modes to reduce pollution. This policy aims to improve these conditions to ensure a cleaner and greener environment.

## AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.

The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes co-located with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population.

## AAP15: Great start in life

AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.

## **AAP15: Great start in life**

AAP15 demonstrates positive health impacts for children and young people irrespective of religion/belief by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. It also encourages greater contact with nature, which has proven mental health benefits.

## **AAP16: Child and youth provision**

AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.

The policy also places emphasis on these facilities being distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community cohesion, which has positive social impacts.

## AAP16: Child and youth provision

AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of religion or belief.

## Sub area and site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.

### Sub area and site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to –and delivery of new–green and open spaces within the sub areas will have positive health impacts for all.

### Sub Area 1

Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.

### Sub Area 1

There are no specific identifiable positive or negative impacts on health for Sub Area 1.

More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.

The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.

In accordance with the Connecting Communities section of the AAP, existing places of worship within and on the cusp of the sub-area will be protected. Examples include Haddon Hall Baptist Church, Bermondsey Hall Methodist Church, the church that operates from Site Allocation OKR6 and the Old Kent Road Mosque and Islamic Cultural Centre.

## Sub Area 2

In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities —which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11— will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.

The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.

## Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

### Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park, various pocket parks and a potential new lido. This delivers urban greening and green spaces for residents, to exercise, rest and play, which is safe and attractive. This encourages a healthy active, lifestyle for all.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

The support given by the Sub-Area 3 site allocations to retaining/reproviding places of worship will reduce the risk of displacement as a result of uplift in land values. This demonstrates positive social impacts.

### Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.

### Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.

## Sub Area 4

There are no specific identifiable positive or negative impacts on health for Sub Area 4.

### Sub Area 5

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience,

### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5.

making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.

# **Equality information on which above analysis is based**

## Health data on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

- Appendix 3 'Baseline data Facts and Figures' to the Integrated Impact
   Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
   Submission; and
- Appendix 9 'Baseline Indicators Table' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.

Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).

It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of religion and belief, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9
- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16
- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

## Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### SEX

A man or a woman.

	Health issues
·	Potential health impacts (positive and negative) of proposed policy

### Vision

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population.

One of the key themes of the Vision is co-location, involving the introduction of residential uses to locations that were formerly exclusively or predominantly industrial. This will make these neighbourhoods much safer places for all, but particularly women, during the day- and night-time (for example, through the presence of more active uses, the presence of increased

### Vision

The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts

It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

numbers of individuals in the public realm, and improved levels of natural surveillance).

### Strategy

The Strategy aims to create delivery of direct benefits to the existing communities regardless of sex. It demonstrates positive social impacts by aiming to shield people from negative experiences such as feeling unsafe. One example is by creating multifunctional neighbourhoods featuring amongst other things youth facilities, shops, services and leisure opportunities linked by pleasant and well naturally-surveilled public spaces and routes; these places will help to promote feelings of security for all, but especially women.

### Strategy

The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-fosters a greater sense of security, comfort and confidence when using the public realm. It will encourage in particular women to use public realm (for exercise, leisure etc.) in the dayand night-time by reducing opportunities for crime and reducing a perception of danger and hostility within external public space. This improves mental and physical wellbeing for all.

In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.

### **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.

### **AAP1: The Masterplan**

AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all.

# AAP2: Bakerloo Line Upgrade and Extension

AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and

# AAP2: Bakerloo Line Upgrade and Extension

There are no specific identifiable positive or negative impacts on health arising from AAP2.

physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond. The two BLE stations will provide toilets, making journeys more dignified and comfortable for all, but in particular women.

All of the above ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.

### AAP3: Homes for all

AAP3 demonstrates positive impacts for all by ensuring a diversity of types and tenures of homes to meet needs of those across the community. This ensures that residents can remain close to their families and communities.

AAP3 also extends to Purpose Built Shared Living developments (also known as co-living), which provide private and shared spaces for single occupiers, male and female, to live as part of a community. This type of housing is an example of how, through the 'Homes for All' policy, the AAP will have positive benefits for inter- and intra-sex relations.

### **AAP4: Student homes**

In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between all, irrespective of sex.

Although not expressly stated, the policy enables PBSA operators to provide --if there is demand and if it is considered

### AAP3: Homes for all

AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life.

### AAP4: Student homes

In placing emphasis on high quality design, AAP4 seeks to ensure PBSA developments provide comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor amenity space for PBSA occupiers. All of these measures

necessary to provide safety reassurances-- female-only floors or spaces bookable for female-only activities. Such provisions can be secured in Student Management Plans. help support mental wellbeing amongst residents.

# AAP5: Businesses and workspace - The Bow Tie

# AAP5 demonstrates positive impacts for all ages by making provisions for current business occupiers of Old Kent Road. This ensures that current and future businesses are considered in the regeneration of Old Kent Road.

# AAP5: Businesses and workspace – The Bow Tie

There are no specific identifiable positive or negative impacts on health for AAP5.

### AAP6: Life sciences

AAP6 may have positive impacts for all by bringing new life sciences business to the area, expanding and diversifying the local jobs market.

### AAP6: Life sciences

There are no specific identifiable positive or negative impacts on health arising from AAP6.

# AAP7: Town centres, leisure and entertainment

The town centre strategy seeks to retain/re-provide the various large supermarkets that line the Old Kent Road high street. In part, this is to safeguard the continued operation of free-to-access public toilets within these large retail premises (something that Policy P35 of the Southwark Plan also requires for main town centre uses that are 1,000 sq.m or more GIA). The provision of public toilets makes for a more comfortable and dignified town centre experience for all, in particular women. This has positive social impacts.

# AAP7: Town centres, leisure and entertainment

In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits for both men and women, the rates of chronic loneliness for whom are 6.3% and 7.7% respectively<sup>14</sup>.

In aiming to transform the high street into a new destination which:

- connects neighbourhoods on both sides of the Old Kent Road high street; and
- is much more directly connected to the surrounding neighbourhoods via the various Town Centre Links;

journeys on foot/bike to the town centre will become more appealing with a

<sup>14 &#</sup>x27;The State of Loneliness 2023: ONS data on loneliness in Britain June 2023', accessible from: <a href="https://www.campaigntoendloneliness.org/wp-content/uploads/The-State-of-Loneliness-2023-ONS-data-on-loneliness-in-Britain.pdf">https://www.campaigntoendloneliness.org/wp-content/uploads/The-State-of-Loneliness-2023-ONS-data-on-loneliness-in-Britain.pdf</a>

greater perception of safety. This will have positive physical health benefits for all, but importantly women, by making them feel more confident to walk or cycle to the high street.

# AAP8: Movement - People, Place and Experience

AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.

# AAP8: Movement - People, Place and Experience

One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution for all.

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. By creating a network of green and open spaces, some of which are enhanced and some of which are entirely new, the policy increases accessibility to open space for all to ensure equality of access and opportunity.

The policy includes 'Principles' sections that advise developers on the types of facilities that would make for high-quality, engaging and appealing playspace. Implicitly, this includes thinking about how playspace can be designed to appeal to girls as much as boys. This has positive social benefits.

# AAP9: The Greener Belt - Parks and healthy streets

There are no specific health impacts arising from AAP9.

However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. Public toilets are also planned for Frensham Street Park, making time spent in green/open public space a more dignified and comfortable experience for all, especially women. This promotes greater physical and mental health and wellbeing.

# AAP10: Tall buildings strategy - The Stations and the Crossings

AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.

# AAP10: Tall buildings strategy - The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

### AAP11: Character and heritage

AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.

### AAP11: Character and heritage

There are no specific identifiable positive or negative impacts on health arising from AAP11.

### AAP12: Design

AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all. This includes ensuring places (internal and external) are well-lit and naturally-surveilled, with opportunities for crime designed-out, which has positive social impacts for all but particularly women.

### AAP12: Design

There are no specific identifiable positive or negative impacts on health arising from AAP12.

More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping all to lead healthier lifestyles.

### **AAP13: Climate Emergency**

AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:

- improving air quality;
- creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and
- reducing global warming.

### **AAP13: Climate Emergency**

There are no specific identifiable positive or negative impacts on health arising from AAP13.

There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing.

All of the aforementioned have beneficial impacts for all.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive impacts by ensuring development has met high environmental standards and promoting more active, public and sustainable travel modes to reduce pollution. This policy aims to improve these conditions to ensure a cleaner and greener environment.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.

The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population.

### AAP15: Great start in life

AAP15 illustrates positive impacts for all because it provides learning and education facilities for the young, for the mature, and for continuous adult learning. This ensures equality of opportunity for all, by improving access to education. This then ensures a higher skilled workforce and boosts employability, while also reducing unemployment and providing new opportunities for all.

### AAP15: Great start in life

AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally (e.g. through building design) and externally (e.g. through maximising distance to roads) to reduce the risk of developing respiratory illness or difficulties later in life. It also encourages greater contact with nature, which has proven mental health benefits.

### AAP16: Child and youth provision

**AAP16: Child and youth provision** 

AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to congregate and exercise for all, which promotes social cohesion. It also supports young people's independence improving their development, teaching and learning.

Implicitly, the policy encourages thinking about how youth facilities can be designed to appeal to girls as much as boys.

The policy also places emphasis on these facilities being affordable distributed across neighbourhoods, rather than consolidated in a single location. This encourages greater community cohesion, which has positive social impacts.

AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— irrespective of sex.

### Sub area and site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.

### Sub Area 1

Sub area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the

### Sub area and site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to –and delivery of new–green and open spaces within the sub areas will have positive health impacts for all.

### Sub Area 1

There are no specific identifiable positive or negative impacts on health for Sub Area 1.

More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments existing land uses, businesses and character. This will help foster good relationships for all.

The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.

for recreation. This has positive mental and physical health effects.

### Sub Area 2

In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities —which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11— will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.

The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.

### Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

### Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be

### Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.

### Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.

### Sub Area 4

There are no specific identifiable positive or negative impacts on health for Sub Area 4.

### Sub Area 5

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.

### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5.

# Equality information on which above analysis is based

Health data on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

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  Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
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It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of sex, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9
- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16
- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3. AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

### Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### **SEXUAL ORIENTATION**

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

### Societal and economic issues

# Potential impacts (positive and negative) of proposed policy

### **Health issues**

Potential impacts (positive and negative) of proposed policy

### Vision

The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport infrastructure in the form of the Bakerloop Bus and other travel enhancements (for Phase 1) and the BLE (Phase 2).

Furthermore, the Connecting
Communities strand of the Vision
recognises the need for more innovative
approaches to supporting the positive
growth of communities, in particular the
hand-in-hand social and economic
benefits that co-location can bring to all
sections of the population.

### Vision

The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts

It also recognises how high quality and community-oriented design, as well as the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for the most vulnerable.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

### Strategy

The Strategy aims to create delivery of direct benefits to the existing communities regardless of sexual orientation. It demonstrates positive social impacts by aiming to shield people from negative experiences such as feeling unsafe. One example is by creating multifunctional neighbourhoods featuring amongst other things youth facilities, shops, services and leisure

### Strategy

The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-fosters a greater sense of security, comfort and confidence when using the public realm. It will encourage in particular women to use public realm (for exercise, leisure etc.) in the dayand night-time by reducing opportunities

opportunities linked by pleasant and well naturally-surveilled public spaces and routes; these places will help to promote feelings of security for all. for crime and reducing a perception of danger and hostility within external public space. This improves mental and physical wellbeing for all.

In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This will improve mental health and wellbeing for all.

### **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.

### AAP1: The Masterplan

AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all.

# AAP2: Bakerloo Line Upgrade and Extension

AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. Phase 1 will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. Phase 2 will deliver a major new piece of modern public transport infrastructure fully accessible to all, which will provide reduced travel times into central London and beyond.

All of the above ensures equality of access to opportunity, amenities and services, and will expand socioeconomic opportunities for all.

# AAP2: Bakerloo Line Upgrade and Extension

There are no specific identifiable positive or negative impacts on health arising from AAP2.

### AAP3: Homes for all

AAP3 demonstrates positive impacts for all by ensuring a diversity of types and tenures of homes to meet needs of those across the community. This ensures that residents can remain close to their families and communities.

### AAP3: Homes for all

AAP3 makes this provision to contribute to a greater sense of security in the home, which has positive benefits for mental wellbeing, and improves quality of life.

### **AAP4: Student homes**

In encouraging PBSA developments to provide communal and community-facing facilities, the policy promotes good relations between all, irrespective of sexual orientation.

### **AAP4: Student homes**

In placing emphasis on high quality design, AAP4 seeks to ensure PBSA developments provide comfortable, practical, restful and uplifting living environments for all. Additionally, the policy promotes where possible the provision of outdoor amenity space for PBSA occupiers. All of these measures help support mental wellbeing amongst residents.

# AAP5: Businesses and workspace - The Bow Tie

AAP5 demonstrates positive impacts for all ages by making provisions for current business occupiers of Old Kent Road. This ensures that current and future businesses are considered in the regeneration of Old Kent Road.

# AAP5: Businesses and workspace – The Bow Tie

There are no specific identifiable positive or negative impacts on health for AAP5.

### **AAP6: Life sciences**

AAP6 may have positive impacts for all by bringing new life sciences business to the area, expanding and diversifying the local jobs market.

### AAP6: Life sciences

There are no specific identifiable positive or negative impacts on health arising from AAP6.

# AAP6: Town centres, leisure and entertainment

AAP6 illustrates positive impacts for all because it provides more spaces for social interaction in a pleasant environment, with more neighbourhood events and cultural activities.

# AAP6: Town centres, leisure and entertainment

There are no specific identifiable positive or negative impacts on health for AAP6.

# AAP7: Town centre, leisure and entertainment

AAP7: Town centre, leisure and entertainment

AAP7 aims to transform town centres. This illustrates positive impacts for those of all ages because it aims to deliver a range of shops and amenities to meet daily needs, clustered in two key locations benefiting from high public transport accessibility and high quality and inclusive public realm. By locating essential amenities together it improves accessibility for all.

In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.

# AAP8: Movement - People, Place and Experience

AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). This improves accessibility and mobility for all, which potentially impacts positively in terms of socioeconomic participation and opportunities.

# AAP8: Movement - People, Place and Experience

One of the key components of AAP8 is promoting a change in travel habits to more active modes of transport. It seeks to do this by, amongst other things, promoting a shift to electric vehicles, delivering more attractive options for cycling and walking, and implementing a CPZ across the entire OA. The policy also seeks to reduce and consolidate commercial deliveries. In these ways, AAP8 will promote healthier lifestyles and (by reducing combustion) tackle air and noise pollution for all.

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. The policy also increases accessibility to open space for all.

# AAP9: The Greener Belt - Parks and healthy streets

There are no specific health impacts arising from AAP9.

However, more generally, AAP9 delivers positive health benefits by creating green spaces for safe and accessible exercise and leisure for all. This promotes greater physical and mental health and wellbeing.

# AAP10: Tall buildings strategy - The Stations and the Crossings

AAP10 illustrates positive impacts for all by creating a strategy to ensure tall buildings are built in the right places to

# AAP10: Tall buildings strategy - The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

benefit everyone. It also ensures that the tall buildings deliver considerable public benefits. AAP11: Character and heritage AAP11: Character and heritage AAP11 illustrates positive impacts for all There are no specific identifiable by preserving and enhancing listed positive or negative impacts on health buildings, conservation areas and their arising from AAP11. settings and locally important historic buildings. This ensures a strong sense of place and identity for all. AAP12: Design AAP12: Design AAP12 demonstrates positive impacts There are no specific identifiable for all by requiring good design to positive or negative impacts on health maintain the character of the Old Kent arising from AAP12. Road but also contribute to a more vibrant, attractive and healthy More generally, the policy's focus on creating walkable and permeable townscape. The policy sets out that neighbourhoods will encourage greater development must provide accessible and inclusive design for all. rates of non-vehicular travel, helping all to lead healthier lifestyles. AAP13: Climate Emergency AAP13: Climate Emergency AAP13 demonstrates positive impacts There are no specific identifiable for all by ensuring new development positive or negative impacts on health responds to the climate emergency arising from AAP13. through reducing carbon across matters of design, construction, building There are more general health benefits operation, whole life cycle and transport. surrounding air quality and the This has secondary impacts by: promotion of active travel, all of which contributes to health and wellbeing. improving air quality; creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and reducing global warming. All of the aforementioned have beneficial impacts for all. AAP14: Water management, air and

noise quality

# AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to

met high environmental standards and promoting more active, public and sustainable travel modes to reduce pollution. This policy aims to improve these conditions to ensure a cleaner and greener environment.

improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.

The policy also requires co-location to be carefully considered so that neighbourhoods are liveable places where residents can walk or cycle to workplaces, daycare and educational institutions easily and safely. Furthermore, it reinforces high standards of residential design to ensure that homes, including homes colocated with industry, provide environmentally comfortable living conditions (i.e. minimal odour, dust, vibration and acoustic disturbance), which is critical to physical and mental wellbeing.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all groups within the local population.

### AAP15: Great start in life

# AAP15 demonstrates positive impacts for all by providing accessible and affordable access to youth facilities. The aim of this policy is to support the freedom of children and young people to occupy and move around the public realm independently. This encourages greater community cohesion and supports children and young people's independence improving their development, teaching and learning.

### AAP15: Great start in life

AAP15 demonstrates positive health impacts for children and young people by improving air pollution both internally and externally to reduce the risk of developing respiratory illness or difficulties later in life.

### AAP16: Child and youth provision

AAP16 demonstrates positive impacts for all by ensuring all young people have access to social and physical infrastructure regardless of their background. This creates safe indoor and outdoor spaces in the public realm, for children and young people to

### AAP16: Child and youth provision

AAP16 demonstrates positive health impacts by providing new and improving existing indoor and outdoor youth and sports facilities. This promotes a healthy, active lifestyle for all, and also promotes improved mental and physical wellbeing.

congregate and exercise for all, which promotes social cohesion.

### Sub area and site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.

Sub Area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the existing land uses, businesses and character. This will help foster good relationships for all.

The provision of a major new park at the heart of this particular Sub Area, along with a number of smaller parks and a change in the character of Mandela Way to a more cyclist and pedestrian friendly route, will mean people have more opportunities to spend time outdoors in social settings. This will have positive social impacts for all.

### Sub Area 2

Sub Area 1

In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities –which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and

### Sub area and site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to -and delivery of newgreen and open spaces within the sub areas will have positive health impacts for all.

### Sub Area 1

There are no specific identifiable positive or negative impacts on health for Sub Area 1.

More generally, the provision of the new parks along with the Healthy Streets initiative at Mandela Way will have positive impacts for all, who will benefit from safer and healthier environments for recreation. This has positive mental and physical health effects.

### Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations will make all residents feel more confident about (a) spending OKR11– will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.

The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life.

their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

### Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle for all, but will also promote social and community cohesion.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

### Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.

### Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly

### Sub Area 4

There are no specific identifiable positive or negative impacts on health for Sub Area 4.

accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.

### Sub Area 5

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.

### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5.

# Equality information on which above analysis is based

Health data on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

- Appendix 3 'Baseline data Facts and Figures' to the Integrated Impact
   Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
   Submission; and
- Appendix 9 'Baseline Indicators Table' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.

Where references are made in the above analysis to any statistical information not contained in Appendix 3 and/or 9 of the IIA, these references are supported by citations (the footnotes to these citations can be found at the bottom of the applicable page).

It is also based on the indicators set out in the Integrated Impact Assessment (IIA). These indicators broadly apply to the Old Kent Road AAP as a whole, and also apply more specifically to each policy. These indicators are listed below. The AAP policies that significantly interrelate/respond/engage with the indicators specifically in respect of the protected characteristic of sexual orientation, are listed alongside each indicator:

- IIA01: AAP3, AAP4, AAP5, AAP6, AAP7
- IIA02: AAP15, AAP16
- IIA03: AAP8, AAP9

- IIA04: AAP12
- IIA05: AAP4, AAP9, AAP15, AAP16
- IIA06: AAP8, AAP12, AAP13, AAP14
- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

### Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### SOCIOECONOMIC DISADVANTAGE

Although the Equality Act 2010 does not include socioeconomic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socioeconomic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.

Societal and economic issues	Societal and economic issues
Potential impacts (positive and negative) of proposed policy	Potential health impacts (positive and negative) of proposed policy
Vision	Vision
The Vision demonstrates positive impacts because it addresses the need for homes and jobs in the Old Kent Road OA, ensuring that this socioeconomic growth is supported by major sustainable transport	The Vision, in seeking seek to promote sustainable transport behaviours amongst all groups within the local population, demonstrates positive health impacts
infrastructure in the form of the Bakerloop Bus and other travel	It also recognises how high quality and community-oriented design, as well as

enhancements (for Phase 1) and the BLE (Phase 2). As the Vision expressly states, it aims to deliver positive benefits through "delivering enviable economic and cultural capital opportunity for all and not just privileged few", in so doing fighting socioeconomic disadvantage.

Furthermore, the Connecting Communities strand of the Vision recognises the need for more innovative approaches to supporting the positive growth of communities, in particular the hand-in-hand social and economic benefits that co-location can bring to all sections of the population. the co-location of certain uses, can provide wider societal benefits for mental health and wellbeing, especially for those who suffer from socioeconomic disadvantage.

The delivery of the Greener Belt, which is one of the key strands of the Vision, demonstrates positive health impacts by making open spaces more attractive and easily accessible to all, irrespective of socioeconomic status.

More generally, the Vision demonstrates positive health impacts because it recognises the importance of the built environment and the impact that it has, when well-designed and welcoming, on mental wellbeing.

### Strategy

The AAP delivers positive impacts by recognising the need for affordable homes. The Strategy sets out a 35% requirement for affordable new homes, with an aim to deliver 7,000 affordable homes in total. This will have direct positive impacts for lower-income households in the OA.

The AAP, in seeking to create 10,000 new jobs (including training/employment opportunities in higher paid sectors), will deliver positive economic impacts for the resident population. This will help tackle socioeconomic disadvantage.

The delivery of the BLE, with its two proposed stations ('Old Kent Road' and 'Burgess Park') will bring major inward investment during and post-completion, as identified in the Hatch Study entitled "Moving London Forward Bakerloo Line Upgrade and Extension", produced and published in 2024. For those who live within reach of the existing Bakerloo Line (47% of whom are within the top 30% most deprived communities in

### Strategy

The positive health impacts of addressing the issue of affordability in housing arise from a greater sense of security that will encourage improved mental health and wellbeing.

The Old Kent Road AAP --through its policies and interventions, such as encouraging car free development and the promotion of walking and cycling-fosters a greater sense of security, comfort and confidence when using the public realm. This improves mental wellbeing for all.

In seeking to deliver 20,000 high-quality new homes and a range of new and enhanced parks and open spaces, the Strategy gives focus to space and 'head room', allowing residents to think, rest and enjoy their leisure time. This is particularly important in the Old Kent Road OA, where living environment quality scores poorly in the IMD; the socioeconomically disadvantaged are likely to be particularly affected by this. The environmental improvements will,

England) this would have positive socioeconomic impacts on a transformative scale<sup>15</sup>.

therefore, improve mental health and wellbeing for all.

### **AAP1: The Masterplan**

AAP1 demonstrates positive impacts because it creates a masterplan with the capacity to meet identified need for housing, employment, infrastructure and community uses. This ensures greater access to housing and local services for all.

Although regeneration causes land and property values to rise, attendant with which is usually an increase in rent rates charged by private sector landlords, the masterplan provides mitigation against this negative impact by delivering 7,000 affordable homes. These homes will be available to those in greatest need and suffering most from housing insecurity.

### AAP1: The Masterplan

AAP1 demonstrates positive health impacts because it will ensure health services, open spaces and new and improved sustainable transport links will be delivered in tandem with the new housing and employment. This new infrastructure will bring positive health benefits, as well as an improvement in the environmental quality across the OA more generally, which will impact positively on all groups.

# AAP2: Bakerloo Line Extension and Infrastructure

AAP2 demonstrates positive impacts by supporting larger scale development throughout its lifetime with social and physical infrastructure. These upgrades will improve public transport accessibility for all and upgrade existing infrastructure such as buses, cycle paths, schools and health and leisure facilities for all. This ensures equality of access to opportunity, amenities and services for all.

# AAP2: Bakerloo Line Extension and Infrastructure

New and improved public transport infrastructure will reduce reliance on private motor vehicles, in turn improving air quality and health outcomes for all.

### AAP3: Homes for all

AAP3 demonstrates positive commitments because it aims to deliver more affordable housing across a

### AAP3: Homes for all

AAP3, by seeking to deliver high quality housing for those of all ages, including specialist (sometime managed) forms of

<sup>&</sup>lt;sup>15</sup> 'Moving London Forward Bakerloo Line Upgrade and Extension', accessible from <a href="https://centrallondonforward.gov.uk/wp-content/uploads/2024/02/Page-Numbers-revised-H372051\_REP\_001F\_Bakerloo-Extension-Revised\_Digital.pdf">https://centrallondonforward.gov.uk/wp-content/uploads/2024/02/Page-Numbers-revised-H372051\_REP\_001F\_Bakerloo-Extension-Revised\_Digital.pdf</a>

broader range of tenures to meet individuals' and families' needs regardless of socioeconomic background. Furthermore these homes will be high quality and the tenures will be undetectable. This is particularly relevant to the Old Kent Road OA, where of all seven indices of deprivation, the 2019 IMD found "quality of living environment" to be the poorest performing metric in this location

housing for mature citizens, will provide comfortable living environments where residents feel a greater sense of security in their home. This has positive benefits for mental wellbeing, and improves quality of life.

### **AAP4: Student homes**

# AAP4 demonstrates positive economic impacts by encouraging investment from higher education providers, who make a significant contribution to the borough's economy and labour market.

### AAP4: Student homes

There are no specific identifiable positive or negative impacts on health arising from AAP4.

# AAP5: Businesses and workspace - The Bow Tie

AAP5 demonstrates positive socioeconomic impacts for people of working age by making provisions for current business occupiers of the Old Kent Road OA. The policy ensures that current and future businesses are considered in the regeneration of Old Kent Road OA. The 10,00 new jobs brought by the AAP will have direct economic impacts, by providing local people with a greater number of employment opportunities within close reach of their home.

# AAP5: Businesses and workspace - The Bow Tie

There are no specific identifiable positive or negative impacts on health arising from AAP5.

### AAP6: Life sciences

AAP6 will have positive impacts for those of working age because it will complement and support existing business in the life sciences and related sectors, while also bringing new life sciences business to the area, expanding and diversifying the local jobs market. Importantly, these new employment opportunities for local people will be in in a higher skilled and paid sector.

### AAP6: Life sciences

There are no specific identifiable positive or negative impacts on health arising from AAP6.

# AAP7: Town centres, leisure and entertainment

AAP7 illustrates positive impacts for all by making provisions for smaller local shops and community facilities in two town centres, making these hubs easily accessible by non-vehicular forms of transport from all neighbourhoods within the OA. This ensures greater accessibility for all to a range of shops, services and recreational/leisure outlets.

# AAP7: Town centres, leisure and entertainment

In seeking to deliver an accessible town centre with a range of services and facilities, AAP7 will help local residents avoid loneliness and isolation. It will, therefore, have positive mental health benefits.

AAP7 seeks to deliver a new NHS health hub to serve the area's growing population. This will bring major benefits for all, providing integrated primary health, community health and social care support. In promoting a shift towards co-ordinated and holistic care in this way, AAP7 responds to the increase in the number of people in the borough with multiple long-term conditions.

# AAP8: Movement - People, Place and Experience

AAP8 demonstrates positive impacts for all because it aims to make active and public modes of travel more accessible, both physically/practicably and in terms of proximity to public transport modes. Financial contributions will be sought from applicants where appropriate to improve access to public transport (examples of such investment being improved bus services and new/expanded cycle hire stations). By improving accessibility and mobility for all in this way, increased socioeconomic participation and opportunities are made possible.

# AAP8: Movement - People, Place and Experience

There are no specific identifiable positive or negative impacts on health for AAP8.

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers a new network of green links and streets across the Old Kent Road OA, improving the ease and comfort with which pedestrians and cyclists can move through the area. The

# AAP9: The Greener Belt - Parks and healthy streets

AAP9 delivers positive health benefits for all because it creates greens spaces for safe and accessible exercise and leisure for all. This promotes greater policy also increases accessibility to open space for all.

There is a correlation between poverty and lower quality living environment. Furthermore, socioeconomic disadvantage can have a bearing on access to good quality and safe green spaces. AAP9 seeks to tackle this adverse relationship by improving the quality and number of green and open spaces, in so doing broadening and enhancing accessibility for residents of all background, but in particular for the most socioeconomically disadvantaged.

physical and mental health and wellbeing for people of all ages.

# AAP10: Tall buildings strategy - The Stations and the Crossings

AAP10 illustrates positive impacts for all by ensuring tall buildings are built in the right places to benefit everyone. It also ensures that the tall buildings deliver considerable public benefits.

# AAP10: Tall buildings strategy - The Stations and the Crossings

There are no specific identifiable positive or negative impacts on health arising from AAP10.

### AAP11: Character and heritage

AAP11 illustrates positive impacts for all by preserving and enhancing listed buildings, conservation areas and their settings and locally important historic buildings. This ensures a strong sense of place and identity for all.

### AAP11: Character and heritage

There are no specific identifiable positive or negative impacts on health arising from AAP11.

### AAP12: Design

AAP12 demonstrates positive impacts for all by requiring good design to maintain the character of the Old Kent Road OA but also contribute to a more vibrant, attractive and healthy townscape. The policy sets out that development must provide accessible and inclusive design for all.

It also reiterates the Southwark Plan and London Plan in stressing the importance on designing-out crime. This is particularly important in the OKR OA, where the IMD show incidence of crime

### AAP12: Design

There are no specific identifiable positive or negative impacts on health for AAP10.

More generally, the policy's focus on creating walkable and permeable neighbourhoods will encourage greater rates of non-vehicular travel, helping everyone lead healthier lifestyles irrespective of socioeconomic status.

to be one of the metrics against which the area performs poorly. By actively seeking to tackle this inequality, AAP12 demonstrates positive socioeconomic impacts.

### **AAP13: Climate Emergency**

AAP13 demonstrates positive impacts for all by ensuring new development responds to the climate emergency through reducing carbon across matters of design, construction, building operation, whole life cycle and transport. This has secondary impacts by:

- improving air quality;
- creating more efficient and less energy-consumptive buildings (attendant with which may be a reduction in residents' bills); and
- reducing global warming.

All of the aforementioned have beneficial impacts for local residents of all socioeconomic backgrounds.

### AAP13: Climate Emergency

There are no specific identifiable positive or negative impacts on health arising from AAP13. There are more general health benefits surrounding air quality and the promotion of active travel, all of which contributes to health and wellbeing for people of all socioeconomic backgrounds

# AAP14: Water management, air and noise quality

AAP14 aims to illustrate positive impacts for all ages by ensuring development has meet high environmental standards and promote more active, public and sustainable travel modes to reduce pollution. Those from lower socioeconomic backgrounds could live in areas with poorer environmental quality and are therefore more susceptible to the effects of poor air quality and low environmental quality. This policy aims to improve these conditions to ensure a cleaner, greener and safer environment for all.

People living in poverty are more financially susceptible to the effects of flooding, which the policy aims to address with its flooding minimisation and drainage requirements.

# AAP14: Water management, air and noise quality

AAP14 illustrates positive health benefits for all because it works to improve air quality and create high quality green and open spaces, while also reducing the risk of flooding.

It sets out requirements to ensure future development meets high standards to ensure long term environmental sustainability that all residents can benefit from.

Having improved open spaces and environmental quality promotes healthier and more active lifestyles amongst all socioeconomic groups within the local population.

### AAP15: Great start in life

AAP15 demonstrates positive impacts for all by providing accessible and affordable access to youth facilities. The aim of this policy is to support the freedom of children and young people to occupy and move around the public realm independently. This encourages greater community cohesion and supports children and young people's independence improving their development, teaching and learning.

### AAP15: Great start in life

AAP15 demonstrates positive health impacts for children and young people by improving school grounds and outdoor areas where they can play, exercise and engage with habitats and food growing. Locating places of education away from main roads helps to reduce the risk of developing respiratory illness or difficulties later in life.

### AAP16: Child and youth provision

AAP16 demonstrates positive impacts by ensuring all young people have access to social and physical infrastructure regardless of their socioeconomic background. This creates safe indoor and outdoor spaces in the public realm where children and young people can congregate and exercise, which promotes social cohesion.

### AAP16: Child and youth provision

AAP16 demonstrates positive health impacts by providing new and improved existing indoor and outdoor youth and sports facilities. This promotes a healthy and active lifestyle —attendant with which are mental and physical benefits— for everyone irrespective of socioeconomic background.

### Sub area and Site allocations

Each sub area will use innovative design and creative master planning to create a suitable mix of homes, work places and shops for each area. The capacity will be appropriate for the local area to ensure greater cohesion and the fostering of good relationships; this will have a positive impact for all.

### Sub area and Site allocations

There are no specific identifiable impacts on health for Sub Areas.

More generally, the proposed enhancements to –and delivery of new\_green and open spaces within the sub areas will have positive health impacts for all.

### Sub Area 1

Sub area 1 has positive impacts for all by encouraging the emerging office and creative sector to grow, through supporting business development and affordable workspace growth. More generally, this also presents positive socioeconomic impacts by attracting inward investment and new development to the OA, bringing new amenities that will complement the

### Sub Area 1

There are no specific identifiable positive or negative impacts on health for Sub Area 1.

existing land uses, businesses and character. This will help foster good relationships for all.

### Sub Area 2

In delivering a range of new community uses, and supporting the continued successful functioning of existing ones, Sub Area 2 demonstrates positive impacts for all. These facilities —which include LEX and the Mosque and Islamic Cultural Centre, as well as those required by site allocations OKR10 and OKR11— will offer education, leisure and social opportunities to the resident population. Creating community spaces for residents to meet, congregate and exercise in this way promotes community cohesion. This has positive impacts for all.

The proposed partial closure of Marlborough Grove to vehicular traffic, which will create space for a park as well as more generous circulation and dwell/recreation space for people, will enhance accessibility for all. Similar effects will be achieved by the proposed pocket parks and the Surrey Canal Park. All of these interventions will foster greater engagement in social and community life, helping to tackle socioeconomic disadvantage.

### Sub Area 2

There are no specific identifiable positive or negative impacts on health for Sub Area 2.

More generally, the investment in new parks and various street reconfigurations (all of which will be designed to be fully accessible) will make disabled people feel more confident about (a) spending their recreation time in the public realm and (b) making journeys by active travel modes. This will have positive mental and physical health impacts.

### Sub Area 3

Sub Area 3 demonstrates positive impacts for all by delivering part of the greener belt, the new Linear Park and the Trim Trail. A lido may also be delivered within site allocation OKR13. This delivers urban greening, green spaces and other recreational spaces where residents can exercise, rest and play. All of these spaces will be safe, attractive and designed to be fully accessible. These facilities will not only encourage a healthy active and lifestyle

### Sub Area 3

There are no specific identifiable positive or negative impacts on health for Sub Area 3.

More generally, however, examples of how this sub area seeks to generate positive health impacts for different groups include the Trim Trail, the provision of a new leisure centre within OKR13, and the delivery of a health hub on the northern edge of the sub area off Verney Way.

for all, but will also promote social and community cohesion.

Positive economic impacts will be brought by, amongst other things, the High Street strategy and the sub area wide employment strategy, the latter being heavily characterised by colocation.

### Sub Area 4

Sub Area 4 demonstrates positive socioeconomic impacts for all in seeking to bring forward a mix of uses alongside new green spaces, all made highly accessible through the delivery of a BLE station. This mix of uses co-locates leisure, employment and homes to improve accessibility for all. Particularly extensive engagement has been undertaken by the Council with existing businesses in this sub area to ensure they can be re-accommodated as part of redevelopment wherever possible.

There are no specific identifiable positive or negative impacts on health for Sub Area 4.

### Sub Area 5

Sub Area 4

Sub Area 5 demonstrates positive socioeconomic impacts for all through the promotion of railway arches as a low line to improve walkability for all. This improves the pedestrian experience, making it a more attractive and safer mode of transit for all. A strong focus of the Sub-Area is business retention/relocation, to ensure that the potential negative impacts of the regeneration brought by the AAP are adequately mitigated.

### Sub Area 5

There are no specific identifiable positive or negative impacts on health for Sub Area 5.

# Equality information on which above analysis is based

Health data on which above analysis is based

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- IIA07: AAP8, AAP13, AAP14
- IIA08: AAP12, AAP13, AAP14
- IIA09: AAP12, AAP14
- IIA010: AAP14
- IIA011: AAP10, AAP11, AAP12, AAP14
- IIA012: AAP10, AAP11, AAP12,
- IIA013: AAP9, AAP14
- IIA014: AAP14
- IIA015: AAP3, AAP4
- IIA016: AAP8, AAP13
- IIA017: AAP1, AAP2

### Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.

### **HUMAN RIGHTS**

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

### Potential impacts (positive and negative) of proposed policy

The Old Kent Road AAP is anticipated to have a range of positive impacts on people living and working in the Old Kent Road Opportunity Area. The proposed masterplan and development management policies do not threaten the human rights of anyone living or working in the area.

### Information on which above analysis is based

The above analysis is based on equality information and health data sets as set out in:

- Appendix 3 'Baseline data Facts and Figures' to the Integrated Impact
  Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19
  Submission; and
- Appendix 9 'Baseline Indicators Table' to the Integrated Impact Assessment (IIA) that supports the draft Old Kent Road AAP 2024 Reg 19 Submission.

These indicators broadly apply to the Old Kent Road AAP a whole, and also applies more specifically to each policy, these indicators are:

- IIA01: AAP4, AAP5, AAP6
- IIA02:AAP13, AAP14
- IIAO3:AAP10. AAP11
- IIAO4: AAP10
- IIAO5: AAP10, AAP13, AAP14,AAP15
- IIAO6: AAP3, AAP7,AAP12
- IIAO7: AAP3, AAP7, AAP12
- IIA08:AAP3, AAP7, AAP10, AAP12
- IIA09:AAP10. AAP12
- IIA010:AAP10, AAP12
- IIA011: AAP5,AAP6,AAP8
- IIA012:AAP9.AAP10
- IIA013:AAP13
- IIA014:AAP12
- IIA015:AAP4
- IIA016:AAP3,AAP7
- IIA017:AAP1, AAP2

### Mitigating actions to be taken

Continuously monitoring and annually reviewing our Old Kent Road AAP policies and IIA indicators, in addition to the Authority Monitoring Report (AMR).

We will continue to monitor and review the Old Kent Road AAP to ensure that the likelihood of negative impacts arising is minimal.