### **APPENDIX C**

### **The Equalities Impact Assessment**

## Appendix C Affordable Housing Supplementary Planning Document

### Cabinet 21 June 2011

Appendix A	The draft Affordable Housing
	Supplementary Planning Document (SPD).
Appendix B	The consultation plan
Appendix C	The Equalities Impact Assessment
Appendix D	The background paper
Appendix E	The Sustainability Appraisal

#### LOCAL DEVELOPMENT FRAMEWORK

Council

# **Equalities Impact Assessment**

Draft Affordable Housing Supplementary Planning Document June 2011

London Borough of Southwark

#### **EQUALITIES IMPACT ASSESSMENT**

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

This is the Equalities Impact Assessment for the draft Affordable Housing Supplementary Planning Document (June 2011). The SPD and all the supporting documents can be found on our website at:

www.southwark.gov.uk/ahspd

The Affordable Housing Supplementary Planning Document (SPD) sits within a set of planning documents called the local development framework (LDF). The Planning and Compulsory Purchase Act (2004) introduced the local development framework (LDF) as a replacement for unitary development plans and supplementary planning guidance. LDFs are designed to take a more pro-active approach to the planning system, linking with key partners to deliver specific plans for areas and to cover specific topics.

The Affordable Housing SPD provides further detail and guidance on the strategic planning policies set out in other LDF documents. It provides information on how to implement the housing policies set out in our core strategy, our saved Southwark Plan policies and our area action plans.

The SPD will assist members and council officers in implementing the policies effectively. It will inform the community of the issues associated with affordable housing and how we maximise provision of affordable housing, and will provided detailed guidance to developers, landowners and registered providers to inform their proposals.

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

This Affordable Housing SPD will replace the existing adopted Affordable Housing SPD 2008. We need to update and replace the 2008 SPD to take into account changes in national, regional and local policies and guidance. In particular it needs to take into account changes to our policies through our core strategy and our area action plans for Aylesbury and Canada Water. We also need

to take into account changes in the way the Government is funding affordable housing schemes.

Since the new Conservative/Liberal Democrat Coalition government came into power in May 2010, there have been a number of suggested changes to the ways in which affordable housing is delivered and what is defined as affordable housing. The Government recently consulted on a change to Planning Policy Statement 3: Housing. The proposed change would include the product Affordable Rent as a form of affordable housing. The council submitted a response to this consultation raising concern whether the product would work in Southwark where there is a high need for affordable housing, particularly social rented housing, and a low average income.

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At the time of producing and consulting on this SPD, the Government's proposed changes have not yet been adopted as policy. The draft SPD for consultation continues to use the current PPS3 and London Plan definitions of affordable housing. We may need to review this and take into account changes in national and regional policy before we take this SPD to Cabinet for adoption.

3. If existing, has the policy/strategy already been reviewed under the previous EqIA programme? If so, what were the findings to come out of this and has the agreed action plan been implemented? What has changed since the last assessment was undertaken (in terms of context, nature of the policy/strategy or the type of people affected by the policy/strategy)

We carried out an equalities impact assessment as part of the preparation of the current adopted 2008 Affordable Housing SPD. The EQIA looked at both the impacts of the SPD consultation and impacts associated with the implementation of the SPD. At the scoping stage we identified a number of possible issues around making the guidance clear so that the maximum amount of affordable housing would be delivered. Stage 2 of the EQIA highlighted that overall the SPD would have positive impacts on the equality target groups by helping to provide equality for all by providing more people with a home. We also set out how we would ensure the SPD was applied consistently and fairly including through ensuring our planning permissions are granted

in accordance with our policies and monitoring the impact of the SPD. From our Annual Monitoring Report we can see that the amount of affordable housing delivered in Southwark is one of the highest in London, with the fourth highest delivery of affordable housing over the past five years. Over the years 2005-2010 3670 new affordable homes were completed in Southwark.

We also carried out equalities impact assessments of the Southwark Plan, core strategy, the Aylesbury Area Action Plan and the Canada Water Area Action Plan. This SPD provides further guidance and information to the policies in all four development plan documents. We have reviewed these as part of the preparation of the SPD and this has fed into section 4 of this EQIA. The Equalities Impact Assessments for these documents can be viewed on our website at:

### www.southwark.gov.uk/ldf

The adopted Affordable Housing SPD 2008 provided guidance solely on the Southwark Plan policies. The new draft Affordable Housing SPD provides guidance on the new documents within the Local Development Framework as well as the Southwark Plan. The core strategy and area action plans have replaced some of the Southwark Plan and introduced new policies which are different to the policies the 2008 SPD provided guidance on.

The key policy and wider housing changes which are reflected in the new draft SPD are:

- Requiring a minimum of 35% affordable housing across the whole borough (previously 40% was required in the Central Activities Zone, excluding the Elephant and Castle Opportunity area)
- Setting out numerical targets for the overall amount of affordable housing across the whole borough and different areas
- Requiring a higher percentage of affordable housing through the Aylesbury Area Action Plan
- Requiring student housing developments to provide an element of affordable housing
- Requiring developments in some areas of the borough to provide a minimum of private housing as well as a minimum of affordable housing

- Our approach to estate regeneration
- Less grant available from the Homes and Communities Agency.
- We have updated the guidance on following the sequential test to require affordable housing on-site, off-site or as a pooled contribution in lieu of on-site affordable housing.

In addition, since we adopted the 2008 SPD, the new Equalities Act 2010 was passed on 8 April 2010, and came into effect from October 2010. The Government has also recently consulted on a new public sector duty which is due to come into effect in April 2011. This introduces nine characteristics that we should look at. The previous legislation required us to look at the impacts of our policies and SPD on the six equalities target groups.

Due to the changes in legislation and our changed planning policies since the preparation of the 2008 SPD we feel it is necessary to carry out a new EQIA for the draft Affordable Housing SPD 2011.

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

We are looking at the impact of the Affordable Housing SPD on the nine characteristics in accordance with the new Act and duty:

- Age
- Disability
- Gender re-assignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

We have identified potential barriers that could prevent our nine protected characteristic groups from benefitting fully from the Affordable Housing SPD. This scoping stage highlights the main issues of the SPD on equality, diversity and social cohesion.

The barriers we have identified could create differential impacts on certain groups and reduce social cohesion. We also have identified how the SPD may have positive impacts on these groups and how it may improve social cohesion. We have tried to minimise the negative impacts and maximise the positive impacts through the SPD and its preparation. Following consultation on the draft SPD and the scoping of this SPD we will consider whether there is anything further we can do within the SPD to maximise positive impacts and minimise negative impacts.

These impacts can be split into two categories

- 1. Impacts created through the production of the SPD in terms of public consultation
- 2. Impacts associated with the implementation of the SPD and the detailed information and guidance within the SPD.

### 4.1 Impacts associated with consultation on the Affordable Housing SPD

There are a number of barriers associated with consultation on all our planning policy documents which may create problems for social cohesion. It is important that everyone is offered the ability to be involved in the preparation of the SPD and that the final document reflects the views of our diverse community. We have prepared a consultation plan for the SPD which aims to do this. The plan sets out how we plan to consult the local community, developers, landowners, Registered Providers and other stakeholders. After the consultation period we will prepare a consultation statement which will set out the findings of our consultation including a summary of the representations received. We will provide officer comments on all the responses we receive explaining why we have/have not amended the SPD to reflect the comments. We will also provide information on the methods of consultation we used and how these were effective in consulting with our diverse community. This will help us to continually monitor and adapt our consultation methods and techniques to try and be as effective as possible and reach as many different groups as possible.

This is in accordance with our Statement of Community Involvement (SCI). Our SCI sets out how and when we will involve the community in the development of planning documents

and applications for planning permission. Within the SCI, we have identified barriers to involving equalities target groups and ways to overcome them. These include English not being someone's first language, problems accessing information, people not feeling safe attending evening meetings and the documents using too much jargon. We have tried to tailor our consultation to try and overcome as many of these barriers as possible. This includes writing the SPD in plain English, offering translation services where required, and attending community meetings when requested. Please refer to <u>Appendix A</u> of this document for the full list of barriers to consultation. We have considered this comprehensive list as part of the preparation of the draft SPD.

Our Annual Monitoring Report also looks at the effectiveness of our consultation and whether we need to change how we consult on our policy documents. As part of the preparation of the Annual Monitoring Report we carry out a survey asking everyone on our mailing list what they think of our consultation and how we could make it more effective. The results of this are reported in our Annual Monitoring Report, and helps inform us how to improve our consultation on future planning documents.

### 4.2 Impacts associated with the objectives and implementation of the Affordable Housing SPD

#### The content of the SPD

Our overall strategy is to provide homes including social rented, intermediate and private homes for people on a wide range of incomes. We will negotiate the maximum reasonable amount of affordable housing whilst also meeting the needs for other types of development and encouraging mixed communities. This is set out in the overarching core strategy policy 6 - Homes for people on different incomes. The SPD provides further guidance on delivering this overarching strategy, other core strategy policies, policies in our saved Southwark Plan policies and area action plans. In particular it provides guidance on:

- How we define affordable housing and the income limits for affordable housing
- Securing the maximum reasonable amount of affordable housing
- Achieving mixed and balanced communities with both private and affordable homes

- Achieving a mix of tenures within the affordable housing to include both social rented housing and intermediate housing
- When affordable housing is required including the threshold and type of developments that we required to provide an element of affordable housing
- The mix of dwelling sizes we require within affordable housing
- How we encourage more wheelchair affordable housing
- Where affordable housing must be delivered to follow the sequential test of requiring affordable on-site, and only in exceptional circumstances off-site or as a pooled contribution in-lieu of on-site affordable housing. It sets out that where we allow a pooled contribution this must be at least as much affordable housing as would have been provided if teh minimum 35% affordable housing requirement were achieved on site. A minimum of £100,000 of pooled contribution per habitable room of affordable housing will be required.
- The design and quality of affordable housing
- Sheltered, supported and extra care housing
- Affordable housing in specific types of development to include estate regeneration, live-work units and mixed use developments
- How affordable housing is financed and secured
- How to work with the council at pre-application and application stage

### The possible impacts and issues of the SPD

As part of the preparation of the draft Affordable Housing SPD we considered the following possible impacts and issues:

- The SPD seeks to provide more affordable housing across the whole borough. This helps to promote equality for everyone as it provides more people with a home that can meet their needs. However it may also have differential impacts on some groups with some groups benefitting more from new affordable housing then others. This may include people on a lower income such as single mothers or asylum seekers who are new to the country. There is a risk that this causes friction with other groups who may feel that some groups are being prioritised above them in accessing affordable housing.
- We define affordable housing in accordance with the adopted Planning Policy Statement 3: Housing, and the London Plan.

Within their definition we set target rents for social rented housing and intermediate housing. This may have differential impacts and could create problems with social cohesion for people whose incomes are just outside the maximum thresholds to qualify for social rented housing. This could include groups such a married people with two incomes whose combined incomes are likely to be above the threshold for social rented housing.

- New affordable housing may only meet the needs of some people, and other people may feel it does not meet their needs and that other groups are being prioritised over their needs. In particular people who are just above the threshold for social rented housing may feel that their needs are not being met as they may not be able to afford intermediate housing. This could cause tension between different groups
- To maximise the amount of affordable housing provided we require developers to submit financial appraisals when they cannot meet our policy requirements. This will help to have a positive impact on the most of the target groups by meaning as much affordable housing as possible is delivered. In particular this will have a positive impact on poorer people who cannot afford private housing. This may be particular equality groups such as young people starting their careers. However, it may have a less positive impact on some groups who would rather all development be private housing as it means overall there would be less private housing.
- We set out how we try to ensure mixed and balanced communities with a range of housing types and tenures. This should help to improve social cohesion by helping to meet the needs of more people wanting to live in Southwark. It may also cause friction between different groups by mixing up tenures. For example our policy requires some areas of the borough which are historically predominantly social rented housing, to now provide an element of private housing. In the long term this will help to create mixed and balanced communities. However, in the short term it may harm social cohesion as many of the residents in these areas may not be used to living next to people in private housing who may have more disposable income than the current residents.
- Similarly people currently living in affluent areas dominated by private housing may feel resentful towards affordable housing being developed in their area. This may create tensions between groups.

- As part of affordable housing, we require a percentage to be intermediate housing. One of the most popular and successful types of intermediate housing in Southwark is shared ownership. However, this may not be suitable for all religious groups, as some religious groups may not want to take out a mortgage for religious or cultural reasons. It may also not be suitable for people with certain types of jobs such as temporary work, as banks are often less likely to lend money to someone without a permanent steady job.
- The SPD provides guidance on how affordable housing is calculated and when it is required. If the SPD is not clear enough there is a risk that lower levels of affordable housing may be accepted and this would have less of a positive impact on those groups needing affordable housing.
- Through the core strategy we have introduced a policy requiring affordable housing from student schemes. Most student developments come forward in Elephant and Castle, Borough and Bankside and Peckham. These areas are areas with many people from BME groups. The guidance in the SPD may have a positive impact on these groups by ensuring some affordable housing is built as well as student housing which will help to create balanced communities and meet the needs of people living in those areas.
- The SPD provides guidance on the mix of different sized units to include more affordable family homes. This will have a positive impact on certain groups, especially those with larger families which are often BME groups.
- We encourage more wheelchair affordable housing, particularly family sized wheelchair affordable housing. This will have a positive impact on people using a wheelchair and also older people who are more likely to need a house designed to be wheelchair accessible. It will also have a positive impact on every group as wheelchair housing required larger room sizes which means more space for everyone.
- The SPD sets out where we require affordable housing to be delivered, with the presumption that it should be part of the new development itself. In exceptional cases we may allow it to be delivered off-site or as a pooled contribution. This helps to ensure mixed communities, which will have a positive impact on all groups. The SPD sets out that where a pooled contributed is agreed this must deliver at least as much affordable housing as would be achieved if the 35%

- requirement was delivered on-site. This will ensure that groups are not adversely affected by a pooled contribution and that there is more affordable housing across the borough.
- The SPD provides guidance on the design of affordable homes. This will have a positive impact on all groups as better designed developments will create a better environment for everyone.
- The SPD includes a table of minimum dwelling sizes. This is a positive for most groups as larger dwelling sizes mean a better quality of life as there is more space for people to live in their homes. However, it could potentially have an impact on some groups as house prices may increase as a result of the larger room sizes and this could have an impact on first time buyers.
- The SPD provides guidance on sheltered, supported and extra care housing and how this type of housing is usually exempt from having to provide affordable housing. The applicant must demonstrate that there is a need for this type of housing. This will have a positive impact on certain groups who need this type of housing which typically are older people and people with a disability.
- The SPD sets out how applicants should engage with us at an early stage in the preparation of the proposal, including securing a register provider to manage the affordable element of the scheme. This section will have a positive impact on all groups as it increases the likelihood of the scheme getting planning permission and being delivered.

#### 5. What happens next

We are consulting on this EQIA alongside the draft SPD. Following consultation we will prepare part B and C of this EQIA. This will be taken to Cabinet for agreement for adoption of the SPD in November 2011.

### APPENDIX A: Barriers to community involvement with different equalities target groups and how to overcome them (extract from Southwark Statement of Community Involvement (January 2008)

### 1. Voluntary groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The voluntary sector in Southwark is made up of around 18,000 individuals delivering services through 1,600 organisations, groups and projects. In 2001-2 Southwark Council supported around 300 voluntary and community groups with an investment of around £10m in grant-aid, service agreements and contracts.	<ul> <li>These barriers are generic barriers faced by many voluntary groups.</li> <li>Need for prior knowledge and experience;</li> <li>Jargon and legal terms;</li> <li>Other funding commitments and priorities than planning;</li> <li>Lack of time; and</li> <li>Knowledge of how and where to access information.</li> </ul>	<ul> <li>Provision of information and training about planning focused on these groups;</li> <li>Ensure that a range of community involvement methods are used that are accessible to these groups;</li> <li>Make sure that groups are added on to relevant mailing lists; and</li> <li>Hold/attend meetings at appropriate times that are accessible to these groups.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

### 2. Community groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Southwark is lucky in having a large number of community groups that	These barriers are generic barriers faced by many community groups:	<ul> <li>Provision of information and training in planning focused on these groups;</li> </ul>
are involved with a diverse range of	<ul> <li>Need for prior knowledge and</li> </ul>	Ensure that a range of community

issues.	<ul> <li>experience;</li> <li>Jargon and legal terms;</li> <li>Lack of time;</li> <li>Other priorities than planning;</li> <li>Accessing information barriers.</li> </ul>	<ul> <li>involvement methods are used that are accessible to these groups;</li> <li>Make sure that groups are added on to relevant mailing lists; and</li> <li>Hold/attend meetings at times that are accessible to these groups.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>
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3. Business – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
There are 11 000 businesses in Southwark. These range from large international and national organisations to small family owned businesses. Approximately 96% of the total businesses in Southwark comprise less than 50 employees of which, approximately 20% are Black and Minority Ethnic businesses. Many businesses are members of Southwark Chamber of Commerce and other local groupings.	i tot anacictananig planning	<ul> <li>Ensuring that information is available at places which are open outside of normal office hours;</li> <li>Hold/attend meetings at times that are accessible; and</li> <li>Provide information and training focused at businesses.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

4. Environmentalist and amenity groups – Equalities Target Group - all

Description	Barriers	to involveme	nt	Measures to overcome barriers to	
				consultation	

A wide range of people express their concern for their environment through membership groups such as Friends of the Earth or Greenpeace. Some of these larger organisations have active local branches. Some people get involved in local groups with the aim of protecting or improving a particular area or amenity such as the Friends of Burgess Park or the Dulwich Society.	<ul> <li>Other priorities than planning;</li> <li>Attending community meetings that do not address their issues;</li> <li>Jargon and legalistic terms; and</li> <li>May not be aware of how other planning issues may affect their area of interest.</li> </ul>	<ul> <li>Provide information to ensure these groups are aware of how planning influences their area;</li> <li>Use plain English; and</li> <li>Translators and interpreters to be used where appropriate</li> </ul>
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5. Neighbourhood, tenants and residents groups – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
There are approximately 232 neighbourhood, tenants and residents groups in Southwark. Many are formally consulted by us to provide residents views about social and private housing. These groups meet, many of them very regularly, to discuss matters affecting the local area including estate improvements.	<ul> <li>Other priorities than planning;</li> <li>Suffer from 'consultation fatigue' as they get consulted on a number of our initiatives and programmes;</li> <li>Need prior understanding and knowledge of planning issues; and</li> <li>Finding the time to get involved in planning.</li> </ul>	<ul> <li>Coordinate consultation between different parts of the council to ensure that groups are not overwhelmed with consultations;</li> <li>Make sure that groups are added on to relevant mailing lists;</li> <li>Provide focused information; and</li> <li>Hold/attend meetings at accessible times.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

### 6. Health organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Health service organisations provide important services to the community. Formal structures can be used to consult and gain feedback from local health organisations on how healthy living issues and requirements might influence or affect planning.	<ul> <li>Limited time to access and absorb detailed planning information;</li> <li>Other priorities than planning; and</li> <li>May not understand how planning impacts on health.</li> </ul>	<ul> <li>Hold/attend meetings at appropriate times; and</li> <li>Ensure that information is easily accessible, relevant and understandable.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

7. Transport organisations - Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation	
Transport for London and the public transport providers are <b>statutory</b> consultees. There are smaller local groups that are interested in the improvement of cycling, walking and public transport infrastructure.	<ul> <li>Other priorities than planning; and</li> <li>May not be aware of how other planning issues may affect their area of interest.</li> </ul>	<ul> <li>Provide information to ensure these groups are aware of how planning affects them.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>	

8. Refugee and Asylum seekers – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The Southwark Refugee Communities Forum (SRCF) was established by Refugee Community Organisations (RCO) in 2003 to	<ul> <li>Need for prior knowledge and experience</li> <li>English may not be their first language</li> </ul>	<ul> <li>Avoid jargon and ensure that all information is given in plain English</li> <li>Ensure that all written information is available in different languages</li> </ul>

enable the voices of refugees
themselves to be heard. The
membership of SRCF currently
includes 28 Southwark-based
Refugee Community Organisations.
An estimated 7,000 people from
refugee backgrounds across
Southwark are in direct contact with
SRCF members and participate in
their activities on a regular basis.

- Other priorities than planning
- Discrimination
- Lack of knowledge of how and where to access information
- Difficult to gain access to these groups, as they may not be recognised local community groups on our database
- Provide information and training that is focused on these groups
- Use a range of community involvement methods to ensure that they are accessible to all.
- Source local knowledge about how to engage groups and those for our mailing lists.
- Translators and interpreters to be used where appropriate.

9. Individuals and groups from other boroughs – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
A number of issues in Southwark have an impact on our neighbouring boroughs such as Lambeth and Lewisham. Groups and residents that are on the borders of Southwark should be included in matters that affect them.	<ul> <li>Need for prior knowledge and experience;</li> <li>Other priorities in their own borough and other than planning;</li> <li>English as a first language; and</li> <li>Lack of knowledge of how and where to access information.</li> </ul>	<ul> <li>Provision of information in appropriate locations;</li> <li>Hold/attend meetings/events at appropriate locations that are accessible and appropriate to these groups.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

10. Residents and individuals (including newcomers to the borough) - Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Residents and individuals in the borough may not belong to a	<ul> <li>Need for prior knowledge and experience;</li> </ul>	<ul> <li>Provision of information and training in planning focused on these groups;</li> </ul>

specific group, but it is important that they are able to engage and get involved with issues and decisions that impact on them.	<ul> <li>Jargon and legal terms;</li> <li>English may not be their first language;</li> <li>Discrimination;</li> <li>Problems accessing information;</li> <li>Other priorities than planning; and</li> <li>Lack of knowledge of how and where to access information.</li> </ul>	<ul> <li>Ensure that a range of community involvement methods are used that are accessible;</li> <li>Source local knowledge about how to engage individuals; and</li> <li>Add onto our mailing lists.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>
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11. Black and minority ethnic groups (including travellers and gypsies) - Equalities Target Group – Race

Description	Barriers to involvement	Measures to overcome barriers to consultation
Southwark is a very ethnically diverse borough. As a result there are many established and new groups and organisations that address issues relevant to each different community.	<ul> <li>Jargon and legal terms;</li> <li>Need for prior knowledge;</li> <li>English may not be the first language;</li> <li>Other priorities than planning;</li> <li>Discrimination;</li> <li>Problems accessing information;</li> <li>We may not be aware of their existence.</li> </ul>	<ul> <li>Avoid jargon; Use plain English;</li> <li>Translators and interpreters to be used where appropriate.</li> <li>Training groups in planning and council officers in understanding equality and diversity issues;</li> <li>Coordinate council consultations;</li> <li>Range of involvement methods; and</li> <li>Gain local knowledge about how to engage groups; and</li> <li>Add to mailing lists.</li> </ul>

12. Religious groups - Equalities Target Group -Faith/Belief

Description	Barriers to involvement	Measures to overcome barriers to
		consultation

organisations are a valuable consultation link due to their very strong links to local communities. groups have a contribution to make to social inclusion and community cohesion that is separate from promoting religion. As they are involved in running community services, community development and leadership representing community interests.	<ul> <li>Needs not being understood;</li> <li>Need for prior knowledge and experience;</li> <li>English may not be their first language;</li> <li>Other priorities than planning;</li> <li>Discrimination;</li> <li>Accessing information; and</li> <li>May not understand how planning affects their group.</li> </ul>	<ul> <li>Avoid jargon; Use plain English;</li> <li>Translators and interpreters to be used where appropriate.</li> <li>Training groups and individuals in planning and</li> <li>Training council officers to understand and belief issues;</li> <li>Coordinate our consultations;</li> <li>Range of involvement methods; and</li> <li>Gain local knowledge about how to engage groups; and</li> <li>Add to mailing lists.</li> </ul>
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13. Older people Forum's Equalities Target Group - Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
Pensioner forums help represent older people's views and are able to represent many local people over particular issues that are affected by planning.	<ul> <li>Older people may not feel safe attending meetings in the evenings;</li> <li>A lack of respect for their views; and</li> <li>Lack of knowledge of how and where to access information;</li> <li>Other priorities than planning.</li> </ul>	<ul> <li>Provision of information in appropriate locations;</li> <li>Hold/attend meetings/events at accessible times;</li> <li>We listen to the views and feedback; and</li> <li>Make information relevant.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

14. Education and young people - Equalities Target Group - Age

Description	Barriers to involvement	Measures to overcome barriers to
-		consultation

Schools, colleges, learning institutions and youth agencies are important aspects of the community, particularly as finding ways of involving young people have been identified as a priority by a large number of people	<ul> <li>May not be aware of the impact planning can have on them and/or how they can have an input;</li> <li>English may not be a first language; and</li> <li>May not be able to attend meetings in the evenings or during the day in term time.</li> <li>Other priorities than planning.</li> </ul>	<ul> <li>Provide information that is focused at young people;</li> <li>Attend schools and after-school centres and local youth forums to consult them on planning issues;</li> <li>Translators and interpreters to be used where appropriate; and</li> <li>Hold/attend meetings/events at accessible times.</li> </ul>
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### 15. Disability Forum - Equalities Target Group - Disability

Description	Barriers to involvement	Measures to overcome barriers to consultation
This forum helps to identify planning issues including safety, access and housing from the perspective of disabled people.	<ul> <li>Venues for meetings may not be accessible; and</li> <li>Written or verbal material is not always appropriate.</li> <li>Other priorities than planning.</li> </ul>	<ul> <li>Hold/attend meetings/events at accessible locations; and</li> <li>Ensure that all written information is available in different formats such as Braille, large print and audio.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

### 16. Lesbian, gay, bisexual and transgender - Equalities Target Group - Sexuality

Description	Barriers to involvement	Measures to overcome barriers to
		consultation

The Southwark Anti Homophobic Forum (SAHF) is the longest established LGBT Forum of its kind and works to meet the needs of the LGBT community in key areas including education, safety in the home, the streets and housing. The Southwark LGBT Network is a social support group for LGBT people and their friends who live and work in Southwark.	<ul> <li>Do not feel secure in raising LGBT issues at open events;</li> <li>Other priorities than planning;</li> </ul>	<ul> <li>Hold specific LGBT consultation events;</li> <li>Avoid jargon and use plain English;</li> <li>Hold/attend meetings/events at convenient times and ensure that the venue is accessible and a safe environment.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>
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