

## APPENDIX 6 EqIA

<b>MEETING:</b>	<b>Peckham Community Council and Nunhead and Peckham Community Council</b>	<b>Date:</b>	11 and 12 May 2011
<b>ITEM TITLE:</b>	Rye Lane Peckham conservation area		
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### SUMMARY OF CONTENT

A description of the effect of a new conservation area in Peckham and Nunhead.

The ways that equalities issues may impact on different groups of people have been highlighted.

### KEY ISSUES

- The methods used to involve and engage people affected by the proposed new Rye Lane Peckham conservation area needs to be accessible to all.
- The designation of the proposed new Rye Lane Peckham conservation area may impose additional planning requirements for those seeking to make alterations to their properties, which may have an impact on those on lower incomes such as lone parents, disabled people, the BME community and the elderly.

### DECISIONS REQUIRED:

- Comment on the main issues raised in this assessment
- Comment on the areas to be focused on at stage two.

# **RYE LANE PECKHAM CONSERVATION AREA EQUALITIES IMPACT ASSESSMENT**

## **Stage One: Scoping**

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

The proposed new Rye Lane Peckham conservation area will designate parts of the Peckham and Nunhead area under the powers of the Planning (Listed Buildings and Conservation Areas) Act 1990 as areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.

The proposed new Rye Lane Peckham conservation areas will be assessed in accordance with statutory regulations and in close consultation with the local community and English Heritage. The conservation area appraisals that will accompany the designation must be in general conformity with national and regional guidance and policy and contribute towards meeting local needs. The council's policies and strategies must also be evidenced to ensure that they are robust, meet local needs and can be justified.

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

This is a new policy. The proposed new Rye Lane Peckham conservation area when it is designated, together with the published conservation area appraisal will form part of the council's Local Development Framework, which contains all of the council's planning policies and will be used to guide the design and appearance of development in the designated area and in the determination of planning applications.

The proposed new Rye Lane Peckham conservation area appraisal will be noted in the Peckham and Nunhead Area Action Plan will be prepared as a development plan document, which forms part of the council's statutory development plan. An existing planning policy for Peckham exists in the Southwark Plan (the council's Unitary Development Plan). The Peckham and Nunhead Area Action plan will replace this policy.

### **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).**

- No, this policy has not been previously reviewed under a previous EqIA.

This EqIA has been carried out in accordance with the Equalities Act (2010) which identifies the following groups with protected characteristics:

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

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

##### **Community and Stakeholder Involvement**

The Planning (Listed Buildings and Conservation Areas) Act 1990 does not oblige the council to consult on its decision to designate a conservation area however, in preparing the Peckham and Nunhead Area Action Plan which will include the Rye Lane Peckham conservation area, the council will consult with the occupants of properties in the designated area in accordance the council's adopted Statement of Community Involvement (SCI),. The SCI sets out how and when Southwark Council will involve the community in the preparation of planning documents and on applications for planning permission in the borough.

National policy states that if the evidence suggests that the heritage asset may have a special significance to a particular community that may not be fully understood from the usual process of consultation and assessment, then the local planning authority should take reasonable steps to seek the views of that community.

The council will endeavour to do this, however there are a number of issues to be considered in this regard:

##### **Considerations:**

- Certain groups may not be able to access information and consultations as easily as others i.e. disabled people, those who do not have English as their first language, young people, those who support vulnerable people such as women who are more likely to care for children, older people and those with limiting illnesses.
- Certain groups may not feel comfortable expressing their views in public due to fear of discrimination such as people from the LGBT community, faith groups, young people and the BME community.
- People may not feel safe in attending public information or consultation events at certain times of the day, in particular after dark, such as older people and women

- Events may clash with times of religious observance and therefore we need to take into account people's faiths.
- Information may not be presented in a way that engages people effectively, such as material only printed in English, or information presented in a complicated format or language.
- Certain groups may not understand the relevance of the proposed Rye Lane Peckham conservation area and the conservation area appraisal to them and therefore they do not become involved in the process.
- Certain groups may have a negative perception of the council or disappointing experiences of community consultations which stop them becoming involved in the process.
- If people do not feel that they can access information at an early stage or have problems accessing it, they may become disillusioned in the process and lose interest i.e. BME groups, young and elderly people and disabled people.
- Some people may not be aware how to express their views or how these will feed into the process i.e. children and young people.
- There may be differences in the needs and aspirations between different groups which may result in conflict.
- People may feel as though certain groups are having a greater influence on how development of the Rye Lane Peckham conservation area

**We propose to consult in a way that will prioritise the needs of people in the area including public meetings and direct communication with the occupants of properties in the proposed conservation area, local groups and businesses in the area**

### **Design and Heritage**

The designation of the proposed new Rye Lane Peckham conservation area may impose additional planning requirements for those seeking to make alterations to their properties. The wider area is expected to undergo significant change through the development and implementation of the Peckham and Nunhead Area Action plan. This will see increased investment and development activity, which provides significant opportunities to improve the built environment in the area.

We see the designation of the proposed new Rye Lane Peckham conservation area as contributing to the enhancement of the area because we value its distinctive historic character. Consideration should be given to the following issues in the development and implementation of policies for design and heritage:

### **Considerations**

The pattern of development

- The conservation of features of the area for heritage and conservation purposes may change the pattern of development because, in addition to new development within the conservation area, traditional features and existing

buildings will need to be preserved which may provide a different range of opportunities for creating new jobs and housing for those that are seeking employment or better quality housing.

Improved quality of design

- High quality design standards will improve the appearance of the area but may result in higher costs for SME businesses i.e. by having to provide high quality shop fronts.

Improved public realm and environmental quality

- Improvements to the public realm and the environmental quality of the area will widen access to the area and will help to address the needs of people who continue to feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, disabled people, older people and women.

**The proposal to designate the area as a conservation area places a higher priority on the quality and design of the built environment which we feel will help to drive forward wider improvements for residents and businesses in the area**

## **Stage two: Assessment of Impacts**

### **Part A: Feedback from the Equalities and Diversity panel**

#### **1. What feedback did the panel give you at stage one**

The designation of the Rye Lane Peckham Conservation area has not been presented to the Equalities and Diversity panel as it was not considered to be a necessary requirement. There is no statutory obligation on the council to consult on the designation of a new conservation area, however as discussed earlier we are proposing to include the designation of the Rye Lane Peckham conservation area in the Peckham and Nunhead Area Action Plan. This document will be consulted on in line with the council's adopted SCI and will also be subject to its own equalities impact assessment.

### **Part B: Purpose and aims of policy/strategy**

#### **2. What is the overall purpose of the policy/ strategy?**

The Rye Lane Peckham conservation area will be part of Southwark's Local Development Framework. This will be set out in the Peckham and Nunhead area action plan which will be an important document which will be used for deciding what sort of development should take place within the Peckham and Nunhead area, and when, where and how it should happen.

#### **3. What are its aims?**

The aim of the Rye Lane Peckham conservation area is to designate the area around Rye Lane and Peckham High Street as defined by the map, as an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance

#### **4. Could these aims be in conflict with the Council's responsibility to:**

- Eliminate discrimination
- Promote equality of opportunity
- Promote community cohesion and good relations between different groups

Stage 1 of this EQIA identifies a number of key considerations which have been acknowledged and addressed in the stage two assessment as follows:

The pattern of development

- The built environment and the public realm may continue to ignore the needs of disabled people which results in creating barriers to inclusion in the wider community and opportunities to decent housing, jobs and access to leisure and community facilities. The designation of a conservation area will not restrict improvements to buildings and the public realm to meet the needs of disabled people from the wider community.
- Existing larger houses within the proposed conservation area will be protected helping to ensure that families can stay within the area alongside its wider regeneration

#### Improved quality of design

- The protection of areas for heritage and conservation purposes may limit development which may limit the opportunities for creating new jobs and housing for those that are seeking employment or better quality housing. The purpose of the conservation area is to maintain a wide choice in housing stock and will help to ensure all people will have access to suitable housing stock and this includes all groups with protected characteristics.

#### Improved public realm and environmental quality

- i.e. If the public realm and the environmental quality of the area remain poorly designed, certain groups may continue to feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, older people and women.
- Different groups may have different priorities for how buildings and the public realm is designed to meet their needs. Tensions could arise if there is the perception that one groups needs are being prioritised over others i.e. older people and young people. The designation of a conservation area will mean that public realm improvements will need to be more widely consulted and will require better quality materials and finishes which will benefit all local residents including all groups with protected characteristics

#### **5. Does the documentation relating to this policy/strategy include specific reference to the Council's responsibility (as set out above) and a commitment to work to meet this?**

While the council's responsibility for eliminating discrimination and promoting equality of opportunity and social cohesion are not specifically referred to as part of the process for designating a new conservation area, the aim of this process is to create attractive and distinctive places for all which are safe, easy to get around and a pleasure to be in by valuing the distinctive historic environment of Peckham.

The consultation strategy for the AAP will refer specifically to the need to ensure that in accordance with Southwark's Equalities and Human Rights Scheme 2008-2011, the Equalities priorities groups involved and the arrangements made to include under-represented groups and individuals.

## **Part C: Application of this policy/strategy**

### **6. What steps are you taking or will you take to ensure that the policy is or will be implemented consistently and fairly?**

Designation of the Rye Lane Peckham conservation area will mean that planning applications for developments within the conservation area, will need to 'preserve or enhance' the character and appearance of the conservation area. New development will need to respect the context of the conservation area, having regard to the content of the conservation area appraisal, propose appropriate materials, preserve traditional features of the area and do not introduce design features or materials that are out of character with the area. In addition, Conservation Area Consent will be required for the substantial demolition of a building within the designated area.

### **7. Could the way that this policy/strategy is being or will be implemented be discriminating against any particular individuals or groups or be potentially damaging to relations between different groups?**

Designation of the Rye Lane Peckham conservation area will contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community relations.

### **8. What changes could you make to either the policy/strategy itself or the way it is applied to improve the positive outcomes for all groups and to reduce or eliminate any negative outcomes?**

The findings of the EqIA scoping have been considered and this has informed the stage 2 assessment. The stage 2 assessment sets out those areas where the designation of the Rye Lane Peckham conservation area may have differential impacts and where appropriate mitigation measures are proposed to address these. ]

### **9. What information do you collect or do you plan to collect to monitor the impact of this policy/strategy on different groups?**

#### **Monitoring of planning applications**



Planning applications are monitored by the council in its Annual Monitoring Report (AMR). This includes, among other things, the area of the borough that is designated as a conservation area. The AMR includes a section on the area of the Peckham Area Action Plan in its report on development outcomes

### **Monitoring of the AAP**

The council monitors participation in the AAP preparation process to ensure that all groups have the opportunity to be involved. Where there is evidence that some groups have not been engaged, the council can seek to address this at the next stage. The consultation that has been carried out will be reported in the consultation statement to be submitted to the secretary of state.

The council's team in the Analytical Hub prepares periodic updates on demographic changes in the population, including changes relating to ethnicity, age, and faith. The council also monitors economic activity, health and pupil attainment in schools. Biannually the council also commissions a residents' survey to ascertain how local people feel about their area and whether it is improving. These analyses are carried out at community council level. These analyses will be useful in determining the success of the AAP.

These analyses are also reported in the council's annual monitoring report which assesses the impact of all development in the borough. Once the AAP has been adopted, the AMR will report annually on the implementation of the AAP, using indicators such as new housing completed in the AAP area, social rented and intermediate housing completed, new retail and business space completed, including small business units, average household income, and the percentage of residents who feel safe at night business start ups and the local employment rate.

## **Annex 3: Related projects and EQIAs**

### **The Southwark Plan**

#### Key findings:

- Provision of small local businesses which are easily accessible by local communities encourages the closure of development gaps for the local communities through an increased sense of belonging, redressing disadvantage and equality of access to services.
- By ensuring that new developments are safe and secure, disadvantage is addressed, community relations are improved and equality of opportunity is promoted.
- Protection of residential accommodation reduces discrimination and promotes equality of opportunity through providing inclusive and accessible housing for communities within the borough.
- Provision of accommodation other than houses and flats recognises the diverse needs of communities within the borough and promotes equality of opportunity since communities that will benefit are frequently the marginalized.
- The protection of transport impacts creates a sustainable, inclusive and accessible borough for its residents, future residents, users and occupiers.
- Public transport improvements assist in the creation of an accessible and inclusive borough by focusing on sustainable forms of transport as well as being socially inclusive. Accessible and inclusive transport links promote equality of opportunity and prevent barriers of exclusion and discrimination.
- Mini cab offices in the borough make transportation in the borough accessible to those who may not have access to public transport or private car use.

### **Core strategy**

#### Key findings:

- By requiring the maximum amount of affordable housing possible across the whole of the borough, this should have a positive impact on all equality groups and help to promote equality of opportunity by offering affordable housing across the whole of Southwark.
- Allowing student housing only in the town centres and in areas with good access to public transport services, this may promote cohesion between different groups as student housing will be located in the areas most suitable to accommodate it.
- Setting out criteria for how we may allocate gypsy and traveller sites in the future may improve community cohesion and good relation by making sure that new sites are located in suitable areas.
- Protecting employment sites should have a positive impact on discrimination and opportunity by increasing the amount of jobs in the borough and protecting the jobs already there. Through our employment and enterprise strategies we will work to ensure that these jobs are suitable for all of the different groups in the community.

- The Core Strategy aims to facilitate a network of community facilities that meet the needs of local communities. This should help to improve community cohesion and ensure that community facilities are easily accessible so that everyone can benefit from access to a range of community facilities.

## **Southwark 2016**

### Key findings:

- Migration in and out of the borough is high: this makes it difficult to measure the success of interventions (because the beneficiaries may have moved on and another, more disadvantaged group, taken their place). It also makes it more difficult to predict the composition of the borough over the next 10 years.
- Southwark's population will continue to grow so that by 2016 it could be between 286,000 and 301,000. That means anything from 14,000 to 20,000 more households than in 2001.
- By 2016 around 43% of the population is expected to be from black and minority ethnic backgrounds, with many different faiths and cultures.
- Southwark's population ranges from those who enjoy significant affluence to those in severe poverty. Southwark is becoming more socially and geographically divided.
- We have a 10% gap in the numbers of people of working age (16-74) in Southwark who are in employment compared to the national average. In that age group, 65% have no or first level NVQ qualifications, rising to over 80% for people of Bangladeshi and Black Caribbean origin.
- 39% of local authority homes and 40% of private rented properties do not yet meet the decent homes standard.

## **Peckham and Nunhead AAP – Issues and Options**

### Key findings (Stage one scoping stage only)

- Redevelopment and regeneration of areas may result in the disruption of communities.
- A significant concern in Peckham and Nunhead is the issue of crime and safety. Safety and security is one of the key concerns for local businesses and residents in the area. The Peckham and Nunhead Area Action Plan will endeavour to incorporate deliverable policies that will improve perceptions of the area and act to prevent crime.
- Consideration needs to be given to identifying sites and developing policies to accommodate a range of employment premises and opportunities of different types, sizes and costs to meet the different needs of the community.
- Local people may not have the skills to access job opportunities that are created through the regeneration of Peckham and Nunhead and therefore will not benefit from these new opportunities. This could act to create tensions in the community if there continues to be a high level of

unemployment in the area and resentment towards new people coming into the area and being successful in securing employment.

- Encouraging investment into the area may result in higher rents, which may push existing businesses out of the area and limit the opportunities for smaller and medium size enterprises. This could have a detrimental effect on current BME businesses that operate in the area and their retention in the long term. This may cause tensions in the community if through the regeneration of the area, the needs of big businesses are prioritised over SME businesses.
- The poor design of open spaces may make them feel unsafe and result in the mis-use of the space. This may exclude certain groups from using open spaces as they may fear for their personal safety, such as women, members of the BME community, the LGBT community, different faith groups, and older people. Poor design may also result in poor access and limit the use of these spaces for disabled people and mothers with children.
- A lack of adequate, accessible and affordable community facilities could act to isolate certain members of the community, such as women who may need a respite from supporting others such as children and those with limiting illnesses or older people who may live alone and need to interact with others.
- Tensions between certain groups may remain resolved if there are no facilities for people to come together and interact in informal surroundings. Social cohesion may be threatened by a deficit of community facilities in the area i.e. between different faith groups, BME groups and those who are not able to speak English.
- People on lower incomes may feel isolated from the rest of the community if they are unable to access affordable leisure and community facilities. This may result in isolation and social exclusion.