

## Appendix F

### Equality impact assessment

Appendix F for the Cabinet Report:  
Peckham and Nunhead Area Action Plan Preferred Option

February 2012

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## Stage One: Scoping

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

#### The Peckham and Nunhead Area Action Plan

The Peckham and Nunhead Area Action Plan (AAP) is a planning document for the Peckham and Nunhead area. It will be used to plan, manage and facilitate change in the area in a sustainable way that will benefit the community and make Peckham and Nunhead a better place to live work and visit. The area action plan contains a number of planning policies on a variety of topics, including housing, transport, employment, open space, community facilities and the environment. The policies are specific to Peckham and Nunhead and will focus on delivery and implementation.

The AAP has been and will continue to be, developed and prepared in accordance with statutory regulations and in close consultation with the local community. The policies in the AAP 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?

The Peckham and Nunhead AAP will be a new policy document and will form part of our Local Development Framework, which contains all of the Southwark specific planning policies and guidance used to guide how land is used in the borough and in the determination of planning applications. Current planning policy for Peckham and Nunhead exists in the saved Southwark Plan (2007) (the council's Unitary Development Plan) and the Core Strategy (2011). Some of the policies in the Southwark Plan policies (April 2011) document have been part replaced by the Core Strategy, however the majority of the Southwark Plan has been saved.

The Core Strategy has a vision for the area and strategic policies for Peckham and Nunhead. The AAP provides further detailed policies based on the vision and strategic policies set out in the Core Strategy and the saved Southwark Plan. The saved Southwark Plan sets out borough-wide policies that are more detailed than those in the Core Strategy. This will be replaced by a forthcoming borough-wide Development Management DPD.

### 3. If existing, has the policy/strategy already been reviewed under the previous EqlA 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).

This is the preferred option (the fifth stage) in the preparation of the Peckham and Nunhead AAP and builds on the scoping, vision paper, issues and options and the towards a preferred option reports. The council undertook, a stage one (scoping) EqlA of the issues and options and towards a preferred option stages of the AAP. We are now updating the stage one scoping stage, taking into account our findings at the previous two stages.

We are now at our fifth stage of consultation, which we call the 'preferred option'. We have used information gathered from each stage of consultation to shape our vision and preferred option for Peckham and Nunhead. Formal consultation for the preferred option will run from 31 January 2012 to 24 April 2012. The policies in this version of the AAP set out our preferred option for achieving our vision and objectives. The themes and objectives that the policies will help deliver are set out at the beginning of each section of the AAP.

At this stage of consultation on the preferred option we are now also carrying out a stage two assessment of impacts of the Peckham and Nunhead Area Action Plan, preferred option report. We will undertake another stage two assessment during the publication/submission stages in the preparation of the AAP to assess the impact of the final policies on equalities groups.

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

We carry out EQIAs on all our policy documents. We have set out the key findings of our most relevant planning policy documents, as well as a number of other key documents below. The relevant findings are summarised at annex one:

- The Southwark Plan 2007
- Core strategy 2011
- Southwark 2016
- Rye Lane Peckham and Peckham Hill Street Conservation Areas EqIA's

#### **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**

In preparing and developing the Peckham and Nunhead AAP, we have to carry out consultation in accordance with statutory regulations and our Statement of Community Involvement (2008), which sets out how and when we will involve the community in the alteration and development of planning documents and applications for planning permission. National policy states that local planning authorities ('the council') should involve the community at an early stage in the process and should continue to involve the community throughout the process of preparing development plan documents (paras. 3.2 and 3.3. of PPS12). The council will endeavour to do this, and more information is set out in our consultation plan, strategy and report. There are some potential barriers to successful and effective community and stakeholder involvement, as set out below:

## **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 what relevance the Peckham and Nunhead AAP has to them and therefore they do not become involved in the process.
- People may misunderstand the purpose of the Peckham and Nunhead AAP and what can be achieved which may result in tensions between groups if it does not deliver what they expect.
- 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 impact on how the area action plan is developed which may increase tensions in the community.

## **Considerations on groups with protected characteristics**

Various factors relating to consultation process have an impact on groups with protected characteristics. In addition, there are potential impacts relating to the actual content of the AAP. This section sets out a brief summary of each of the key topics the AAP will look at and sets out the considerations we need to make on groups with protected characteristics.

### **Housing**

Meeting housing need is one of the most challenging issues that national, regional and local government is faced with. Everyone should have the opportunity of living in a decent home. Housing should not reinforce social distinctions and should meet the housing needs of the whole community, creating mixed and inclusive communities and housing choice. Consideration should be given to the following when developing housing policies for Peckham and Nunhead:

## **Considerations**

- The plan could unintentionally fail to meet local housing needs by not providing the right housing type and mix for the local community which could sustain or result in overcrowding and poor quality accommodation which in turn disproportionately affects older people, young and BME community. An appropriate range of affordable, permanent and temporary accommodation may not be provided to meet the needs of specific user groups such as refugee and asylum seekers and Travellers.
- The regeneration of Peckham and Nunhead may result in a rise in house prices and housing may become unaffordable to those currently living in the area, especially for, lone parents, disabled people, the BME community and elderly people. This may also result in a dilution of the existing community as people are forced to move out of the area as they no longer can afford to live there. People may view the Peckham and Nunhead AAP as gentrification rather than regeneration.
- People currently living in the area may feel resentful towards large numbers of people moving in. This tension could be further exacerbated if people moving into the area buy up newer and higher quality housing.
- New housing may only cater for a broad market and fail to cater for the needs of specific groups such as disabled people, families with children, young people, and older people.
- People may feel that the needs of certain groups are being prioritised over others such as homes for larger families. People who are married or in a civil partnership may feel that the needs of single people are prioritised over their needs and vice versa.
- Redevelopment and regeneration of areas may result in the disruption of communities.

## **Transport**

National, regional and local policy states that sustainable methods of transport should be promoted. It is the intention that the capacity of public transport should be increased, the quality and integration of the transport system should be improved and a co-ordinated approach to improvements to transport integration and facilitating greater use of public transport, walking and cycling should be sought. Consideration should be given to the following when developing transport policies for Peckham and Nunhead:

## **Considerations**

- Proposed transport and infrastructure projects are reliant on central and regional governmental funding. Programmes may be subject to delay or cancellation. This may cause anger and frustration amongst the community if their expectations are not met, especially among those that do not have access to cheap and reliable public transport such as children, older people and parents with children (who are predominantly women).
- Transport services may feel unsafe for certain user groups. Some people may continue to feel unsafe when travelling on public transport and fear for their personal safety such as women (especially pregnant women) and young people or they fear discrimination such as members of the BME community, the LGBT community or people following a certain faith, such as Muslims and Sikhs. In the same way, walking routes may continue to feel unsafe for these groups.
- Older people and young people may not have the opportunity to be independently mobile if reliable, convenient, safe and cheap public transport is not made available to them. This could further exacerbate the need for parents and carers to continue to use unsustainable forms of transport, such as the car. This also puts pressure on ensuring the availability of accessible parking spaces in areas where required.

- Although it has been recognised that Southwark council has taken disabled people's needs into account, this should continue to be an important consideration to avoid circumstances where disabled people continue to find it difficult in accessing convenient and reliable public transport due to poor design and management. This could act to create further barriers to their inclusion within the wider community and limit their access to job opportunities, leisure activities and housing options. This could make disabled people unnecessarily dependant on others and limit their inclusion.
- Disabled access may be provided but they may be segregated from other access routes, which further exacerbate separation and isolation from the rest of the community.
- Public transport could continue to be unaffordable to those on lower incomes such as the BME community, young people (i.e. those who do not have access to free travel) refugees and asylum seekers. This may limit their job opportunities and inclusion in the wider community. It may limit them to one particular area.
- People may have different priorities in terms of transport such as parents with children, disabled people and those on lower incomes. Tensions may arise if people think that the needs of any one-user group are being prioritised above their own.
- Restricting car parking in new homes may be seen to disadvantage people who are married or in a civil partnership who own more than one car.

## **Safety and Security**

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 AAP will endeavour to incorporate deliverable policies that will improve perceptions of the area and act to prevent crime. The following considerations should be taken into account in the development and implementation of policies for safety and security in Peckham and Nunhead:

### **Considerations**

- The fear of crime could continue to make people feel isolated if they do not feel safe travelling from their homes to use and enjoy facilities and services within the area i.e. women (especially pregnant women), members of the BME community, members of certain faith groups, young people, members of the LGBT community and older people.
- The needs of individuals and groups may not be taken into account when designing new buildings, homes, open spaces and areas of the public realm and result in people not feeling safe to use them.
- Through promoting growth and regeneration to the area, the Peckham and Nunhead AAP may act to displace problems or create alternative problems with regard to crime and the fear of crime instead of solving or preventing them.

## **Employment**

The policies in the Peckham and Nunhead AAP must be in accordance with national and regional guidance and policy and contribute towards meeting the aims and objectives of the council's community strategy whilst meeting local needs for employment in Peckham and Nunhead. Through the development and implementation of the Peckham and Nunhead AAP, sites will be identified and improvements will be proposed for the growth and improvement of Peckham and Nunhead's economy. This will lead to greater investment in the area and lead to a growth in jobs in the area. 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. In developing employment policies for Peckham and Nunhead, consideration should be given to the following:

### **Considerations**

- People may feel excluded from new job opportunities created through the regeneration of the area such as women who can only work part time due to other commitments such as childcare. This could also exacerbate problems of child poverty in the area where this results in more households without an adult in employment.
- Certain groups may experience discrimination in accessing employment opportunities such as a members of certain faith groups; single parents; pregnant women, members of the BME community (especially young black men); and disabled people. The inability to access opportunities to work could further lead to poverty, social exclusion and isolation from the wider 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.
- There may be conflicting priorities for the expansion and control of the night time economy. Younger people may feel strongly that there is a need for a more vibrant night time economy, which could act as a way to make the town centre safer in the evening and at night by having an increased footfall at these times. Elderly people may feel threatened by this in terms of the people that the night time economy might attract and the noise that it will create.

### **Design and Heritage**

The action area is expected to undergo significant change in the Peckham core action area around the town centre, through the development and implementation of the Peckham and Nunhead AAP. This will see increased investment and development activity, which provides significant opportunities to improve the built environment in the area. Consideration should be given to the following issues in the development and implementation of policies for design and heritage:

### **Considerations**

- 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.
- The needs of certain groups may not be properly considered which may mean that they are unable to use the services and facilities in and around the area. For instance, older people may not be provided with basic facilities such as accessible and safe places to meet, public toilets and street furniture, such as benches, which provide a respite when using the town centre.

- 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. In contrast, the needs of disabled people may be considered but results in the public realm being designed in a way that segregates and separates disabled people from the wider community.
- 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.
- High quality design standards in the area may result in higher costs for SME businesses i.e. by having to provide high quality shop fronts, which may threaten the viability of these businesses.
- 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.

## **Open spaces**

Through the development and implementation of the Peckham and Nunhead AAP, the area will experience significant changes through growth in population, housing and employment. More people living in Peckham and Nunhead will mean more people wanting to use and enjoy the existing open spaces. It is important to ensure that open space is accessible to all members of the community. The following considerations need to be taken into account when developing and implementing policies for open space within Peckham and Nunhead:

## **Considerations**

- The needs of different user groups may not be properly considered which will result in certain groups not feeling that they are able to use the space. This may occur where there are conflicting priorities of how the spaces should be used, i.e. elderly people and women may wish to use the space for informal recreation such as a meeting place whereas other groups, such as young people, may wish to use the space for more formal and active recreation such as sports. This may cause tensions between groups if it perceived that one groups needs are being prioritised above others.
- The poor design of open spaces may make them feel unsafe and result in the misuse 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 open spaces in the area may restrict the ability for people to benefit from the health benefits of participating in active recreation and the educational benefits of learning about sporting activities or ecology, depending on the functionality of the open space. In addition, open spaces can act as a social meeting place and a deficit of open space could have a detrimental effect on inclusion and social cohesion.
- A lack of play space for children can have detrimental effects on their physical and mental development.

## **Community facilities**

Through the development and implementation of the Peckham and Nunhead AAP, the area will experience significant growth in population. We will need to develop policies to ensure that



there is the supporting infrastructure for an increased population. The following considerations will have to be taken into account when developing and implementing policies for community facilities in Peckham and Nunhead:

### **Considerations**

- 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 unresolved 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.
- A lack of appropriate community facilities may create boredom through a lack of things to do. This could result in a rise in anti social behaviour problems, particularly with young people.
- The needs of certain groups may not be properly considered when deciding on the number and type of community facilities that are considered appropriate for the area. For instance the need for meeting places for older people, BME groups, faith groups and the need for high quality childcare and play, leisure, cultural and educational facilities for children and young people.
- If poorly designed and located, it may limit the use of these facilities. For instance, disabled people may not be physically able to access the facilities, those on lower incomes may not be able to afford to use them, such as older people, young people and refugee and asylum seekers. Some people may not be able to travel distances due to other commitments, such as women with dependants.
- People having different priorities for the use of community facilities, i.e. for women it may be health and childcare, for young people it may be youth clubs and sporting facilities and for other groups it may be informal meeting places. Tensions could arise among different groups in the community if it is perceived that the needs of one group are being prioritised above others.

### **Sustainability**

The Peckham and Nunhead AAP seeks to ensure that development meets the high environmental standards set out in the Core Strategy, helping to reduce the impact of development on climate change. This includes ensuring that developments cut CO2 emissions by at least 44% beyond the requirements of the Building Regulations.

### **Considerations**

- The increasing price of fuel has led to a rise in fuel poverty, this can have a more significant impact on those with lower incomes and this is particularly important within the Peckham and Nunhead action area. Fuel poverty can also have a greater impact on the elderly who require more heating in winter but cannot afford the higher bills.
- Incorporating environmental measures within a scheme can add cost to the development. The needs of local residents will need to be balanced against any environmental concerns on a site by site basis. This will be especially important for

schemes put forward by local businesses and community groups who may not have the resources to fund more expensive design measures.

- Consideration will need to be given to the impact of some design measures and renewable technologies on the character and setting of the new development. This can have a negative impact on all residents in the area but especially those groups who struggle to engage with the planning system such as those who do not speak English as their first language. People may feel like they have not had the opportunity to comment on the development and have been isolated from the decision making process.

## **Stage Two: Assessment of Impacts**

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

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

The Peckham and Nunhead Area Action Plan, when adopted, will be part of Southwark's Local Development Framework. This will make it an important document which will be used for deciding what sort of development should take place within Peckham and Nunhead, and when, where and how it should happen.

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

The Peckham and Nunhead AAP sets out a spatial strategy for the area which provides a clear guide for future development and sets out where development will take place. At this stage the preferred option is being put forward for consideration. The equalities implications for choosing these options are considered below. The AAP sets out what we would like Peckham and Nunhead to be like. As we set out in the previous section, we have also updated the stage one assessment as this stage.

#### **3. 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

The scoping report identifies a number of key considerations which have been acknowledged and addressed in the stage two assessment as follows:

#### **Community and stakeholder involvement**

The stage 1 EqIA highlighted the need to ensure that the methods used to consult and engage people in the preparation of the AAP are open accessible to all members of the community. To help address this issue the council prepared a consultation strategy which sets out the principles of how it will consult and the importance of reducing barriers to consultation. It emphasises that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

At the towards a preferred option stage a variety of means were used to publicise, consult and engage with local people. These are described in detail in the Consultation Statement which accompanies the preferred option AAP and is summarised below:

- **Publicity:** Consultation on the AAP towards a preferred option report was widely publicised using the following methods; mail-out to contacts on Southwark's Planning Policy database, documents available on Southwark's website, a newspaper advert, documents made available in libraries, area housing offices and council offices.
- **Events and exhibitions:** Public exhibitions were held to publicise the towards a preferred option consultation from May until September 2011 at Peckham Space, Peckham Multiplex cinema, the Bussey building (133 Rye Lane), Charter School and at council offices at 160

Tooley Street for 'Southwark Reborn: the next chapter' – an event for landowners and developers. Officers also attended the following events to publicise the AAP; Tate Modern Travellers Launch, Refugee and Asylum seekers event, New London Architecture Breakfast and Friends of Peckham Rye Park Festival

- Stakeholder meetings: Meetings were held with the following stakeholders; Southwark Strategic Housing Partnership (SSHP) and Southwark Housing Association Group (SOUHAG)
- Community Council: Attended Peckham and Nunhead and Peckham Rye Community Council on 12 May, 12 July, 21 September 2011 and Nunhead and Peckham Rye Community Council on 19 September 2011. We presented the AAP to Planning Committee for comment on 7 June 2011.

The monitoring of consultation showed that wide range of groups and communities were involved at the towards a preferred option stage. Our consultation plan for the preferred option stage sets out what consultation we are doing now. We have used information gathered from each stage of consultation and will build on this to shape the next version of the AAP. Formal consultation for the preferred option will run from 31 January 2012 to 24 April 2012.

## **Housing**

The housing aim of the Peckham and Nunhead preferred option is to provide more and better homes, suitable for a range of groups. We will do this by allocating particular sites in the area for housing, bringing forward our own land for development and working with other developers to provide new homes. The preferred option sets out that development in the action area will provide a minimum of 2,000 net new homes between 2011 and 2026. It is expected that at least 1,500 of these homes will be within the Peckham core action area. The aim is to protect the character of Peckham and Nunhead by ensuring that new development is of an appropriate density for the character of each area.

45,000 people (census 2001) live in 25,584 households in Peckham and Nunhead with a high number of people of ethnic origin. The population of Peckham community council is expected to remain young in the future with a decrease in adults aged 65 and over, despite a decrease in proportion of children (0-14 years). The area has become far more mixed as young professional families have been attracted in by the better value of family homes compared to neighbouring areas.

The policy set out in the preferred option AAP is to require a minimum of 20% of family housing in the urban zone and core action area and a minimum of 30% of family housing in the suburban density zone. All family units must have direct access to private amenity space and should have sufficient play space for children and young people. As a result more homes would have access to private gardens and courtyards. Increasing the amount of private amenity space available will benefit families and young children in particular. Providing more houses will give more households their own front door, and so generate more activity at street level and help create a safer environment. This should benefit those groups who can feel vulnerable, such as the young and elderly.

Within the action area there is a high proportion of socially rented housing ( over 40% in Nunhead and Peckham Rye community council area and over 65% in the Peckham community council area). This compares to the Southwark average of 49% (Southwark Housing Requirements Study 2009). The Index of Multiple Deprivation (2010) shows that there have been considerable improvements during the last six years. However, large parts of the wards

remain in the 20% most deprived areas of the country. Also the north west of Nunhead ward has remained in the 10% most deprived areas in the country. The area as a whole has become far more mixed as young professional families have been attracted in by the better value of family homes compared to neighbouring areas.

The approach taken forward in the action area is to provide a minimum of 700 affordable homes and 700 private homes over the life of the plan. The preferred option AAP is to provide 35% affordable units within developments over 10 units. This will help to provide housing that is affordable to those on low incomes currently living in the area, especially for, lone parents, disabled people, the BME residents and elderly people. This may also result in helping to prevent dilution of the community if people are forced to move out of the area in which they can no longer afford to live. Development within Livesey, Peckham, Nunhead and The Lane wards must provide a minimum of 35% private homes. The affordable housing must be an appropriate mix of dwelling type and size. 50% of the affordable homes should be intermediate homes and 50% should be social rented homes. This will ensure that the housing needs of different groups in the area – for example, families, wheelchair users, the elderly, single and students and professionals are met. Southwark's Sustainable Community Strategy (Southwark 2016), Core Strategy, strategic housing market assessment (2010) and housing requirements study (2009) demonstrate the need for more affordable homes (both social rented and intermediate) and more private homes in Peckham and Nunhead. The Southwark Housing Requirements Study (2009) shows that in the Peckham community council area, over 65% of the stock is socially rented, and only 11% is owned outright or with a mortgage and 23% is in private sector ownership.

The policies in the core strategy require very high standards for all new housing delivered as part of the AAP. All new homes will be designed to Lifetime Homes Standards. They will be flexible enough to meet the changing lifetime needs of residents such as when people get older. Homes will be able to be altered and adapted to meet the needs of single people, older people, couples, large families and disadvantaged groups. The preferred option AAP sets out that at least 10% of all new homes will be designed to meet the needs of vulnerable groups such as the elderly and disabled including specialised housing schemes, providing appropriate level of support and homes designed for wheelchair users at each phase of the development. There will be a range of housing types in each development which will help to create a more mixed community. This will prevent residents from having to move as their housing requirements change and will help to ensure that a sense of community is maintained amongst a long-term resident population.

The Peckham and Nunhead preferred option AAP also includes a requirement for development in the area to meet minimum room size standards, meeting the criteria set out in section 2.2 of the Residential Design Standards supplementary planning document (2011). This will help to ensure a higher standard of living accommodation that will benefit all residents, including those with protected characteristics. Most notably, larger room sizes will benefit families, people with disabilities and those on lower incomes as they will be able to afford to stay in the area and not have to relocate elsewhere in order to find suitable accommodation.

## **Transport and Movement**

The AAP approach is to provide a high quality transport network in Peckham and Nunhead, to make Peckham and Nunhead a more convenient and comfortable place to access and move around by walking and cycling, with a range of other transport options., The AAP discourages car use where possible and encourages local journeys and active travel to school. Improving active travel opportunities will have a positive impact on health by encouraging more active

lifestyles. This may help reduce obesity and prevent long term conditions such as diabetes and cardiovascular disease which are significant issues in Peckham and Nunhead.

Although the core action area is highly accessible by public transport, the wider area is less accessible. More people living, working and visiting Peckham and Nunhead over the next 10-15 years will also increase the demand for public transport use. By further improving the key transport nodes, we will ensure that there is improved access throughout the wider area. Rye Lane is the focus of pedestrian movement and links to this key destination and thoroughfare are of variable quality. Rye Lane suffers from congested footways and the one-way systems on either side form a barrier to walking for some people.

The AAP supports enhancements to public transport and public transport services. Public transport quality, frequency and traffic flows should be improved; greater use of public transport, walking and cycling should be sought through improved routes and reduced car parking in new developments. Major public transport improvements have already been committed to Peckham town centre with the East London line extension phase 2 due to start operating in late 2012. The introduction of Cycle Superhighway Route 5 along Peckham High Street/Queens Road will also make the town centre a significant through route for cyclists. The AAP continues to support the extension of the Bakerloo line to Peckham and Camberwell, and the potential for the Cross River Tram, which would link Peckham with Waterloo, Kings Cross and Camden. The AAP prioritises improvements to links between key destinations, such as Peckham town centre and Nunhead local centre, stations and schools.

The safety, and perception of safety, should also be improved regarding existing and new walking and cycle routes throughout the action area. Also, large development should be directed to parts of Peckham Nunhead that are very accessible by walking, cycling and public transport so that new development does not lead to an increase in traffic on the roads.

In principle, this approach benefits all members of the community. Car ownership levels tend to be lower among the young and elderly. Therefore a policy which seeks to promote walking and cycling, creating routes which are safe from conflict with vehicles, which prioritises non-car users, and which also maximizes opportunities to use public transport should benefit these groups in particular, promoting inclusivity and equality of access to jobs and services.

It should be noted however that there are certain groups who may rely on using a car. This might include the elderly, people with disabilities and parents with young children. The AAP will seek to mitigate the impact of a general presumption in favour of low parking levels by prioritising parking for people with disabilities, even within what are otherwise in some cases "car free" developments in line with the parking standards set out in Saved Policy 5.7 of the Southwark Plan. New parking for town centre uses will be provided in basements within buildings or where appropriate above ground. This may have implications for safety of more vulnerable users. To mitigate this we require developers to submit a parking management strategy which should address safety issues among other issues.

It will also be very important that a reduction in car parking and promotion of sustainable modes of transport are undertaken in tandem with improvements in public transport and the public realm. While in theory promoting walking and cycling is beneficial to all users, if routes out of developments are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as the elderly and young, people with disabilities, women and LGBT groups.

## **Safety and Security**

Historically Peckham has had a negative reputation, focusing on high crime levels and feelings of the area not being safe. The AAP will help to change this image, including through encouraging developers and landowners to bring forward sites for development. This includes developing the council's many own sites. Crime levels in Peckham and Nunhead are around the Southwark average. In Livesey and The Lane wards crime rates are slightly higher. This is a result of higher than average recorded offences of anti-social behaviour and violence against the person. Crime rates in Peckham and Nunhead wards are just below the Southwark average and Peckham Rye ward has a considerably lower crime rate. Overall, crime rates have been falling in all wards and, contrary to Peckham's image in the media, is at around the London average.

Safety and security is a concerns for local businesses and residents in the area. Some streets can seem quiet and unsafe, particularly in the evening. A range of town centre uses such as office, arts, cultural and entertainment uses that bring activity and/ or improve the safety of the area will be encouraged. It is important that a safe, accessible, comfortable and attractive environment is provided for pedestrians and cyclists in order to encourage people to walk and cycle, promote healthier lifestyles and physical and mental wellbeing. The AAP policies ensure that public spaces are well lit, overlooked with active ground floor uses and which feel safe at different times of the day and in the evening. The policies also ensure that developments follow the principles of Secured by Design and incorporate inclusive design which promotes and protects mobility and wayfinding for the elderly and people with disabilities.

## **Employment**

One of the aims Peckham and Nunhead preferred option AAP is to promote the generation of new jobs and businesses in Peckham and Nunhead action area core, Peckham town centre and Nunhead local centre by supporting the provision of new business floorspace and encouraging more. Existing business floorspace is to be retained unless replaced by an alternative town centre use. This will provide important local jobs and training opportunities and reduce the need for local people to travel far to get to work. We have identified that there is capacity for up to 8,000 sqm of new business space in Peckham town centre through our capacity studies. We will provide more detail at the next stage of consultation.

87.1% of all businesses in Peckham are micro or small and medium enterprises (SMEs).The small businesses mostly include light manufacturing, workshops and builder's yards.The railway arches located along the Thames Link railway accommodate B2, B8, light industrial and sui-generis uses. Saved Southwark Plan policy 1.5 promotes the use of the railway arches for either A, B and D uses to ensure the spaces can meet the needs of a wide range of occupiers.

In principle, this approach benefits all as it will create local jobs which all members of the community will be able to access. Focusing on office and light industrial space instead of larger industrial units will provide more of a wide range of jobs for people with protected characteristics such as young people, women and disabled people who may be more likely to pursue jobs in office environments.

A higher than average proportion of Peckham and Nunhead residents has low or no formal qualifications and work in elementary occupations. A study on creative industries carried out in 2007 found that Peckham also has large and growing number of creative industries including media and visual arts. Employment and training opportunities created by new development will be targeted at local people. This will have a particularly positive effect on young people, particularly school leavers who live in the area and want to work locally. One consideration is

that a risk that local people may have the right skills for the jobs and are not gaining employment locally. We will mitigate through things such as securing section 106 money for employment training. Local employment and training projects will help local people access sustainable jobs and share in local economic growth. This will help to reduce inequalities, both social and economic, and to create a fairer future for all residents.

Certain groups may experience discrimination in accessing employment opportunities such as a members of certain faith groups and members of the BME community (especially young black men) and disabled people. However by targeting employment and training opportunities at older and young people, women, people with disabilities and groups from all religions, beliefs or sexual orientation this can be mitigated against.

## **Design and Heritage**

The preferred option AAP seeks to create more of a sense of place and a better environment in the town centre through the design of new development. Good public realm helps to define an area's identity, sense of place and attractiveness as a neighbourhood. It must celebrate Peckham and Nunhead's identity and work with buildings and landmarks to encourage people to the area. This will be achieved by creating new public spaces and promoting good urban design guidance to ensure that the design, scale and location of new buildings respects the character of places provides safe walking and cycling routes and helps create attractive streets and neighbourhoods,

The AAP should ensure that most of the development in the wider area will be small scale infill development, in keeping with the existing character. The core area will see more change with the potential for taller buildings and denser development. The major development sites, particularly in the core area provide opportunities for improved design and public realm improvements. Allowing a taller building of six to ten storeys on certain suitable sites offer the opportunity to locate a landmark building that will create a new focus in the area.

The AAP seeks to ensure that new development is built to the highest quality design and creates places where everyone feels safe and secure. The heritage of the area will be strengthened the recently adopted Rye Lane Peckham and Peckham Hill Street conservation areas which ensure the valuable historic buildings on Rye Lane and Peckham Hill Street will be protected whilst also facilitating new development.

Improving the public realm through design will benefit all people with protected characteristics, in particular certain groups may currently feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, older people and women. Varied building frontages create visual interest and activation along main pedestrian routes. This creates safer streets which will benefit everyone in the community, particularly women and families or elderly people who may feel less safe . We have recently been granted some funding from the Mayor's Outer London Fund for improvements to shopfronts and public realm improvements in Nunhead. The public realm will need to take into account the specific needs of elderly, young and disabled people, benches and public toilets will be provided.

## **Open spaces**

The preferred options AAP approach is that all development in the core area must provide high quality open spaces and encourages linkages between the open spaces. Around 25% of the AAP area is protected open space. The two largest of these open spaces are Peckham Rye which covers approximately 40 hectares and Nunhead Cemetery which are both designated as



Metropolitan Open Land and as Sites of Importance for Nature Conservation. The north part of the action area has relatively few open spaces.

The preferred options AAP has identified new open spaces in the north of the action area and sets out that Calypso Gardens, Central Venture Park and Jowett Street Park should be protected as Other Open Space, in accordance with Southwark Plan and Core Strategy policies. These spaces boost local wildlife and provide the local community with valuable space to play and relax. The AAP also designates Surrey Canal Walk as a SINC so that its special nature wildlife and biodiversity value is not damaged.

Children's play areas should be provided as part of new housing developments. We will continue to protect important existing open spaces such as Nunhead Cemetery and Peckham Rye. Future improvements across the action area include are also proposed as set out in the preferred option.

This approach will benefit all members of the community provided that the needs of different user groups are considered in the design and location of open spaces e.g. benches for elderly people, disabled access and children's play areas. The provision of children's play space will have a particularly positive impact on children and families.

By maintaining a network of well used, high quality open spaces this will benefit all residents including those with protected characteristics by ensuring everyone has access to outdoor space for sport and recreation. Supporting a network of open spaces will also help to promote sustainable modes of transport which may particularly benefit people on lower incomes who may not own cars or be able to afford public transport on a regular basis. Good access to open space can also lead to health improvements and provide more opportunity for sport and recreation which can benefit those on lower incomes and people who may not wish to undertake physical activity as part of an organised activity.

## **Community facilities**

One of the aims of the preferred option AAP is to provide facilities to meet all the needs of Different communities in Peckham and Nunhead. The diverse and growing population creates a challenge to providing facilities to meet a wide range of needs across people of different ages, genders, faith, ethnicity, sexual orientation, income and disability that need to be considered. facilities. This includes looking at libraries, community halls, new schools, new and improved leisure and sports provisions, court facilities, places of worship, employment and training facilities, community space, children's play and youth facilities.

The strategy in the Peckham and Nunhead preferred option AAP is to locate local facilities together so that the services required by the community provided in the core action area core and in accessible locations outside the action area core. The AAP encourages better use of community facilities that are currently under-used and requiring flexible community space in new developments so that different groups can share the spaces to meet a wide range of needs. The sites of Nunhead community centre and the former Nunhead Early Years centre, both of which are currently closed, will be redeveloped with a replacement community centre provided on the Early Years site in addition to new homes. Locating new community facilities together will have a positive impact on young people, the elderly and disabled people who may be less likely to have access to a car to get to different facilities.

There is projected pressure for both primary and new secondary places in the action area. Our strategy is to meet the pressure with temporary and permanent expansions at good and outstanding schools and the provision of the new academies in Walworth and in Rotherhithe.

We are committed to encouraging the use of school buildings for community activities outside of school hours. St Thomas Apostle College and Bredinghurst School will be rebuilt with new facilities available for community use outside school hours. This will benefit the wider community as a whole and particularly young people.

The AAP sets out how we will work with NHS Southwark to improve the health of current and new residents in Peckham and Nunhead. Local issues of lower life expectancy in Nunhead and higher rates of childhood obesity in Peckham need to be addressed by overcoming health issues such as cardio-vascular disease, diabetes and mental health problems. The Lister Health Centre and Sunshine House Children's Services just outside the AAP boundary in Camberwell, both provide a number of health services. We will look to develop further improved services in the area as opportunities arise. Improved health facilities will have a positive impact on all members of the community and in particular, the elderly and families with young children.

This approach will have a positive impact on all members of the community as access to local services help to create good community relations and improve satisfaction with the local area.

## **Sustainability**

The AAP should help achieve sustainable development by balancing environmental, social and economic needs to ensure a good quality of life for people now and in the long term. Development should maximise the potential for enhancing the biodiversity value of existing open spaces and cemeteries.

The Peckham and Nunhead preferred option AAP seeks to ensure that development meets the high environmental standards set out in the Core Strategy strategic policy 13, helping to reduce the impact of development on climate change. The AAP supports the provision of an efficient energy network for Peckham and Nunhead and sets out how new developments should reduce energy use which includes ensuring that developments cut CO<sub>2</sub> emissions by at least 44% beyond the requirements of the Building Regulations. In accordance with the London Plan, development proposals should evaluate the feasibility of connecting to existing heating and cooling networks and Combined Heat and Power (CHP) systems and all development should be future proofed and designed to be capable of connecting to a future CHP/communal heating network.

The increasing price of fuel has led to a rise in fuel poverty, this can have a more significant impact on those with lower incomes and this is particularly important within the Peckham and Nunhead action area which has some high levels of deprivation. Fuel poverty can also have a greater impact on the elderly who require more heating in winter but cannot afford the higher bills. Encouraging developers to use more energy efficient design and materials can help to reduce fuel poverty as well as reducing CO<sub>2</sub> emission. The amount of growth in Peckham and Nunhead is likely to result in more waste being created. The way we manage waste should follow the waste hierarchy, which means reducing, reusing, recycling and recovering. The sustainable design and construction SPD provides further guidance on how new development will be expected to apply the energy hierarchy as set out in the London Plan and how to reduce water and waste consumption and meet the environmental standards set out in the Core Strategy.

Incorporating environmental measures within a scheme can add cost to the development and it is important to ensure that new development is viable and that environmental controls are not so onerous that they prohibit new development from taking place in the area. The needs of local residents for the new development will need to be balanced against any environmental concerns on a site by site basis. This will be especially important for schemes put forward by

local businesses and community groups who may not have the resources to fund more expensive design measures.

Consideration will need to be given to the impact of some design measures and renewable technologies on the character and setting of the new development. It is important that these measures are incorporated in a way that helps to promote good urban design and does not harm sensitive areas such as conservation areas and listed buildings. This can have a negative impact on all residents in the area but especially those groups who struggle to engage with the planning system such as those who do not speak English as their first language. People may feel like they have not had the opportunity to comment on the development and have been isolated from the decision making process.

**4. 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 in the Peckham and Nunhead preferred option AAP, the objectives of the document refer to the aim of creating a strong community in which the needs of all groups are taken into account.

The consultation strategy for the AAP does refer specifically to the need to ensure that the Equalities priorities groups are involved and that arrangements are made to include under-represented groups and individuals. As set out in our consultation report, strategy and plan we seek to involve all groups in the preparation of the AAP.

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

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

The next stage of the AAP will contain a framework which will set out how the plan will be monitored as it moves into the implementation phase. The implementation is likely to take between 10 and 15 years and will require yearly monitoring. The AAP also provides an umbrella framework for a number of council strategies as the policy cut across a number of different council departments and function including housing and transport.

Consultation on the AAP will continue to be monitored at each stage of the plan preparation process to ensure that all groups will be engaged as effectively as possible. The consultation statement which accompanies the preferred option AAP contains more details on this. When the draft AAP is submitted to the Secretary of State, the council will also submit a consultation report demonstrating that the consultation which has been carried out meets statutory minimums and meets the requirements of Southwark's Statement of Community Involvement.

**6. 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?**

The preferred option AAP aims to contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community relations.

**7. 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?**

In preparing the preferred option AAP, the findings of the EqIA scoping have been considered and the report has been prepared iteratively with the stage 2 EqIA. We have updated the stage one scoping report at this stage. This stage 2 assessment recognises those areas where the AAP may have differential impacts and where appropriate mitigation measures are proposed to address these. The council has taken all representations on the issues and options and the towards a preferred options stages into account. There will be one further opportunity to adjust policies prior to the submission of the draft plan to the secretary of state.

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

As is noted above 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. This year we have new data from the Southwark Council Reputation Survey 2010, which shows resident perceptions of crime and how they identify with their area. The survey shows that almost all residents (98%) say they feel safe walking in their area alone in the daytime. After dark, almost three quarters say they feel safe. This is higher than the results for last year and may have been influenced by efforts to tackle anti-social behaviour and reduce crime from both the council and the police. 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, the percentage of residents who feel safe at night business start ups and the local employment rate.

As mentioned above, the AAP comprises an umbrella framework under which a number of strategies, including those of the council and its partners will be implemented. While organisations such as the PCT may have their own strategies for monitoring the impact of their policies on key groups with protected characteristics, the preparation of the AAP may enable the council and PCT to identify a set of key indicators for the AAP area. These can inform the monitoring framework which is put in place to assess monitor and review the AAP.

## **Annex 1: Related projects and EQIAs**

### **The Southwark Plan 2007**

#### 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 2011**

#### 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 groups with protected characteristics 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:

- Southwark 2016 sets out a vision for the borough alongside objectives and priorities for how the vision will be achieved. Southwark 2016's objectives and priorities form the basis of our core strategy objectives. The core strategy translates these objectives into a physical reality that will be implemented by setting out our spatial framework of how we will design, build and plan Southwark.

- 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 is 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.

### **Rye Lane Peckham & Peckham Hill Street Conservation Areas EQIA's**

#### Key findings:

- 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.
- 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 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