



## ELEPHANT AND CASTLE OPPORTUNITY AREA SUPPLEMENTARY PLANNING DOCUMENT

### APPENDIX D: EQUALITIES IMPACT ASSESSMENT

MARCH 2012

No.	Title
Appendix A	Elephant and Castle Supplementary Planning Document/ opportunity area framework
Appendix B	Consultation Report (part one)
Appendix C	Consultation Report (part two): Table of representations received on the draft SPD and the council's response
Appendix D	Equalities Impact Assessment
Appendix E	Sustainability Appraisal
Appendix F	Sustainability Statement

## **Stage One: Scoping**

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

#### The Elephant and Castle Supplementary Planning Document

The Elephant and Castle Supplementary Planning Document (SPD) sets out our vision for the Elephant and Castle. It provides a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The document will be used to plan, manage and guide change in the area in a sustainable way that will benefit the community and make Elephant and Castle a better place to live work and visit.

The SPD provides guidance on:

- The look and function of the town centre, including the mix of shops and other activities
- The amount and of new homes that may be built and their location
- The size and design of new buildings
- Public realm improvements, particularly around the shopping centre and northern roundabout
- The infrastructure needed to ensure that growth in the area can be accommodated sustainably, including improvements to public transport, open spaces and health facilities.

The SPD will be part of our framework of planning documents. Once adopted, it will be a material planning consideration in deciding planning applications in the opportunity area. It will help ensure that the council makes decisions transparently, providing clarity for members of the public and giving more confidence to developers to invest in the area.

The London Plan advises that boroughs should work with the Mayor to produce opportunity area frameworks (OAFs) for the opportunity areas. This document comprises an SPD and an opportunity area framework (OAF). The council and GLA have worked closely on the preparation of the draft. Adopted by both Southwark and the Mayor, an agreed approach will help provide certainty for developers, clarity for members of the public and councillors, and a robust basis on which forthcoming planning applications can be assessed.

The Elephant and Castle SPD will be developed and prepared in accordance with statutory regulations and in close consultation with the local community. The policies in the SPD 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 Elephant and Castle SPD will be a new policy document and will form part of the council's Local Development Framework, which will contain all of the council's planning policies used to guide how land is used in the borough and in the determination of planning applications. Current planning policy for Elephant and

Castle exists in the Southwark Plan (the council's Unitary Development Plan) and the Core Strategy (2011).

The Core Strategy has a vision for the area and strategic policies for Elephant and Castle. The Elephant and Castle SPD will provide further detailed policies based on the vision and strategic policies set out in the Core Strategy and the saved Southwark Plan.

We have prepared planning guidance for the Elephant and Castle Opportunity Area and this is set out in the 2004 Development framework SPG, the 2008 Enterprise Quarter SPD and 2008 Walworth Road SPD. This guidance will be replaced by the guidance provided in the Elephant and Castle SPD.

**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 previous EQIA has been carried out for the Elephant and Castle SPD. An EQIA has been carried out for the Core Strategy alongside the preparation of the document to assess the impacts of the policies. The core strategy sets out a vision for Elephant and Castle which has been carried forward in the Elephant and Castle SPD. A joint EQIA was also carried out for the Enterprise Quarter and Walworth Road SPDs.

The EQIA looked at both the impacts of consultation on the SPDs and impacts associated with the implementation of the SPDs. We identified a number of possible issues around making the guidance clear so that the objectives of the SPD were met. Some of the key objectives were to help promote sustainable transport choices and prioritise cycling and walking in the layout and design of new development, promote public realm improvements and provide for new routes where these are needed and to promote town centre developments involving provision of commercial and educational space, residential homes etc. Both SPDs also looked at requiring the provision of space which would be suitable for small businesses.

Since the Equalities Act 2010 has come into force out new groups with protected characteristics need to be included in equality impact assessments. We have prepared on a stage one scoping assessment (this document) to accompany the Elephant and Castle SPD. We will undertake a stage two assessment after this stage of consultation alongside preparation of the final SPD for Cabinet adoption.

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?**

We are looking at the impact of the Elephant and Castle SPD on the nine groups with protected characteristics in accordance with the 2010 Act and duty.

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

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

These impacts can be split into two categories:

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

##### **4.1 Impacts associated with consultation on the Elephant and Castle SPD**

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

This is in accordance with our Statement of Community Involvement (SCI). Our SCI sets out how and when we will involve the community in the development of planning documents and applications for planning permission. Within the SCI, we have identified barriers to involving equalities target groups and ways to overcome them. These include English not being someone's first language, problems accessing information, people not feeling safe attending evening meetings and the documents using too much jargon. We have tried to tailor our consultation to try and overcome as many of these barriers as possible. This includes writing the SPD in plain English, offering translation services where required, and attending community meetings when requested. Please refer to Annex 3 of this document for the full list

of barriers to consultation. We have considered this comprehensive list as part of the preparation of the draft SPD.

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

In preparing and developing the Elephant and Castle SPD, the council will have to carry out consultation in accordance with statutory regulations and the Statement of Community Involvement, which sets out how and when we will involve the community in the alteration and development of town planning documents and applications for planning permission.

We have already carried out consultation in Elephant and Castle with different groups over the years with the 2004 SPG, the 2007 Southwark Plan, the 2011 Core Strategy, Walworth Road SPD 2008 and the Enterprise Quarter in 2008. The consultation carried out alongside the preparation of the 2010 SPD builds on this work. We recognise that consultation can have a differential impact on groups with protected characteristics and we will use a variety of methods to ensure we engage with all groups as effectively as possible.

#### **4.2 Impacts associated with the objectives and implementation of the Elephant and Castle SPD**

The possible impacts and issues of the SPD

As part of the preparation of the Elephant and Castle SPD we considered the following possible impacts and issues:

##### **Community and stakeholders**

- Certain groups may not be able to access information and consultations as easily as others e.g. 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 Elephant and Castle SPD has to them and therefore they do not become involved in the process.

- People may misunderstand the purpose of the Elephant and Castle SPD 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 e.g. 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 e.g. 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.

## **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, which they can afford, in a community where they want to live. Housing should not reinforce social distinctions and should meet the housing needs of the whole community, creating mixed and inclusive communities and housing choice. The opportunity area is located across six administrative wards; East Walworth, Faraday, Newington, Chaucer, Cathedrals and Camberwell Green. The Heygate Estate is located close to the centre of the opportunity area. Walworth Community Council area consists of Newington, East Walworth and Faraday wards which fall wholly or partly within the opportunity area boundaries. Around 40,000 people live in 17,000 households in these areas. The age structure of the population of Walworth Community Council area shows that there is a higher proportion of people aged 10-29 years in Walworth than in the borough as a whole. According to GLA projections, the population of Walworth Community Council will almost double in population size by 2029. In 2001 the top two most populous ethnic groups were White British and Black or Black British (African) with the majority of the Black British population residing in the East Walworth and Chaucer wards. As we have been preparing the SPD, we have considered the following issues to ensure we minimise the impact on groups with protected characteristics:

## **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. There may also be a need to ensure access to specialist housing such as care homes and supported housing. This is likely to have the greatest impact on elderly people and people with disabilities. The SPD will help to ensure that more homes of all types are provided in the area to meet the needs of local residents.

- The 2010 Index of Multiple Deprivation levels in parts of East Walworth ward have reduced since 2007 levels however parts of the ward still rank in the 10% most deprived areas in the country. Parts of Faraday and Newington rank in the 20% most deprived areas in the country. The regeneration of Elephant and Castle 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 community as people are forced to move out of the area as they no longer can afford to live there. People may view the Elephant and Castle SPD as gentrification rather than regeneration therefore it is important that the guidance in the SPD makes it clear that the policies consider the needs of existing residents and local businesses as well as seeking to attract more investment into the area.
- The 43-storey Strata residential building lies just south of the shopping centre on the Walworth Road. Several other large mixed use developments have also recently been completed including Printworks, Amelia Street, Southwark Central and O-Central. 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. The SPD will promote new homes of a high standard of accommodation, including generously sized rooms and ensure that a proportion of the new housing is affordable to existing residents.
- Owner occupation forms only a minority of the housing stock in the area. Only 15% of all properties across the area are owned outright or owned with a mortgage with over 59% of the stock socially rented and the remaining 26% in the private rented-sector. People may feel that the needs of certain groups are being prioritised over others such as the need to have designated locations for homes for larger families or wheelchair users. 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.
- Flats account for the majority of the stock at over 80% with 16% terraced housing and less than 1% of the stock comprising detached and semi-detached properties. If we do not allocate enough sites for housing, we may find we do not have enough space to build housing to meet local needs. This may result in the building of more one and two bedroom dwellings which may have a negative impact on some groups, such as some groups and some ethnic groups which are more likely to have larger families. The SPD will help to ensure we can provide enough housing to meet local needs by ensuring an appropriate level of development is achieved on sites in the area
- Redevelopment and regeneration of areas may result in the disruption of communities.
- An important consideration is the need to provide adequate amounts of affordable housing, especially due to the “option to return” which approximately 175 Heygate tenants have and can assert their right if they want to do so.
- As part of affordable housing, we require a percentage to be intermediate housing, which is often shared ownership. This may not be suitable for all religious groups, such as Muslims or people from other cultures who may not want to take out a mortgage for religious or cultural reasons.
- As part of the Elephant and Castle SPD we will look at how we can successfully create mixed communities with a range of housing types and tenures. This should help to improve social cohesion.

## Transport

National, regional and local policy states that sustainable methods of transport should be promoted. Elephant and Castle is dominated by a complex road junction system, which forms part of the London Inner Ring Road. There are two tube stations serving the Northern and Bakerloo lines and the shopping centre is connected to the mainline rail station which serves Thameslink and Southeast Trains. Elephant and Castle is also a significant bus interchange, with 24 bus services travelling through the area, eight of which terminate there. 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.

We have considered the following issues whilst preparing the SPD to ensure we minimise the impact on groups with protected characteristics:

Recent public realm improvements have been made on the Walworth Road with a central pedestrian island being introduced to help transform what was an arterial corridor into an attractive and safer place to visit and shop in. Other improvements include pavement widening, removal of bus lanes and the provision of loading bays for local shops, making the area much better in terms of street layout and access.

## 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). The southern roundabout improvements and subway removal were completed in April 2011 and have delivered significant improvements for pedestrians and for cyclists. We want to ensure that there is funding for continued improvements including improvements to the Northern Line ticket hall and capacity between the ticket hall and the platforms.
- Transport services may feel unsafe for certain user groups. Some people may 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 feel unsafe for these groups.
- Increased pedestrian and cycle routes can have a positive impact on those with lower incomes, promoting more sustainable means of travels for no cost which can lead to health improvements and increased access to employment. The SPD sets out guidance on how we will provide convenient, direct, safe, and attractive pedestrian and cycle links through the area.
- Safe and reliable public transport can also have a beneficial impact on more vulnerable groups such as older people, women and black and minority ethnic groups. Guidance in the SPD will help improve the frequency, reliability and journey times of bus services and increase space for bus stands.
- Safer and more accessible routes through new development can make the environment more pleasant particularly for vulnerable groups such as those with disabilities, young families and older people



- Public transport could be unaffordable to some groups. This can limit access to job opportunities, leisure facilities, education etc. 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 may limit their job opportunities and inclusion in the wider community. It may limit them to one particular area. This could also increase the need for parents and carers to continue to use unsustainable forms of transport, such as the car.
- Another important consideration is to meet the transport needs of disabled people, people with limited mobility as well as groups such as parents with children in pushchairs. 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, causing more separation and isolation from the rest of the community. The SPD aims to improve access to the railway station and improve interchanges between all public transport modes. This will help to promote accessibility and help to reduce feelings of segregation for those with restricted mobility
- 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. Car-free developments can have a negative impact on some groups who need a car more than others. For example, families with young children, elderly people, and disabled people. The SPD recognises this and emphasises that spaces should be provided for people with disabilities as well as car club spaces which help provide choice for people who do need cars from time to time.
- Some areas may see greater improvements to public transport than other areas. This can have an impact on all the equality groups in terms of access to employment, shops, leisure facilities and education. It may have a particular impact on groups less likely to have access to a car such as young people and single parents.

## **Safety and Security**

A significant concern in Elephant and Castle is the issue of crime and safety. Safety and security is one of the key concerns for local businesses and residents in the area. There are several large buildings with little active frontage. This means that 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 following considerations should be taken into account in the development and implementation of policies for safety and security in Elephant and Castle:

## **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 e.g. 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 SPD will help to ensure that new development helps to create environments that are inclusive, well lit, overlooked and which feel safe at different times of the day and in the evening.
- 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. The SPD sets out further guidance on how comprehensive redevelopment does not compromise safety and maximises opportunities to make use of vacant sites on an interim basis.
- Through promoting growth and regeneration to the area, the Elephant and Castle SPD may act to displace problems or create alternative problems with regard to crime and the fear of crime instead of solving or preventing them.
- Creating employment and business opportunities, as well as high quality leisure and cultural amenities offer can strengthen communities and reduce crime and fear of crime. The SPD requires the impact on safety, security and residential amenity to be taken into consideration when determining the location and provision of new facilities
- Ensuring that streets are well used by pedestrians and cyclists helps improve personal safety and can also encourages drivers to travel more slowly.
- Buildings with large footprints such as the Heygate Estate and the Shopping Centre mean that there is reduced permeability and it is harder to move around for pedestrians and cyclists. The SPD will endeavour to incorporate deliverable policies that will improve perceptions of the area and act to prevent crime such as ensuring new development increases lighting, reduces barriers and improves active street frontage at different times of day.

## **Employment**

Through the development and implementation of the Elephant and Castle SPD, sites have been identified and improvements proposed for the growth and improvement of Elephant and Castle's economy. This will lead to greater investment in the area and lead to a growth in jobs in the area. Through the SPD we want to improve the evening economy and provide new leisure and cultural facilities. We also intend to renew business space in the area and encourage the development of an enterprise culture and inward investment by providing more opportunities for local people and small and medium sized businesses (SMEs). 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. The SPD proposes that all developments of retail space in excess of 1,000sqm should provide a proportion of floorspace as affordable business space. Priority for such space will be given to businesses displaced by development in the opportunity area. In developing employment policies for Elephant and Castle SPD, consideration should be given to the following:

## **Considerations**

- Comprehensive redevelopment of the Elephant and Castle will have an impact on the displacement of local businesses from the shopping centre and surrounding area. This may have a disproportionate impact on black

and ethnic minorities of which a larger percentage work in the existing SME businesses. The SPD supports the provision of new business space that must be designed flexibly to accommodate a range of unit sizes to help meet the needs of the local office market and SME businesses and to enable businesses to remain in the area as they grow.

- Large-scale redevelopment may also have a negative impact on older people who have less opportunity to re-train in other areas and would be forced to move elsewhere if their current place employment was removed as a result of redevelopment.
- 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.
- Having the right types of jobs in the right areas and suited to people's skills. Local people may not have the skills to access job opportunities that are created through the regeneration of Elephant and Castle and therefore may not benefit from these new opportunities. This may impact on some groups more than others such as young people, people without qualifications, people without English as their first language, single parents with childcare problems etc. This could also 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.

## **Town Centre**

The Elephant and Castle shopping centre currently has around 26,000sqm of shopping and leisure space, including a bowling centre and bingo hall. One of the key objectives of the SPD is to strengthen the Elephant and Castle as a major shopping destination by increasing the amount of shopping space by up to 45,000sqm in the town centre. The focus of new development will be to provide a vibrant mix of activities in the town centre, ensuring it is busy throughout the day and evening. The SPD also seeks to improve the evening economy and the variety of arts, cultural and entertainment offer by providing more cafes and restaurants as well as new leisure and cultural facilities, including a new cinema.

## **Considerations**

- 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.

- Young people may benefit from the increased bars and shops in the area due to the increase in students, but older people may object to the noise of so many young people.
- Currently the centre has a strong specialist function which is the particular concentration of Latin-American businesses which reflects the growth of the Latin American community in Southwark. We should ensure that this specialist function is not lost as a result of development and regeneration.
- Around 38% of the retail space in the shopping centre is occupied by independent businesses. There may be conflict between the need for provision of larger retail units to encourage a wider mix of retailers into the area and maintaining the existing smaller units for local businesses. The SPD sets out further guidance on how development will provide a range of shop unit sizes, including affordable units for existing tenants in the area who have been displaced, new business start-up or independent retailers. The SPD also sets out guidance on how we will use planning conditions or s106 obligations to ensure that a proportion of new floorspace is made available as affordable units to provide suitable premises for small and medium sized enterprises and to accommodate businesses relocated as a result of redevelopment.
- Markets can help enliven town centres, reinforce the identity of an area and help provide a more varied shopping experience. They can also have other benefits, such as giving more people access to fresh fruit and vegetables, supporting local producers, reducing air-freighting and creating a route into setting up small businesses. East Street market has been officially running since 1880. The market is one of London's oldest, largest and busiest markets and is as fondly visited now by local people as it has been for decades. A new market square will be provided to the east of the railway viaduct. Consideration should be given to ensuring that neither the new market nor the retail mix in the opportunity area threatens East Street market.

## **Design and Heritage**

The opportunity area is expected to undergo significant change through the development and implementation of the Elephant and Castle SPD. This will see increased investment and development activity, which provides significant opportunities to improve the built environment in the area where new development can help to create lively, interesting frontages and safer feeling streets and spaces. New development also offers the opportunity to address existing issues of inequality through design; this could result in a more accessible environment for disabled people and those with restricted mobility as well as promoting the use of more sustainable transport modes which can help those on lower incomes to travel more easily. 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 SPD seeks to ensure that development helps create a sense of place and reinforces the area's character.
- 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. Improving existing spaces such as the Michael Faraday Memorial and creating new ones like St. Mary's Churchyard can mitigate this impact.

- 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 e.g. 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 e.g. older people and young people. The SPD sets further guidance on how development will be required to be inclusive, well lit, overlooked and which feels safe at different times of the day and in the evening.
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## **Open spaces**

Through the development and implementation of the Elephant and Castle SPD, the area will experience significant changes through growth in population, housing and employment. As development intensifies the value of the open space increases, especially where there are current deficits. Improvements to the public realm and open spaces is likely to have a positive impact on all groups with protected characteristics, however in addition to the overall quantity of the open space, the location and use of the space is also important to ensure that they are accessible to all members of the community. As part of the Elephant and Castle regeneration a new public park is proposed as part of the Heygate site, the provision on new and improved open spaces can bring positive benefits, especially for younger people and those on lower incomes who may not be able to afford more organised physical activity, helping to encourage sport and recreation which can lead to health improvements and a better quality of life.

The following considerations need to be taken into account when developing and implementing policies for open space within Elephant and Castle:

## **Considerations**

- It is important that new open spaces and public spaces are safe and well used in order to ensure more vulnerable groups feel able to visit these spaces without fear of crime and victimisation. 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, e.g. 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. It is important to ensure that open spaces are accessible to everyone and that different types of open spaces are provided. It may cause tensions between groups if it is perceived that one groups needs are being prioritised above others. The SPD sets out how new open spaces, including a new public park, will ensure that provision of public parks is at least 0.61ha per 1000 people

- 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 open spaces in the area may restrict the ability for people to benefit from the health benefits of participating in active recreation. The SPD seeks to encourage new development that provides opportunities for food growing and adequate play facilities for children and young people.
- 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.
- The quality of open spaces and range of activities that can take place there can offer considerable educational benefits of learning about sporting activities or ecology, depending on the functionality of the open space. The SPD sets out further guidance on how we will continue to maintain and improve a network of open spaces that have a range of functions

### **Community facilities**

Through the development and implementation of the Elephant and Castle SPD, the area will experience significant growth in population. The council will need identify sites for and propose improvements to the community infrastructure to meet additional needs resulting from development. In November 2011 the cabinet gave approval to progress with the design of a new leisure centre in Elephant and Castle. The facility will consist of a new six lane 25m swimming pool, a learner pool, four court sports halls, a gym, exercise studio, crèche and café. Leisure centre charges will not increase as a result of this redevelopment and will ensure that this valuable service that is accessible to different community groups, residents, workers and students in the area. The following considerations will have to be taken into account when developing and implementing policies for community facilities in Elephant and Castle:

### **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. The SPD sets out further guidance on how proposals on the Heygate development site, 50 New Kent Road and the shopping centre site should include appropriate arts, cultural, leisure or entertainment space which contributes to supporting a lively and vibrant town centre, increasing

its attraction to a wider catchment and making a positive contribution to the evening economy.

- Tensions between certain groups exist 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 e.g. between different faith groups, BME groups and those who are not able to speak English. The SPD seeks to ensure the new facilities have the potential to appeal to a wide range of age and social groups.
- 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. The SPD is proposing a new local authority leisure centre which should help avoid this problem.
- 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, e.g. 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 Elephant and Castel SPD also 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. Development will be expected to apply the energy hierarchy as set out in the London Plan: use less energy; supply energy efficiently; and use renewable sources of energy. 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.

## **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 Elephant and Castle opportunity area which has some of the highest levels of deprivation experienced in the borough. 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 co2 emission, The SPD sets out further guidance on how development will be expected to apply the energy hierarchy as set out in the London Plan: use less energy; supply energy efficiently; and use renewable sources of energy.

- 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.



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

### **Part A: Feedback on the Stage One Assessment: Scoping Report**

We consulted on the Scoping Report as part of the consultation on the draft SPD. This took place between 15 November 2011 and 7 February 2012. Along with the SPD and other supporting documents, the Scoping Report was made available on the council's website, in libraries and one-stop shops. An advertisement was placed in the press publicising its availability and we also wrote to over 3000 individuals and organisations on the Planning Policy team's database, notifying them of the consultation and advising them where the documents could be found. Further information on the consultation carried out can be found in the SPD Consultation Report.

In response to the consultation, we received three comments specifically in relation to the EQIA. Two comments acknowledged some of the potential impacts that we had noted in the Scoping Report, but stressed the need for regeneration and the fact that new development could also have a positive impact by generating investment in the area. The third comment stated that it was unclear how much weight was attached to the different themes in the EQIA. Specifically the respondent stated that too little attention had been paid to the negative impact that new development would have on air quality. This issue is picked up in more detail as part of our sustainability appraisal. The full comments are set out in Annex 4 of this document.

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

#### What is the overall purpose of the policy/strategy?

The Elephant and Castle Supplementary Planning Document (SPD) sets out our vision for the Elephant and Castle. It provides a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The document will be used to plan, manage and guide change in the area in a sustainable way that will benefit the community and make Elephant and Castle a better place to live work and visit.

#### What are its aims?

The aims of the plan are set out in Annex 1 of this report

#### 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?

An EQIA has been prepared to accompany the Elephant and Castle SPD. In accordance with the Equality Act 2010 (and therefore the Public Sector Equality Duty), the EQIA identifies the potential impacts of the SPD on groups with protected characteristics. The Equality Act 2010 identifies the following nine protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership

- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

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

### **Community and stakeholder involvement**

The most recent consultation on the Elephant and Castle SPD (2011) is the latest in a range of consultations in the area. Comprehensive consultation has previously been carried out locally on the Elephant and Castle Development Framework SPG (2004), the Walworth Quarter SPD (2008) and the Enterprise Quarter SPD (2008). In addition, extensive borough-wide consultation has been carried out for the Southwark Plan (2007) and the Core Strategy (2011). Consultation has consistently been carried out in accordance with the statutory regulations and our Statement of Community Involvement (SCI).

We adopted our Statement of Community Involvement (SCI) in 2007. The SCI established the key principles that would cover all future consultations on planning policy documents. This includes the scope, timescales and extent of consultation that we would undertake. The SCI sets out that we will hold consultation for a minimum of twelve weeks for all new planning documents in order to give the local community ample time to respond. The SCI also identifies some of the key barriers to consultation that exist across the borough, such as the use of too much planning jargon, many residents not having English as their first language and the fact that the timing of meetings will need to reflect the times that best suit particular local groups. These issues have been fully considered when devising the consultation plan for the Elephant and Castle SPD.

Prior to the latest consultation, a stage 1 EQIA was carried out. The stage 1 EQIA acknowledged the need to consult broadly in order to fully engage the diverse local community, including groups that have been traditionally hard-to-reach. Specific issues highlighted as potential barriers included:

- The need to engage people for whom English is not a first language
- Consultation events could clash with religious commitments
- Too much planning jargon could mean that people lose interest or are unsure of how to be involved
- General distrust of planning or feeling that little can be accomplished
- Fear of discrimination within the community if views expressed in public
- Feeling that certain individuals or groups dominate the process

We have carried out a comprehensive programme of consultation on the SPD. The events that we have organised and attended are set out in detail in our consultation strategy. A summary is included below. Our consultation report provides a detailed commentary on whether or not our consultation events were successful in engaging the community and overcoming some of the barriers identified in the Stage 1 EQIA.

Publicity: Consultation on the SPD was widely publicised to raise awareness. All contacts on the Planning mailing list were notified by post and an article was published in the Southwark News to reach people who had not previously been involved. All documents were made available on the Southwark website, in libraries,

area housing offices and in council offices and one-stop shops. In addition, regular updates were posted on the council webpage, on facebook and via twitter.

**Events & Exhibitions:** A public exhibition was held at the Elephant and Castle shopping centre; one of the area's busiest hubs. In addition, we held several exhibitions at "the hubs" building on Walworth Road and at London South Bank University, both in the heart of the area covered by the SPD.

A selection of walkabouts were held in the opportunity area with invites being sent to local residents, community groups and businesses, ward councillors and council officers. We also organised a walkabout in the Spitalfields area to highlight to local residents on the Rockingham Estate how the local community could be involved in regeneration.

**Stakeholder meetings:** Meetings were held with a variety of local stakeholders, including: local faith groups; school children at Walworth Academy and at a local primary school; Southwark Cyclists; Living Streets; a range of local residents associations and interest groups, including the Elephant Amenity Network. We also carried out bespoke consultation with the Latin American community in light of their significant role in Elephant and Castle. A workshop was held, with a translator present, to raise issues that were of concern to local Latin American residents and particularly local businesses, who are a prominent part of the existing shopping centre and the surrounding area.

**Community Council:** The planning policy team attended the Walworth Community on 21 January 2012 and held a number of themed workshops to cover the main policy issues addressed in the SPD. We also attended the Borough and Bankside Community Council in January 2012.

Section 2 of the SPD has been amended to highlight the prominent role of local faith communities and of the Latin American community in Elephant and Castle. The SPD now stresses the need to accommodate the needs of these groups as part of the regeneration of Elephant and Castle. With regard to faith communities, reference has also been made to some local facilities and faith premises that are well valued, for instance on the Heygate Estate.

## **Housing**

The policies in the SPD aim to ensure provision of high quality, affordable housing throughout the opportunity area. The SPD aims to provide a range of housing types to reflect the needs of the existing community, their future needs and to provide choice for people who might move into the area over the plan period.

The SPD states that a minimum of 4,000 new homes will be provided over the period up to 2026. In accordance with the Core Strategy, at least 1,400 of these homes will need to be affordable homes and at least 1,400 will need to be in the form of private housing. This approach will help increase the availability of new homes for local people and also broaden the mix of tenure within the opportunity area, which will better reflect local demand for housing.

In accordance with the Core Strategy, all new homes will need to be designed to meet Lifetime Homes standards and the space standards set out in our residential design standards SPD. Furthermore, at least 10% of all units will be required to meet wheelchair access standards. Collectively these policies will ensure that new housing

in Elephant and Castle is more inclusive; addressing the needs of disabled people and ensuring that housing is more flexible to meet people's needs as they get older.

Student housing will be supported in the opportunity area, in accordance with our adopted Core Strategy, and particularly given the presence of London South Bank University within the opportunity area. This will be of significant benefit to younger people in the area and may also benefit local traders and businesses.

Specific guidance is included regarding the standards that new housing developments will need to meet in terms of noise. This is due to the prominence of a number of major arterial roads and also businesses, including in the Enterprise Quarter, the Ministry of Sound. This guidance is important to ensure that regeneration in the area does not create an unsatisfactory living environment or jeopardise the continued reasonable operation of existing businesses.

## **Transport**

The guidance in the SPD covers a range of transport interventions, ranging from major schemes such as expanding and improving access to the Northern Line tube station to improving the public realm and network of routes to encourage more active travel. It also states that new development in the central activities zone should be car free. Collectively, the policies on transport will ensure that the area is more accessible by a means of sustainable travel choices.

The focus on improving the Northern Line ticket hall will improve access to Central and South London for local residents and improve access to Elephant and Castle for people living outside the area. This will be of particular benefit to those who are economically active since travel to work will be improved. Similarly it will be of benefit to local businesses and traders in Elephant and Castle. Improvements to the tube station will create an opportunity to improve the public realm around the northern roundabout, shopping centre, tube and rail stations. This should improve safety for people in what is a key hub for the area, particularly more vulnerable groups including the elderly and young, people with disabilities, women and LGBT groups.

Car ownership levels tend to be lower than the borough average in Elephant and Castle, so a policy approach that prioritises other forms of travel should, in principle, be of greatest benefit to the local community. It should be noted however that the focus on pursuing car-free developments could affect private car users who are re-locating to the area. In particular this could have a disproportionate impact on groups who are more dependent on their cars, such as the elderly, disabled or families with young children. The SPD makes clear that even in 'car-free' developments we will allow disabled parking spaces and car club spaces, which will reduce the negative impacts to an extent. In order to mitigate the impacts of this policy more fully, it is crucial that investment is focussed on improving public transport and on making walking and cycling safer and more attractive travel choices.

Improvements to the cycling network in the area will be of benefit to those who cycle and the creation of more bespoke cycle routes will also have the benefit of reducing conflict between pedestrians/cyclists and motorists/cyclists on busy routes. Aside from the environmental and health benefits associated with more active travel, this is one of a suite of measures that will improve safety for people with mobility issues, the visually impaired or families with young children. In light of responses made through consultation, we have amended SPD11 to refer to provision of an eastern cycle bypass to the northern roundabout and also to refer to the need for signage. Both additions indicate some of the measures that will be introduced to promote cycling.

We have highlighted through our consultation responses that proposals to change traffic flows around London Road and St Georges Road were included in the SPD at the request of Transport for London, since these roads form part of the Transport for London Road Network (TLRN). We have clarified that any further work on this scheme would be subject to detailed investigation around the impacts in terms of traffic flow, noise and pollution, and would also be subject to detailed consultation. This will ensure that local residents are kept fully informed about the proposals and will give groups that are typically harder to reach an opportunity to be involved.

### **Safety and security**

Personal safety and fear of crime is an enduring issue in Elephant and Castle and one that the SPD needs to address. The area, and particularly areas like the former Heygate Estate, has a stigma that regeneration of the area has to try to overcome. The investment that is proposed for the Elephant and Castle and the policies in the SPD relating to open space, public realm and the built environment, amongst others, will make a significant contribution to creating a area that is safer and that local people consider to be safer.

The SPD sets out that 4,000 net new homes will be delivered over the next 15 years. An increase in the number of houses in the area could lead to more passive surveillance and supervision of spaces, but this is dependent on good quality design of buildings and the spaces around them. The SPD addresses this by promoting active ground floor uses with residential units above and also by promoting more fine grained building blocks with plenty of routes that link to local shops, open spaces and transport hubs. This will be a stark contrast to some of the former residential blocks in the area and will be of particular benefit to more vulnerable groups such as the elderly, young or people for whom English is not their first language, and also for those who may fear discrimination as a result of their beliefs, such as certain religious groups.

The SPD also makes clear that we will promote new community facilities as part of development so that there are opportunities for local groups to meet. This will potentially benefit all current and future residents, but particularly groups such as the elderly, families with young children, religious groups or people whose first language is not English, who can be more reliant on community space for social interaction. The SPD has been amended to highlight that existing well-valued facilities will continue to be protected through planning policies in the Southwark Plan.

### **Employment**

The area has been identified as an Opportunity Area in the London Plan in recognition of the fact that there is an opportunity to deliver a significant number of new jobs and new homes in the area over the next 15 years. The policies in the SPD focus on protecting existing employment space and promoting up to 25,000sqm of new business floorspace. The provision of this level of new employment space will have a positive impact on those of working age and also for younger people who will be of working age over the plan period.

The SPD makes clear that new business space must be planned flexibly to include a range of unit sizes. Small and medium enterprises make up over 99% of all businesses in Southwark, so this approach will ensure that regeneration in the area embraces local businesses and is not at their expense. This is particularly important in Elephant and Castle to reflect the prominence of Latin American businesses that make up a notable proportion of businesses in and around the Central Area.

In accordance with the Core Strategy, we will use s106 planning obligations to target training and employment opportunities, which are created by new development, towards local people. This will potentially benefit a wide spectrum of local people, including young people, those who feel excluded from the job market and for those who are unable to travel further afield to find work, including disabled people or people with childcare commitments.

### **Town centre**

The SPD sets out that the most significant new development in Elephant and Castle will be concentrated in the town centre. This includes major transport interventions around the northern roundabout and tube station, the redevelopment of the shopping centre, provision of a new leisure centre and a substantial number of new homes.

We acknowledged as part of the stage 1 EQIA that the town centre currently has a high proportion of independent retailers and businesses and a particularly strong concentration on Latin-American businesses. This reflects the growing Latin-American community in Elephant and Castle and Southwark as a whole. The SPD states that for new large new retail development, there must be a range of unit sizes and a proportion of space must be made available at affordable rents. This approach is a reflection of the current business and retail mix in the area and addresses some of the concerns that have been raised through consultation. It will help to ensure that provision is made for existing small scale, independent retailers who are displaced as a result of regeneration in the area.

Similarly, for new business space, the SPD states that we will promote new business space, but that it must be designed flexibly and consist of a range of unit sizes, so that there is ample space for small and medium enterprises, which make up the bulk of businesses within Southwark. We have also amended SPD policy 4 to refer to the fact that we will encourage the provision of affordable business space. This approach reflects the aspiration to create a range of new jobs in the area, but aims to ensure that this is not at the expense of existing businesses. It aims to ensure that a diverse range of jobs is provided to support the diverse local community.

The town centre is identified in the SPD as the focus for major developments, such as the new leisure centre. This is due to the fact that it is very accessible by a range of public transport. The SPD also states a priority to improve the pedestrian and cycling environment, with a particular focus on the town centre roundabouts. These policies will ensure that key facilities and services are accessible to a broad range of people, via safer and more convenient means of travel. This will particularly benefit those with mobility issues, potentially including the disabled, elderly or families with young children.

### **Design and heritage**

The opportunity area will undergo significant changes over the next 15 years as major new developments take place. The SPD's design and heritage policies ensure that the changes are managed in a way that is inclusive and improves the area for the benefit of local people, whilst also being in-keeping with local character.

As noted above, in some parts of Elephant and Castle, design has contributed to a number of the problems experienced by local people. The large scale redevelopment of the Central Area and Heygate Estate provide a huge opportunity to address some of these. The policies in the SPD stress the need to improve the public realm and

create a network of routes that will improve access throughout the area and contrast with some of the monolithic post-war development blocks in the area. Guidance in the SPD also highlights the need for creating spaces that are well-lit and overlooked. Further references have been added to SPD15 to highlight that if new public realm is to be inclusive, then it needs to be well defined, with a sense of enclosure. This will ensure public spaces are defensible and feel safer. These policies will create an area that is much more pedestrian friendly and help will to counteract the perception that the area is unsafe. This will particularly benefit more vulnerable groups, such as certain members of faith groups, the young or elderly and women. Improvements to the quality of routes and public realm will also be particularly beneficial for people whose disability means that they have reduced mobility.

There is a risk that the increased costs associated with higher quality design might have a negative impact on some smaller businesses and also contribute to higher house prices. To address this, the SPD sets out minimum requirements for affordable housing and affordable business space, which must be met or exceeded in new developments. The council will continue to work with developers and other partner organisations to pursue new development that is affordable and meets the needs of the local community.

### **Open space**

The SPD sets out a range of priorities for improving open spaces in the opportunity area. It focuses on improving the range of functions provided by open spaces, which will help to ensure that they appeal to a broader spectrum of residents. In principle, improvements to open spaces will benefit all members of the community, but specific measures will need to be considered in order to accommodate all members of the community. For instance, the installation of new play or sports space might be positive for younger people, but could alienate older people. Similarly, the installation of certain facilities like benches and public toilets can make spaces more inclusive for older and disabled people. These issues will be considered in further detail at the point at which funding is allocated to open space improvement projects.

The SPD also sets out that a new park will be provided as part of the redevelopment of the Heygate Estate. The park will have a positive impact on future residents of the Heygate character area, who will have immediate access to the park, but also residents in the wider opportunity area. The new open space provides an opportunity to alter perception held by many that the local area is unsafe by providing a vibrant, well designed and ultimately well-used space. Similarly, the SPD states that children's play provision and space for food growing will be included in major new housing developments. This will have a strong positive impact for residents of new housing, particularly those with young children and those who are less able to travel far to access open space, such as some disabled and older people.

The SPD sets out that open spaces will be linked by a network of green routes. Although not necessarily open spaces themselves, by increasing tree planting and other measures, the green links will provide more attractive connections between open spaces and will encourage more active travel.

There will be an ongoing challenge to ensure that open space in the area is well maintained. Whilst high quality open space can be a major asset, poorly maintained open space can lead to fear of crime and anti-social behaviour, which in turn could lead to the exclusion of certain more vulnerable groups.

### **Community facilities**

The SPD identifies a broad range of community facilities and aims to locate them together, where possible. Co-locating facilities in accessible locations is a general principle that is reflected by services throughout the council and helps to ensure that residents have the best chance of accessing key facilities. Community facilities are defined as ranging from health services and schools to libraries, youth centres and buildings used by community or faith groups. The broad definition is a reflection on the range of individuals, organisations, religious and faith groups and cultures that are resident in Elephant and Castle. The specific benefits will depend on the particular facilities that are delivered, but the provision of community facilities could potentially have a positive impact on all of the groups with protected characteristics. Our approach is also to ensure that new community facilities, including those associated with new schools, are accessible to all members of the public.

The SPD identifies few specific facilities that will be delivered over the plan period. It does acknowledge the need for a new secondary school and the fact that various options will be explored to expand primary schools in the area. This is particularly beneficial for families with children of school age; as well as the students themselves.

The SPD also makes clear that we will promote new community facilities as part of development so that there are opportunities for local groups to meet. This will potentially benefit all current and future residents, but particularly groups such as the elderly, families with young children, religious groups or people whose first language is not English, who can be more reliant on community space for social interaction.

The SPD has been amended to highlight that existing well-valued facilities will continue to be protected through planning policies in the Southwark Plan.

### **Sustainability**

The SPD seeks to ensure that development meets the highest possible environmental standards, as set out in the Core Strategy. This includes applying the energy hierarchy as set out in the London Plan and investigating whether it is feasible for new developments to connect to combined heat and power systems or existing heating and cooling networks.

The stage 1 EQIA acknowledged that the rising cost of fuel has led to increasing incidences of fuel poverty, which is of particular concern in Elephant and Castle since it has some of the highest levels of deprivation in the borough. Requiring developers to design buildings with greater energy efficiency and to reduce CO<sub>2</sub> emissions will lead to reduced fuel bills. This will benefit residents of new properties, particularly older people and larger families, who tend to require more energy.

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 is not specifically referred to in the SPD, it has informed both our consultation and preparation of the SPD. The EQIA has been completed alongside our consultation and the development of the SPD and where potential impacts on the groups identified as having protected characteristics have arisen, we have been able to amend our consultation programme and the content of the SPD to ensure that the council's responsibility has been upheld.



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

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

The SPD is a long term strategy and establishes a framework for development at Elephant and Castle for the next 15 years. Delivery of the policies in the SPD will be monitored on an annual basis as part of the annual monitoring report (AMR). Through the AMR we will consider whether policies are being implemented in an equitable and consistent way. Where our monitoring demonstrates that this not the case, changes could be made to the way in which policies are implemented.

Throughout the preparation of the SPD we have consulted extensively with the local community to try to ensure that a broad range of views have been considered and incorporated into the document. The breath of our consultation is demonstrated in the consultation report, which sets out the ways in which we have exceeded the level of consultation that is required of us, in order to gather more extensive local views to inform the final SPD.

### 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 SPD aims to contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community values.

The stage 1 EQIA scoping report identified issues that could arise during consultation that might create tension between individuals and organisations, such as the timing and location of events or the perception that certain individuals/groups had greater influence. We have been mindful of these issues throughout consultation and in drafting the policies in the SPD. The scoping report also identified ways in which different policies could potentially impact on groups with certain protected characteristics. This has informed the development of policies in the SPD, as detailed above in part B.

### 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 stage 2 EQIA has been prepared iteratively alongside the final version of the SPD. Where the assessment has indicated that a policy may have a negative impact on a particular group, changes have been made where possible. Where impacts are unavoidable, mitigation measures have been identified and further detailed consideration will be required as the policies are delivered in relation to individual developments.

The council has taken on board all of the representations that were submitted through consultation, making changes to the document where appropriate. These are highlighted in the section on Community and stakeholder involvement above.

Some examples of the changes made as a result of consultation and with regard to eliminating negative outcomes include:

- Amending SPD15 to add a clarify some of the design issues that will need to be considered to ensure that new public realm is inclusive. This includes

reference to creating well defined spaces that have a sense of enclosure and are defensible and feel safer.

- We have raised the profile of faith groups in the local area, stressing the important role that they will have as part of the regeneration of Elephant and Castle. We have added references to Section 2 of the SPD, which focuses on the existing area; the opportunities and challenges that regeneration will need to address. We have also identified particular faith premises or community facilities that host faith groups within the character area sections. A cross-reference has been added to SPD9 that highlights that well-valued community facilities, including faith premises, will continue to be protected by policy in the Southwark Plan.
- Similarly, we have made changes to the SPD to highlight the prominence of the Latin American community. It is noted that there are a large number of local Latin American businesses and services in Elephant and Castle and that their needs have to be considered as a key part of the regeneration.
- We have added a reference to SPD 11 to refer to the need to work with Transport for London to devise a safe cycle route that will bypass the northern roundabout. Support for this route was a particularly strong theme of our consultation. We have also added a specific reference that refers to the need for good signage, which will help to encourage more cycling in the opportunity area.
- With regard to proposed changes to traffic flows along London Road and St George's Road, we have clarified that the proposal is being led by Transport for London and that any scheme involving changes to the road network would be subject to further detailed investigative work to consider traffic impacts, noise and pollution, and also would be subject to further detailed consultation. This will enable more local people and typically hard-to-reach groups to be involved.

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

As noted above, and as set out in our Consultation Plan, we have consulted comprehensively in Elephant and Castle in an attempt to gather a broad range of views and opinions from a range of individuals and organisations. We have surpassed the statutory minimum requirements for consultation that local authorities are subject to and have exceeded the standards that are set out in our Statement of Community Involvement. We have received over 1,000 comments on the SPD during this stage of consultation. Engaging the local community as the SPD is delivered will be an ongoing process and if we become aware that certain groups are not involved or are being adversely affected, we will amend our approach accordingly.

We will monitor the delivery of the SPD on an annual basis as part of the AMR. This will include information relating to the delivery of individual policies and progress on individual development sites. The AMR will, for instance, monitor the number of new affordable homes in the area and increases in business and shopping floorspace. These developments will have impacts on groups with protected characteristics, as noted in the stage 1 and stage 2 EQIA.

As policies are delivered, we will have continued dialogue with our partners to determine the need for different infrastructure to underpin new development and population growth. This will include NHS Southwark with regard to health facilities and the council's children's services team with regard to school places. The infrastructure plan will be updated to reflect changing needs for new facilities as growth takes place. This will ensure that the local community, and particularly some of the more vulnerable groups, are not disadvantaged by new development and that we have the right sort of infrastructure in place to provide valuable services for local people. Linked to this, we will consult with local people regularly to update the community project bank. This consists of a list of projects that are a priority for local people as development takes place and funding becomes available via s106 planning obligations and/or community infrastructure levy. This process will ensure that we can work towards providing new infrastructure and new investments that are wanted by local residents and it will help to mitigate any negative impacts associated with new development.

## Annex 1: Our vision and objectives for Elephant and Castle

### Vision

Elephant and Castle has potential for redevelopment into an attractive central London destination. We will facilitate regeneration of the Elephant and Castle into a more desirable place for both existing and new residents. There will be excellent shopping, leisure facilities and cultural activities. London South Bank University and London University of the Arts will develop further as important centres of learning. Elephant and Castle will continue to be highly accessible from other places in Southwark and London.

We are using our land at the heart of the area to stimulate 440,000 sqm of new development with of up to 45,000 sqm new shopping and leisure floor space and 25,000-30,000 sqm of business floorspace. We will meet our target of 4000 new homes and a minimum of 1,400 affordable housing units by working with the local community, registered providers and private developers to deliver new homes. We will also meet the London plan target of 5,000 new jobs by encouraging more offices, hotels, small businesses and developing the evening economy and cultural activities. There could be tall buildings on some sites in the core area where this helps stimulate regeneration and creates a distinctive place. We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework.

The regeneration of the opportunity area will create a highly integrated and efficient public transport hub. This will include an improved Northern line station with a new ticket hall and improved access to platforms; while additional lifts would provide sufficient capacity, there is an aspiration that access should be via escalators. There will be enhanced conditions for bus and rail users and an improved interchange between the various modes. All development will be phased to ensure that the funding is available so that the necessary transport capacity and improvements can be delivered in time to accommodate the new residents, businesses and leisure activities in the opportunity area. Existing subways will be removed and replaced by surface pedestrian crossings creating a more attractive and safe environment with priority for public transport users, cyclists and walkers over the car. A minimum level of car parking and limitations on traffic will reduce pollution. A new and improved street layout including public open spaces will be created allowing those who live and work in the area to move around easily and safely. We will work with Transport for London and Network Rail to bring forward these improvements and will have due regard to the detailed principles set out in the Elephant and Castle Development Framework (2004), or any development plan documents or updated supplementary planning documents which may from time to time be adopted to guide development in this opportunity area.

Elephant and Castle will be a leading example for sustainable development. It will meet the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality.

We are working with the local community, Greater London Authority, businesses including local traders, land owners, the London Development

Agency, Transport for London, Lambeth Council, the Cross River Partnership, English Heritage, the Primary Care Trust, and developers to make the Elephant and Castle a successful place.

The vision for the area is expressed spatially on the key diagram. The key diagram is a graphical representation of the main elements of the vision, such as improvements to transport infrastructure and the creation of a new town centre, to be delivered in the area.

## Objectives

To help achieve our vision, we have set out strategic objectives for the SPD. The objectives relate directly to the vision and have also been also designed to help deliver key elements of other strategies and policies, including our Sustainable Community Strategy, the Core Strategy and the London Plan.

The objectives have been tested using our sustainability appraisal to make sure that they are working together to create a sustainable place.

In addition to establishing a clear direction for future development, the objectives have also been used to create more detailed day-to-day policies for the SPD and make sure that these are focused on our key aims. In part 4 of the SPD, we show how the objectives relate directly to the SPD policies.

We have grouped the objectives and the policies that follow from them into the following themes

### Theme 1: Town centre: Shopping, business and hotels

- Strengthen the Elephant and Castle as a major shopping destination by increasing the amount of shopping space by up to 45,000sqm in the town centre.
- Provide a vibrant mix of activities in the town centre, ensuring it is busy throughout the day and evening.
- Reinforce retail activities on the main roads leading into the town centre.
- Improve the evening economy and the variety of arts, cultural and entertainment offer by providing more cafes and restaurants as well as new leisure and cultural facilities.
- Renew business space in the area and encourage the development of an enterprise culture and inward investment by providing more opportunities for local people and small and medium sized businesses (SMEs).
- Regenerate railway arches, enabling their use for a mix of uses including business, retail and community uses.
- Ensure that new retail and business opportunities generate around 5,000 new jobs.

### Theme 2: High quality homes: Providing more and better homes

- Deliver at least 4,000 (net) new homes over the period 2011-2026.
- Provide at least 1,400 affordable homes over the period 2011-2026.
- Provide at least 1,400 private homes over the period 2011-2026.

- Ensure that at least 10% of new homes have 3 or more bedrooms and that all new homes provide good quality accommodation and have generous room sizes.
- Help address needs for student housing, whilst ensuring that a mix and choice of housing types is available in all character areas.

#### Theme 3: Wellbeing: Social and community infrastructure

- Ensure that new development promotes healthy and active lifestyles.
- Transform leisure opportunities by building a new leisure centre, including a new swimming pool.
- Provide more and improved educational, health and community facilities which meet the needs of existing and future residents.
- Support the growth of London South Bank University and the London College of Communication.

#### Theme 4: Transport and movement: Better connections and an integrated public transport hub

- Improve bus, tube and rail facilities and the pedestrian connections between them, ensuring that necessary increases in capacity are provided to support development.
- Improve the Northern Line station by providing a new ticket hall and increased capacity to platforms.
- Replace subways with surface level crossings.
- Minimise the amount of car parking provided.
- Reduce the impact of the viaduct and main roads as a barrier to pedestrian and cycle movement and use development opportunities to provide a high quality network of pedestrian and cycle links which are attractive, safe and easy to use.

#### Theme 5: Built environment: Attractive neighbourhoods with their own character

- Promote a high quality public realm which is safe, secure and attractive.
- Ensure that the design, scale and locations of new buildings contributes to reinforcing and creating neighbourhoods which have distinctive character and a sense of place.
- Create a positive identity for the town centre which reflects its status as a major destination in south London and potential to appeal to a wide catchment.
- Conserve and enhance the historic environment and use the heritage of places as an asset to promote positive change.

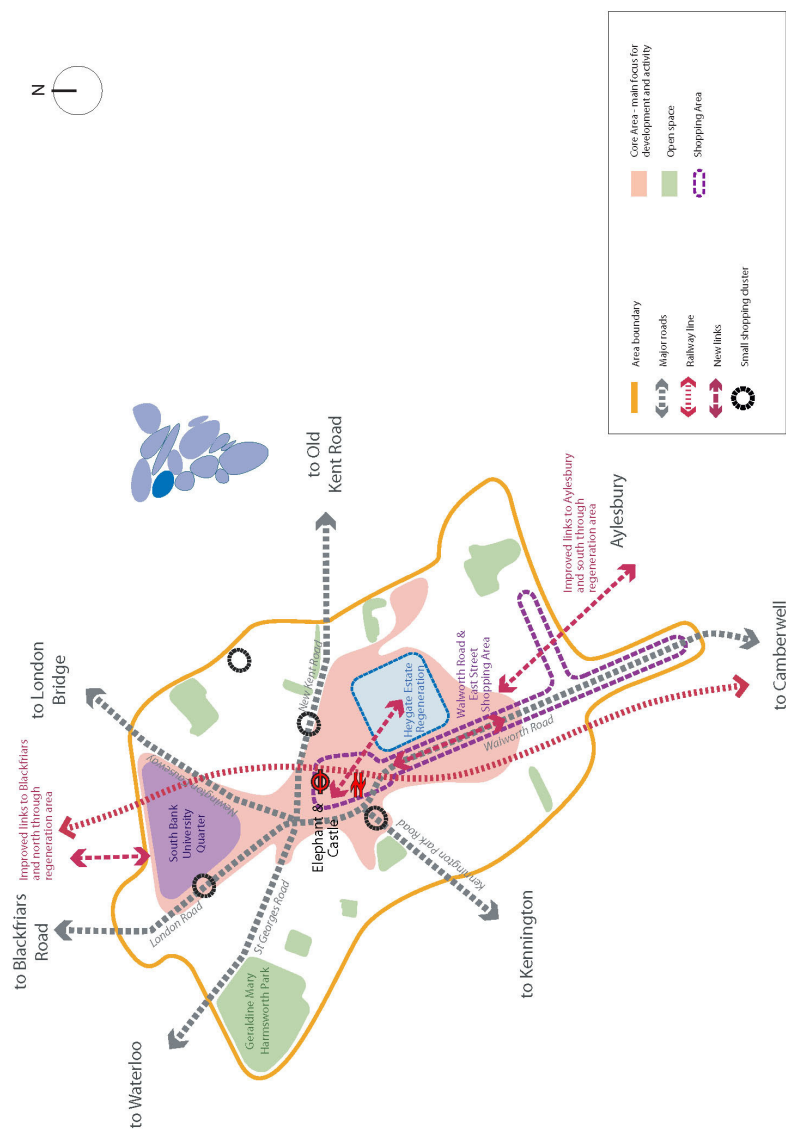
#### Theme 6: Natural environment: Sustainable use of resources

- Promote a network of high quality open spaces which have a range of functions including recreation, children's play, sports and food growing.
- Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes.
- Reduce the impact of development on the environment, minimising greenhouse gas emissions and enabling adaptation to climate change and managing pollution, waste and flood-risk.

## Theme 7: Delivery: Making regeneration happen

- Continue to work with key stakeholders including the local community, landowners, developers and Transport for London (TfL) to deliver the vision and objectives of the SPD.
- Provide mechanisms to ensure that physical and social infrastructure needed to support the expanded residential and worker population at the Elephant and Castle is delivered in a timely manner.
- Ensure that comprehensive redevelopment does not compromise safety and maximises opportunities to make use of vacant sites on an interim basis.
- To monitor and review the delivery of SPD policies annually to inform phasing of future development and delivery of infrastructure.

Figure 1: Elephant and Castle vision



## Annex 2: 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 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:

- 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.

### **Local Implementation Plan for Transport (LIP)**

Key findings:

- Factors such as age and level of deprivation can increase the risk to people's road safety.
- Access to employment can be affected by journey time to travel to work.
- As a person ages and mobility decreases the importance of being able to access their surrounding environment and public transport grows considerably and inaccessible transport can be a major isolating factor.
- Accessibility transport planning should be used to: maximise independence and access to key services; establish transport standards; and assess, prioritise and meet the needs for all.
- The walking plan should be used to promote initiatives that aim to improve the physical environment, such as improved surfacing, removal of street clutter, improvements to street lighting while also providing additional footways.
- Route management strategies on the strategic road network should comprise measures to improve efficiency and safety by reducing traffic speeds and providing for improved pedestrian safety.

### **Employment and enterprise strategies**

Key findings:

- Overall in both the UK and Southwark the employment rate of BME people is lower than that of white British people.
- Overall in the UK and Southwark the employment rate of women is lower than that of men. Barriers include limited access to affordable and flexible childcare and caring responsibilities.
- Young people (16-24) and older people (50+) in the working age group tend to experience specific barriers to employment related to their age.

### **Housing Strategy 2009–2016**

Key findings:

- 44% of vulnerable private sector households (excluding housing association tenants) in Southwark live in decent homes compared to the 2020 target of 75% which disproportionately affects older people.
- About 20% of homes in Southwark are at risk of fuel poverty, higher than national average of 11%.

- In 2008, 3,580 households in Southwark had health problems where the layout of their current home did not meet their needs, of which 37.4% could be adapted.
- 47.2% of council stock was non-decent in accordance with the Government definition as at March 31 2009, based on the 2002/03 stock condition survey and as identified in the private sector housing stock condition survey 2008, 35% of housing association homes were also non-decent.

### **Housing area management**

Key findings:

- A high proportion of new tenants are young people.
- Access to the full range of services provided and opportunities for involvement in community life may be limited for disabled people.
- Residents with mental health problems may have difficulties sustaining their tenancies.
- Issues of harassment and hate crime may disproportionately affect LGBT tenants.
- Dealing with issues which can cause specific tensions within communities e.g. nuisance, noise, clashes emanating from lifestyles, is one of the functions of this service area. It is difficult to isolate any particular factor in determining why people feel more or less safe or comfortable within a community so difficult to assess the contribution that area management may make to this.

### **Culture service**

Key findings:

- There are complexities in bringing buildings that are heritage listed up to standard with the Disability Discrimination Act. Solutions that provide access to upper floors are expensive and time consuming, as planning approval is needed.
- There is a broader issue with access to heritage sites and properties elsewhere in the borough and not in council control - there is a lack of information on what physical barriers to access to heritage sites there are and this needs to be addressed with our partners to ensure that they are compliant and working towards best practice.

### **Alcohol Strategy**

Key findings:

- Under 25 year olds are most likely to be binge drinkers or drink to get drunk, which leads to an increase in the risk of accidents and alcohol poisoning.
- Older people who live in social housing have been identified as a group with alcohol issues.
- All services within the borough need to consider the difficulties that disabled people face when seeking help. This will include the difficulties faced by those who have acquired a disability due to alcohol use. This can be for a number of reasons including difficulties articulating that they have a problem; the physical barriers to attending meetings or counselling and the negative perceptions that they sometimes face from 'outsiders' that makes it hard for disabled people to admit that something is wrong.
- Nationally, as well as locally, statistics show that alcohol misuse and binge drinking is predominantly more common within the white community. In Southwark the ethnicity of patients admitted to hospital where alcohol was either the primary or secondary diagnosis was overwhelmingly White British, followed by White Other, and White Irish.

## **Children and Young People's Plan**

### Key findings:

- Children in Southwark are more likely to be experiencing deprivation than elsewhere in the UK, with Southwark ranked as the 17th most deprived borough in the UK.
- In Southwark, 31% of dependent children live in households with no working adults, compared with 17%. 36% of children in Southwark live with a lone parent, increasing their likelihood of experiencing economic disadvantage. In terms of housing tenure, 73% of dependent children in Southwark live in rented accommodation, with 54% living in accommodation rented from the council.
- Children and young people are more likely to become victims of crime than any other age group. Recorded offences against young people rose by 2% in the six months to October 2005 compared to the previous year, including a 26% rise in the incidence of robbery. In roughly half of all offences against young people in Southwark last year, the suspect was also a young person.
- The views of disabled children and their parents are not always taken into account when planning services. Disabled children and young people frequently experience barriers when trying to use sports and leisure facilities and other types of provision for young people.
- Boys do less well at school than girls. Across Southwark, Black Caribbean boys, mobile pupils and those with English as an additional language are doing less well than other groups.
- Traveller children and 'Looked After' Children have particularly low rates of attainment. More young Travellers are now using early years services, education and youth projects, but they are not yet meeting their full educational potential and appear to have some unmet health needs.

## **Education Achievement**

### Key findings:

- Underachieving groups identified were:
  - pupils in receipt of free school meals across all communities but in particular white working class boys;
  - Black Caribbean pupils, particularly boys;
  - Traveller, Gypsy and Roma children;
  - Children Looked After;
  - Children who move school during the primary phase;
  - Children living in specific geographic areas linked to high levels of deprivation;
  - Summer born children particularly boys.

## **Sustainable Design and Construction Supplementary Planning Document (SPD)**

### Key findings:

- Improving the environmental performance of buildings, such as through energy saving, is likely to have benefits for the community such as more comfortable living and working environments and reduced running costs, which could be of particular benefit to people on low incomes, older people, families and disabled people.
- Local businesses are more likely to be owned/run by people from the BME community.
- Taking better care of our natural environment and resources will also help ensure a good quality of life for future generations.

Disabled people, some older people and families with small children will benefit from the lifetime homes standard, as the barriers that previously existed to enabling them to enjoy their own homes, will be broken down by the new standard for all new developments.

**Annex 3: Barriers to community involvement with different equalities target groups and how to overcome them** (extract from Southwark Statement of Community Involvement, January 2008)

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

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>The voluntary sector in Southwark is made up of around 18,000 individuals delivering services through 1,600 organisations, groups and projects. In 2001-2 Southwark Council supported around 300 voluntary and community groups with an investment of around £10m in grant-aid, service agreements and contracts.</p>	<p>These barriers are generic barriers faced by many voluntary groups.</p> <ul style="list-style-type: none"> <li>• Need for prior knowledge and experience;</li> <li>• Jargon and legal terms;</li> <li>• Other funding commitments and priorities than planning;</li> <li>• Lack of time; and</li> <li>• Knowledge of how and where to access information.</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of information and training about planning focused on these groups;</li> <li>• Ensure that a range of community involvement methods are used that are accessible to these groups;</li> <li>• Make sure that groups are added on to relevant mailing lists; and</li> <li>• Hold/attend meetings at appropriate times that are accessible to these groups.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

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

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Southwark is lucky in having a large number of community groups that are involved with a diverse range of issues.</p>	<p>These barriers are generic barriers faced by many community groups:</p> <ul style="list-style-type: none"> <li>• Need for prior knowledge and experience;</li> <li>• Jargon and legal terms;</li> <li>• Lack of time;</li> <li>• Other priorities than planning;</li> <li>• Accessing information barriers.</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of information and training in planning focused on these groups;</li> <li>• Ensure that a range of community involvement methods are used that are accessible to these groups;</li> <li>• Make sure that groups are added on to relevant mailing lists; and</li> <li>• Hold/attend meetings at times that are accessible to these groups.</li> </ul>

		<ul style="list-style-type: none"> <li>• Translators and interpreters to be used where appropriate.</li> </ul>
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### 3. Business – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>There are 11 000 businesses in Southwark. These range from large international and national organisations to small family owned businesses. Approximately 96% of the total businesses in Southwark comprise less than 50 employees of which, approximately 20% are Black and Minority Ethnic businesses. Many businesses are members of Southwark Chamber of Commerce and other local groupings.</p>	<ul style="list-style-type: none"> <li>• Accessing information outside of business hours (this is particularly a problem for small businesses);</li> <li>• Attending community meetings that do not address their needs;</li> <li>• Not understanding planning influences on their issues;</li> <li>• Other priorities than planning.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring that information is available at places which are open outside of normal office hours;</li> <li>• Hold/attend meetings at times that are accessible; and</li> <li>• Provide information and training focused at businesses.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

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

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>A wide range of people express their concern for their environment through membership groups such as Friends of the Earth or Greenpeace. Some of these larger organisations have active local branches. Some people get involved in local groups with the aim of</p>	<ul style="list-style-type: none"> <li>• Other priorities than planning;</li> <li>• Attending community meetings that do not address their issues;</li> <li>• Jargon and legalistic terms; and</li> <li>• May not be aware of how other planning issues may affect their area of interest.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide information to ensure these groups are aware of how planning influences their area;</li> <li>• Use plain English; and</li> <li>• Translators and interpreters to be used where appropriate. .</li> </ul>

protecting or improving a particular area or amenity such as the Friends of Burgess Park or the Dulwich Society.		
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#### 5. Neighbourhood, tenants and residents groups – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
There are approximately 232 neighbourhood, tenants and residents groups in Southwark. Many are formally consulted by us to provide residents views about social and private housing. These groups meet, many of them very regularly, to discuss matters affecting the local area including estate improvements.	<ul style="list-style-type: none"> <li>• Other priorities than planning;</li> <li>• Suffer from ‘consultation fatigue’ as they get consulted on a number of our initiatives and programmes;</li> <li>• Need prior understanding and knowledge of planning issues; and</li> <li>• Finding the time to get involved in planning.</li> </ul>	<ul style="list-style-type: none"> <li>• Coordinate consultation between different parts of the council to ensure that groups are not overwhelmed with consultations;</li> <li>• Make sure that groups are added on to relevant mailing lists;</li> <li>• Provide focused information; and</li> <li>• Hold/attend meetings at accessible times.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

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

Description	Barriers to involvement	Measures to overcome barriers to consultation
Health service organisations provide important services to the community. Formal structures can be used to consult and gain feedback from local health organisations on how healthy living issues and requirements might influence or affect planning.	<ul style="list-style-type: none"> <li>• Limited time to access and absorb detailed planning information;</li> <li>• Other priorities than planning; and</li> <li>• May not understand how planning impacts on health.</li> </ul>	<ul style="list-style-type: none"> <li>• Hold/attend meetings at appropriate times; and</li> <li>• Ensure that information is easily accessible, relevant and understandable.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

#### 7. Transport organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Transport for London and the public transport providers are <b>statutory</b> consultees. There are smaller local groups that are interested in the improvement of cycling, walking and public transport infrastructure.	<ul style="list-style-type: none"> <li>• Other priorities than planning; and</li> <li>• May not be aware of how other planning issues may affect their area of interest.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide information to ensure these groups are aware of how planning affects them.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

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

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>The Southwark Refugee Communities Forum (SRCF) was established by Refugee Community Organisations (RCO) in 2003 to enable the voices of refugees themselves to be heard. The membership of SRCF currently includes 28 Southwark-based Refugee Community Organisations.</p> <p>An estimated 7,000 people from refugee backgrounds across Southwark are in direct contact with SRCF members and participate in their activities on a regular basis.</p>	<ul style="list-style-type: none"> <li>• Need for prior knowledge and experience</li> <li>• English may not be their first language</li> <li>• Other priorities than planning</li> <li>• Discrimination</li> <li>• Lack of knowledge of how and where to access information</li> <li>• Difficult to gain access to these groups, as they may not be recognised local community groups on our database</li> </ul>	<ul style="list-style-type: none"> <li>• Avoid jargon and ensure that all information is given in plain English</li> <li>• Ensure that all written information is available in different languages</li> <li>• Provide information and training that is focused on these groups</li> <li>• Use a range of community involvement methods to ensure that they are accessible to all.</li> <li>• Source local knowledge about how to engage groups and those for our mailing lists.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

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

Description	Barriers to involvement	Measures to overcome barriers to
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<p>A number of issues in Southwark have an impact on our neighbouring boroughs such as Lambeth and Lewisham. Groups and residents that are on the borders of Southwark should be included in matters that affect them.</p>	<ul style="list-style-type: none"> <li>• Need for prior knowledge and experience;</li> <li>• Other priorities in their own borough and other than planning;</li> <li>• English as a first language; and</li> <li>• Lack of knowledge of how and where to access information.</li> </ul>	<p><b>consultation</b></p> <ul style="list-style-type: none"> <li>• Provision of information in appropriate locations;</li> <li>• Hold/attend meetings/events at appropriate locations that are accessible and appropriate to these groups.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>
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**10. Residents and individuals (including newcomers to the borough) – Equalities Target Group – all**

<b>Description</b>	<b>Barriers to involvement</b>	<b>Measures to overcome barriers to consultation</b>
<p>Residents and individuals in the borough may not belong to a specific group, but it is important that they are able to engage and get involved with issues and decisions that impact on them.</p>	<ul style="list-style-type: none"> <li>• Need for prior knowledge and experience;</li> <li>• Jargon and legal terms;</li> <li>• English may not be their first language;</li> <li>• Discrimination;</li> <li>• Problems accessing information;</li> <li>• Other priorities than planning; and</li> <li>• Lack of knowledge of how and where to access information.</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of information and training in planning focused on these groups;</li> <li>• Ensure that a range of community involvement methods are used that are accessible;</li> <li>• Source local knowledge about how to engage individuals; and</li> <li>• Add onto our mailing lists.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

**11. Black and minority ethnic groups (including travellers and gypsies) - Equalities Target Group – Race**

<b>Description</b>	<b>Barriers to involvement</b>	<b>Measures to overcome barriers to consultation</b>
<p>Southwark is a very ethnically diverse borough. As a result there are many established and new groups and</p>	<ul style="list-style-type: none"> <li>• Jargon and legal terms;</li> <li>• Need for prior knowledge;</li> <li>• English may not be the first</li> </ul>	<ul style="list-style-type: none"> <li>• Avoid jargon; Use plain English;</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

organisations that address issues relevant to each different community.	language; <ul style="list-style-type: none"> <li>• Other priorities than planning;</li> <li>• Discrimination;</li> <li>• Problems accessing information;</li> <li>• We may not be aware of their existence.</li> </ul>	<ul style="list-style-type: none"> <li>• Training groups in planning and council officers in understanding equality and diversity issues;</li> <li>• Coordinate council consultations;</li> <li>• Range of involvement methods; and</li> <li>• Gain local knowledge about how to engage groups; and</li> <li>• Add to mailing lists.</li> </ul>
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### 12. Religious groups - Equalities Target Group –Faith/Belief

Description	Barriers to involvement	Measures to overcome barriers to consultation
Organisations are a valuable consultation link due to their very strong links to local communities. Groups have a contribution to make to social inclusion and community cohesion that is separate from promoting religion. As they are involved in running community services, community development and leadership representing community interests.	<ul style="list-style-type: none"> <li>• Needs not being understood;</li> <li>• Need for prior knowledge and experience;</li> <li>• English may not be their first language;</li> <li>• Other priorities than planning;</li> <li>• Discrimination;</li> <li>• Accessing information; and</li> <li>• May not understand how planning affects their group.</li> </ul>	<ul style="list-style-type: none"> <li>• Avoid jargon; Use plain English;</li> <li>• Translators and interpreters to be used where appropriate.</li> <li>• Training groups and individuals in planning and</li> <li>• Training council officers to understand and belief issues;</li> <li>• Coordinate our consultations;</li> <li>• Range of involvement methods; and</li> <li>• Gain local knowledge about how to engage groups; and</li> <li>• Add to mailing lists.</li> </ul>

### 13. Older people Forum’s Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
Pensioner forums help represent older	<ul style="list-style-type: none"> <li>• Older people may not feel safe</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of information in appropriate</li> </ul>

people's views and are able to represent many local people over particular issues that are affected by planning.	<p>attending meetings in the evenings;</p> <ul style="list-style-type: none"> <li>• A lack of respect for their views; and</li> <li>• Lack of knowledge of how and where to access information;</li> <li>• Other priorities than planning.</li> </ul>	<p>locations;</p> <ul style="list-style-type: none"> <li>• Hold/attend meetings/events at accessible times;</li> <li>• We listen to the views and feedback ; and</li> <li>• Make information relevant.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>
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#### 14. Education and young people - Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
Schools, colleges, learning institutions and youth agencies are important aspects of the community, particularly as finding ways of involving young people have been identified as a priority by a large number of people	<ul style="list-style-type: none"> <li>• May not be aware of the impact planning can have on them and/or how they can have an input;</li> <li>• English may not be a first language; and</li> <li>• May not be able to attend meetings in the evenings or during the day in term time.</li> <li>• Other priorities than planning.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide information that is focused at young people;</li> <li>• Attend schools and after-school centres and local youth forums to consult them on planning issues;</li> <li>• Translators and interpreters to be used where appropriate; and</li> <li>• Hold/attend meetings/events at accessible times.</li> </ul>

#### 15. Disability Forum - Equalities Target Group – Disability

Description	Barriers to involvement	Measures to overcome barriers to consultation
This forum helps to identify planning issues including safety, access and housing from the perspective of disabled people.	<ul style="list-style-type: none"> <li>• Venues for meetings may not be accessible; and</li> <li>• Written or verbal material is not always appropriate.</li> <li>• Other priorities than planning.</li> </ul>	<ul style="list-style-type: none"> <li>• Hold/attend meetings/events at accessible locations; and</li> <li>• Ensure that all written information is available in different formats such as Braille, large print and audio.</li> </ul>

		<ul style="list-style-type: none"> <li>• Translators and interpreters to be used where appropriate.</li> </ul>
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### 16. Lesbian, gay, bisexual and transgender - Equalities Target Group – Sexuality

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>The Southwark Anti Homophobic Forum (SAHF) is the longest established LGBT Forum of its kind and works to meet the needs of the LGBT community in key areas including education, safety in the home, the streets and housing. The Southwark LGBT Network is a social support group for LGBT people and their friends who live and work in Southwark.</p>	<ul style="list-style-type: none"> <li>• Do not feel secure in raising LGBT issues at open events;</li> <li>• Other priorities than planning;</li> </ul>	<ul style="list-style-type: none"> <li>• Hold specific LGBT consultation events;</li> <li>• Avoid jargon and use plain English;</li> <li>• Hold/attend meetings/events at convenient times and ensure that the venue is accessible and a safe environment.</li> <li>• Translators and interpreters to be used where appropriate.</li> </ul>

#### Annex 4: Consultation responses on EQIA scoping report

Rep No.	Objector Ref	Details of representation	Officer response
403	674	<p>Equalities Impact Assessment: There is nothing to say how the information for the assessment was gathered, and there is a lack of objective evidence indicating the relative importance of the issues raised as each is treated as being substantially of equal importance and to support the overall conclusions. The document lists a number of factors under sub-headings. Where is the evidence for the statements made and the mechanism of how the SPD actually addresses those statements? In the context of transport the “considerations” raised are not adequately addressed by SPD because in the SPD there is no transport assessment. This is a major omission as a main aspect of the E&amp;C regeneration is transport. In the context of sustainability there is also no mention of the high levels PM10 and NO2 in London that are outside EU guidelines and considered to be causing 4000 early deaths per annum. This is clearly unsustainable. They are very relevant to the transport assessment that is in turn closely related air equality for PM10 and NO2. Of additional concern is that the current measurements of air quality, which have not improved since the Great Smog of 1952, are made three metres off the ground and the impact of vehicle emissions is much greater at pedestrian breathing heights. So the real emissions are quite likely to damage the health of the local population may be much greater than even the official records indicate.</p>	<p>The role of the EQIA is to consider the potential impacts of the SPD on the groups identified as having protected characteristics under the Equality Act 2010. The EQIA is undertaken alongside the preparation of the SPD so that it can influence the way in which the SPD is prepared, such as the timing, location and format of our consultation, and also so that it can influence the SPD policies themselves.</p> <p>Large parts of the EQIA are subjective. In making judgements about particular impacts we consider a range of sources, including views previously expressed through consultations. It is important to acknowledge that the SPD will have a varied impact on people within each protected group and it is difficult to claim a definitive, objective impact on one particular group. However, where a potential impact is identified, we can consider amending our approach accordingly. Where impacts are unavoidable, we can consider mitigation measures to minimise any impact.</p> <p>The impacts of regeneration and growth on air quality throughout the opportunity area are considered as part of the sustainability appraisal. These impacts will continue to be investigated in more detail as individual developments come forward.</p>

			<p>Core Strategy policy 13 sets out that all development will be required to meet the highest possible environmental standards. All major developments are required to submit an air quality assessment as part of the planning application process. Further guidance is set out in our sustainable design and construction SPD.</p> <p>Also, we are aiming to secure a new air quality monitoring station at Elephant and Castle. This will monitor background air quality in central London and should be operational by April 2012.</p>
410	665	<p>The equalities and impact assessments highlight the risk of alienating the current black and minority ethnic populations if the area 'gentrifies'. It would be a mistake to maintain the area in deprivation simply so those who have lived in it as an area of deprivation are able to feel that it has not changed. Elephant and Castle is less than 30 minutes walk from Covent Garden and only 20 minutes walk to Parliament. You can hear Big Ben chime from West square. London is finally waking up to the proximity and convenience of this part of 'south London'. At the north end of the patch flats are being built costing several million pounds. This may be frightening, or alienating, to some but with it comes much needed regeneration funds and council tax revenue.</p> <p>The existing population, my family included, should be included and encouraged in all consultation but we should not hold back this important development which will help lift the area out of poverty</p>	<p>Our Statement of Community Involvement (2008) sets out how we engage with the community to ensure we consult with as many different groups as possible on our policy documents. We have carried out extensive consultation on the Elephant and Castle SPD to ensure we consult as fully as possible. Our consultation report which accompanies the final SPD sets out the consultation we carried out and a summary of the responses we received. It comes much needed regeneration funds and council tax revenue.</p> <p>We have updated the EQIA to explain more clearly that how we have consulted on the SPD to try and involve all groups in the consultation process.</p>
53	634	<p>2. The Equalities Impact Assessment within the draft Housing SPD sets out a concern that property values will increase in the area and this will prevent existing residents</p>	<p>Noted. The SPD sets out the need to deliver a range of types of housing and to ensure that a proportion of these are affordable, so that large parts of the existing</p>

		<p>from accessing housing. Whilst we recognise that there will be an impact on the existing community and development proposals should consider ways of mitigating this, it is essential that capital values do increase to cross-subsidise the affordable housing</p>	<p>community are not excluded. It is correct that market housing is often used to cross-subsidise affordable housing and also that housing and commercial development in Elephant and Castle will provide a mechanism for delivering a range of other improvements in the opportunity area.</p>
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