

# Appendix F

## Equality Analysis

### Appendix E for the Cabinet Report: Peckham and Nunhead Area Action Plan Publications/Submission version

September 2012

Appendix A	The Peckham and Nunhead Area Action Plan report
Appendix B	Consultation report
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# **Peckham and Nunhead Area Action Plan Publication/Submission version**

## **Equality analysis**

**September 2012**

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**Section 1: Equality analysis details**

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<b>Proposed policy/decision/business plan to which this equality analysis relates</b>	Peckham and Nunhead Area Action Plan - publication/submission version
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<b>Equality analysis author</b>	Kate Johnson				
<b>Strategic Director:</b>	Simon Bevan				
<b>Department</b>	Chief Executive	<b>Division</b>	Planning Policy		
<b>Period analysis undertaken</b>	September 2012				
<b>Date of review (if applicable)</b>	N/A				
<b>Sign-off</b>	Alison Squires	<b>Position</b>	Planning Policy Team Leader	<b>Date</b>	11 September 2012

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

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### 1.1 Brief description of policy/decision/business plan

The Peckham and Nunhead Area Action Plan (AAP) is a planning document that will help bring long-lasting improvements to Peckham and Nunhead. It sets out policies to make sure that over the next ten to fifteen years we get the type of development needed to support a healthy, safe and prosperous community and a fairer future for all in Peckham and Nunhead.

The AAP sets planning policies for Peckham and Nunhead to include:

- The look and function of Peckham town centre, including the mix of shops and other activities.
- The type of development on large sites.
- The size and design of new buildings.
- The amount and type of new homes built and their location.
- The impact of new development on the environment and traffic.
- The infrastructure needed to ensure growth in the area can be accommodated sustainably, including improvements to open spaces, schools, health facilities and leisure facilities.

The AAP will be part of our framework of planning documents. It will be a material planning consideration in deciding planning applications in the action 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.

### Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
<b>Key users of the department or service</b>	<p>Planning is a statutory function carried out by local authorities. The development of planning policies and the impacts of planning decisions can affect everyone with an interest in land in the borough. This can include residents, landowners, developers, local businesses and their employees, community organisations, statutory consultees and interest groups.</p>
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	<p>The Peckham and Nunhead Area Action Plan will have an impact on anyone in the borough with an interest in Peckham and Nunhead, particularly residents, local community groups landowners and developers.</p> <p>The Peckham and Nunhead Area Action Plan has been through five previous rounds of public consultation. This is the final stage of consultation - the publication/submission version document. Each round of public consultation has been carried out in accordance with our adopted Statement of Community Involvement (SCI) (2008).</p> <p>Our Statement of Community Involvement (SCI) sets out our approach to consultation on all our planning documents. The SCI identifies a number of barriers for consultation for different groups and we will seek to address these issues by using different consultation methods in order for each all groups.  <a href="http://www.southwark.gov.uk/info/856/planning_policy/1238/statement_of_community_involvement_sci">http://www.southwark.gov.uk/info/856/planning_policy/1238/statement_of_community_involvement_sci</a></p> <p>We carried out Equalities Impact Assessments on the previous iterations of the AAP at Issues and Options, Towards a Preferred Option and Preferred Option stages. The findings of these EQIAs have been used to inform the policies set out in the AAP. We have revised the format of our Equalities Impact Assessments in order to meet the requirements of the Equalities Act 2010. Previous versions of the Equalities Impact Assessments can be found on our website at;  <a href="http://www.southwark.gov.uk/futurepeckham">http://www.southwark.gov.uk/futurepeckham</a></p> <p>We have carried out extensive consultation on the AAP. All organisations and individuals on our mailing list are notified when the documents were available for consultation. Information was also available on our website to raise awareness of the consultation. We attended a ran a large number of workshops and presentations including community councils, topic based workshops, attending local events such as local fairs, meeting and attending local community meetings and meeting with developers and landowners. Our consultation report sets out further detail on how we consulted with the community on each stage in the preparation of the AAP.  <a href="http://www.southwark.gov.uk/futurepeckham">http://www.southwark.gov.uk/futurepeckham</a></p> <p>All comments received during the previous consultation stages were considered when preparing the Peckham and Nunhead AAP and changes have been made where appropriate in light of comments received. At this consultation stage, officers will provide a written response to each written representation that is received, and the written representations along with the officer responses will be submitted to the Inspector for his/her consideration during the examination in public.</p>

We will be consulting on the publication/submission version AAP until 4 December 2012. This final formal stage of consultation requires respondents to comment on whether the AAP has met certain tests required by the Secretary of State. These are the factors that a planning inspector will consider when examining the AAP. More information is set out in the National Planning Policy Framework (specifically paragraph 108) at:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf>

This is a formal consultation on our finalised plan. Although in draft and subject to an Examination in Public we cannot make substantive changes through this stage of consultation and we can only agree minor changes if they are essential.

Representations on this stage of the AAP should relate to:

- Whether the AAP has been prepared in accordance with:
  - The Duty to Cooperate
  - Legal and procedural requirements
- Whether the AAP is sound.  
A “sound” AAP should be:
  - Positively prepared
  - Justified
  - Effective
  - Consistent with national policy

Once consultation closes we will look at all the representations we receive and prepare officer comments on the representations. We will send all of these to the Secretary of State alongside the AAP, supporting documents and evidence base in December 2012. If we think there are any minor changes we need to make to the AAP following this final stage of consultation we will set these out in a table of suggested changes and send these to the Secretary of State.

A Planning Inspector will hold an Examination in Public to look at the AAP in March 2013, holding a Pre-Hearing Examination in January 2013. We hope to adopt the final AAP in October 2013.

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

This section considers the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and Human Rights, the equality information on which above analysis is based and mitigating actions to be taken.

The policies in the AAP have many similar impacts on the different groups with protected characteristics. We have set out below some of the key impacts we have identified. Overall, we have assessed the policies and consider that the overall impact of the plan will be positive on all residents and people who work in and visit the borough. Further information is also set out in our sustainability appraisal, where we have assessed all of our policies against 17 sustainable development objectives to assess the social, environmental and economic impacts of the plan. Our sustainability appraisal is available to view on our website at: <http://www.southwark.gov.uk/futurepeckham>

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

**Potential impacts (positive and negative) of proposed policy/decision/business plan**

**Vision**

The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead including all age groups.

**Enterprise and activity: A vibrant town centre and local centres, and shopping areas**

The Peckham and Nunhead AAP promotes the generation of new jobs and businesses in Peckham core action area, Peckham town centre and Nunhead local centre by supporting the provision of new business floorspace. Existing business floorspace is to be retained unless an exception can be demonstrated in accordance with our borough-wide policies. This will provide important local jobs and training opportunities and reduce the need for local people to travel far to get to work.

The AAP also encourages new retail (Classes A1/A2/A3/A4) development in Peckham town centre to help maintain and enhance its status as a major town centre in the borough's retail hierarchy and encourages a mix of complementary arts, cultural, leisure and entertainment.

This approach benefits all as it will create local jobs which all members of the community will be able to access. Providing a wider range of employment opportunities may be particularly beneficial for young people.

A higher than average proportion of Peckham and Nunhead residents have low or no formal qualifications and work in elementary occupations. A study on creative industries carried out in 2007 found that Peckham also has large and growing number of creative industries including media and visual arts. Employment and training opportunities created by new development will be targeted at local people. This will have a particularly positive effect on young people, particularly school leavers who live in the area and want to work locally. There is a risk that local people may have the right skills for the jobs but are not able to gain employment locally. We will mitigate against this by securing section 106 funding for employment training. Local employment and training projects will help local people access sustainable jobs and share in local economic growth. This will help to reduce inequalities, both social and economic, and to create a fairer future for all residents.

Policy 4 aims to restrict the number of hot food takeaways in Peckham Town centre, Nunhead local centre and around local schools. This policy will be especially beneficial for children as it will

help to reduce childhood obesity which is especially prevalent in the area.

**Community wellbeing: improving individual life chances**

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

There is projected pressure for both primary and new secondary places in the action area. Our strategy is to meet the pressure with temporary and permanent expansions at good and outstanding schools and the provision of the new academies in Walworth and in Rotherhithe. We are committed to encouraging the use of school buildings for community activities outside of school hours. St Thomas Apostle College and Bredinghurst School will be rebuilt with new facilities available for community use outside school hours. This will benefit the wider community as a whole and particularly young people.

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

**Traffic and transport: Improved connections**

The AAP promotes active travel, including highlighting indicative walking and cycle routes which will help to improve the safety and perception of safety in Peckham and Nunhead. Also, large development will be directed to parts of Peckham and Nunhead that are very accessible by walking, cycling and public transport so that new development does not lead to an increase in traffic on the roads. The majority of development will take place in the core action area where most of the available sites are located and the Public Transport Accessibility Levels (PTALs) is highest. This approach benefits all members of the community but may be especially beneficial to groups where car ownership levels tend to be lower such as the young and elderly.

It should be noted that there are certain groups who may rely on using a car. This might include the elderly and parents with young children. New parking for town centre uses may be provided in basements within buildings, above developments or in some cases at surface level. This may have implications for safety of more vulnerable users including the elderly. To mitigate this, the AAP will require developers to submit a parking management strategy which should address safety issues among other issues. The re-development of existing car parks could benefit more vulnerable groups such as the elderly as these are often underused, for example the cinema multi storey car park is currently underused at only 10% of spaces and many people through consultation have said they do not feel safe using it.

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

**High quality homes: Providing more and better homes**

One of the aims of the Peckham and Nunhead area action plan (AAP) is to provide more and better homes, suitable for a range of different groups. The AAP sets out how development is expected to provide a minimum of 2,000 net new homes between 2011 and 2026. The population



of Peckham and Livesey wards is expected to remain young in the future with a decrease in adults aged 65 and over, despite a decrease in proportion of children (0-14 years). The area has become far more mixed as young professional families have been attracted in by the better value of family homes compared to neighbouring areas.

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

The approach taken forward in the action area is to provide a minimum of 700 affordable homes and 700 private homes over the life of the plan. The Peckham and Nunhead AAP aims to provide 35% affordable units within developments over 10 units. This will help to provide housing that is affordable to those on low incomes currently living. The affordable housing must be an appropriate mix of dwelling type and size to meet the identified housing need. 50% of the affordable homes should be intermediate homes and 50% should be social rented homes. This is a change of policy from the Southwark Plan where we required 30% social rent and 70% intermediate within Peckham and Nunhead. This change in policy seeks to ensure we meet the needs of those most in need of affordable housing and provide a range of housing choices. This will help to ensure that the housing meets the needs of different groups and could be especially beneficial for young people wanting to get on to the property ladder and for older people who wish to move to more suitable accommodation but remain in the local vicinity. The policies in the AAP do not allow for the new affordable rent housing to be provided as we do not consider this type of housing meets the needs of the majority of those in housing need in southwark.

Development within Livesey, Peckham, Nunhead and The Lane wards must also provide a minimum of 35% private homes. These wards currently have high levels of social rented housing and low levels of private housing, and so by requiring a minimum amount of private housing, people who are not eligible for affordable housing, can choose to live in these wards. This may have a positive impact on young families looking for private family housing in Southwark, which tends to be cheaper in Peckham and Nunhead than the majority of the rest of Southwark.

The policies in the Core Strategy and the AAP require very high standards for all new housing delivered. All new homes should be designed to Lifetime Homes Standards. They will be flexible enough to meet the changing lifetime needs of residents such as when people get older. Homes will be able to be altered and adapted to meet the needs of single people, older people, couples, and families.

#### **Natural environment: Sustainable use of resources**

The AAP approach is to ensure that open spaces are protected and improved and linkages between open spaces are encouraged. Around 25% of the AAP area is protected open space. The two largest of these open spaces are Peckham Rye Park and Peckham Rye Common (which covers approximately 40 hectares) and Nunhead Cemetery which are both designated as Metropolitan Open Land and Sites of Importance for Nature Conservation (SINCs). The north part of the action area has relatively little open space consisting of small pocket parks compared with the larger open spaces in the south. However, the north of the AAP area does border Burgess Park, which is the largest open space in Southwark.

The AAP protects additional open spaces for protection, mostly in the north of the action area. These spaces boost local wildlife and provide the local community with valuable space to play and relax. The AAP also designates Surrey Canal Walk, Kirkwood Road Nature Garden and Warwick Gardens as SINCs so that the wildlife and biodiversity value of these sites is not damaged. This approach will benefit all groups but may benefit the elderly and young families who cannot travel further for access to high quality open spaces. Improving biodiversity may also have educational benefits for children and young people.

The AAP also requires children's play areas to be provided as part of new housing developments.

This approach will benefit children particularly, but also all members of the community provided that the needs of different user groups are considered in the design and location of open spaces e.g. benches for elderly people and children's play areas.

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

The increasing price of fuel has led to a rise in fuel poverty, this can have a more significant impact on those with lower incomes and this is particularly important within the Peckham and Nunhead action area which has some high levels of deprivation. Fuel poverty can also have a greater impact on the elderly who require more heating in winter but cannot afford the higher bills. Encouraging developers to use more energy efficient design and materials can help to reduce fuel poverty as well as reducing CO<sup>2</sup> emissions.

### **Design and Heritage**

Historically Peckham has had a negative reputation and has been associated with high crime levels and feelings of the area not being safe. This can particularly affect more vulnerable groups such as the young and the elderly. However, crime levels in Peckham and Nunhead are around the Southwark average. In Livesey and The Lane wards crime rates are slightly higher. This is a result of higher than average recorded offences of anti-social behaviour and violence against the person. Crime rates in Peckham and Nunhead wards are just below the Southwark average and Peckham Rye ward has a considerably lower crime rate. Overall, crime rates have been falling in all wards and, contrary to Peckham's image in the media, is at around the London average.

The AAP promotes a range of town centre uses including shops, office, arts, cafes and restaurants, cultural and entertainment uses that bring activity and/ or improve the safety of the area. The AAP policies will ensure that public spaces are well-lit, overlooked with active ground floor uses and which feel safe at different times of the day and in the evening. The policies also ensure that developments follow the principles of Secured by Design and incorporate inclusive design which promotes and protects mobility and wayfinding for the elderly.

The AAP seeks to ensure that new development is built to the highest quality design and creates places where everyone feels safe and secure. Improving the public realm through design will benefit all people with protected characteristics, in particular certain groups may currently feel threatened walking through the area including young people and the elderly. Varied building frontages create visual interest and activation along main pedestrian routes. This creates safer streets which will benefit everyone in the community, particularly families or elderly people who may feel less safe.

Policy 26 of the AAP allows for taller buildings in certain locations. This could have an uncertain/negative impact on families as taller buildings do not always provide suitable accommodation as there can be problems with providing adequate private amenity space. We are proposing to mitigate this impact as the majority of development is lower scale and therefore enough suitable accommodation for families will be provided on other sites, we are only encouraging taller buildings on 5 sites. Furthermore on the sites where we allow taller buildings, we will encourage developers to look at innovative ways to provide suitable amenity space such as through roof gardens and terraces as well as traditional gardens.

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

Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the policies set out in the Peckham and Nunhead AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions taken through the AAP in the main section above.

**Disability** - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

**Vision**

The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead including people with disabilities.

**Enterprise and activity: A vibrant town centre and local centres, and shopping areas**

Certain groups may experience discrimination in accessing employment opportunities including disabled people. The AAP promotes the generation of new jobs and businesses in Peckham and Nunhead action area core, Peckham town centre and Nunhead local centre by supporting the provision of new business floorspace. Existing business floorspace is to be retained unless an exception can be demonstrated in accordance with our borough-wide policies. This will provide important local jobs and training opportunities and reduce the need for local people to travel far to get to work.

This approach benefits all as it will create local jobs which all members of the community will be able to access. There is a risk that local people may have the right skills for the jobs but are not able to gain employment locally. We will mitigate against this by securing section 106 funding for employment training. Local employment and training projects will help to ensure that local people can access sustainable jobs and share in local economic growth. This will help to reduce inequalities, both social and economic, and to create a fairer future for all residents.

Focusing on office and light industrial space instead of larger industrial units will provide more of a wide range of jobs for people including disabled people who may be more likely to pursue jobs in office environments.

The AAP also encourages new retail (Classes A1/A2/A3/A4) development in Peckham town centre to help maintain and enhance its status as a major town centre in the borough's retail hierarchy and encourages a mix of complementary arts, cultural, leisure and entertainment. This will mean that a wider range of facilities will be available in more accessible locations which will be of particular benefit to those with disabilities who may find it difficult to travel further.

**Community wellbeing: improving individual life chances**

One of the aims of the AAP is to provide facilities to meet all the needs of different communities in Peckham and Nunhead. The strategy in the Peckham and Nunhead AAP is to locate local facilities together so that the services required by the community provided in the core action area and in accessible locations outside the core action area. The AAP encourages better use of community facilities that are currently under-used and requires flexible community space in new developments so that different groups can share the spaces to meet a wide range of needs. Locating new community facilities together will have a positive impact on disabled people who may find it more difficult to get to a number of locations for different facilities.

#### **Traffic and transport: Improved connections**

The AAP approach is to provide a high quality transport network, to make Peckham and Nunhead a more convenient and comfortable place to access and move around by walking and cycling, with a range of other transport options

It should be noted that there are certain groups who may rely on using a car. This might include the people with disabilities. The AAP will seek to mitigate the impact of a general presumption in favour of low parking levels by prioritising parking for people with disabilities, even within what are otherwise in some cases “car free” developments in line with the parking standards set out in Saved Policy 5.7 of the Southwark Plan which states that a minimum of one accessible car parking space should be provided per development where associated car parking is not provided; or minimum of two accessible car parking spaces in circumstances where associated parking is provided.

#### **High quality homes: Providing more and better homes**

The policies in the Core Strategy and the AAP require very high standards for all new housing delivered. All new homes should be designed to Lifetime Homes Standards. They will be flexible enough to meet the changing lifetime needs of residents such as when people get older. Homes will be able to be altered and adapted to meet the needs of people with disabilities.

The Peckham and Nunhead AAP sets out minimum dwelling sizes for new development. This will help to ensure a higher standard of living accommodation that will benefit all residents. Larger room sizes may be of particular benefit to people with disabilities as they will be able to stay in their home and not have to relocate elsewhere in order to find suitable accommodation.

#### **Natural environment: Sustainable use of resources**

The Peckham and Nunhead AAP sets out an approach to ensure that open spaces are protected and improved and that linkages between the open spaces are encouraged. This approach will benefit all members of the community provided that the needs of different user groups are considered in the design and location of open spaces and that this include providing disabled access to open spaces and improving accessibility along green links.

#### **Design and Heritage**

The AAP policies ensure that public spaces are well lit, overlooked with active ground floor uses and which feel safe at different times of the day and in the evening. The policies also ensure that developments follow the principles of Secured by Design and incorporate inclusive design which promotes and protects mobility and wayfinding for people with disabilities. Policy 23 sets out how we will use high quality and durable materials and street furniture and reduce existing street clutter which will help to improve the accessibility of the public realm.

The AAP seeks to ensure that new development is built to the highest quality design and creates places where everyone feels safe and secure. Improving the public realm through design will benefit all people with protected characteristics. In particular, this will benefit more vulnerable groups who may currently feel threatened walking through the area, including disabled people. Improving accessibility through the public realm will also be of particular benefit to those with disabilities.

Policy 26 of the AAP allows for taller buildings in certain locations. This could have an uncertain/negative impact on people with disabilities as taller buildings do not always provide suitable accommodation. We are proposing to mitigate this impact as the majority of development is lower scale and therefore enough suitable accommodation for special needs housing will be provided on other sites, we are only allowing taller buildings on 5 sites. Furthermore on the sites

where we allow taller buildings, we will encourage developers to look at innovative ways to provide suitable amenity space such as through roof gardens and terraces as well as traditional gardens.

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

Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the policies set out in the Peckham and Nunhead AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, with have highlighted the mitigating actions taken through the AAP in the main section above.

**Gender reassignment - The process of transitioning from one gender to another.**

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

**Vision**

The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead including people who have undergone a gender reassignment.

No specific impacts identified. The implementation of the Peckham and Nunhead AAP should benefit all groups by ensuring the right type of development is delivered that is needed to support a healthy, safe and prosperous community and a fairer future for all in Peckham and Nunhead.

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

Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the policies set out in the Peckham and Nunhead AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, with have highlighted the mitigating actions taken through the AAP in the main section above.

**Marriage and civil partnership** - Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters. **(Only to be considered in respect to the need to eliminate discrimination.**

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

**Vision**

The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead including people who are married or in civil partnerships.

**High quality homes: Providing more and better homes**

The Peckham and Nunhead AAP sets out minimum dwelling sizes for new development. This will help to ensure a higher standard of living accommodation that will benefit all residents. Larger room sizes may be of particular benefit to people to married couples or those in civil partnerships as they may require larger room sizes than single people.

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

Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the policies set out in the Peckham and Nunhead AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, with have highlighted the mitigating actions taken through the AAP in the main section above.

**Pregnancy and maternity** - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

**Vision**

The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead including pregnant women and

those with young children.

**Enterprise and activity: A vibrant town centre and local centres, and shopping areas**

The Peckham and Nunhead AAP aims to create local jobs which all members of the community will be able to access. Providing a wider range of jobs for local people may be particularly beneficial for pregnant women or those with young children as there may be more flexible working available and providing jobs locally will reduce the need to travel.

The AAP also encourages new retail (Classes A1/A2/A3/A4) development in Peckham town centre to help maintain and enhance its status as a major town centre in the borough's retail hierarchy and encourages a mix of complementary arts, cultural, leisure and entertainment. This will mean that a wider range of facilities will be available in more accessible locations which will be of particular benefit to pregnant women and those with young children who may find it difficult to travel further.

**Community wellbeing: improving individual life chances**

There is projected pressure for both primary and new secondary places in the action area. Our strategy is to meet the pressure with temporary and permanent expansions at good and outstanding schools and the provision of the new academies in Walworth and in Rotherhithe. This will benefit the wider community but will be particularly beneficial to young families.

The AAP sets out how we will work with NHS Southwark to improve the health of current and new residents in Peckham and Nunhead. We will look to develop further improved services in the area as opportunities arise. Improved health facilities will have a positive impact on all members of the community and in particular, pregnant women and women with young children.

**Traffic and transport: Improved connections**

The AAP discourages car use where possible and encourages local journeys and active travel to school. However, it should be noted that there are certain groups who may rely on using a car. This might include pregnant women and those with young children. New parking for town centre uses will be provided in basements within buildings or where appropriate above ground. This may have implications for safety of more vulnerable users such as pregnant women and those with young children. To mitigate this we require developers to submit a parking management strategy which should address safety issues among other issues. The re-development of existing car parks could benefit more vulnerable groups such as pregnant women and those with young children as these are often underused, for example the cinema multi storey car park is currently underused at only 10% of spaces and many people through consultation have said they do not feel safe using

**Design and Heritage**

The AAP policies will ensure that public spaces are well-lit, overlooked with active ground floor uses and which feel safe at different times of the day and in the evening. The policies also ensure that developments follow the principles of Secured by Design and incorporate inclusive design which promotes and protects mobility and can benefit more vulnerable groups including pregnant women and those with young children who require access for push chairs.

The AAP seeks to ensure that new development is built to the highest quality design and creates places where everyone feels safe and secure. Improving the public realm through design will benefit all people including those with protected characteristics. In particular, this will benefit more vulnerable groups who may currently feel threatened walking through the area, including pregnant women and women with young children.

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

Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

## Mitigating actions to be taken

The above analysis highlights that the implementation of the policies set out in the Peckham and Nunhead AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, with have highlighted the mitigating actions taken through the AAP in the main section above.

**Race** - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

## Possible impacts (positive and negative) of proposed policy/decision/business plan

### Vision

The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead regardless of race.

### Enterprise and activity: A vibrant town centre and local centres, and shopping areas

Certain groups may experience discrimination in accessing employment opportunities such as members of the BME community (especially young black men). The AAP promotes the generation of new jobs and businesses in Peckham and Nunhead action area core, Peckham town centre and Nunhead local centre by supporting the provision of new business floorspace. Existing business floorspace is to be retained unless an exception can be demonstrated in accordance with our borough-wide policies. This will provide important local jobs and training opportunities and reduce the need for local people to travel far to get to work.

This approach benefits all as it will create local jobs which all members of the community will be able to access. There is a risk that local people may have the right skills for the jobs but are not able to gain employment locally. We will mitigate against this by securing section 106 funding for employment training. Local employment and training projects will help to ensure that local people can access sustainable jobs and share in local economic growth. This will help to reduce inequalities, both social and economic, and to create a fairer future for all residents.

### Traffic and transport: Improved connections

The AAP approach is to provide a high quality transport network in Peckham and Nunhead, to make Peckham and Nunhead a more convenient and comfortable place to access and move around by walking and cycling, with a range of other transport options., The AAP discourages car use where possible and encourages local journeys and active travel to school. Improving active travel opportunities will have a positive impact on health by encouraging more active lifestyles. This may help reduce obesity and prevent long term conditions such as diabetes and cardiovascular disease which are significant issues in Peckham and Nunhead and often most prevalent in BME groups.

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

One of the aims of the Peckham and Nunhead area action plan (AAP) is to provide more and better homes, suitable for a range of different groups. The AAP sets out how development is expected to provide a minimum of 2,000 net new homes between 2011 and 2026. The AAP seeks to provide more and better homes, suitable for a range of groups. The approach taken forward in the action area is to provide a minimum of 700 affordable homes and 700 private homes over the life of the plan. The Peckham and Nunhead AAP is to provide 35% affordable units within developments over 10 units. This will help to provide housing that is affordable to those on low incomes currently living in the area, which may be particularly beneficial for BME residents who are often on lower incomes.



The Peckham and Nunhead AAP sets out minimum dwelling sizes for new development. This will help to ensure a higher standard of living accommodation that will benefit all residents, including those with protected characteristics. Most notably, larger room sizes will benefit larger families and those on lower incomes which can often include BME groups.

### **Design and Heritage**

Safety and security is a concern for local businesses and residents in the area. Some streets can seem quiet and unsafe, particularly in the evening. A range of town centre uses such as office, arts, cultural and entertainment uses that bring activity and/ or improve the safety of the area will be encouraged. A reduction in crime could bring significant benefits to the local businesses that which may be of particular benefit to BME groups that make up a large proportion of local businesses in the area.

The AAP seeks to ensure that new development is built to the highest quality design and creates places where everyone feels safe and secure. Improving the public realm through design will benefit all people with protected characteristics. In particular, this will benefit more vulnerable groups who may currently feel threatened walking through the area, including those from BME groups.

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

Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

### **Mitigating actions to be taken**

The above analysis highlights that the implementation of the policies set out in the Peckham and Nunhead AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, with have highlighted the mitigating actions taken through the AAP in the main section above.

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

### **Possible impacts (positive and negative) of proposed policy/decision/business plan**

#### **Vision**

The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead regardless of religion or belief.

#### **Community wellbeing: improving individual life chances**

One of the aims of the Peckham and Nunhead AAP is to provide facilities to meet all the needs of different communities in Peckham and Nunhead. The strategy in the Peckham and Nunhead AAP is to locate local facilities together so that the services required by the community provided in the core action area and in accessible locations outside the core action area. The AAP encourages better use of community facilities that are currently under-used and requiring flexible community

space in new developments so that different groups can share the spaces to meet a wide range of needs. Providing more flexible community space may allow for more religious practices to take place within existing community facilities that will benefit religious groups unable to afford separate facilities in the borough.

We recognise that this is an important issue in Peckham and we have consulted extensively on the AAP including holding specific work shops with faith groups at both the Towards a Preferred Option and Preferred Option stage. Our Development Management team continue to work with faith groups to find suitable premises in the borough. Faith buildings are included within the definition of community facilities in the use class order, and many of our proposals sites in Peckham core action set out that community use could be acceptable on those sites.

**Traffic and transport: Improved connections**

Promoting walking and cycling is beneficial to all users, however if the routes out of developments are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups including some faith groups.

**High quality homes: Providing more and better homes**

One of the aims of the Peckham and Nunhead area action plan (AAP) is to provide more and better homes, suitable for a range of groups. The policy set out in the AAP is to require a minimum of 20% of family housing in the urban zone and core action area and a minimum of 30% of family housing in the suburban density zone.

The Peckham and Nunhead AAP sets out minimum dwelling sizes for new development. This will help to ensure a higher standard of living accommodation that will benefit all residents, including those with protected characteristics. Most notably, larger room sizes will benefit larger families which can sometimes be linked with religious background or beliefs.

**Design and Heritage**

The AAP policies will ensure that public spaces are well-lit, overlooked with active ground floor uses and which feel safe at different times of the day and in the evening this could particularly benefit more vulnerable groups including some faith groups.

The AAP seeks to ensure that new development is built to the highest quality design and creates places where everyone feels safe and secure. Improving the public realm through design will benefit all people with protected characteristics. In particular, this will benefit more vulnerable groups who may currently feel threatened walking through the area, including those from certain faith groups.

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

Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the policies set out in the Peckham and Nunhead AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, with have highlighted the mitigating actions taken through the AAP in the main section above.

<b>Sex</b> - A man or a woman.
<b>Possible impacts (positive and negative) of proposed policy/decision/business plan</b>
<p><b>Vision</b> The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead regardless of sex.</p> <p><b>Enterprise and activity: A vibrant town centre and local centres, and shopping areas</b> Certain groups may experience discrimination in accessing employment opportunities including women. The AAP promotes the generation of new jobs and businesses in Peckham and Nunhead action area core, Peckham town centre and Nunhead local centre by supporting the provision of new business floorspace. Existing business floorspace is to be retained unless an exception can be demonstrated in accordance with our borough-wide policies. This will provide important local jobs and training opportunities and reduce the need for local people to travel far to get to work.</p> <p>This approach benefits all as it will create local jobs which all members of the community will be able to access. There is a risk that local people may have the right skills for the jobs but are not able to gain employment locally. We will mitigate against this by securing section 106 funding for employment training. Local employment and training projects will help to ensure that local people can access sustainable jobs and share in local economic growth. This will help to reduce inequalities, both social and economic, and to create a fairer future for all residents.</p> <p><b>Traffic and transport: Improved connections</b> Promoting walking and cycling is beneficial to all users, however if the routes out of developments are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups including women.</p> <p><b>Design and Heritage</b> The AAP policies will ensure that public spaces are well-lit, overlooked with active ground floor uses and which feel safe at different times of the day and in the evening this could particularly benefit more vulnerable groups including women.</p> <p>The AAP seeks to ensure that new development is built to the highest quality design and creates places where everyone feels safe and secure. Improving the public realm through design will benefit all people with protected characteristics. In particular, this will benefit more vulnerable groups who may currently feel threatened walking through the area, including women.</p>
<b>Equality information on which above analysis is based</b>
Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.
<b>Mitigating actions to be taken</b>
The above analysis highlights that the implementation of the policies set out in the Peckham and Nunhead AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, with have highlighted the mitigating actions taken through the AAP in the main

section above.

**Sexual orientation** - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

**Vision**

The vision and objectives set out in the AAP aim to help create a successful place where people want to live, work and visit and which includes good housing, safe and attractive public realm, well-used open spaces, good connections, successful schools, shops, health and leisure facilities. This will benefit all people living in or working in Peckham and Nunhead regardless of sexual orientation.

No specific impacts identified. The implementation of the Peckham and Nunhead AAP should benefit all groups by ensuring the right type of development is delivered that is needed to support a healthy, safe and prosperous community and a fairer future for all in Peckham and Nunhead.

**Information on which above analysis is based**

Consideration has been given to specific impacts that might arise as a result of the implementation of the Peckham and Nunhead AAP. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous iterations of the AAP. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

**Mitigating actions to be taken**

No specific impacts have been identified that would affect people differently as a result of their sexual orientation.

**Human Rights**

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

The implementation of the Peckham and Nunhead AAP will have no impacts on the Articles that are set out in the Human Rights Act.

**Information on which above analysis is based**

<b>Mitigating actions to be taken</b>
N/A

**Section 5: Further actions and objectives**

5. Further actions			
Based on the initial analysis above, please detail the key areas identified as requiring more detailed analysis or key mitigating actions.			
Number	Description of Issue	Action	Timeframe
1	Monitoring the impact of the policies in the Peckham and Nunhead AAP on groups with protected characteristics	Report on development impacts in Peckham and Nunhead in the Authority's Monitoring Report (AMR)	AMR to be published annually
2			
3			
4			
5			
6			
7			