



**Revised Canada Water Area Action Plan**

**Equality Analysis**

**October 2013 and updated in March 2015**

No.	Title

## Section 1: Equality analysis details

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<b>Proposed policy/decision/business plan to which this equality analysis relates</b>		Canada Water Area Action Plan Review			
<b>Equality analysis author</b>		Emma Fenton and Tim Cutts			
<b>Director:</b>		Simon Bevan			
<b>Department</b>		Chief Executive	<b>Division</b>	Planning	
<b>Period analysis undertaken</b>		January - October 2013			
<b>Date of review (if applicable)</b>		N/A			
<b>Sign-off</b>	Tim Cutts	<b>Position</b>	Planning Policy Team Leader	<b>Date</b>	March 2015

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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 Canada Water area action plan (AAP) is a plan for Canada Water and the surrounding area. The AAP will help shape the regeneration of Canada Water. Like the core strategy, it is a spatial plan and concentrates on how change will be managed and achieved. It is part of the council's local plan and together with the core strategy it used as the basis for determining planning applications in the area.

Work on the AAP commenced in late 2007. In 2008 the council consulted on issues and options for the plan and this was followed by consultation on preferred options in 2009. In January 2010, council assembly determined to publish and submit the draft AAP to the Secretary of State for examination in public (EIP).

The EIP Public hearings took place over 6 days in August 2011. During the hearings the council proposed a number of minor amendments to the AAP which sought to overcome outstanding objections and to factually update the plan.

The Inspector concluded that the AAP was sound and it was adopted on 28 March 2012 by Council Assembly. The adopted AAP was accompanied by a full Equalities Impact Assessment that was updated and progressed over the 3 years of preparation.

During the preparation of the AAP, the Daily Mail group indicated that subject to receiving planning permission for a new printworks in Essex, that they will vacate Harmsworth Quays in 2014. The council therefore committed to reviewing the parts of the plan that relate to the site.

Harmsworth Quays is a large, key site in the action area core. The existing AAP is predicated on the site remaining in use as a printworks and employment use as the majority of employment uses are concentrated in and around this site. The option that the site could come forward as a development site during the life of the Plan was not fully considered. The AAP needs to be updated to ensure that we can plan for the redevelopment of the site by testing options and seeking views from the public and key stakeholders.

The adopted AAP was subject to a full equalities impact assessment (EqIA) which assessed the equalities impacts at each stage of drafting and consultation. This updated analysis builds on the previous EqIA and reassesses the AAP and its revisions in light of the 2010 Equality Act.

We consulted on a draft revised AAP between 7 May and 30 July 2013 alongside a first draft of the equalities analysis. We have taken all the comments we received from the community and stakeholders into account, amended the AAP and updated this equalities analysis. We have made minor changes to the AAP in the following areas:

- Shopping in the town centre - CWAAP 24 was added to the list of sites and the proposed town centre boundary has been amended to make it more indicative as we do not yet know the detailed location of blocks and streets on the site.
- 22. Affordable homes - The council is proposing to delete the reference to the split between the different types of affordable housing we require and instead rely on the core strategy policy. This has recently been accepted in the examination-in-public into the Peckham and Nunhead AAP and we will review our approach to affordable housing in the preparation of a new local plan to ensure there is a consistent borough wide approach.
- 29a. Higher education and student housing - clarification was added to ensure that new student housing developments are developed alongside a mix of other uses which contribute towards the creation of a town centre and meeting the vision. We have also added the requirement for a satisfactory student management plan in order to ensure that student homes are well managed and their impacts on the surrounding community are minimised.
- 32a. Presumption in favour of sustainable development - a new policy on sustainable development has been added to highlight that the AAP takes a positive approach to development and accords with the NPPF.

- CWAAP 24. Site E, Mulberry Business Park, Harmsworth Quays and Surrey Quays Leisure Park - the supporting text has been clarified to make it explicit that the policy is flexible about the range of non-residential uses which can be provided and does not require higher education use. The reference to the capacity of the site has also been revised to enable more flexibility.

The AAP was submitted to the Secretary of State for an examination in public in May 2014 and the public hearings took place at the end of September and beginning of October 2014.

Following the hearings the council has proposed making a number of modifications to the plan to make sure that it is “sound”. The main changes are:

- Extending the boundary of the town centre to encompass the entirety of CWAAP 24 (Harmsworth Quays, Mulberry business Park, Site E and Surrey Quays Leisure Park) (the AAP previously showed an indicative boundary on the site).
- Increasing the project number of homes from 3,400 to 4,500 to reflect existing planning permissions and also make some allowance for residential development on Harmsworth Quays.
- Making the link between expansion of retail space and the need to improve road infrastructure set out in policy 1 clearer.
- Deleting the requirements for tall buildings to be “recessive” “elegant” and “slender” as the policy requires exemplary design in any event and using the words “strong vertical emphasis” instead.
- Designating the space between Blick House and the City Business Centre on Lower Road as “other open space”.
- In the inspector’s view, the requirement for large student housing developments to be part of a wider campus development, as set out in policy 29a, was overly onerous and unnecessary as CWAAP24 requires a mix of uses in any event. It is proposed to change the policy by stating that large student housing developments should have good links to university campuses.
- A clarification is proposed to policy 32 to state that the council will take viability concerns into account in assessing provision of the “required uses” which are identified in proposals sites policies (CWAAP1-CWAAP25).
- The inspector suggested that CWAAP 24 be amended to state that it is anticipated that residential use and student housing will form part of the mix of uses. However, these should not prevent either the minimum amount of employment floorspace identified in policy 25 from being delivered (12,000sqm) or the aspiration in the Further Alteration to the London Plan to establish a science cluster.
- In the inspector’s view, policy 32a in the AAP relating to sustainability repeated national policies in the NPPF and was therefore unnecessary and could be deleted.
- Minor amendments are proposed to reflect the fact that the new health centre on the Downtown site has opened and that new pre-school facilities could be provided in the core area, including the town centre (as drafted the AAP only referred to the parts of the core area which are outside the town centre).
- The inspector also considered that it would be beneficial to state explicitly that a masterplan would be expected to accompany the first phase of development on Harmsworth Quays and this is proposed in the modifications.

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

<b>2. Service users and stakeholders</b>	
<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 involved in this policy</b>	<p>The review of the AAP will be relevant to anyone with an interest in the Canada Water area, particularly residents, local community groups, landowners and developers.</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 an EqlA on the adopted area action plan between 2009 and 2012. The findings of the EqlA were used to inform the content of the final AAP. We have revised the format of our Equalities Impact Assessments in order to meet the requirements of the Equality Act 2010. This analysis will build on the previous EqlA and extends it to ensure that the duties of the 2010 Act in relation to the AAP as a whole are fully considered.</p> <p>We carried out extensive consultation on the adopted AAP 2012 and we will build on the consultation that we carried out when we review the plan.</p>

**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 the 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 the updated AAP against 18 sustainable development objectives to assess the social, environmental and economic impacts. Our sustainability appraisal is available to view on our website at: <http://www.southwark.gov.uk/canadawateraap>

<p><b>Age</b> - 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).</p>
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b></p>
<p><b>Vision</b>                  The vision and objectives set out in the AAP will remain the same as the adopted AAP, with the exception of a minor change to add a reference to higher education and its potential to help diversify the town centre. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.</p> <p><b>Strategy</b>  <i>Shopping: A genuine town centre and local facilities</i>                  The aim of this section of the AAP is to improve Canada Water town centre, encouraging investment to provide a wider range of shops and services, as well as places to eat, drink and relax. Canada Water has around 40,000 sqm of shopping floorspace. The AAP promotes the reconfiguration or redevelopment of key sites, including the shopping centre, the Surrey Quays Leisure Park, the Decathlon Site and now Harmsworth Quays, to increase the amount of shopping space by around 35,000 sqm. The number of cafés and restaurants will also be increased. Local shopping parades on Albion Street and Lower Road will be protected and enhanced. New small-scale local shops, cafes and restaurants will be permitted in certain places outside of the town centre.</p> <p>This approach will have a positive impact on all members of the community as access to local services helps to create good community relations and improve satisfaction with the local area. This approach will also create more local jobs which all members of the community will be able to access. Providing a wider range of employment opportunities will be particularly beneficial for young people.</p> <p><i>Transport</i>                  AAP approach is that the area is made highly accessible, particularly by public transport, walking and cycling, and that new development does not lead to an increase in traffic on the roads. The changes proposed in the revised draft AAP extend this approach to cover the Harmsworth Quays site as well. Public transport quality and frequency should be improved, the road network should be changed to improve traffic flows, and greater use of public transport, walking and cycling should be sought through improved routes and reduced car parking in new developments. The safety, and perception of safety, should also be improved regarding existing and new walking and cycle routes.</p> <p>In principle, this approach benefits all members of the community. Car ownership levels tend to be</p>

lower among the young and elderly. Therefore a policy which seeks to promote walking and cycling, creating routes which are safe from conflict with vehicles, which prioritises non-car users, and which also maximises opportunities to use public transport should benefit these groups in particular, promoting inclusivity and equality of access to jobs and services. It should be noted however that there are certain groups who may rely on using a car which might include the elderly and parents with young children. It will be very important that a reduction in car parking and promotion of sustainable modes of transport are undertaken in tandem with improvements in public transport and the public realm. While in theory promoting walking and cycling is beneficial to all users, if routes out of developments are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as the elderly and young.

The clarification on the need for improvements to the highway network, set out in the Proposed Modifications, would benefit those who rely on public transport or who walk or cycle.

*Leisure: a great place to visit, relax in and have fun*

The aim of this section is to promote arts, culture, tourism and healthy lifestyles and make the area known for its excellent sports, leisure and entertainment facilities. These types of facilities are important to help create a thriving and vibrant town centre. The approach to protect existing facilities and support new ones in the core area will benefit the whole community. This will mean that a wider range of facilities will be available in more accessible locations which will be of particular benefit to the elderly or families with young children who may find it difficult to travel further.

Policy 12 now includes the consideration of longer term options for the provision of sports and leisure facilities beyond the refurbishment of the Seven Islands leisure centre. We will look to develop further improved services in the area as opportunities arise.

*Places: better and safer streets, squares and parks*

The aim of this section is to ensure the design, scale and location of new buildings help create streets and neighbourhoods which have a varied character. It also aims to link open spaces, the docks and the river together as well as reducing the impact of development.

A key objective of the AAP is to create a centre which is more distinctive with the Canada Water basin as its focus. The AAP seeks to ensure that a range of heights are provided in the core area, generally between 4 and 8 storeys. Policy 17 (building heights) has been redrafted to reflect the availability of Harmsworth Quays for redevelopment and the scope to expand the town centre eastwards generates the potential to provide some tall buildings. Tall buildings can help deliver regeneration and the AAP vision for Canada Water. A key advantage of tall buildings is that they can utilise much smaller footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The policy requires tall buildings which are significantly higher than existing tall buildings in the area (20-25 storeys) to make an exceptional contribution to the regeneration of the area and where feasible, contain a facility accessible to the public which takes advantage of spectacular views from upper floors. The amendment to the tall building policy proposed in the Modifications would not significantly change the policy or have additional impacts.

The Canada Water area is expected to undergo significant change through the development and implementation of the Canada Water AAP and the subsequent update (which this analysis refers to). This will see increased investment and development activity, which provides significant opportunities to improve the built environment in the area and will have positive impacts on all members of the community. Better permeability and improved walking/cycling routes will benefit everybody particularly the young and elderly, more public space will benefit the whole community and more town centre uses will provide more of a focus to the area as more shops and services open around the basin.

However policy 17 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 through requiring a range of building heights, which will include lower scale buildings which may be more appropriate for family accommodation. 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.

The AAP approach is that all development in the core area must provide high quality open spaces which are linked together and have different uses. Children's play areas should be provided as part of new housing developments. Improvements will also be made to existing open spaces in the area. This will benefit all members of the community provided that the needs of different user groups are considered in the design and location of open spaces e.g. benches for elderly people, disabled access and children's play areas. The provision of children's play space will have a particularly positive impact on children and families.

Since adopting the AAP in March 2012 the council has also adopted its Open Space Strategy (2013). In accordance with this strategy, three additional spaces are proposed for designation as "other open space": Cumberland Wharf, Neptune Street park and Surrey Docks Adventure Playground.

The updated AAP designates additional open spaces for protection. These spaces boost local wildlife and provide the local community with valuable space to play and relax. 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. The designation of the additional open space adjacent to Blick House, set out in the Proposed Modifications would reinforce this beneficial impact.

#### *Providing more and better homes*

The AAP aims to provide new high quality homes in the AAP area suitable for a range of groups by developing particular sites in the area for housing. New housing developments will need to meet required policy standards for affordable housing, wheelchair accessible homes, family housing, public and private open space and children's play space. The types and size of homes will meet the needs of the local community.

All new homes will be designed to Lifetime Homes Standards. They will be flexible enough to meet the changing lifetime needs of residents such as when people get older. For example, ensuring there is space to install a shower next to a downstairs toilet. Homes will be able to be altered and adapted to meet the needs of single people, older people, couples, large families and disadvantaged groups. This will prevent residents from having to move as their housing requirements change and will help to ensure that a sense of community is maintained amongst a long-term resident population.

The AAP also includes a requirement for development in the area to meet minimum room size standards. This will help to ensure a higher standard of living accommodation that will benefit all residents, including those with protected characteristics. Most notably, larger room sizes will benefit families, people with disabilities and those on lower incomes as they will be able to afford to stay in the area and not have to relocate elsewhere in order to find suitable accommodation.

The Modifications proposing raising the housing target for the area. While this is largely in recognition of existing planning permissions an increased number of homes and a higher number of affordable homes will benefit all groups and especially those in need of housing, which include the elderly and the young.

#### *Enhanced social and economic opportunities*

A cluster of business uses will be promoted in the core area. 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. Providing a wider range of employment opportunities may be particularly beneficial for young people. Not all of the existing employment space will be re-provided (this was an option at Issues and Options stage), however by focusing on providing new office and light industrial units, more jobs will be created in the area compared to the re-provision of existing storage, warehouse and industrial units which tend to employ less people.

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



office environments.

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.

The AAP aims to provide more and enhanced educational, health and community facilities which meet the needs of the growing population. This approach will have a positive impact on all members of the community as access to local services help to create good community relations and improve satisfaction with the local area. Locating new community facilities together will have a positive impact on young people, the elderly and disabled people who may be less likely to have access to a car to get to different facilities.

Improved health facilities will have a positive impact on all members of the community and in particular, the elderly and families with young children. A new school, improved sports, leisure and young people's provision will have a very positive impact on young people but will also improve the lives of elderly people and women who may feel threatened by groups of young people congregating in the area.

There is a new policy (29a) in the updated AAP on higher education and student housing which aims to support proposals for higher education uses and set criteria for the provision of new student housing developments to ensure that they contribute to the vision and objectives of the wider area. This policy will have a positive impact on all members of the community, particularly young people, who will be able to access higher education facilities in their local area. A cluster of higher education uses in the area may also have a knock on effect for the local community, by attracting investment and students to the area. An increase in the number of student age people in Canada Water may have an impact on the existing community. This policy aims to ensure that large student developments integrate with the existing community and create a range of other uses to ensure that student enclaves are not created. The policy also requires all new student housing development to be accompanied by a student management plan which will help to identify issues and manage any impacts on the community.

The inspector has asked the council to loosen policy 29a, to ensure that student housing developments are conveniently located in relation to other university campuses, but not necessarily requiring on-site provision of wider campus facilities. The impact of this would be mitigated by the fact that the plan requires a mix of uses in any event.

**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 AAP. In addition we have considered the EqIA carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**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 will remain the same as the adopted AAP which has already been assessed for its equalities impacts. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.

### Strategy

#### *Shopping: A genuine town centre and local facilities*

The aim of this section of the AAP is to improve Canada Water town centre, encouraging investment to provide a wider range of shops and services, as well as places to eat, drink and relax. Canada Water has around 40,000 sqm of shopping floorspace. The AAP promotes the reconfiguration or redevelopment of key sites, including the shopping centre, the Surrey Quays Leisure Park, the Decathlon Site and now Harmsworth Quays, to increase the amount of shopping space by around 35,000 sqm. The number of cafés and restaurants will also be increased. Local shopping parades on Albion Street and Lower Road will be protected and enhanced. New small-scale local shops, cafes and restaurants will be permitted in certain places outside of the town centre.

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

#### *Transport*

The AAP approach is that the area is made highly accessible, particularly by public transport, walking and cycling, and that new development does not lead to an increase in traffic on the roads. The changes proposed in the revised draft AAP extend this approach to cover the Harmsworth Quays site as well. Public transport quality and frequency should be improved, the road network should be changed to improve traffic flows, and greater use of public transport, walking and cycling should be sought through improved routes and reduced car parking in new developments. The safety, and perception of safety, should also be improved regarding existing and new walking and cycle routes.

In principle, this approach benefits all members of the community. Car ownership levels tend to be lower among the young and elderly. Therefore a policy which seeks to promote walking and cycling, creating routes which are safe from conflict with vehicles, which prioritises non-car users, and which also maximizes opportunities to use public transport should benefit these groups in particular, promoting inclusivity and equality of access to jobs and services. It should be noted however that there are certain groups who may rely on using a car which might include 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. It will be very important that a reduction in car parking and promotion of sustainable modes of transport are undertaken in tandem with improvements in public transport and the public realm. While in theory promoting walking and cycling is beneficial to all users, if routes out of developments are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as people with disabilities.

The clarification on the need for improvements to the highway network, set out in the Proposed Modifications, would benefit those who rely on public transport or who walk or cycle.

#### *Leisure: a great place to visit, relax in and have fun*

The aim of this section is to promote arts, culture, tourism and healthy lifestyles and make the area known for its excellent sports, leisure and entertainment facilities. These types of facilities are important to help create a thriving and vibrant town centre. The approach to protect existing

facilities and support new ones in the core area will benefit the whole community. 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.

Policy 12 now includes the consideration of longer term options for the provision of sports and leisure facilities beyond the refurbishment of the Seven Islands leisure centre. This will be subject to separate consultation outside the AAP process. We will look to develop further improved services in the area as opportunities arise.

*Places: better and safer streets, squares and parks*

The aim of this section is to ensure the design, scale and location of new buildings help create streets and neighbourhoods which have a varied character. It also aims to link open spaces, the docks and the river together as well as reducing the impact of development.

A key objective of the AAP is to create a centre which is more distinctive with the Canada Water basin as its focus. The AAP seeks to ensure that a range of heights are provided in the core area, generally between 4 and 8 storeys. Policy 17 (building heights) has been redrafted to reflect the availability of Harmsworth Quays for redevelopment and the scope to expand the town centre eastwards generates the potential to provide some tall buildings. Tall buildings can help deliver regeneration and the AAP vision for Canada Water. A key advantage of tall buildings is that they can utilise much smaller footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The policy requires tall buildings which are significantly higher than existing tall buildings in the area (22-26 storeys) to make an exceptional contribution to the regeneration of the area and where feasible, contain a facility accessible to the public which takes advantage of spectacular views from upper floors.

The Canada Water area is expected to undergo significant change through the development and implementation of the Canada Water AAP and the subsequent update (which this analysis refers to). This will see increased investment and development activity, which provides significant opportunities to improve the built environment in the area and will have positive impacts on all members of the community.

The AAP approach is that all development in the core area must provide high quality open spaces which are linked together and have different uses. Children's play areas should be provided as part of new housing developments. Improvements will also be made to existing open spaces in the area. 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.

Policy 18 (open spaces) has been amended to reflect the standards in the adopted Open Spaces Strategy. Since adopting the AAP in March 2012, the council has also adopted its Open Spaces Strategy (2013). In accordance with this strategy, three additional spaces are proposed for designation as "other open space": Cumberland Wharf, Neptune Street park and Surrey Docks Adventure Playground.

The updated AAP designates additional open spaces for protection. These spaces boost local wildlife and provide the local community with valuable space to play and relax. 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. The designation of the additional open space adjacent to Blick House, set out in the Proposed Modifications would reinforce this beneficial impact.

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adapted to meet the needs of single people, older people, couples, large families and disadvantaged groups. This will prevent residents from having to move as their housing requirements change and will help to ensure that a sense of community is maintained amongst a long-term resident population.

The AAP also includes a requirement for development in the area to meet minimum room size standards. This will help to ensure a higher standard of living accommodation that will benefit all residents, including those with protected characteristics. Most notably, larger room sizes will benefit families, people with disabilities and those on lower incomes as they will be able to afford to stay in the area and not have to relocate elsewhere in order to find suitable accommodation.

The Modifications proposing raising the housing target for the area. While this is largely in recognition of existing planning permissions an increased number of homes and a higher number of affordable homes will benefit all groups and especially those in need of housing, which include disabled groups.

#### *Enhanced social and economic opportunities*

A cluster of business uses will be promoted in the town centre. 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. Providing a wider range of employment opportunities may be particularly beneficial for young people. Not all of the existing employment space will be re-provided (this was an option at Issues and Options stage), however by focusing on providing new office and light industrial units, more jobs will be created in the area compared to the re-provision of existing storage, warehouse and industrial units which tend to employ less people.

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

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.

The AAP aims to provide more and enhanced educational, health and community facilities which meet the needs of the growing population. This approach will have a positive impact on all members of the community as access to local services help to create good community relations and improve satisfaction with the local area. Locating new community facilities together will have a positive impact on young people, the elderly and disabled people who may be less likely to have access to a car to get to different facilities.

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The inspector has asked the council to loosen policy 29a, to ensure that student housing developments are conveniently located in relation to other university campuses, but not necessarily requiring on-site provision of wider campus facilities. The impact of this would be mitigated by the fact that the plan requires a mix of uses in any event.

**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 AAP. In addition we have considered the Equalities Impact Assessments carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**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 will remain the same as the adopted AAP which has already been assessed for its equalities impacts. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.

**Strategy**

No specific impacts identified for this group. The implementation of the Canada Water 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 Canada Water.

It is not considered that the Proposed Modifications 2015 would have any additional impacts, beyond those identified above.

**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 AAP. In addition we have considered the Equalities Impact Assessments carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**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 will remain the same as the adopted AAP which has already been assessed for its equalities impacts. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.

**Strategy**

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

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**Mitigating actions to be taken**

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**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 will remain the same as the adopted AAP which has already been assessed for its equalities impacts. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.

**Strategy**

*Shopping: A genuine town centre and local facilities*

The aim of this section of the AAP is to improve Canada Water town centre, encouraging investment to provide a wider range of shops and services, as well as places to eat, drink and relax. 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.

*Transport*

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 clarification on the need for improvements to the highway network, set out in the Proposed Modifications, would benefit those who rely on public transport or who walk or cycle.

*Places: better and safer streets, squares and parks*

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.

*Enhanced social and economic opportunities*

There is projected pressure for both primary and new secondary places in the action area. Our strategy is to meet the pressure by expanding existing schools and reviewing the provision of the new schools like the one on the Southwark College site. 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 Canada Water. 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.

**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 AAP. In addition we have considered the Equalities Impact Assessments carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**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 will remain the same as the adopted AAP which has already been assessed for its equalities impacts. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.

**Strategy**

*Enhanced social and economic opportunities*

A cluster of business uses will be promoted on Harmsworth Quays and the surrounding sites. 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.

Not all of the existing employment space will be reprovided (this was an option at Issues and Options stage), however by focusing on providing new office and light industrial units, more jobs will be created in the area compared to the re-provision of existing storage, warehouse and industrial units which tend to employ less people.

In principle, this approach benefits all as it will create local jobs which all members of the community will be able to access. Focusing on office and light industrial space instead of larger industrial units will provide more of a wide range of jobs for people including disabled people who may be more likely to pursue jobs in office environments. However, certain groups may experience barriers to accessing employment opportunities.

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 CIL 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.

*Providing more and better homes*

One of the aims of the Canada Water area action plan (AAP) is to provide more and better homes, suitable for a range of different groups. The Canada Water 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 Canada Water 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. The Housing Requirements Study 2009 shows that family housing is the type of housing that is most needed in Southwark, particularly within the social rented tenure. It also shows that of the 3,452 households in Rotherhithe, 1,019 are overcrowded.

The Modifications proposing raising the housing target for the area. While this is largely in recognition of existing planning permissions an increased number of homes and a higher number of affordable homes will benefit all 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 AAP. In addition we have considered the Equalities Impact Assessments carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

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

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**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 will remain the same as the adopted AAP which has already been assessed for its equalities impacts. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.

#### **Strategy**

##### *Enhanced social and economic opportunities*

One of the aims of the Canada Water AAP is to provide facilities to meet all the needs of different communities in Canada Water. The strategy in the 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.

##### *Providing more and better homes*

One of the aims of the AAP is to provide more and better homes, suitable for a range of groups. The AAP also 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.

##### *Places: better and safer streets, squares and parks*

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.

It is not considered that the Proposed Modifications 2015 would have any additional impacts, beyond those identified above.

**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 AAP. In addition we have considered the Equalities Impact Assessments carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**Sex** - A man or a woman.

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

**Vision**

The vision and objectives set out in the AAP will remain the same as the adopted AAP which has already been assessed for its equalities impacts. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.

**Strategy**

*Enhanced social and economic opportunities*

A cluster of business uses will be promoted on Harmsworth Quays and the surrounding sites. 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. Certain groups may experience discrimination in accessing employment opportunities including women. We will mitigate against this by securing CIL 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.

It is not considered that the Proposed Modifications 2015 would have any additional impacts, beyond those identified above.

**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 AAP. In addition we have considered the Equalities Impact Assessments carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**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 will remain the same as the adopted AAP which has already been assessed for its equalities impacts. The review of the AAP proposes a new site allocation policy for Harmsworth Quays and a new policy on higher education and student housing. It also proposes updates to the policies on tall buildings, town centre, open space, health, education, business space and the shopping centre/Decathlon site allocation.

**Strategy**

**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 AAP. In addition we have considered the Equalities Impact Assessments carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

**Mitigating actions to be taken**

The above analysis highlights that the implementation of the AAP will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions that will be taken to overcome these impacts.

**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 open space strategy will have no impacts on the Articles that are set out in the Human Rights Act.

**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 AAP. In addition we have considered the Equalities Impact Assessments carried out for the adopted AAP and the Core Strategy. The Equalities Analysis has also been informed by feedback through consultation events and responses, other planning policy documents and our local knowledge and expertise.

**Mitigating actions to be taken**

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 Canada Water AAP on groups with protected characteristics	Report on development impacts planning policies in the Authority's Monitoring Report (AMR)	AMR to be published annually
2			
3			
4			
5			
6			
7			