

**Equalities Impact Assessment (EQIA)
of the
Design and Access Statements Supplementary Planning
Document (SPD)**

POLICIES, STRATEGIES AND PLANS

Stage one: scoping

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

What are design and access statements?

A design and access statement is a legal requirement for many types of applications for planning and listed building consent. It explains the evolutionary process of the development and the thinking behind the final design. It demonstrates how the applicant has considered how everyone, regardless of mobility, will be able to use the development.

The Town and Country Planning (General Development Procedure) (Amendment) (England) Order (GDPO) 2006 made design and access statements a statutory element for the majority of planning applications from 10 August 2006. There is a need for further guidance on how to read, write and use design and access statements. The *Design and Access Statements Supplementary Planning Document (SPD)* seeks to provide this guidance for applicants, officers, councillors and the local community.

The SPD expands on policies within the London Plan (2004), the adopted Unitary Development Plan (1995) and the emerging Unitary Development Plan (the emerging Southwark Plan, 2006). The London Plan (2004), through policies 4B.1 and 4B.5 requires a design and access statement to be submitted for certain applications. Policy 3.12 in the emerging Unitary Development Plan (emerging Southwark Plan, 2006) also requires the provision of a design and access statement for certain applications. The design and access Supplementary Planning Document (SPD) provides further guidance to these policies and will be a material consideration in the determination of planning applications. The SPD is adopting to policies 4B.1 and 4B.5 of the London Plan; strategic objective E2 and policies E.2.1-E.2.5 of the adopted Unitary Development Plan (1995) and; policy 3.12 of the emerging Southwark Plan (2006).

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

Differences to previous Draft Supplementary Planning Guidance

Southwark Council previously put a draft *Design* Supplementary Planning Guidance out to consultation in 2002. This SPD replaces the 2002 draft and takes into account changes in legislation, the adopted London Plan, and the policies and comments on the emerging Unitary Development Plan's (the emerging Southwark Plan) design and access policies. The 2006 amendment to the GDPO requires design and access statements for the majority of planning applications, and policy 3.12 of the emerging Unitary Development Plan (the emerging Southwark Plan) also requires design statements for all new developments. This has meant that the content of the draft *Design and Access Statements* SPD has changed from that of the draft design SPG. The key differences are:

- The new draft SPD covers the procedural elements of how to write a design and access statement, whereas the previous draft SPG focused much more on detailed elements of design.
- The new draft SPD includes information on access as well as design. The previous draft SPG focused solely on access.
- Design and access statements are now a legal requirement.

3. If existing, has the policy/strategy already been reviewed under the previous EqIA programme? If so, what were the findings to come out of this and has the agreed action plan been implemented? What has changed since the last assessment was undertaken (in terms of context, nature of the policy/strategy or the type of people affected by the policy/ strategy).

The previous draft design SPG was not reviewed under the previous EqIA programme because it was written prior to the full EqIA programme starting.

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

Issues to consider may include:

- Whether your policy could have or is having a differential impact or unintended consequences, which are disproportionately, and unfairly benefiting or disadvantaging certain groups.
- Whether there may be any barriers, which could prevent certain groups from benefiting fully from what you are intending to happen as a result of your policy.
- Whether there is any risk that the policy could lead to worsening relations between members of different groups or exacerbate tensions between communities.

It is important to address all six equality areas here (age, disability, faith & belief, gender, race & ethnicity and sexual orientation), even if for some you just state

that you do not think there is, or will be, a differential impact. You should also consider the experiences of Gypsies and Travelers and of refugees and asylum seekers.

Any issues identified here will provide an initial focus for the impact assessment.

Do the expected outcomes or impacts of the SPD differ according to equalities group?

The assessor has looked at the six equality groups (gender, race, disabled people, sexuality, faith groups, age) and other groups (for example gypsies, refugees, asylum seekers) to assess whether the SPD could have a differential impact on certain groups and whether there is a risk of worsening any relationships between different groups.

Overall there is deemed to be no discrimination by group on what to include in a design and access statement. Where a design and access statement is required, all applicants will be expected to provide the same kinds of information and to follow the same checklist (see appendix 1 of the draft SPD).

The implications of clarifying what is required in a design and access statement through the SPD are likely to have a differential impact on certain groups. The SPD aims to improve the quality of design and access in developments, which should benefit all of Southwark borough, including all the equality groups. Good quality design and access benefits everyone meaning there should be no negative impacts on certain groups. However, some groups may experience more of a positive impact than other groups by improved design and access. In particular young people, older people, parents with pushchairs, and disabled people are likely to benefit by the improved access and higher quality designed buildings. Because everyone will benefit to some degree by improved design and access, it is unlikely that relationships between any of the different groups would worsen.

Overall therefore it is considered that the SPD will have a positive impact on everyone, and a particularly positive impact on the groups outlined above. The SPD complies with the Statement of Community Involvement, and does not unlawfully, directly or intentionally discriminate against anybody according to their race, sexuality, gender, faith, disability or age.

Stage two: assessment of impacts

Part A: Feedback from the equalities and diversity panel

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

The meeting of the equalities and diversity panel on the 16 January 2007 was cancelled. The draft SPD and draft EQIA were subsequently emailed to the

panel for comment. No response was made. Should the panel request to consider the SPD and EQIA, it will be presented to the panel after the period of consultation.

Part B: Purpose and aims of policy/strategy

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

3. What are its aims?

4. Could these aims be in conflict with the Council’s responsibility to:

The council has the responsibility to:

- A. Eliminate discrimination
- B. Promote equality of opportunity
- C. Promote community cohesion and good relations between different groups

The table below outlines how the SPD addressed the council’s Core Values, which assist the council in achieving its above responsibilities.

Corporate Values	How does this SPD address this value?	Shortfalls
Equality and diversity – promoting equality for everyone, and responding to the needs of the diverse communities.	-	
Community involvement and cohesion – engaging with all sectors of the community so that the vision is representative, reflects local needs and encourages good community spirit and relations.	-	
Investing in young people – targeting efforts on those who will provide for the future needs of Southwark Council		
Fairness – delivering priorities in a way that eliminates unfair disadvantages against		

any or person or group in Southwark Council		
Sustainability - ensuring that actions today benefit future generations		
Quality – ensuring that quality rather than quantity drives the vision to continuously improve the borough		
Value for money – using scarce resources efficiently		

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

Part C: Application of this policy/strategy

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

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

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

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

Stage three: Developing your action plan and making changes

Having completed stages one and two of your EqIA, you are likely to have identified a number of areas where improvements could be made. In stage three you will pull together a comprehensive list of the issues that have been identified so far. You will then outline what you are going to do to address these. This document has been designed to enable you to outline and keep track of the changes you are making. Over the coming months you will complete three separate documents to take you through the different stages of implementing the necessary changes to your policy or service. There are:

- 1) Outlining what you are doing and how you are going to do it – developing your Action Plan (this document)
- 2) Measuring progress towards implementation, which occurs on a quarterly basis
- 3) Measuring the impact of the changes you have made. Once you have made all of the required changes, you will complete a final document that can be used to record what impact the changes you have made have had for different clients. This document is the first of these documents. It concentrates on helping you to draw up your Action Plan. Once this has been completed you should complete a quarterly progress report, which will help document your progress in relation to the actions you are committed to and the impact they are having.

Developing your action plan

The first step is to draw up your action plan. The following explains what needs to go into each of the boxes:

Completing the action plan
Issue:
Action:
Who:
When:
Measuring Impact

Once your Action Plan is complete, which must include sign-off by your Executive Member, please e-mail it to the social policy unit. You now simply have to begin the work of making the changes you have identified.