

Southbank and Waterloo Neighbourhood Plan

Equalities Impact Assessment

MARCH 2020

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- We have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- We review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- We take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- We consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the protected characteristics and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others who can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present within divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments. Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health and wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Southbank and Waterloo Neighbourhood Plan
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Equality analysis author	Juliet Seymour				
Strategic Director	Simon Bevan				
Department	Place and Wellbeing	Division	Planning Policy		
Date of analysis	10 March 2020				
Sign-off	Juliet Seymour	Position	Planning Policy Manager	Date	10 March 2020

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

A Neighbourhood Plan is a plan which sets out policies in relation to the development and use of land in the whole, or part of, a Neighbourhood Area. It may contain a range of policies or proposals for land use development that will carry weight in the determination of planning applications. Neighbourhood Development Orders grant planning permission in relation to a particular Neighbourhood Area for development specified in the Order or for a class of development specified in the Order. Both Neighbourhood Plans and Neighbourhood Development Orders must be in general conformity with the strategic policies in the development plan for the relevant area.

South Bank and Waterloo Neighbours (“SoWN”) was first designated as a Neighbourhood Forum for the South Bank and Waterloo Neighbourhood Area in March 2014, it renewed its forum status in February 2019. The neighbourhood area, straddles the borough boundary with Lambeth, the greater part falls within Lambeth.

The draft neighbourhood development plan (NDP) was submitted to Lambeth and Southwark in August 2018. On 18 October 2018 Southwark made the decision that the draft NDP could be formally published and submitted to examination under Regulations 16 and 17 of the 2012 Regulations. The Examiner’s report was received on 28 May 2019.

The local planning authorities must now make a decision based on the examiner’s recommendations as to whether the draft Neighbourhood Plan meets the basic conditions, the statutory requirements and whether it complies with the convention rights as set out in the Human Rights Act 1998. If successful at referendum, once ‘made’, the South Bank and Waterloo Neighbourhood Plan will form part of Southwark’s development plan, alongside the New Southwark Plan, the London Plan and any other neighbourhood plans made in the future.

Section 3: Service users and stakeholders

Service users and stakeholders	
Key users of the department or service	Members of the public; Developers; Local Authorities; Housing Associations; Environment and Leisure Department; Flood and Drainage Department; Children's and Adult's Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Place and Wellbeing Department; Greater London Authority; Transport for London; Thames Water; Metropolitan Police; Chief Executive's Department.
Key stakeholders were/are involved in this policy/decision/business plan	Members of the public; Housing Associations; Local Authorities Environment and Leisure Department; Children's and Adult's Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Place and Wellbeing Department.

Section 4: Baseline analysis of local population

The draft South Bank and Waterloo Neighbourhood Plan contains demographic data about the neighbourhood area (Appendix 7 – Area data):

- The neighbourhood area has a resident population of 9,656; this includes residents of both Lambeth and Southwark
- The resident population is 47.9% female and 52.1% male
- The mean age of the neighbourhood area population is 35 years – 25.1% of the population is age 30 to 44
- 59% of the neighbourhood area's population is 'White'. The second largest ethnic group is 'Asian/ Asian British' at 18% of the neighbourhood area's population. 14% of the population are 'Black/ African/ Caribbean/ Black British'
- The area has 4,554 households. The largest number of households live in 'Households rented from private landlord or letting agency' (30%) and the second largest live in 'Households rented from other social landlords' (24%)
- In terms of employment, 20.35% of residents aged 16-74 are in 'Lower managerial, administrative and professional' roles. The second largest group are 'Not classified' which includes full time students and economically inactive people, followed by 'Higher managerial, administrative and professional' roles
- 43% of the neighbourhood area's residents have Level 4 qualifications and above compared to 27% in England as a whole. 13% of residents have no qualifications compared to 22% in England as whole
- The majority of residents identify as being in 'very good health' or 'good health'

In addition, Southwark's Joint Strategic Needs Assessment carried out in 2019 for North West Southwark contains the following demographic data:

- Over 47,800 people live in North West Southwark, with the population increasing by 23% since 2001. In 2017, the total population of the Borough and Bankside ward was 10,140
- North West Southwark has fewer children and young people when compared with Southwark as a whole, particularly so in the Borough & Bankside area
- 33.2% of the residents in the Borough and Bankside ward identify as non-White
- 25.8% of children aged 0-15yrs in the Borough and Bankside ward are living in households that claimed out of work benefits in May 2017. This is higher than the 18.5% average across Southwark
- Levels of school readiness in North West Southwark are broadly in line with the borough average
- New requests for adult social care support are significantly lower than the borough average
- Life expectancy in North West Southwark is comparable to the borough average for both male and females
- The Borough and Bankside ward has a deprivation score of 23.3 compared to the 29.5 Southwark average
- The proportion of homes managed by the Council or TMOs is significantly below the Southwark average. There are 6,334 homes in the Borough and Bankside ward of which 707 are managed by the Council

- All wards in North West Southwark have a crime rate significantly higher than the borough average, with the rate in Borough & Bankside particularly high

Key stakeholders that have been involved in the preparation of the draft Neighbourhood Plan, and those that are likely to be affected by the draft Neighbourhood plan are:

- Those who live, work and carry out business in the South Bank and Waterloo Neighbourhood Area
- SoWN Neighbours Forum
- Tenants and leaseholders
- Residents' associations
- Community and voluntary groups
- Elected politicians
- Business Improvement Districts and business networks
- Developers and landowners (and their representatives)
- Registered providers of affordable housing
- Infrastructure providers (such as transport and health services)
- Statutory consultees such as the Mayor of London, London Borough of Lambeth, London Borough of Southwark, Historic England, Environment Agency and Natural England

As indicated in Figure 1, the boundary of the Southbank and Waterloo neighbourhood area only includes a small area of the Borough and Bankside ward in Southwark.

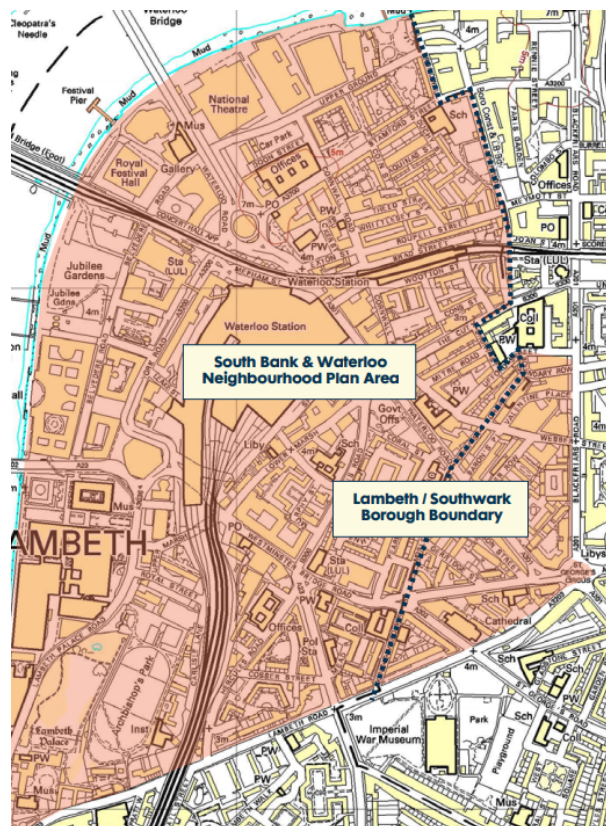


Figure 1: Southbank and Waterloo neighbourhood area boundary.

Section 5: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken. Protected groups include the following:

- 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).
- 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.
- Gender reassignment - The process of transitioning from one gender to another.
- 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.
- 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.
- 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. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others
- Socio-economic disadvantage – although the Equality Act 2010 does not include socioeconomic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.
- Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

The draft South Bank and Waterloo Neighbourhood Plan is based on 7 key themes; Green infrastructure, open space and air quality, Housing, Development management, Retail and work, Social infrastructure and culture, Transport, and Planning gain and mitigation. Summaries of the policies are presented and analysed under these key themes in Table 1.

Table 1: Assessment of the Examiner's proposed modifications to the draft Neighbourhood Plan policies and the equalities impact.

Neighbourhood Plan policy	EIA analysis of Examiner's Report and proposed modifications
Green infrastructure, open space & air quality	
<p>P1 seeks to protect existing publicly accessible open spaces and ensure the quality of new, replacement open space is of equal or greater value whilst supporting the additional needs arising from development, and the Examiner recommends modifications to the policy.</p>	<p>It is considered that the draft policy as proposed will not result in any negative impacts on the protected characteristics of those within the South Bank and Waterloo Neighbourhood Area as the modified policy may provide the health and well-being benefits attributed to open spaces.</p> <p>Protection of existing open space can encourage healthy lifestyles and mental well-being for those equalities groups at greater risk of ill-health (e.g. some children and young people, some older people, some women, some members of ethnic minority communities, people with a history of mental illness). Evidence suggests certain population groups are more likely to benefit, for example:</p> <ul style="list-style-type: none"> • Children: A greater quantity or proximity of natural spaces around the home or school is significantly related to improved cognitive performance and reduced incidence of behavioural issues. Evidence suggests that use of green space by children is a lifetime determinant of future use. • People with health and well-being concerns: Evidence shows that among other benefits, viewing nature is positive for health in terms of recovering from stress, improving concentration and productivity, and improving psychological state. Living environments with a greater amount of green spaces are associated with reduced likelihood of depression and anxiety amongst those from this group. <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P2 seeks to improve existing open space or provide additional publicly accessible open spaces where major developments contribute to the intensification of the area.</p>	<p>The provision of improved and/or additional open space helps to improve mental, emotional and physical health and wellbeing, particularly for those equalities groups at greater risk of ill health.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P3 seeks to maximise the provision</p>	<p>It is considered that the policy as proposed to be modified will</p>

<p>of green roofs and measures to mitigate the effects of climate change.</p>	<p>not result in any negative impacts on the protected characteristics of those within the South Bank and Waterloo Neighbourhood Area. The provision of green roofs provides health and well-being benefits, while encouraging increased use of green spaces, making people feel safer and be healthier. It is considered that green roofs, subject to the character of surrounding built form and safety and amenity considerations will provide significant positive effects on health and well-being for users and occupiers of the site, and for those adjacent to the site. The ability to even just see green infrastructure contributes to a sense of well-being and has beneficial impacts on health and environmental amenity.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P4 seeks to ensure major developments provide amenity space for occupants, ensures public open space provides public seating and encourages pedestrian movement and mitigates temporary loss of amenity trees.</p>	<p>The policy may help deliver positive health and well-being benefits. Provision of amenity space and green roofs can provide health and well-being benefits, while encouraging increased use of green spaces, making people feel safer and be healthier. It may have a positive effect by helping to improve mental, emotional and physical health and well-being for users and occupiers of the site, and for those adjacent to the site.</p> <p>The provision of seating and other types of outdoor furniture/amenities together with strategically thought out landscaping to attract people to use these spaces may improve mental, emotional and physical health and well-being, as well as benefiting children and young people, older persons and those with a disability who may need a place to rest. Requiring developments to consider the design of publicly accessible open space, particularly the ease of pedestrian movement, may have a positive impact on those who have a disability and those with children. Developers will be required to think about whether spaces are fully accessible, which may benefit wheelchair and pushchair uses when they are living, working or visiting the neighbourhood area.</p> <p>Trees and other green measures promote social and health and well-being benefits and can also help to improve air quality by filtering particulates which is likely to help those with respiratory conditions, older people and children. Furthermore, older people, especially over 75 years old, or those living on their own who are socially isolated, or in a care home are at greater risk of heatstroke. Planting trees and vegetation and the creation of green spaces to enhance evaporation and</p>

	<p>shading can make the environment cooler and reduce this risk.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P5 seeks to ensure developments in the Neighbourhood Area contribute to improving air quality and encourage green pedestrian and safe cyclist routes.</p>	<p>It is considered that the draft policy will not result in any negative impacts and may deliver positive impacts to the health and well-being of those within the South Bank and Waterloo Neighbourhood Area. There may be positive impacts on age, disability, socio-economic groups and pregnancy/maternity.</p> <p>Air quality is a severe problem in many parts of the Neighbourhood Area, affecting the health of many people of varying ages. The London Plan Integrated Impact Assessment (November 2017) notes that the health impacts of air pollution can include an increased risk of early death, as well as whole-life impacts on lung function, lung health and increased susceptibility to cardiovascular diseases, respiratory cancer, stroke, asthma and COPD. The impact of poor air quality is greater for those with lower socio-economic status, older people, children and those with existing health concerns. Improving air quality in the Neighbourhood Area will provide significant health benefits, helping to improve mental, emotional and physical health and well-being for users. Requiring developers to incorporate air filtration systems to improve indoor air quality for occupants may have a positive impact on those with lower socio-economic status who are more likely to live on main roads and in areas with poorer air quality. It will also benefit older people, children and those who are pregnant. The draft policy supports pedestrian routes via greenways and encouraging cycling via protected routes will benefit the health and well-being of users by encouraging them to use active transport measures and reducing noise and pollution levels which can help to alleviate stress and improve mental well-being.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P6 seeks to use vacant, available land (where planning consent for temporary uses has been granted) for sports pitches and food</p>	<p>The use of sites for temporary activity such as sports pitches may help to improve physical health, helping people be healthier for longer and live an inclusive and active lifestyle. It may also support improved physical and mental health of local</p>

growing.	<p>people, in particular young people, with opportunities to engage in sport often leading to reduced opportunities to engage in antisocial behaviour and in contrast, 11 promoting more social cohesion and improve positive mental wellbeing. The encouragement of food growing may enable the local community in the neighbourhood area to access to cheaper or even free fruit and vegetables which may benefit lower socio-economic group.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
Housing	
<p>Draft policy P7 which underwent examination sought to ensure new affordable housing is made available for low to middle income earners working within the Neighbourhood Area and elderly people including those in need of care. The policy was likely to have negative impacts on protected characteristics.</p>	<p>The Examiner recommends the deletion of this policy and subsequent supporting or associated text throughout the Neighbourhood Plan as this policy is inconsistent with National policy and guidance and the Development Plan. Paragraph 47 of the NPPF (2012) imposes a duty on each planning authority to meet its full need for affordable housing in its Housing Market Area (HMA). The Examiner notes that the Neighbourhood Plan area is not an HMA and there is no quantitative evidence to support the assertions that there is a particular need of a particular type for affordable housing in the Neighbourhood Plan area. The Examiner noted that draft P7 implies that it would not support affordable housing that is not made available for the specified target groups.</p> <p>The council proposes to accept the modification to delete P7. If the policy remained in the draft neighbourhood plan, it is considered there would be negative impacts on protected characteristics as the policy may restrict some groups' access to affordable housing in the neighbourhood area.</p>
<p>Draft policy P8 which underwent examination sought to support cohousing and unit sizes that maximise space and affordability by closely aligning with minimum space standards. It is linked to P7 and would therefore have the same negative impact on protected characteristics.</p>	<p>The Examiner recommends the deletion of this policy and subsequent supporting or associated text throughout the Neighbourhood Plan as the policy seeks to unnecessarily duplicate Development Plan objectives and policies. Furthermore, the term "closely aligning with minimum space standards in the London Plan" is uncertain and inconsistent with the London-wide approach to minimum space standards in the London Plan. Housing that does not meet the minimum space standards has the potential for negative impacts on health and wellbeing due to poor quality of housing. This is likely to have greater impact on those with families, those with disabilities and lower socio-economic groups.</p>
<p>P9 seeks to address the off-site provision of affordable housing by</p>	<p>The provision of affordable housing is considered to be positive on age, sex, ethnicity, faith/belief, sexual orientation,</p>

<p>involving a local designated Community Land Trust. The Examiner has recommended a minor modification to the policy to clarify that is only acceptable in exceptional circumstances.</p>	<p>pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health and socio-economic groups.</p>
<p>Development Management</p>	
<p>P10 seeks to mitigate impacts from hotel development on existing residential, business and communities by providing retail frontage to high streets (where possible), providing accessible community space, minimal 'in-house' food and drink options to encourage use of local facilities and local job opportunities. The Examiner suggests a minor modification to this policy.</p>	<p>It is considered that P10 as proposed to be modified may result positive benefits for some protected characteristics in the neighbourhood area. For example, requiring space for community use may benefit groups who are more likely to use community facilities such as older people, those with disabilities and those with children. The provision of accessible community spaces and facilities, including for fitness, meeting and social purposes, supports improved physical and mental health of local people, particularly those who may be unable to access such spaces due to costs. The provision of jobs that are accessible to local people benefits young people, the unemployed, those from BME groups, and lower income communities in particular, who may have more limited access to education and employment opportunities. It may also, by providing localised employment, benefit equalities groups such as women and parents in terms of offering a better work and domestic life balance.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P11 seeks to ensure graffiti in the neighbourhood area is mitigated and minimised. The Examiner suggests modifications to the policy.</p>	<p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>Retail and work</p>	
<p>P12 seeks to ensure retail units are of a size and fit-out that is available to small, pop-up uses. The Examiner suggests minor amendments to the supporting text of this policy to remove the requirement to developers to provide affordable retail units.</p>	<p>The provision of flexible workspace suitable for micro, small and medium enterprises increases availability of workspace for specific social, cultural or economic purposes. This may encourage younger persons or those with a lower socio-economic status looking to start their own businesses with the opportunity to do so, thereby creating a positive impact on those protected characteristics.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>

<p>P13 seeks to ensure a specific mix of retail units and frontages is maintained in Lower Marsh. The Examiner recommends a minor modification to this policy and to the supporting text so that it applies only to Lower Marsh.</p>	<p>Protecting a proportion of retail units will support the retention of local shops and services, providing a positive impact on groups such as older people, those with a disability or those with children who need to access these shops and services but may find it harder to travel or access shops and services due to these characteristics.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P14 seeks to provide office or workspace in the neighbourhood area with specific characteristics, targeted at certain user groups. The Examiner suggests a minor amendment to this policy to remove 'in appropriate parts', and to the supporting text so that it is consistent with strategic policy which supports office and employment uses in the neighbourhood area.</p>	<p>The provision of flexible or co-working spaces may provide suitable locations for micro, small and medium enterprises, benefiting start-up businesses, creative businesses and not for profit and/or charitable organisations. This may include education providers and organisations whose primary purpose is to support disadvantaged groups and tackling economic inequality.</p> <p>The provision of job accommodation for jobs that are accessible to local people or that provide work placements, apprenticeships or training support for unemployed or school-aged persons are likely to benefit young people, the unemployed, those from BME groups and lower income communities in particular, who may have more limited access to education and employment opportunities. It may also, by providing localised employment, benefit equalities groups such as women and parents in terms of offering a better work and domestic life balance.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P15 seeks to ensure development in the Neighbourhood Area enables relevant infrastructure improvements to support the Lower Marsh street market. The Examiner has not proposed any modifications to this policy.</p>	<p>Improved lighting, seating and green infrastructure is considered to have a positive impact on the protected characteristics of those within the South Bank and Waterloo Neighbourhood Area as the provision of improved and/or additional open space helps to improve mental, emotional and physical health and well-being, particularly for those 24 equalities groups at greater risk of ill-health. The provision of seating and other types of outdoor furniture/amenities, including lighting, to attract people to use these spaces may improve mental, emotional and physical health and well-being of users, as well as benefiting children and young people, older persons and those with a disability who may need a place to rest.</p>

	<p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>Social infrastructure and culture</p>	
<p>P16 seeks to protect specific sites or buildings for community uses or significance, including the Waterloo Action Centre, Living Space Community Centre and Make Space Studios. The Examiner has proposed minor modifications to the policy and supporting text.</p>	<p>It is considered that P16 will provide a positive impact to all protected characteristics as community facilities provide benefit to a number of user groups by providing facilities to the community who may not normally have access, enabling them to maintain an active and healthy lifestyle and encouraging social interaction which benefits mental well-being. Furthermore, the provision of sites or buildings for community uses can benefit groups who are more likely to use community facilities such as older people, those with disabilities and those with children, while accessible community spaces and facilities, including for fitness, meeting and social purposes, supports improved physical and mental health of local people, particularly those who may be unable to access such spaces due to costs.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>P17 seeks to recognise, contribute to and promote the artistic and cultural distinctiveness of Leake Street. The Examiner has proposed a minor modification to this policy to clarify where these uses will be supported in the neighbourhood area.</p>	<p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.</p>
<p>Transport</p>	
<p>P18 seeks to ensure pedestrian way finding is adequately signed (where required by scale) with the Legible London way finding system and the Examiner has not suggested any modifications to this policy</p>	<p>The Legible London way finding system has been developed with a range of organisations representing disability groups to ensure the Legible London design is as inclusive as possible, using maps to show steps, pavement widths and pedestrian crossings. This system is beneficial to user groups by ensuring that street names, landmarks and user facilities (including restrooms, escalators and lifts and baby changing facilities) are visually available. This system is identified as having a positive impact on those with a disability, pregnancy/maternity and those with young children.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil</p>

	partnership, gender reassignment and socio-economic groups is considered to be neutral.
Policy & guidance: Planning gain & mitigation	
P19 seeks to use Section 106 funding to mitigate the impacts from development on the neighbourhood area.	The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and socio-economic groups is considered to be neutral.
Draft policy P20 that underwent examination sought to require the spending of the neighbourhood element of Community Infrastructure Levy on projects identified in the neighbourhood plan or on other projects in consultation with the neighbourhood forum. The Examiner recommended the deletion of this policy and associated supporting text as it is not a policy for the development and use of land.	If draft policy P20 were to be retained in the draft Neighbourhood Plan, it may have a negative impact on the protected characteristics by fettering the council's spending of the neighbourhood element of CIL on projects that provide benefit to other groups not identified in the projects chosen by the South Bank and Waterloo Neighbours.

Section 6: Conclusion

Overall the EQIA analysis demonstrates generally positive impacts on the protected characteristics in Southwark. Where negative impacts have been identified, it is proposed to accept the examiner's recommendations to delete the identified policies.

Section 5 of this EQIA has identified that the Green infrastructure, open space & air quality policies (P1-P6), Development management policy (P10), Retail & work policies (P12-P15), Social infrastructure & culture policy (P16) and the Streetscape & transport policy (P18) in the draft neighbourhood plan may deliver positive impacts on protected characteristics. The positive impacts identified in this EIA will be delivered through the decision-making process for planning applications in the neighbourhood area.

Officers propose to accept the examiner's recommended modifications to the draft Neighbourhood Plan. These modifications mitigate the negative impacts of the Housing policies (P7-P8), and Policy & guidance: Planning gain & mitigation (P20) identified in this EIA.

Overall, it is considered that the draft Neighbourhood Plan, with proposed modifications, will not have an adverse impact on the protected characteristics, but rather a positive impact, particularly on the health and wellbeing of multiple user groups, those with a lower socioeconomic status and some younger and older people.