

Elephant and Castle Shopping Centre Redevelopment

Equality Impact Assessment Update

January 2020

Quality information

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Southwark Council

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Introduction

1.1 Purpose of the EqIA

Southwark Council has commissioned AECOM to undertake an Equality Impact Assessment (EqIA) of the Elephant and Castle shopping centre redevelopment scheme. The Public Sector Equalities Duty [PSED] imposes a continuing duty on the council to consider equalities impacts to inform its decision making. The planning application for the proposed redevelopment received approval from the Council's planning committee in July 2018. This EqIA provides an update to the Equality Analysis undertaken by AECOM in June 2016² prior to the planning application approval, including the additional equalities analysis undertaken by AECOM in March and August 2017 in order to understand specific issues related to the potential redevelopment of the Bingo Hall and Bowling Alley. This report was commissioned in August 2019, with survey work undertaken in September 2019 and appraisal of equality effects completed in October 2019, prior to the decision being made to close the shopping centre by the owner.

An update is required to monitor any implications arising since the initial Equality Analysis was undertaken and the development and approval of the subsequent planning application. This includes changing policies, demographics, and operators in the area as well as measures implemented or proposed as part of the s106 agreement for the planned development. The objectives of this EqIA are therefore to:

- Identify any potential new negative equality effects that might arise from the planned redevelopment;
- Analyse whether any negative equality effects would give rise to unlawful discrimination for any identified group;
- Validate committed mitigation measures and identify any further measures required to mitigate or avoid any negative equality effects; and
- Identify potential positive equality effects that could arise through the development, including opportunities to enhance equality of opportunity.

This EqIA will support Southwark Council to fulfil its Public Sector Equalities Duty³.

1.2 Background

Elephant and Castle, located in the London Borough of Southwark, has been identified as an Opportunity Area in Southwark Council's Core Strategy⁴ and the London Plan⁵. The Greater London Authority has defined Opportunity Areas as "London's major source of brownfield land with significant capacity for new housing, commercial and other development linked to existing or potential improvements to public transport accessibility"6.

The Elephant and Castle Opportunity Area covers 122 hectares, as outlined in the Elephant and Castle Supplementary Planning Document (SPD), which was subject to equalities impact assessment. This includes the Elephant and Castle shopping centre, Elephant Square, Elephant Park, Walworth Road, the Pullens Estate, West Square, St George's Circus, the Enterprise Quarter, and the Newington and Rockingham Estates⁷.

A key part of the regeneration of Elephant and Castle is the shopping centre. This was opened in 1965 and was the first covered shopping mall in Europe. Unfortunately, the original design principles have not stood the test of time, and the adopted SPD provides a planning framework for the redevelopment

¹ Planning Application reference 16/AP/4458 https://planning.southwark.gov.uk/online-applications-old/

² Southwark Council (2016) Equality Analysis of the Elephant and Castle Shopping Centre Redevelopment: Final Report [online] available at: https://www.london.gov.uk/priorities/planning/london-plan

⁴ Southwark Council (2012) Adopted Core Strategy [online] available at: https://www.southwark.gov.uk/planning-and-buildingcontrol/planning-policy-and-transport-policy/development-plan/local-plan

⁵ https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan

⁶ https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/opportunity-areas/opportunity-areas

⁷ https://www.southwark.gov.uk/regeneration/elephant-and-castle

of the site to transform the character of the town centre and improve its appeal as a shopping destination to a wider catchment area. The overall retail objective for the Elephant and Castle as set out in the SPD is to create a well-connected town centre with an improved layout. Residents will be able to walk easily between the redeveloped shopping centre site and the Walworth Road with continuous retail lining the high street. The shopping centre site will form the heart of the town centre with most accessibility and highest footfall, connecting directly to the varied offer of the Walworth Road and East Street, creating a vibrant and diverse town centre.

Specific objectives of the redevelopment as set out in the SPD include the creation of a new pedestrian link through the site and beneath the viaduct (to connect to the Elephant Park scheme), strengthening links with Walworth Road, the creation of a new civic space and public transport improvements needed to support growth within the Opportunity Area. Transport improvements include a new northern line ticket hall, and the transformation of the public realm in the town centre to create a new public square. The redevelopment will also facilitate the expansion of the London College of Communication with additional cultural facilities for the area.

In order to deliver the regeneration, Delancey, a national property asset company currently acting as advisors on behalf of the developer of the shopping centre, Elephant & Castle Properties Co. Limited require vacant possession of the complex to deliver the consented scheme.

Businesses and other stakeholders within this area are likely to experience significant effects from the redevelopment. The 2015 Southwark retail study⁸ notes that Elephant and Castle is part of a wider Major Town Centre which includes the shopping centre, a new campus for the London College of Communication and Elephant Park (on the site of the former Heygate estate). It is also an important public transport interchange, with connections to the underground, over ground lines, and bus network. As such, employees and customers who will be impacted by the redevelopment may reside outside the immediate vicinity of the shopping centre. The London Plan states that Major Centres are likely to have borough wide catchment areas. The scope of the assessment therefore accounts for people with protected characteristics across this wider residential, centre user, and transport user catchment area.

The shopping centre and surrounding area is home to a wide range of ethnic minority businesses, and for Southwark Council to fulfil its Public Sector Equalities Duty, any impact on these businesses and communities, as well as others sharing protected characteristics must be fully understood⁹. Several changes to the redevelopment proposals have already been made because of on-going public consultation and engagement since 2016 and recommendations proposed in the 2016 Equality Analysis report have been incorporated into the s106 agreement. This report, therefore assesses the impacts of the redevelopment at this stage of the redevelopment process.

1.3 Report Structure

This report is structured as follows:

- Chapter 1: Introduction
- Chapter 2: Methodology
- Chapter 3: Equalities Legislation and Policy Review
- Chapter 4: Description of the Regeneration
- Chapter 5: Equalities Baseline
- Chapter 6: Primary Research
- Chapter 7: Assessment of Equality Impacts
- Chapter 8: Recommendations and Conclusions

⁸ Southwark Council (2009) Retail Capacity Study: main report [online] available at: http://www.southwark.gov.uk/downloads/download/1672/retail capacity study 2009

⁹ These are the grounds upon which discrimination is unlawful. The characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Although the socioeconomic duty part of the Equality Act 2010 was not implemented by the government, Southwark Council's approach to equality also considers socioeconomic disadvantage

2 Methodology

2.1 Introduction

In accordance with the requirements of the Duty, this EqIA is designed to enable consideration of the likely positive and negative equality impact of the redevelopment for affected people sharing protected characteristics identified in the Equality Act 2010. The focus of the analysis is on the effects for businesses currently operating at the shopping centre and surrounding area and associated indirect effects for customers. The analysis also considers effects to people with protected characteristics across this wider residential, centre user, and transport user catchment area.

In considering the direct effects of the redevelopment proposals, this EqIA takes a 'worst case scenario' approach.

The methodology for undertaking the EqIA and compiling this report comprised a combination of desk-based research and primary data collection and has involved the following stages:

- Desk-based review including relevant national, regional, and local policies and legislation, the proposed regeneration plan and secondary datasets relating to groups with protected characteristics;
- Primary research including with businesses and customers at the Elephant and Castle shopping centre:
- Assessment of potential impacts informed by a consideration of the policy context, planning application, equalities baseline data, primary research survey findings; and
- Recommendations and conclusions.

The approach draws on guidance for the appraisal of equality impacts produced by the Equality and Human Rights Commission (EHRC)¹⁰, as well as AECOM's in-house approach for conducting Equality Impact Assessments (EqIAs).

2.2 Desk-based review

In addition to a review of recent relevant national, London-wide, and local policies and legislation, the desk-based review included the following:

- Review of all relevant and recent documentation regarding the proposed regeneration associated including the planning application, cabinet members report on equalities migration proposals and section 106 agreement;
- Review of national and local datasets to develop an equalities baseline profile of groups with protected characteristics within and surrounding the regeneration area including Census 2011; and
- Review of changes to occupiers within the Elephant and Castle shopping centre and other affected businesses.

2.3 Primary research

For consistency purposes, primary research followed the same approach for the Equality Analysis report undertaken in June 2016 and additional equalities analysis of potential impact to the Bingo Hall and Bowling Alley in 2017. This comprised of two surveys designed to gather the views of those affected by the proposed redevelopment of the Elephant and Castle shopping centre. A survey was prepared for businesses located within the proposed redevelopment area and an on-street survey was prepared for customers. Copies of the business survey can be found in Appendix D and the customer survey in Appendix E.

The surveys captured a combination of quantitative and qualitative information. This approach helped to ensure that relevant information was collected, whilst also allowing respondents to share their wider views on the proposed redevelopment. Questions were developed that were relevant to the objectives

¹⁰Equality and Human Rights Commission (2017) https://www.equalityhumanrights.com/en/advice-and-guidance/equality-impact-assessments

of the EqIA. A series of demographic questions that were developed in line with the 2011 Census were also included, although these questions were asked for qualifying respondents only (see Section 2.3.1 below for further details).

The implementation of the business and on-street surveys adhered to best practice principles of survey design. This included the avoidance of leading questions, careful choice of wording (e.g. clear, lay language) and type (e.g. closed, open), the application of logical sequencing and simple layout, and consideration of questionnaire length. All interviewers are trained professional market research interviewers and took care to ensure that respondents understood what they were being asked, without influencing their responses.

The surveys were conducted face to face with representatives from businesses within the Elephant and Castle shopping centre, market areas, railway arches and members of the general public who use the shopping centre. This area was selected as the core fieldwork location as this will be directly affected by the proposed redevelopment. The fieldwork for both sample groups was conducted simultaneously and ran from 9th September 2019 to 23rd September 2019 and all interviews were conducted by trained market research interviewers who work for AECOM.

In total 84 business interviews were conducted across all categories. An address list for all the businesses in the study area (Figure 2) was supplied to AECOM by Southwark Council. The Shopping Centre manager was notified about the surveys and on-site briefing was given by Delancey and Tree Shepherd prior to the fieldwork period. The list consisted of representatives from businesses with units or barrows within the shopping centre and market stallholders. Businesses within the sample were visited on up to three occasions to arrange interviews and appointments were made to complete interviews to maximise participation in the survey.

In addition, a total of 199 customers of the shopping centre were interviewed. Respondents were stopped at random and asked to participate in the survey and no screening criteria was applied other than the exclusion of all those who stated this was their first ever visit to the shopping centre. Recruitment focused on key areas in and around Elephant and Castle shopping centre and interviewing took place on the internal floors and the external market areas to ensure that a mix of Centre users were canvassed. All interviewers were given a Letter of Authority (Appendix C), which was pre-agreed with Southwark Council, to verify legitimacy and assist in respondent confidence in the purpose and independence of the survey.

All interviews were conducted using tablets in order to save data entry time. Both datasets were then checked, cleaned, and coded in the case of open-ended responses.

2.3.1 Limitations and constraints

The survey methodology was designed to enable capturing the views of those people who are most likely to be affected by the regeneration scheme. As such the surveys were targeted at representatives from businesses (owners or managers) and users of businesses located within the shopping centre. Those who commute via Elephant and Castle underground or rail station were not specifically targeted for inclusion in the on-street surveys, although they were not precluded from participating and a number of commuters passing through the centre participated in the customer surveys (those selecting accessing train station as their main reason for being on site account for 13% of the respondent base).

The fieldwork with businesses was designed to include approximately 84 business organisations from the defined area, including occupiers within Elephant and Castle shopping centre, the market area, and the railway arches. No quotas were applied and there was no requirement to gain a specific number of interviews from each business type. Southwark Council provided a sample file with specified contacts included for all the relevant business categories. This excluded contact information for market stallholders.

Due to the prevalence of national chain stores within Elephant and Castle shopping centre, the decision was taken to only ask those who were business owners/proprietors demographic questions as their responses were more pertinent to the EqIA. There were 47 valid responses to the demographic section.

The public surveys were conducted with members of the general public who were recruited 'on street' for convenience - i.e. stopped and asked to take part while inside Elephant and Castle shopping centre. Most respondents stated that their main purpose for being on site at the point of interview was shopping

within the centre or market areas. No exclusion criteria were applied to the on-street surveys other than the exclusion of respondents who were making their first visit to the Centre (this would make them less familiar with the area and thus less qualified to comment on the proposed redevelopment).

The nature of the business survey and the small total eligible population size mean that results are not intended to be generalised outside of the regeneration area and the responses should be seen as indicative. It is noted that the exact response size is not proportional to the number of different types of traders with the centre, for example the number of market stall responses is proportionally higher than the number of national multiples or independent shopkeepers. Similarly, the random nature of the onstreet survey sample limits the reliability of responses as it is not weighted nor were quotas applied to be reflective of any population. It is meant to provide an indicative response of general users of Elephant and Castle shopping centre. As a result, caution should be taken in interpreting both business and onstreet survey data findings, and these cannot be generalised to represent views of the wider population.

2.3.2 Survey Analysis

Once the surveys were completed all datasets were checked, cleaned, and coded in the case of openended responses. Analysis was undertaken producing frequencies of responses as well as identifying any significant differences in responses by different groups with protected characteristics. Results of the surveys are provided in Section 6 of this report.

2.4 Assessment of impacts

An assessment of equality impacts has been undertaken and considers the information gathered through the above activities. A judgment has then been made as to how the regeneration process would contribute to the realisation of the equality effects of the planned development for affected people with protected characteristics as defined in the Equality Act 2010 as:

- Age: this refers to persons defined by either age or a range of ages;
- Disability: a disabled person is defined as someone who has a physical or mental impairment that
 has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day
 activities;
- Gender reassignment: this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- Marriage and civil partnership: marriage can be between a man and a woman or between two
 people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must
 not be treated less favourably than married couples;
- Pregnancy and maternity: pregnancy is the condition of being pregnant or expecting a baby.
 Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- Race: The Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief**: religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys', and girls' lives; and
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical, and/or sexual attraction and the expression of that attraction.

The assessment considers both disproportionate and differential impact. A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a location. For the purposes of this EqIA, disproportionality can arise in two main ways, either:

 where an impact is predicted for the area, where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in the wider local authority district and/or county/region; or where an impact is predicted on a community resource predominantly or heavily used by protected characteristic groups, e.g. primary schools attended by children or care homes catering for very elderly people.

A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristic, irrespective of the number of people affected.

In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects. This EqIA will consider impacts on groups of people rather than on individuals.

Criteria used to determine differential or disproportionate impacts of the regeneration with respect to equality protected characteristics include:

- People who share a protected characteristic form a disproportionately large number of those adversely affected by the regeneration;
- Amongst the population affected by the regeneration, people who share protected characteristics
 are particularly vulnerable or sensitive to a possible impact in relation to their possessing a specific
 protected characteristic;
- The regeneration may either make worse or improve existing disadvantage (e.g. housing deprivation or economic disadvantage) affecting people who share a protected characteristic;
- People with shared protected characteristics amongst the affected population may not have an
 equal share in the benefits realised as a result of the regeneration. This can be either due to direct
 or indirect discrimination or where the groups experience barriers to realising such benefits, unless
 suitable mitigations are proposed to overcome those barriers; and
- The regeneration may worsen existing community cohesion amongst the affected local population or exacerbate conflicts with community cohesion policy objectives.

2.5 Recommendations and conclusions

The final section of this report sets out conclusions on the equality impacts of the proposed redevelopment and sets out further recommendations for mitigating against any adverse impacts identified as well as enhancing equality of opportunity.

3 Legislative and Policy Context

3.1 Introduction

This section provides a brief overview of relevant statutory requirements and associated guidance which have been considered in the EqIA process. It also highlights any relevant policy changes since the publication of the 2016 Equality Analysis report. A detailed summary of all relevant statutory and policy requirements and associated guidance can be found in Appendix A.

3.1.1 Equality Act 2010 and the Public Sector Equality Duty

The Equality Act 2010 is a major piece of UK legislation which provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 of the Equality Act sets out the PSED to which Southwark Council, as a public body, is subject in carrying out all its functions.

Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

The duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation as described Section 2.4 of this report.

Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that advancing equality and fostering good relations do not apply.

3.2 Policy development

Since publication of the Equality Analysis report in June 2016, there have been several policy developments at the national, regional and local levels. These have been outlined in Table 3-1 below.

Table 3-1: Changes in National, Regional and Local Policy since 2016 Equality Analysis

Policy Description	
National Policy	
National Planning Policy Framework (2019)	NPPF ¹¹ was adopted in July 2018 and updated with minor revisions in February 2019. It consolidates the Government's economic, environmental and social

¹¹ Department for Communities and Local Government, (2019); National Planning Policy Framework available at https://www.gov.uk/government/publications/national-planning-policy-framework--2 (last checked July 2019)

planning policies for England into a single document and describes how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the Government's development aims.

While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society.

Regional Policy

Draft London Plan (2019)

The new Draft London Plan¹² was published for public consultation in December 2017. The 'consolidated' version of the London Plan shows all of the Mayor's suggested changes following the Examination in Public (EiP) of the draft Plan and the final London Plan is expected to be published in Feb/March 2020. The current 2016 Plan is still the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions.

The following draft policies are of particular relevance to this EqIA update:

- Policy H5 sets out targets for affordable housing on new developments;
- Policy E11 states that development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate'; and
- Policy GG1 seeks to build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities.

Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2018)

The Mayor's Equality, Diversity and Inclusion Strategy (EDIS) was published in May 2018. The strategy sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality, as well as the challenges and disadvantage facing London can be a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential.

The strategy sets out 33 equality, diversity and inclusion objectives which include working with Councils and other partners to:

- Increase the supply of homes that are both affordable and meet Londoners' diverse housing needs.
- Regenerate the most deprived parts of London in a way that supports good growth and opens up opportunities for the most disadvantaged groups.
- Protect and provide the social infrastructure needed by London's diverse communities.
- Promote the use of inclusive design through planning, procurement and commissioning of projects and programmes.
- Support effective ways to involve communities in the development of their neighbourhoods and the wider city.

Objectives also include working with employers, education and skills providers, and voluntary and community organisations so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London.

The strategy aims to encourage inclusive growth in London through better planning and provision of business support, including access to finance for BAME, women and disabled-led businesses, and to help save and sustain diverse cultural places and spaces by promoting good growth.

London Housing Strategy (2018)

The London Housing Strategy¹³ sets out the Mayor's plans to tackle the capital's housing crisis and his vision to provide all Londoners with a good quality home they can afford. The strategy was formally adopted in August 2018.

The aim of this strategy is to address the housing shortage through an intensive use of London's available land, focusing on more genuinely affordable housing

¹² Greater London Authority (2018) The Draft London Plan https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0 (last checked July 2019)

¹³ Greater London Authority (2018) London Housing Strategy. Available at: https://www.london.gov.uk/what-we-do/housing-and-land/tackling-londons-housing-crisis

and providing help now for people feeling the effects of the housing crisis – from private renters to rough sleepers.

This strategy has five key areas:

- Building more homes for Londoners;
- Delivering genuinely affordable homes;
- Providing high-quality homes and inclusive neighbourhoods;
- A fairer deal for private renters and leaseholders; and
- Tackling homelessness and helping rough sleepers.

The Mayor has also published a high level implementation plan, which includes key policies, proposals and actions; Mayoral targets or milestones where these have been agreed; and headline indicators of success.

Local Policy

New Southwark Plan (proposed submission version) The New Southwark Plan will be a new borough-wide planning and regeneration strategy up to 2033. Once finalised and adopted, it will replace the Core Strategy (2011) and Southwark Plan (2007) policies. The Council has published the proposed submission version of the New Southwark Plan and consultation of this closed in May 2019. It is expected that the Plan will be adopted in Summer 2020.

The Plan sets out a vision for the Elephant and Castle Opportunity Area that includes plans for supporting the area's function as a major town centre for all Southwark residents and a central London location that attracts global business, research, teaching, shopping, flexible business spaces and cultural activities. It also sets out a vision for:

- providing as many homes as possible at a range of different tenures including social housing supported by community facilities;
- providing opportunities for existing small businesses, particularly those from minority ethnic groups, to relocate and continue trading;
- supporting the creation of a distinctive environment through a mix of innovative and enduring new architecture, heritage buildings, open spaces and quality public realm that provides greenery, safety, connectivity and reduces exposure to air pollution; and
- improving the train station and enabling new transport infrastructure links with the surrounding areas by providing safe and accessible walking, cycling and public transport routes.

4 The planned redevelopment

4.1 Existing site

The centre of the Elephant and Castle Opportunity Area was heavily bombed during the Second World War which resulted in redevelopment in the 1960s and 1970s. This period of redevelopment has left a legacy of poorly connected single use structures (such as the shopping centre) and a "traffic dominated road network that creates an unpleasant environment for pedestrians and cyclists and that disconnects adjoining neighbourhoods".¹⁴

Currently there is approximately 15,132m² of retail space in the centre. The proportion of shops that sell comparison goods (music, clothes, books etc.) at Elephant and Castle is very low compared to other UK town centres, and the number of units providing professional services, such as financial services, is high. Around 38% of the retail space in the shopping centre is occupied by independent businesses, with the remaining retail space (62%) occupied by national chain stores. The offices above the Centre (Hannibal House) are now closed and stripped of fittings awaiting demolition The site also previously included a bingo club, bowling club and music/mixed entertainment venue at the Coronet theatre, all of which have now closed.

The centre contains several minority ethnic businesses, including Caribbean, African, Asia and Latin-American businesses¹⁵. London South Bank University and London College of Communication are an important presence in the area and are expected to expand over the plan period, with this scheme facilitating a new modern and expanded campus for the London College of Communication.

Apart from a limited number of residential units above the shops at 30-32 New Kent Road, there is no residential provision at either the existing shopping centre site or the London College of Communications site.

Since the publication of the 2016 EqIA there have been several changes to the operation of the shopping centre which include:

- The closure of the large bingo hall
- The closure of the bowling alley
- The closure of Tesco supermarket and conversion into a smaller format Co-Op
- The closure of Santander bank
- The closure and internal strip out of Hannibal House offices
- The closure of the Coronet and Charlie Chaplin public house

4.2 Planned redevelopment

The Elephant and Castle shopping centre redevelopment has been approved planning permission. The new regeneration proposals include demolishing the shopping centre and implementing:

- 979 new homes, of which 36% (330 units) will be affordable, including 116 social rented homes, 53 London Living Rent homes and 161 discounted market rent homes;
- Around 18,234m² of retail facilities (3,102m² more than existing) financial and professional institutions, cafes, and restaurants and drinking establishments.
- A new Northern Line entrance, escalators, and ticket hall with new accessible toilets.
- A new building for the London College of Communication (LCC), which is part of the University of the Arts London (UAL) and a centre for UAL's core university services, ensuring the leading education establishment can remain in the area. It will secure existing jobs in Elephant and Castle

¹⁴ Southwark Council (2012) Elephant and Castle Supplementary Planning Document [online] available at: https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/supplementary-planning-documents-spd/spd-by-area accessed September 2019

documents-spd/spd-by-area accessed September 2019

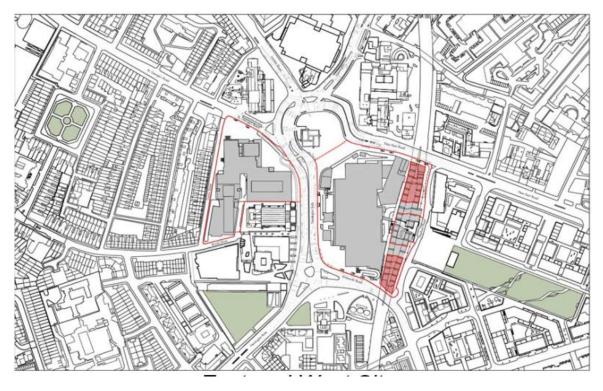
15 Latin Elephant (2015) Elephant and Castle Community Vision [online] available at: http://elephantandcastleshopping.com/ accessed September 2019

as well as relocating UAL staff to the area, alongside a more permeable space for public exhibitions and events. The new building may be particularly beneficial for young people and BAME groups (see Appendix F) by providing improved educational facilities in the heart of the opportunity area;

- Space for community leisure uses, as the developer has listened to concerns and offered a bingo
 operator first refusal on one of the leisure spaces in the proposed development on the West site
 (currently occupied by the university). There is also leisure space on the East site (currently
 occupied by the shopping centre) that could be used as a cinema;
- On-site affordable retail and workspace facilities;
- Significant job creation during the build, with 1,230 construction workers per year needed across the ten-year build time and almost 2,000 full-time jobs being provided in the new town centre;
- Additional expenditure in the local area; and
- High-quality public realm including new safer pedestrian routes, railway arches and a public square.

The development will be located over two sites; the West site and East site (Figure 4-1).

Figure 4-1: West site and East site



Since the publication of the 2016 EqIA, there have been several changes to the planned redevelopment in Elephant and Castle as outlined in the 2018 Planning Committee Report which include:

- An increase in the number of social rented units which provides them as traditional social rented
 units which could be owned by the Council or a registered provider, as opposed to 'social rent
 equivalent' units retained by the developer. The revised proposal reduces the number of London
 Living Rent units within the development and increases the number of Discount Market Rent units.
- An agreement to a 30-year covenant for the private units on the East site. The applicant proposes
 a fallback position whereby the housing coming forward on the West site could be either build-torent, in which case the private units would have a 30-year covenant, or build-to-sell, in which case
 no covenant would be required.
- An additional financial contribution is proposed towards children's play space on the West site to reflect the increased number of social rented units now proposed.
- An increase in the amount of affordable retail space has been proposed. The revised proposal would provide 10% on-site affordable retail space, i.e. 10% of the retail space coming forward on

the east site would be affordable and 10% of the retail space coming forward on the west site would be affordable. This is a notable increase from the original offer of 5.3% on-site affordable retail, with an in-lieu contribution to make up for the shortfall.

- The applicant's update letter advises that a temporary retail facility would be created on Castle Square, which is a new area of public realm to the west of the site. The letter advises that it would extend to around 300m², and the units would be offered in priority to independent retailers currently located within the shopping centre at affordable rents discounted in line with the standard of accommodation likely to be provided.
- The applicant proposes to develop a vision for Pastor Street on the west to provide a cluster of affordable retail and commercial spaces as part of the formal affordable retail offer.
- The applicant proposes to give the right of first refusal to a bingo operator, on commercial terms, to lease approximately 1,850m² of the leisure floorspace within the proposed development. This would be large enough to accommodate approximately 959 seats.
- Additional information has been submitted to consider what the transport implications would be if the bingo facility referred to above were provided on the west site.
- Although not specifically referred to in the applicant's update letter, at the Planning Committee
 meeting on 16 January 2018 the applicant agreed to fund a controlled parking zone (CPZ) review
 in relation to the west site.
- Additional equalities information has been submitted as part of the planning application by research company QUOD to assess the impacts of the proposal and to address comments made following public consultation.
- An Environmental Impact Assessment update letter has been submitted, which advises that the
 amendments outlined above would not give rise to any new, additional, or different likely significant
 effects from those already considered within the Environmental Statement.

Since the publication of the 2016 EqIA, planning consent has been granted for the following relocation sites, which together with the existing consent and construction of affordable retail space at 50 New Kent Road provides for 36 new retail units saved for the relocation of operators from the shopping centre, plus 10% of the retail space within Elephant Park

- Elephant Arcade, the construction of 11 new units in 550m² of retail space at the ground floor of Perronet House, planning application reference 17/AP/4651
- Castle Square, the construction of 517m² of retail space in 32 modular units planning application reference 18/AP/2108

4.3 Retail and Business

The redevelopment will provide new buildings which will provide a range of uses including retail and office space.

Ten percent on-site affordable retail space would be provided in accordance with the Elephant and Castle SPD. This would equate to between $1.823m^2$ and $2.109m^2$, depending on how flexible space on the West site were ultimately occupied. The provision of this space on-site would enable businesses to cluster, which is something that has been raised during public consultation.

4.4 Housing

The planning consent is for 979 residential units, of which 330 units will be affordable, including 116 social rented homes, 53 London Living Rent homes and 161 discounted market rent homes. The social rented homes will be managed by Southwark Council and or another registered provider and be offered in priority to people living and working in Southwark.

The development as proposed would be primarily PRS (private rented sector) also known as a Build to Rent but with traditional social rented units provided on the West site as opposed to the previous offer which was for social rent equivalent units as envisaged in draft policy P4. The table below sets out the proposed affordable housing offer as outlined in the s106 agreement under Schedule 2 and 3 part 2. The proposal is for 35% affordable housing based on habitable rooms but amounting to 330 units, 165 on each of the East and West sites. On the East site this would be provided as London Living Rent

(LLR, 25%) and Discount Market Rent (DMR, 75%). On the West site provision would be Social Rent 45%, LLR 33%, and DMR 22%.

In total this would provide an affordable housing split as follows:

- 38% social rented units operated by a Registered Provider or the Council with standard Social Rented terms;
- 14% LLR; and
- 48% at 80% market rent for household incomes between £80,000 and £90,000, reflecting the upper limit of the Mayor's income threshold for intermediate housing.

The number of affordable homes split by the East and West site and housing type are set out in Table 4-1.

Table 4-1: Affordable housing split

	Social Rent		London Living rent		Discounted Market Rent			
	East Site	West Site	East Site	West Site	East Site	West Site	Total	
1 bed	0	22	18	2	35	10	87	
2 bed	0	66	23	10	89	27	215	
3 bed	0	28	0	0	0	0	28	
Total	1	16	Ę	53	1	61	0	

The units would be tenure blind and the facilities provided, e.g. amenity space, children's play space, refuse, cycle storage, etc., will be equally available to all residents.

Policy 3.8 of the London Plan 'Housing choice' requires ninety percent of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings', and ten per cent of new housing to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The planned development would comply with the London Plan requirement, and a condition to secure this is part of the permission. Each site would also be policy compliant in respect of wheelchair accessible and adaptable housing.

All the children's play space requirements for the East site would be met on-site, in accordance with guidance in the GLA's Informal Play and Recreation SPG. A condition requiring details of the play equipment to be submitted for approval is recommended, which would need to be provided prior to the occupation of the dwellings. However, there would be a shortfall of $386m^2$ of children's play space on the West site, therefore in accordance with the Council's Planning Obligations and Community Infrastructure Levy (CIL) SPD a contribution of £117,780 would be required, and this has been included in the s106 agreement. The contribution amount has increased to reflect the increased number of social rented units now proposed.

4.5 Leisure and Community Uses

There will be a new building for the London College of Communications and a centre for University of the Arts London's core university services.

There are also plans to provide space for community leisure with a s106 agreement that a bingo operator would be offered first refusal of a proportion of the leisure floorspace on commercial terms.

The additional activity set out above, will place more pressure on transport infrastructure particularly at the Northern Line Underground Station. As part of the regeneration a new Northern Line entrance, escalators, and ticket hall are to be provided at Elephant and Castle mainline railway station.

5 Equalities baseline

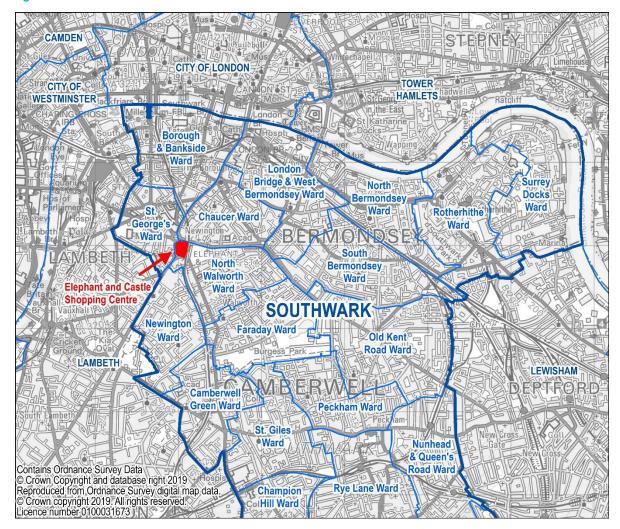
5.1 Introduction

An equalities baseline is necessary for the identification of potential equality impacts in order that an assessment can be made as to the potential level of impact the redevelopment may have on groups with protected characteristics. The baseline describes:

- Protected characteristics groups living and working in the area analysis of demographic
 data including Census 2011 data and other datasets from the Office for National Statistics (ONS)
 to identify prominent groups with protected characteristic groups living and working in the
 immediate and wider area and as such may be affected by the impacts of the proposed
 redevelopment.
- Socio-economic data examination of currently available socio-economic information with regards to employment, education, housing, transport, access to services, public realm, open space, and crime in the area as well other data providing indicators of social inequality including deprivation levels, health inequalities and community cohesion.

While the Elephant and Castle shopping centre is located within North Walworth, additional wards within the Elephant and Castle Opportunity Area have been considered, as Elephant and Castle shopping centre's influence as a major centre is likely to extend beyond the boundaries of the ward it is situated in (**Error! Reference source not found.**). In May 2018, there were changes to the ward boundaries in Southwark, as shown in **Error! Reference source not found.**. However, for the purpose of this report and data consistencies with national and local datasets, the former boundaries of Southwark have been used in the analysis.

Figure 5-1: Ward boundaries



The equalities baseline draws on a range of data sources, including the 2011 Census. Data is presented at a Greater London, LB Southwark, and Ward level (Cathedrals Ward, East Walworth Ward, Faraday Ward, Newington Ward, Chaucer Ward, and Camberwell Green Ward) where available.

Several key issues were identified following analysis of baseline data. These are presented below. A full summary of the equalities baseline relevant to the proposed redevelopment area can be found in Appendix B of this report. We have also received equalities data from LCC, via Southwark Council, regarding student data. This data is provided in Appendix F.

5.2 Key issues

Some of the key findings from the analysis of baseline data are summarised as follows:

- Although the shopping centre area (former East Walworth) has a much lower percentage of children when compared to Southwark or London, GLA Population Projections estimate that by 2031 the proportion of nought to 15-year olds living in the Borough will increase by approximately 9.5% on 2016 levels. The working age population of 16 to 64-year olds will experience a similar rate of population increase over the same time period, at 10.5%.
- The greatest population increase is expected in the over 65 years age group, which will increase considerably on 2016 levels, to 32.7%. An increase in the number of older people will require appropriate housing and access to other key services that meets their needs. Housing implications include increased demand for both specialist accommodation for older people and for services and home adaptations to enable older people to remain 'at home' living independently.
- Apart from the former Cathedrals (6.7%) and Chaucer (5.6%) Wards, all wards within the
 Opportunity Area have a higher proportion of residents who consider that their day-to-day activities
 are 'limited a lot' by disability or illness when compared with the borough (7.7%) and London (8.1%)
 averages. This will have implications for the types of development and services that will be required
 to meet the needs of society, including disabled people and others with mobility issues.
- Apart from the former Cathedrals Ward, all wards within the Opportunity Area have a lower proportion of White residents and correspondingly a higher proportion of Black and Minority Ethnic (BAME) residents than the LB Southwark or London averages. Ethnicity projections by GLA show that from 2016 to 2050 the largest population increase in the borough is projected to occur amongst Other Mixed (71.8%), Arab (57.6%), Other Asian (54.9%), Other Ethnic Group (55.4%) and Other White (50.7%).¹⁶
- The Index of Multiple Deprivation 2015 revealed that wards within the Elephant and Castle Opportunity Area fall within the top 20% and 30% most deprived wards in England. Other parts of the borough experience more severe deprivation however and fall within the top 10% most deprived in England.
- There are high proportions of social rented housing, and low levels of privately owned or rented housing within the LB Southwark and all Wards within the Opportunity Area. 43.7% of housing in LB Southwark is socially rented, compared with 24.1% in London. In Camberwell Green and Faraday Wards the proportion is considerably higher (at 63.5% and 68.4% respectively).
- Within the LB Southwark, 15.3% of households are overcrowded (occupancy rating bedrooms), less than the London average of 11.3%. Within London, Brent, Tower Hamlets, Haringey and Southwark all have high levels of overcrowding. The proportion of overcrowding within wards in the Opportunity Area is higher than the Borough average (18%); the lowest proportion within the former Cathedrals Ward (11.7%) and the highest proportion within Camberwell Green Ward (19.9%).¹⁷-There is evidence to suggest that overcrowding is more likely to occur among ethnic

¹⁶ GLA (2019) GLA Projections Archive [online] available at: < https://data.london.gov.uk/gla-projections-archive/ [accessed 18/12/2019]

¹⁷ Census table QS412EW

minority households in London¹⁸ and is also likely to be more detrimental to people belonging to certain protected groups, for example, young people and disabled people²⁰.

- Southwark has an unemployment rate of 4.7% which is slightly higher than the unemployment rate in London as a whole (4.6%) and above UK levels (3.9%).21
- There are high concentrations of employment by sector in certain wards, with 22.9% people in East Walworth and 25.7% people in Faraday ward employed in the Wholesale and retail trade, and 30% people in Camberwell Green employed in Transportation and storage. The variation in employment sectors, and higher prevalence of people employed in sectors which require lower levels of qualifications, may reflect the lower levels of educational attainment in some wards.
- Access to open space is limited in the Elephant and Castle sub-area:
 - LB Southwark's Open Space Strategy indicated that there is a total of "0.7ha of park provision per 1,000 population, which is below the standard of 0.72ha per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth". The sub-area has the highest population density of any of the eight sub-areas in the borough.
 - The area has "the second highest proportion of housing units with no access to private open space (after Bankside)". Both indicators suggest that there is high demand for open space within the sub-area.
 - The Open Space Strategy also reports that residents within the sub-area reported that safety fears often prevented them using open spaces.

People sharing protected characteristics may be disadvantaged if they are unable to access public open space, and for certain protected groups there are considerable advantages associated with access to open space; for example, young and older people are likely to benefit from opportunities for active and passive recreation and socialising with others.²²

- Elephant and Castle Northern Line Station is currently served by two lifts and experiences passenger capacity problems. Transport for London estimate that in the morning peak 30% of passengers entering the station are using the spiral emergency stairwell rather than queuing for one of only two lifts, and there are times when staff are required to manage congestion by 'holding' passengers outside the station.
- Reported crime has increased by over 20% across London Boroughs over the last five years. Southwark has a higher reported crime rate in comparison to the average of other boroughs.²³ In July 2019, the highest proportions of crime within the borough were theft, violence against a person and vehicle offences.24
- Compared to the Higher Education Institute sector average, the LCC has:
 - 16.3% more BAME UK students and 18.6% fewer White UK students;
 - 21.3% fewer UK students, 12.35% more EU students, and 9% more overseas students;
 - 8.2% more female students and 8.15% fewer male students; and
 - 4% more students with a declared disability.

The new development will also increase staff numbers at the site from 634 to 1162.

tps://www.nomisweb.co.uk/reports/lmp/la/1946157256/report.aspx#tabempocc, accessed January 2020.

¹⁸ Ministry of Housing, Communities and Local Government (MHCLG) (2018); English Housing Survey; Overcrowded Households. Available at: https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowdednouseholds/latest, accessed January 2020.

households/latest, accessed January 2020.

19 Elahi, F. and Khan, O. (2016) Ethnic Inequalities in London: capital for all. London: Runnymede Trust.

²⁰ Equality and Human Rights Commission, (2010); How Fair is Britain? report. Available at: http://www.equalityhumanrights.com/ publication/ how-fair-britain, accessed September 2019. ²¹ Nomis (2018); Labour Market Profile - Southwark. Available at:

²² Equality and Human Rights Commission, (2010); *How Fair is Britain?* report. Available at:

https://www.equalityhumanrights.com/sites/default/files/how_fair_is_britain_-_complete_report.pdf, accessed September 2019. ²³ London Crime Statistics (2019). Available at: https://www.finder.com/uk/london-crime-statistics, accessed September 2019.

²⁴ Metropolitan Police (2019) Crime Statistics. Available at: https://www.met.police.uk/sd/stats-and-data/met/crime-datadashboard/ accessed September 2019.

6 Primary research

6.1 Introduction

This chapter presents findings from the business and customer surveys conducted by AECOM with directly affected business owners and representatives, as well as with customers of the affected businesses. Where possible, the results of the surveys have been compared to the findings of the 2016 businesses and customer surveys which were also conducted by AECOM.

6.2 Business survey results

The following is a breakdown of the results from the surveys conducted with businesses within the area affected by the proposed Elephant and Castle shopping centre redevelopment scheme. The red line of the planned redevelopment will affect 98 existing operators which includes 34 external market traders and a database of all the tenants was provided to AECOM. The business survey achieved a total of **84 responses** from a mix of business owners and representatives such as store managers and other employees.

Fifty-one of the businesses interviewed were from within the shopping centre itself, 31 were external market stalls and two interviews were completed with representatives from the railway arches. The survey scope included the two kiosks beneath the viaduct on New Kent Road. It should be noted that nearly all of the market stall holders responded, resulting in an over-representation when compared to shopkeepers within the overall sample. The exact locations of the stores are highlighted in Table 6-1.

Table 6-1: Business interviews by store location

Business location	Number of interviews completed
Ground floor of the shopping centre	30
First floor of the shopping centre	20
Second floor of the shopping centre	0
Floor not specified	1
Outside	2
External market	29
Elephant Road arches	2

6.2.1 Nature of the businesses

A mix of business types were recruited to take part in the research. Table 6-2 shows the breakdown of completed interviews by business category and shows that 40% (34) of interviews were conducted with businesses that class themselves as 'Independent'. 37% (31) interviews were conducted with market stallholders and a further 18% (15) were conducted with managers of local outlets of national chain stores.

Table 6-2: Business interviews by category

Business category	Number of interviews completed (2019)
Independent shop or business	34 (40%)
Market stall	31 (37%)
Local outlet of a national chain	15 (18%)
Franchise	2 (2%)
Other	2 (2%)
Base:	84

Table 6-3 provides details on the types of services provided by all businesses surveyed in 2016 and 2019. Results of the 2019 surveys reveal that 25% of stores provide 'Other' services. These mostly consisted of accessories shops including bags, hats, watches, belts, and fashion accessories shops as well as a carpet shops, a card shop, an electronic repair shops, two grocery shops, a chemist, and an IT services.

Table 6-3: Store services provided

Store type	%
Trades and other services	2%
Clothing/shoe shop	23%
Fast food outlet/takeaway	12%
Financial services	6%
Beauty/hair salon	5%
Restaurant	8%
Supermarket/general food shop	5%
Community organisation / charity / advice services	1%
Health shop	1%
Mobile phone shop / electrical goods	7%
Betting shop	1%
Specialist food shop	2%
Leisure facility	1%
Other	25%
Base:	100% (84)

Of the independent businesses that responded to the demographic questionnaire, female proprietors run 32% (11) of these stores which consist of clothing and shoe shops, beauty and hair salons, a specialist food shop as well as a haberdashery. Male proprietors run all five of the mobile phone and electrical goods shops, restaurants, as well as fast food outlets, a specialist food shop, trades and other services and a leisure facility (Table 6-4).

In terms of ethnic breakdown, Latin American proprietors run three of the five restaurants listed below. The other two are run by an owner of white origin and another that refused to specify. The two fast food outlets are run by owners of Asian/Asian British and Turkish origin.

Table 6-4: Store services provided (independents only) - Base (34)

Store type	Number of interviews completed
Trades and other services	1
Clothing/shoe shop	8
Fast food outlet/takeaway	2
Restaurant	5
Beauty/hair salon	4
Mobile phone shop / electrical goods	4
Leisure facility	1
Specialist food shop	2
Other	7
Base:	34

6.2.2 Business ownership

The business survey asked respondents to indicate if they were the business owner, manager or other representative. 56% of those interviewed were business owners and 36% were managers. The remaining respondents (8%) indicated that they were a representative of the participating organisation.

Table 6-5: Respondent position within business

Respondent position	Respondents
I own the business	47 (56%)
I am the business manager	30 (36%)
Other- I have the permission of the owner or manager to take part in this survey	7 (8%)
Base:	84

As shown in Table 6-6 the majority of responding business <u>owners</u> were from Black African/Caribbean/British backgrounds (10 respondents) and Latin American backgrounds (10 respondents).

Table 6-6: Ethnicity of business owners

Ethnicity	Number of interviews completed
Black/African/Caribbean/Black British: African	10
Latin American	10
Asian/Asian British: Other Asian	8

Asian/Asian British: Pakistani	4
White: Other White	4
Black/African/Caribbean/Black British: Caribbean	3
Other Ethnic Group	2
White: English/Welsh/Scottish/Northern Ire/British	1
Mixed/multiple ethnic group: White and Asian	1
Asian/Asian British: Indian	1
Asian/Asian British: Bangladeshi	1
Arab	1
Refused	1
Base:	47

Amongst business owners, 75% were male and 25% were female. In the 2016 survey, 67% of business owners were male and 33% were female. In terms of the age of responding business proprietors the largest proportion were aged between 45 and 54 years (Table 6-7).

Table 6-7: Age range grouping of business owners

Age bands:	Respondents	
25-34	6 (13%)	
35-44	10 (22%)	
45-54	18 (38%)	
55-64	11 (23%)	
65-74	2 (4%)	
Base:	47	

Most business owners (49%) stated that they view themselves as Christian, while 43% stated that they are followers of Islam (Table 6-8).

Table 6-8: Religious affiliation of business owners

Religion	Respondents	
Christianity	23 (49%)	
Islam	20 (43%)	
No religion	3 (6%)	
Prefer not to say	1 (2%)	
Base:	47	

6.2.3 Leaseholder type

As shown in Table 6-9 the majority of those interviewed classified themselves as the main leaseholder. This was also the case in 2016.

Table 6-9: Lease type

Lease-type	2019 %
Main leaseholder	56%
License-holder for a market stall	31%
Sub-leaseholder	3%
Don't know	10%
Base:	100% (84)

Amongst business owners, the breakdown of lease type within gender is shown in Figure 6-10 and suggests that there are a greater proportion of male stallholders than female ones.

Figure 6-10: Lease type by gender



All ten Latin American business proprietors are the main leaseholder, the greatest proportion of all ethnic groups. Market stall license holders make up 13 out of 14 of the Asian/Asian British business respondents compared to five of the 15 Black/African business proprietors.

6.2.4 Number of leases

The majority of responding organisations had one lease within the sample area. Nine percent of all responding organisations had more than one lease (Table 6-10). This is similar to the 2016 survey results.

Table 6-10: Number of leases held in sample area

Number of leases	Respondents	
One	91%	
Two	7%	
Three	2%	
Base:	100% (84)	

Amongst business owners, 10% have more than one lease within the sample area (Table 6-11).

Table 6-11: Number of leases held in sample area business proprietor group—Base (40)

Number of leases	%
One	90%
Two	9%
Three	1%
Base:	100% (47)

Of these there are no female proprietors with more than one lease. Three of the business owners who have more than one lease are from Asian ethnic backgrounds and the other two are from Latin American ethnic backgrounds.

6.2.5 Period of occupation

Analysis of lease tenure shows that 58% of the businesses interviewed have been in their current location for more than ten years and are well-established in their locations. 11% of lease holders have been in their premises for two years or less. It should be noted that not all operators trade with leases, some are licenced, such as the market stalls.

When we look at lease tenure by organisation category (where base sizes allow) we see that the national chains represented in the survey tend to have longer residence in the sample area, with nine of the 15 businesses interviewed having their position for over ten years. Response from independent shops and market stalls were similar with the majority having been there for over ten years (Table 6-12).

Table 6-12: Period of occupation by organisation category

	Organisation category		
Lease tenure	Independent shop or business	Market stall	Local outlet of a national chain
Less than 12 months	1	1	1
Between one and two years	3	3	0
Between two and five years	5	3	1
Between five and ten years	6	4	4
More than ten years	19	20	9
Base:	34	31	15

Lease tenure amongst business owners surveyed indicates that 59% have been in their current location for more than ten years, 2% greater than for all businesses surveyed.

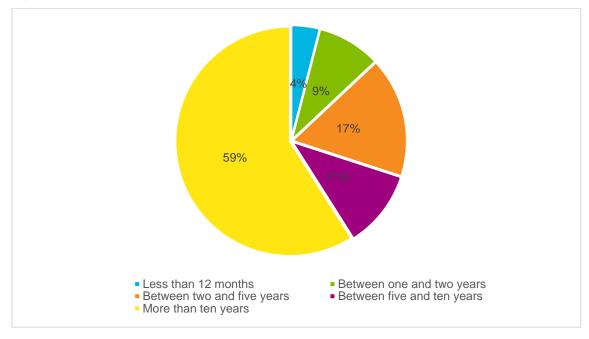


Figure 6-2: Lease tenure (Business owners) - Base (47)

When we analyse this by ethnicity, the length of time that white business owners had held leases for was more than 10 years in 40% (2) of cases, whilst 30% (3) of Latin American owners, 77% (10) Black / Black British owners and 71% (10) of Asian owners had held the lease for more than 10 years. Across ethnic groups the responses indicated few leases had been held for less than 12 months, except for 20% (2) Latin American business owners.

When we analyse the data by gender, 92% (11) of female business proprietors have been in their premises for two years or more. This proportion is slightly lower amongst male business leaseholders at 86% (30).

6.2.6 Information on employees of the businesses

All respondents were asked how many people are employed at the premises. 48% of businesses only had one person employed, 32% had between two and five people, 13% had between five and ten people and only 8% had more than ten people.

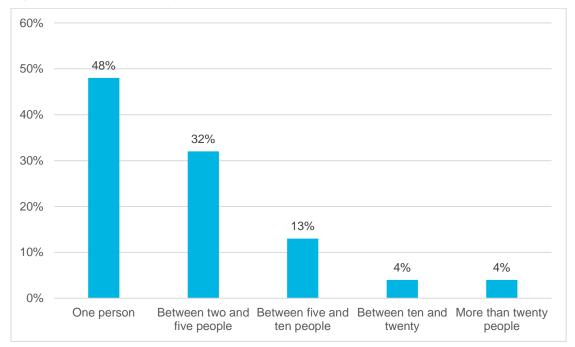


Figure 6-3: Number of employees on site - Base (84)

When we look at the data for business owners only, we see that the proportion of firms with one employee is much higher at 83%. It is noted that the national multiple chain stores did not form a proportionate part of this interview sample.18% (6) of the 33 firms with one employee are run by women. Two of the businesses have more than ten employees which were answered by business owners and are run by proprietors from a Latin American and Black African background.

In addition to the manager, 73% (61) businesses employed extra full-time staff. Most of these businesses have one to five full-time employees (87%). Only one business had more than ten employees (2%) employed full-time. Unsurprisingly market stalls tended to have the fewest full-time employees.

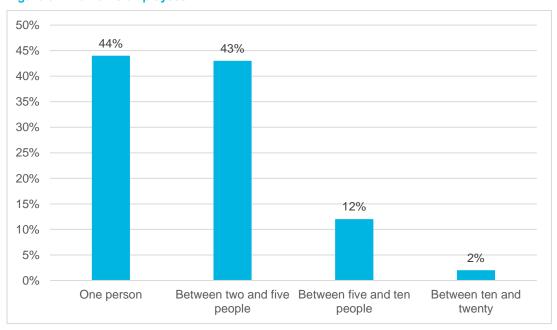


Figure 6-4: Full-time employees

On the basis of the survey, the overall employment figures for Latin American-run independent enterprises have the highest number of full-time employees.

Forty-three percent (36) of businesses had part-time staff employed, with 50% of these having just one part-time member of staff.

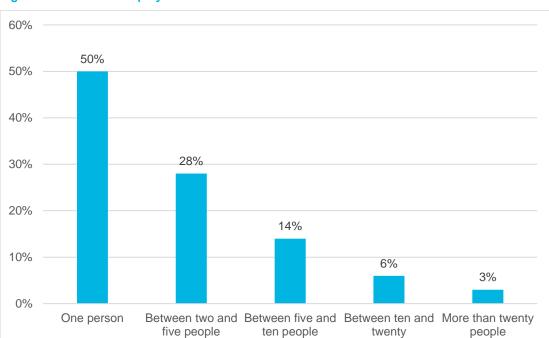


Figure 6-5: Part-time employees

Respondents were asked to provide a breakdown of the ethnic make-up of their employees. Seventy five respondents provided answers: 41 staff from 18 businesses are White, 18 staff from 13 businesses are from Mixed/Multiple ethnic backgrounds, 63 staff from 34 businesses are from Asian/ Asian British backgrounds, 24 staff from 12 businesses are from Latin American backgrounds, four staff from four businesses are from Arab backgrounds and 25 staff from 25 business are from 'Other' backgrounds.

6.2.7 Nature of service provision

Over half (52%) of all business proprietors strongly agreed that their customers are from the local community and in all 73% of all respondents agreed with this statement. One of the 16 respondent Latin American business owners agreed with this statement and over half (9) strongly agreed. Seventy seven percent (17) of Black/Black British business proprietors agreed or strongly agreed with this statement.

Thirty percent of all respondents agreed that their organisation provides goods or services that serve the needs of people from a shared ethnic background. Seventy seven percent of Asian/Asian British respondents and 77% of Black/Black British respondents agreed or strongly with this statement. Sixty three percent of responding Latin American respondents agreed or strongly agreed with this statement.

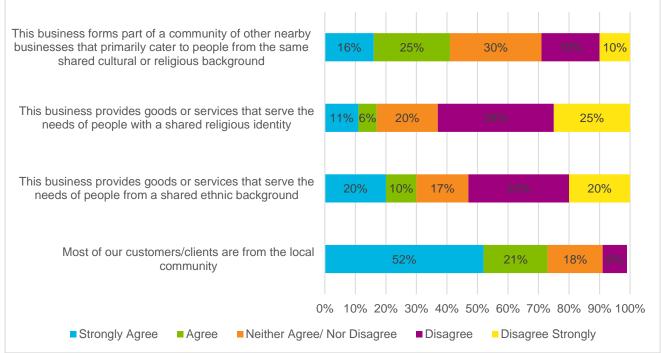
There is little difference when we compare responses to this question based on gender; 74% of male and 73% of female respondents agreed with his statement. In terms of response by religious background, 73% (27) those who classify themselves as Christian agreed or strongly agreed with this statement. The equivalent proportion amongst those who classify themselves as followers of Islam is similar at 76% (25).

Just 11% of responding organisations strongly agree that their business provides goods or services that serve the needs of people with a shared religious identity. Twenty-seven percent of respondents from Black/Black British backgrounds agreed with this statement, this reduces to 6% among Latin American business proprietors. Sixteen percent of those who classify themselves as Christian agreed with this statement. The equivalent proportion amongst those who classify themselves as followers of Islam is similar at 18%.

Forty-one percent of responding organisations agreed or strongly agreed with the statement 'This business forms part of a community of other nearby businesses that primarily cater to people from the same shared cultural or religious background'. Fifty-six percent (9) of Latin American business owners agreed or strongly agreed with this statement- the highest level of endorsement seen across any ethnic grouping. The proportion amongst Black/Black British respondent is 45% (10), and 46% (11) amongst those who are Asian/Asian British. Analysis by religious grouping shows a higher proportion of

agreement amongst those who classify themselves as Christian (51% or 19 responses) when we compare with those who are followers of Islam (39% or 13 responses).

Figure 6-6: Attitudinal statements- Base (84)



6.2.8 **Opinions on the strengths of Elephant and Castle**

All business respondents were asked to rate Elephant and Castle across various attributes on a fivepoint scale from very poor to very good. 'Transportation links' was the best rated attribute with 90% of all respondents stating that they are 'good' or 'very good'. Elephant and Castle was thought to be a 'good or very good' hub for culturally specific shops and service providers by 41% of respondents. Respondents rated Elephant and Castle most negatively on 'Existing level of footfall' (45% rated this as 'poor' or 'very poor') and 'Availability of commercial units '(37% rated this as 'poor' or 'very poor').

The same attributes were rated in 2016 and received similar responses from the respondents. In 2016, 'Transportation links' was still the best rated attribute with 83% of all respondents stating that they are 'good' or 'very good'. Elephant and Castle was thought to be a 'good or very good' hub for culturally specific shops and service providers by 56% of respondents. However, respondents rated Elephant and Castle most negatively on 'General attractiveness as a destination' (44% rated this as 'poor' or 'very poor') and 'Competitive rental rates of commercial units '(36% rated this as 'poor' or 'very poor').

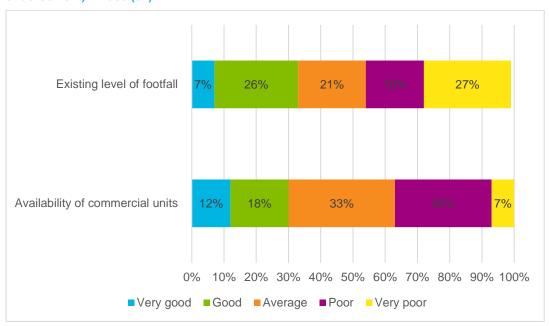


Figure 6-7: Rating of Elephant and Castle on locational attributes (ranked on Good/Very good endorsement) – Base (84)

When the data is analysed for business owners only from an equalities perspective, the data reveals slight variations. There is little difference in ratings of Elephant and Castle as a location to do business when responses are analysed by gender. Although it is noteworthy that female business owners rated Elephant and Castle more negatively for 'general attractiveness as destination' than their male counterparts did: 43% (13) of female respondents rated it as 'poor' or 'very poor' vs. 26% (14) of male business owners.

'Transportation links' was the best rated attribute amongst both white and BAME business owners.

Elephant and Castle was thought to be a 'good or very good' hub for culturally specific shops and service providers by 41% of respondents. This increases to 56% (9) of the Latin American business owner group.

Respondents rated Elephant and Castle most negatively on 'existing level of footfall' (45% rated this as 'poor' or 'very poor') and 'Availability of commercial units '(37% rated this as 'poor' or 'very poor'). Asian/Asian British respondents have the most positive outlook when it comes to rating Elephant and Castle on 'existing level of footfall' with 50% (6) of them rating it as 'good or very good'. The equivalent proportion amongst Black/Black British and Latin Americans is 33% (2) and 38% (6) respectively.

Of the Latin American respondents, 31% respondents rated the 'competitive rental rates of commercial units' in Elephant and Castle as 'good' or 'very good'. This falls to 21% (3) amongst Black/Black British and 24% (7) amongst Asian/Asian British business owners. 'Poor' and 'very poor' ratings for this aspect are also higher amongst Black/Black British and Asian/Asian British business owners than seen amongst the Latin American group.

All respondents were asked if they were aware of the redevelopment of Elephant and Castle and 100% of all respondents stated that they were aware of it. This compares to 97% of respondents who were asked in the 2016 survey.

6.2.9 Opinions on the proposed redevelopment

All respondents were then asked about various elements of the current proposed redevelopment and asked to what extent they felt that they would benefit businesses in Elephant and Castle, if at all.

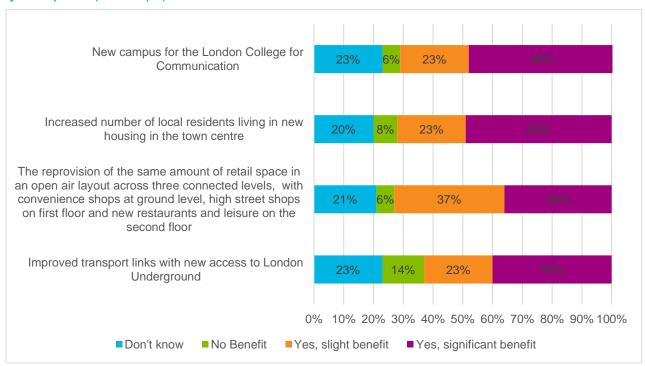
Total positive endorsement (combined 'slight benefit' and 'significant benefit') was highest for the redevelopment proposals to provide 'the same amount of retail space in an open air layout across three connected levels, with convenience shops at ground level, high street shops on first floor and new restaurants and leisure on the second floor' with 73% of all respondents stating that this will be of benefit

to businesses in the area. This is slightly less than the 2016 survey where 83% of respondents stated that this will be of benefit to businesses in the area.

Of the businesses (72%) felt that having an increased number of residents in new housing in the town centre would result in a significant benefit to business in the area. Eight percent felt that they would bring no benefit.

Sixty three percent of respondents felt that 'Improved transport links with new access to London Underground' would bring 'a benefit to the area. The majority (72%) of respondents also agreed with the statement that redevelopment proposition to create a new campus for the London College of Communication. However, this is less than the 91% who stated that this will be of benefit to businesses in the area in 2016.

Figure 6-8: Impact rating of elements of redevelopment (ranked on overall positive endorsement - NET of 'yes' responses) – Base (84)



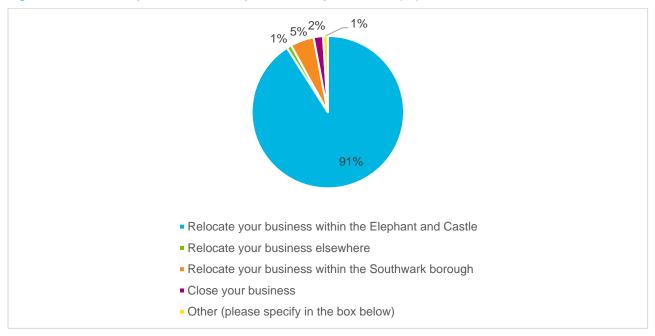
All respondents were asked what their preferred option would be for their business assuming that the developer proceeds with the planning permission for the proposed redevelopment. Ninety-one percent of respondents plan to relocate their business within Elephant and Castle. This is greater than the 64% of respondents who planned to relocate their business within Elephant and Castle in 2016. Five percent plan to relocate outside Southwark and 2% will close their business. This is less than the 12% who planned to relocate outside Southwark and 11% who planned to close their business in 2016.

Amongst the two respondents who stated that they would close their business one was male and one was female. In 2016 all of those who stated they will close their business were male. All five of the white business owners plan to relocate their business within Elephant and Castle compared to two of the three white business owners who planned to relocate their business elsewhere, i.e. outside of Southwark in 2016. Fourteen percent (2) of Asian/Asian British business owners plan to relocate their business within the Southwark borough. When the responses are analysed by religion, there is only one individual of Christian faith who would close the business and two individuals of Islam faith who would relocate within the Southwark borough. All other business owners would relocate within Elephant and Castle. Whereas in 2016, business owners who stated that they are followers of Islam expressed more pessimism regarding their intentions: 36% (4) of them stating that they would close their business and a further 27% (3) stating that they would relocate outside of Southwark.

In 2016, market stallholders were most likely to say that they relocate their business outside of Southwark, 22% of 22 market stallholders interviewed stated that this was their intention. Whereas now

86% of market stallholders interviewed stated that they would relocate within Elephant and Castle, 7% would close their business and 7% would relocate within the Southwark borough.





Respondents were then asked why they gave their specific response. Only four respondents provided answers; two of which were planning to close their business and one stated that they want to close the business and the other one is looking for another shop. One respondent wants to relocate the business elsewhere because 'since the bingo hall closed, we don't make much money now and we won't want to stay'. The other respondent stated that they have only been here two weeks and is therefore too early to say.

Respondents were asked how confident they felt that they will be able to relocate within the (planned) new town centre or the immediate area surrounding this. Most respondents (67%) of respondents expressed a positive level of confidence as to whether they would be able to relocate. This has increased since 2016 where only 34% expressed a positive level of confidence. Eleven percent of business respondents stated that they are 'not at all confident' about their ability to relocate their business within the new development, lower than the 21% in 2016. Six percent in 2019 rated their confidence level as 'not very confident' in comparison to 24% in 2016.

There is no obvious pattern of response when confidence levels are analysed by organisation type. However, it can be noted that all of those who are 'not at all confident'; about their chances of relocating within the redevelopment are either independent traders (3 responses), market stallholders (2 responses) or local outlet of a national chain (4 responses).

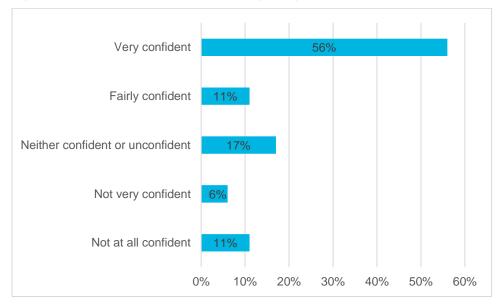


Figure 6-10: Confidence level expressed regarding relocation within new development - Base (84)

Respondents were then asked why they expressed their level of confidence regarding their chances of securing space in the new town centre development. Those that expressed confidence tended to point towards their faith in their business and a belief that their existing tenure at the current site will mean that they are offered space as a priority. This was similar to the 2016 responses.

- 'We have been involved with the relocation plans for the last 3 years and I have been offered a place'
- 'We have 20 years of experience in the area'
- 'I already have been given a relocation'
- 'Everybody around here knows us as the main branch of the business in London and wouldn't want to move out of the elephant and castle'
- 'We are a very popular business and some people say they only come here to the elephant and castle because of us'
- 'I have a regular customer base here'

Those who rated their confidence level as 'not very confident' or 'not at all confident' tended to express concerns with uncertainty on how much space they would be offered.

- 'They have only extended our lease for 6 months and we don't know what the cost will be of the new shop they have allocated us, and it will be very expensive to move our display units are a very popular business and some people say they only come here to the elephant and castle because of us'
- 'We don't know much yet first they offered me a big space then a small one and I'm scared if I upset the developers and complain they will take that away from me, so I just don't know have a regular customer base here'
- 'We will be relocated during the re construction and I think new businesses will come into the area and take our business away'

All business respondents were then asked, if the development progresses, what measures they would find useful to enable them to continue operating their business.

'Business advice' was the most commonly cited measure that business respondents felt would be useful to help them to continue their operation (consisting of 39 respondents when they were asked to choose all options, they would find useful). 'Support with the upfront costs' was the most commonly cited

measure that business respondents felt would be most useful to help them to continue their operation (26 cited this measure as most useful).

In 2016, 'Affordable business space' was the most commonly cited measure that business respondents felt would be useful to help them to continue their operation.

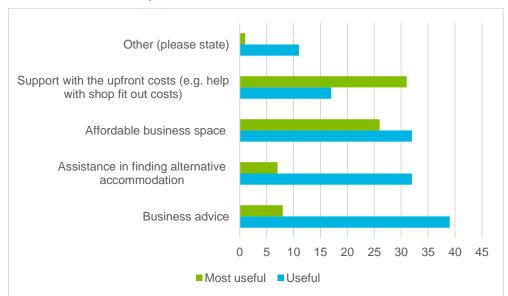


Figure 6-11: Business continuity measures rated as useful

Respondents were asked whether they would like to make any further comments regarding the proposed redevelopment and any potential impact this might have on their business. Several independent traders expressed the financial concerns that they had about moving:

- 'I want to move but expensive to move £350,000 so need help with upfront costs.' -Independent trader
- 'I'm very concerned financially as I've been here 5 yrs. and worried as its very quiet here now.' Independent trader
- 'It's not easy to move as it's an expensive process and up-front costs are very expensive.'
 Independent trader

Market traders expressed that there has been a lack of result from attending consultation meetings:

- 'All the meeting we attend it is not useful for us.' Market stall holder
- 'I always make a complaint about what problem I'm facing but no body come back to me.'
 Market stall holder
- 'We attend so many meetings but there still no result.' Market stall holder
- 'I don't have time to discuss more about this as we already attend too much meetings'-Market stall holder

Some concerns around safety were also mentioned:

- 'Two people were killed recently outside and some of my customers phoned and asked if it was safe to come here as lots of drugs and horrible people in the area and I think this will all change when it's redeveloped.'
- 'Need more security in the new shopping centre recently someone who ate in my restaurant was murdered outside the centre and it was all on the news.'

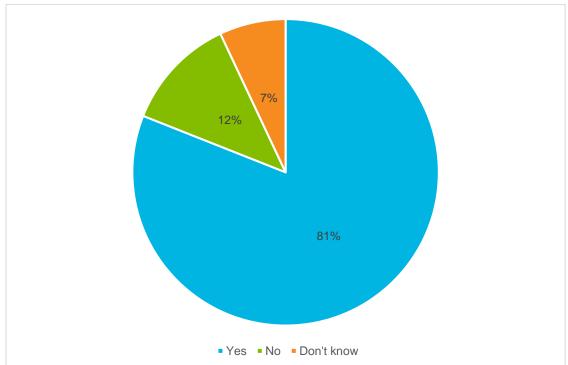
Some business respondents appear frustrated on how long the development is taking.

- When is it going to happen? We just want to know most of the units are empty upstairs now?
- 'They just need to get on with it and make a decision'
- 'They delay day by day which is effect my business even I don't know when I moved from here.'
- 'Its been drawn out too long the whole thing and every passing day things get worse and quieter so if it doesn't happen soon, I may have to close my business '
- 'Just please hurry up and get on with it as customers keep asking us when we are moving and as a pawn brokers, we are holding client's valuables and we are losing business in this particular shop because of the uncertainty amongst our customers'

6.2.10 Participation in consultation activities

All respondents were then asked whether they have participated in any consultation activities organised over the last year by the developers, 81% percent of respondents stated that they have taken part in consultation activities and 12% stated that they had not. In 2016, 27% had taken part in consultation activities and 73% had not.





6.3 On-street survey results

In total **199 on-street interviews** were conducted with users within Elephant and Castle shopping centre and the immediate surrounding market area. In order to understand the demographic breakdown of those using the site, all respondents were asked where they live. Forty seven percent stated that they reside in the London Borough of Southwark.. However, in the 2016 survey the proportion was 70%.

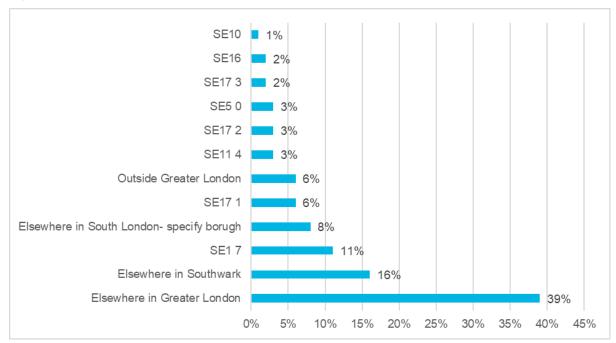


Figure 6-13: Respondent postcode/area – Base (199)

The sample consists of an almost even spread of male and female respondents, with 51% males and 49% females.

The age breakdown of the sample group indicates that people from a range of ages use Elephant and Castle shopping centre to some degree.

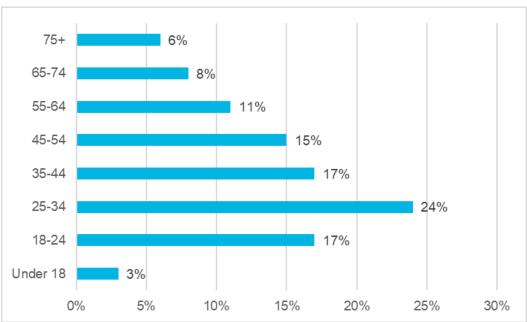


Figure 6-14: Age breakdown of sample group- Base (198)

In order to understand more about the types of people using Elephant and Castle shopping centre all respondents were asked whether they consider themselves to have a disability. Eighteen people (10%) of those interviewed stated that they do.

Similarly, in order to understand more about the profile of those using Elephant and Castle shopping centre all respondents were asked what their ethnicity is. As shown in Figure 6-14 the ethnic make-up of centre users is varied. Those from White backgrounds make up 28% of the sample group. In 2016, those from White backgrounds made up 47% of the sample group.

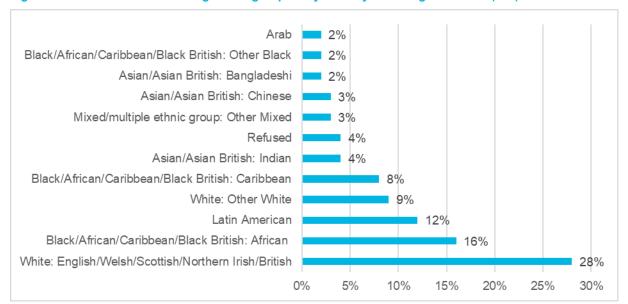


Figure 6-15: Which of the following ethnic groups do you feel you belong to? - Base (199)

Figure 6-16 shows that 41% of those interviewed class themselves as Christian, whilst 35% of respondents stated that they have no religion.

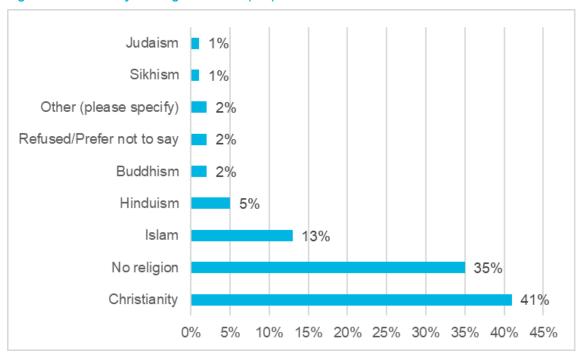


Figure 6-16: What is your religion? - Base (199)

Respondents were also asked how they usually travel to Elephant and Castle shopping centre. Those that use more than one mode were asked to select the one they use for the longest duration on their

journey. Modal choices reflect the local nature of the respondent group. As shown in Figure 6-17, the most used modes were bus (39% of respondents use this) and walking (21% of respondents travel there on foot). Unsurprisingly London Underground and Rail use is highest amongst those who live elsewhere in or outside Greater London.

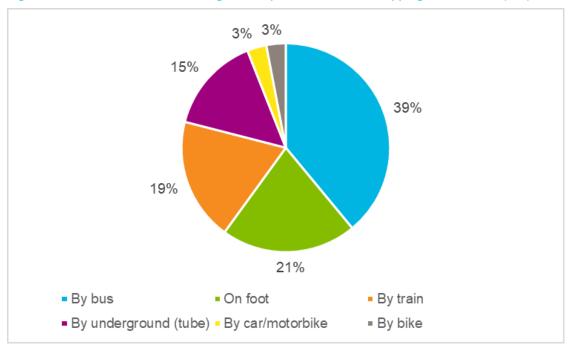


Figure 6-17: Modes of travel used to get to Elephant and Castle shopping centre- Base (199)

Respondents were asked what the main purpose of their visit to Elephant and Castle was on the day they were interviewed. The most commonly cited purpose was shopping in the centre itself which is less than half of the response in 2016. (Table 6-13).

Table 6-13: Purpose of visit to Elephant and Castle - Base (502)

Purpose of visit	2016 %	2019 %
Shopping within the centre	67%	33%
I work in the centre (including Hannibal House)	6%	2%
Meet friends	5%	20%
To access the train station	5%	13%
Eat at a restaurant / café /take-away	4%	14%
Shopping at the market	4%	5%
Visit hairdresser / other service	3%	4%
Bingo	1%	0%
I attend the London College of Communication	1%	4%
Bowling	1%	0%
Other	5%	8%
Base:	502	199

All respondents were asked how often they visit Elephant and Castle shopping centre. Sixty five percent of respondents visit the centre at least once a week and 16% visit it on five or more days a week.

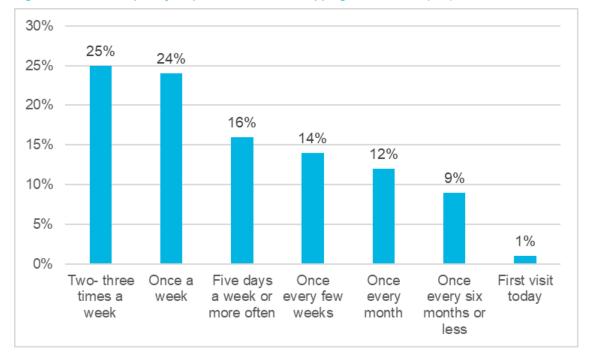


Figure 6-18: Visit frequency Elephant and Castle shopping centre- Base (199)

Elephant and Castle is rated most positively by customers on the attribute of 'location/ease of getting here', with 91% rating it as 'good' or 'very good' on this attribute. This is greater than the 73% rating of this attribute in 2016. Elephant and Castle is also rated well on 'affordability of goods and services' with 85% rating it as 'good' or 'very good' on this attribute, greater than the 74% rating in 2016.

There is little significant difference in the overall ratings of Elephant and Castle when we analyse the response by age. However, those aged 65 years and over rate Elephant and Castle more positively than those aged 64 years and under on the attribute 'general feeling of being welcome/safe': 69% of those over 65 rated it 'good or very good' vs. 63% of those under 65.

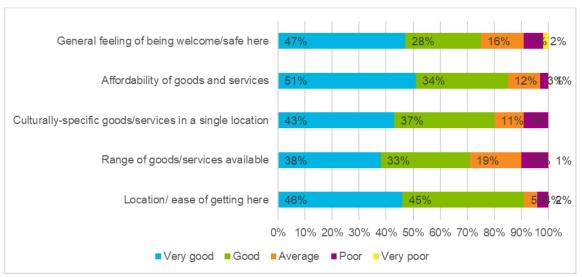


Figure 6-19: Rating of Elephant and Castle on various attributes (ranked on 'very good' rating)

Fifty five percent of respondents were aware of the redevelopment in comparison to 52% in 2016. Those aged over 65 are significantly more likely to be aware of the proposed redevelopment, 81% of this group were aware vs. 50% of those aged 64 and under. Non-White respondents were less likely to be aware of the redevelopment of the site (52% vs. 63% awareness amongst white respondent group).

Fifteen percent of respondents stated that they 'strongly support' the redevelopment, and a further 27% 'support' the plan. This is less than in 2016 where 26% strongly supported the plan and a further 42% supported the plan. 14% of respondents oppose the planned redevelopment compared to 6% in 2016. There are no significant differences in level of support for redevelopment proposals within break age and ethnicity breaks.

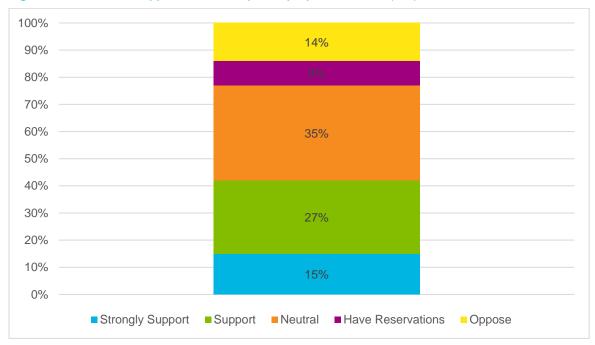


Figure 6-20: Extent of support of redevelopment proposals – Base (199)

Respondents were then asked to expand on why they support, oppose, or have no particular feelings towards the redevelopment of Elephant and Castle shopping centre. Analysis of reasons given by those who 'strongly support' or 'support' the redevelopment shows that while 'in need of modernisation and improvement' (61% of responses). Other popular responses were focussed on the need for more shops and that it would be good for local people.

Those with reservations about the redevelopment expressed concern about where the shops will go, and they hope that it supports local communities and provides opportunities for businesses already here. One individual stated 'Thought it was going to be knocked down. I'm disabled so it's not an easy place to access. I only come to one place here'.

Reasons for respondents that stated that they oppose the redevelopment of Elephant and Castle shopping centre were concerned about local people being pushed out and liking it the way it is. Two respondents expressed concern for old people in that a lot of pensioners will find it hard and it is a meeting place for old people. Other concerns included history being erased and getting rid of local culture.

All respondents were then asked what the impacts will be on the local community in Elephant and Castle, and 47% of responses were from respondents who either supported or strongly supported the redevelopment. The majority of these felt that there will be a positive impact on the local community due to the creation of jobs, and a greater investment and attraction in the area. Twenty percent of responses were from respondents who opposed the redevelopment. These respondents considered that there might be a negative impact on the local community due to an increase in pollution, traffic on road, nothing for older people, and a loss of business.

Forty four percent of non-White respondents and 40% of White respondents either support or strongly support the redevelopment. Twelve percent of non-White respondents and 13% of White respondents opposed the redevelopment suggesting there is little variation between ethnic groups.

All respondents were asked to select what facilities they use within the shopping centre and then asked whether they have any concerns about the impact of the new development might be on the services they use. Seventeen percent of those who use the market stalls are concerned about the impact of a

new development on them, as are 15% who use budget shops and 11% who use restaurants or cafes. A fifth (22%) of those who use community services or charities are concerned about the impact up on them (Table 6-14).

Table 6-14: Services used and perceived concern regarding potential impact of redevelopment- Base size per facilities shown in table

Facilities used:	Base:	% concerned about impact
Market stalls	57	17%
Budget shops	61	15%
Restaurants or cafes	96	11%
Food shops (cultural foods)	36	8%
Clothes shops	49	6%
Culturally-specific shops or services	15	6%
Food shops (supermarkets)	192	6%
Community services/charities	16	5%
Other	10	2%

Respondents that expressed a level of concern regarding the impact of the redevelopment on the facility or facilities they use were asked why this was the case. Concerns include it becoming less affordable, losing community feel, and that they won't be accommodated.

Respondents were then asked what they felt the main effects would be of the proposed plans to develop a new town centre at Elephant & Castle on the local community.

There were fewer respondents which indicated that the new town centre would have a positive impact on the local community which included more visitors, jobs, and shops. Negative sentiments included concern about the cultural implications, gentrification, and people being pushed out. There are no significant differences in the response of White and non-White respondents.

All respondents were then asked what retail and leisure facilities they would like to see should the redevelopment go ahead. 'Keep it the same way/what is there now' was the most cited response (Table 6-15). Twenty three percent cited they wanted 'Other' services which included: art galleries and film spaces, cinema, food court, pop up gallery spaces, bowling, candy shop, sports shop, library, and more entertainment places.

Table 6-15: what type of retail or leisure services would you like to see incorporated in new development (multiple response)

Retail/leisure services in new development	%
Keep it the same/ what is there now	47%
Other	23%
Cafes and restaurants	21%
Food shops (supermarkets)	19%
Food shops (cultural foods)	19%
High street shops/branded chain stores	18%
Cultural facilities	14%
Market style- retail	14%
Service retail	10%
Small-scale convenience stores	8%
Department stores	7%

7 Assessment of Equality Impacts

7.1 Introduction

The appraisal considers the potential impacts on affected people sharing protected characteristics arising from the redevelopment of the Elephant and Castle shopping centre Area. The assessment addresses impacts in relation to the key themes of business, employment, housing, communities and engagement.

7.2 Business

Shops and businesses affected by the closure of the shopping centre may experience financial and other adverse effects of relocation or closure. Equality effects may be experienced where the pattern of affected business owners or employees affects a single race, or other patterns in terms of protected characteristics, including effects of changes to clustering of businesses offering services to a common customer set.

A diverse range of business types operate within the shopping centre and the arches. Forty percent of those interviewed were independent shops/businesses, and a slightly lower number were local outlets of a national chain. The vast majority of business owners (98%) interviewed are from BAME groups.

Around 30% of all businesses surveyed agreed that their business serves the needs of those with a shared ethnic background. Responses from specific BAME business owners and managers however indicate that this is much higher. In particular, 63% of Latin American business owners, 77% of Black/Black British and 77% of Black African and Caribbean business owners 'agreed' or 'strongly agreed' that their business served the needs of those with a shared ethnic background.

The business survey found that 91% of respondents plan to relocate their business within Elephant and Castle area. This is an increase from the 64% of respondents who planned to relocate their business within Elephant and Castle in 2016. Only 2% of respondents stated that they would close their business, lower than the 11% who planned to close their business in 2016.

Most business respondents (67%) expressed a positive level of confidence as to whether they would be able to relocate within the planned new town centre or the immediate area. This has increased since 2016 when only 34% expressed a positive level of confidence. Furthermore, 17% of respondents stated that they are not confident about their ability to relocate their business within the new development, much lower than the 55% who responded this way in 2016.

Analysis by ethnic group showed a more positive outlook in terms of confidence of relocation in or near the site across all BAME groups when compared to the 2016 survey. The main reasons for level of confidence including having a strong customer base and having agreed a new location for their business. This demonstrates the positive impact that engagement activities over the past three years have had in terms of resolving issues around relocation of businesses.

A range of Developer obligations have been agreed as part of the s106 agreement with respect to affordable retail space. These include:

- A Local Business Support and Relocation Strategy.
- An Independent Business Advisor (Tree Shepherd) has been appointed to support all independent businesses within the planning application boundary, including those in the shopping centre, the market, the railway arches and kiosks located on New Kent Road. Tree Shepherd has been based in one of the shopping centre units since August 2017. The scope of services which it provides include producing information packs in English and Spanish, holding information and business workshops, making door-to-door visits, conducting business health checks, and managing the relocation database which provide details of commercial property available for rent in the area.
- A database of relocation opportunities has been created by the Developer and is available to businesses via Tree Shepherd. The database includes details on vacant retail units in the opportunity area, affordable retail units being delivered through other development sites, and market stall opportunities including in the new market square to the East of the site and in East Street Market. The database differentiates between affordable and market retail units and is

available to all existing businesses within the planning application boundary. The database would detail the eligibility criteria for affordable retail coming forward as part of other developments, as set out in their respective s106 agreements. Tree Shepherd provide or arrange for support for those who do not speak English as their first language. The Council would seek to use its role under the s106 agreement to coordinate the marketing and selection of tenants for the affordable retail units on nearby developments with the relocation of businesses from the site. The database would be available 6 months prior to demolition of the shopping centre, until one year after its demolition.

- Relocation fund to support business with legal and financial costs, costs of relocation and fit-out, and any other appropriate costs.
- The planning agreement guarantees that 10% of the retail in the new shopping centre will be
 affordable, and any independent business currently trading there who is displaced the
 development will have first right to apply for one of those affordable units. The provision of this
 space on-site would enable businesses to cluster, which is something which has been raised during
 public consultation.
- The development of temporary retail units at Castle Square, subject to planning permission. These are being built by Delancey and required by the Council to provide additional, temporary space for traders during the redevelopment of the town centre.
- A vision for Pastor Street to become a cluster for affordable retail provision.

Extra space is being provided by the Council either directly or from planning agreements in the local area for independent traders from the shopping centre site. These locations are being built to offer additional space on top of what is available on local high streets. However, they do not provide enough space on their own for every trader to move there.

- Retail units at the base of Perronet House. These have been built by Southwark Council to create additional affordable space and help maintain a local retail offer after the shopping centre closes. The total size of the scheme is 550m².
- Retail units at Elephant One. These were provided under the planning permission for this development and have been held in reserve by Delancey for shopping centre traders. The Total size of the scheme is 517m².
- New retail units are being constructed across Elephant Park which are being released in phases as the blocks are constructed. The first units are being opened on Walworth Road and a new independent shopping street called Sayer Street which connects Castle Square to Walworth Square. Later units will be opened along New Kent Road and alongside the new park. Ten percent of the overall mix of retail units across Elephant Park will be offered as affordable units. Traders have the option of a discounted rent (40% discount over the first 5 years) or a grant towards the fit out of the new unit.

In addition, there's a regularly updated database of properties available for nearby locations such as Walworth Road and East Street. Traders are also free to relocate outside of these areas, and this will not affect their access to business planning support or the relocation fund. All traders will also have the option to apply as a priority to the rebuilt shopping centre on affordable rents.

In order to help with financial costs associated with decline in business due to the shopping centre closure, businesses will be given 50% off rent in closing months.

Southwark Council has a dedicated markets team which is supporting market traders at Elephant and Castle. Following group presentations, tailored one-to-one discussion was identified as the preferred form of engagement by all. The Council has encouraged traders to contact the market teams, with the help of Tree Shepherd if required to discuss which opportunities might work for them. Pitches are available in the major Southwark markets in areas with growing populations and footfall including East Street, the Blue Bermondsey, several street markets in Peckham, and Deal Porter Square at Canada Water. In addition, the Council has good links with neighbouring and other London boroughs who have offered available pitches and can discuss opportunities outside of Southwark.

Although, there is not space at specific location to relocate all businesses and as such recreating the current cluster of businesses it is considered that the above mitigation contributes to resolving many of potential adverse equality impacts of the redevelopment. The businesses are provided with advice and

support through Tree Shepherd, funds for relocation assistance, temporary and permanent affordable retail options (including 10% on-site). The level of confidence and support amongst business owners has increased since first surveyed in 2016 with only 2% stating that they would close their business.

New affordable workspace in the West site will also provide an opportunity for SMEs and new start-ups to locate in the new development. This is a benefit that can be shared by groups with protected characteristics.

7.3 **Employment**

Employees and self-employed workers at affected businesses and organisations may experience temporary or permanent loss of income and/or employment until relocated and/or where employer closes, downsizes, or relocates elsewhere. Equality effects may be experienced where the pattern of effected employees affects a single race disproportionally or have other protected characteristics which make them more sensitive than others to the effects of the redevelopment.

The primary research with businesses showed that 77% of employees are from BAME groups with majority of these from Asian/Asian British background followed by Latin American employees. It is envisaged that those employees working for businesses relocating within the Elephant and Castle area should be able to retain employment with their current employer but there remains a risk that some employees may lose their jobs because of the redevelopment.

However, the redevelopment brings with it the opportunity for new employment and associated training. The groups who benefit from this new employment may vary considerably depending on the type of business and training e.g. young people may benefit through part-time employment for students. Equality effects may arise where training or employment is not available to groups with protected characteristics, for example if jobs require high skill/education levels which make it harder for some groups to access the opportunities.

There is an estimated creation of 1,230 construction jobs over the approximate 10-year construction period. As stated, clauses would be included in the s106 agreement to secure jobs, training, and construction industry apprenticeships for unemployed Southwark residents. It is recommended that this includes measures to ensure that residents sharing protected characteristics can fully share in these opportunities. These measures include:

- Skills and Employment Plan identifying sustainable employment opportunities for unemployed Southwark residents in the end use of the development. (s106, Schedule 2, part 4).
- The appointment of a Construction Workplace Co-ordinator with responsibilities for:
 - Liaising with Jobcentre Plus services within the Borough, employment services providers including Southwark Works, The Southwark Construction Skills Centre, the voluntary and community sector, training providers and careers service providers;
 - Provide training for unemployed Southwark residents in pre-employment skills and basic construction skills; and
 - To recruit Construction Industry Apprenticeships.
- Local procurement targets to ensure that reasonable endeavours are made to procure local businesses for construction of the redevelopment.

The loss of employment on site remains a risk for current employees particularly those from businesses who are a greater risk of closure. BAME employees are currently over-represented on site and therefore may be disproportionately adversely impacted. The redevelopment will create jobs through construction and in the end use of the development, and a series of s106 commitments are in place to ensure that local and unemployed people can benefit from these opportunities. Further benefits can be ensured through adding requirements for contractors to be part of nationally recognised schemes such as Disability Confident as well as ensuring training such as Fairness, Inclusion and Respect training is provided to all employees.

7.4 Housing

The redevelopment includes provision for 979 new homes across the West and East sites. Groups with high needs for access to housing and high representation amongst the local population include BAME groups, women, families with children, and young people. These groups particularly stand to benefit from new housing associated with the redevelopment, except where affordability barriers limit these opportunities.

The development would result in the provision of 330 affordable housing units including 116 social rent units, 53 London Living Rent homes, and 161 discounted market rent homes.

The proportion of social rent properties and affordable homes is referred to in the 'Affordable housing' section of the Final Planning Committee Report. The Viability Review section recognises that the affordable housing has a non-compliant split and therefore a viability review is required. This will be to ensure that in the future if the target rate of return is exceeded, an improved tenure split can be achieved in order to be more compliant if not fully compliant with the policy (that 50% of affordable housing should be for social rent).

Paragraph 415 in the Planning Committee Report states that "Notwithstanding the extent to which the affordable housing provision is contrary to some elements of the development plan notably the Core Strategy, officers are satisfied that the provision, as revised, is the maximum reasonable and that it is in overall conformity with the development plan taking account of scheme viability."

The homes for social rent include 28 three-bedroom properties than will be suitable for families. Additional child play space is being provided on the East site and the Developer is required to provide funding.

As part of the new housing, 10% will be new housing that provides wheelchair parking and provision for mobility scooters.

The new additional housing in the area (including affordable housing) is likely to benefit the local community, including BAME Groups (Black African, African Caribbean, Latin American and Asian), single-parent households, children in low-income families and people with disabilities (including wheelchair users) who should also be able to share in the benefit of new housing provision on site.

7.5 Community

7.5.1 Shops, goods, and services

The loss of existing shops, market stalls and business premises providing the current mix of goods, services and facilities at the site will affect users of these services. Equality effects may be experienced where there are patterns in terms of affected customers and their having protected characteristics. The redevelopment will bring a different mix of goods, services, and facilities at the site, with the potential for a mix of positive and negative effects for groups, possibly patterned in relation to protected characteristics. The effects may include changes to access to culturally-specific goods and services, associated sense of belonging, and cultural connections.

The Shopping Centre comprises a range of culturally diverse shops that provide convenience goods and services that cater to a range of BAME groups, in addition to serving the general public. As described in above, the redevelopment will result in the displacement of BAME owned businesses, who comprise most of the SME businesses currently operating in the centre. The business survey response indicates that BAME businesses, and in particular Asian, Black African/Caribbean and Latin American businesses, provide goods or services that serve the needs of people from a shared ethnic background. Responses to the business survey also highlight the challenges that independent shops and market stalls will face to retain their existing customer base should they be required to moved outside of Elephant and Castle. This is particularly for businesses that have enjoyed a long tenure at their current location and are more reliant on repeat customers for business viability.

The on-street survey results suggest that Asian/Asian British customers are most likely to use culturally specific shops or services in the centre and at the market. Similarly, Asian/Asian British and Black African and Caribbean customers are more likely to use culturally specific food shops. Latin American customers also currently feel well catered to with regard to culturally specific goods and services in the

existing Shopping Centre. These findings suggest that the redevelopment may potentially impact on BAME groups who benefit from the provision of specialist goods and services in the centre. However, the local area has a diverse mix of shops that provide a wide range of similar goods and services within easy walking distance. The redeveloped shopping centre site will also provide easy walking access to shopping along Walworth Road.

The area's redevelopment will result in an overall increase of commercial retail floor space by 3,102m². On the basis that many existing businesses will have to relocate to different sites in the area there is risk that some BAME-owned businesses that provide convenience goods and services may cease to operate as a result of the redevelopment. The site as a hub for BAME goods, services and cultural activities risks becoming lost in its current location. This could potentially have negative equality effects on the local BAME community, in terms of access to culturally specific services at the redeveloped site and on community cohesion, and sense of place. Support from customers interviewed in the shopping centre has decreased since 2016, with only 42% of respondents strongly supporting the proposals compared to 67% previously. One of the main reasons provide for lack of support was associated with concerns about what will happen to businesses currently in the shopping centre.

To minimise the risk to businesses and their customers, the Developer has produced the 'Follow the Herd' campaign including a website directory²⁵ of independent businesses within Elephant and Castle area. It is recommended that this website continues to be maintained providing details of new locations of these businesses after the closure of the shopping centre. Information should also be provided in printed format so that is accessible to older customers and those who do not have access to the internet, as well as alternative language versions if requested. Promotion of the website and campaign should be escalated during the 6-month period up to closure of the centre.

7.5.2 New leisure, educational and community facilities

Most people living in the opportunity area and the wider Southwark area are likely to benefit from access to new shopping and other facilities. The extent to which these benefits are shared between those with protected characteristics and others will depend on the type of goods and services offered. For instance, the new shopping and other facilities may be of a different mix than currently provided meaning that access to culturally-specific goods and services, associated sense of belonging and cultural connections could be more difficult for groups with protected characteristics to access.

The redevelopment proposes to replace the existing shopping centre with a new town centre, which will include additional restaurant and leisure opportunities and a new university campus for London College of Communication with exhibition and cultural space for general community use. This will benefit the wider local community who will have access to these new facilities, although it is less certain the extent to which BAME, and in particular, Latin American, businesses or their customers will benefit from these changes. Although the proposed redevelopment will provide cultural benefits for different groups, there is a risk that it may also result in the loss of existing culturally specific businesses which may limit benefits for the local BAME community. On the other hand, the new mix of businesses as well as the provision on-site for affordable retails may attract a more diverse range of shops with the capacity to appeal to the diverse local community as well as others visiting the shopping centre and wider Opportunity Area.

The redevelopment includes a new campus for the London College of Communication at the heart of the town centre including the transfer of UAL's core university services to the site. This will create an additional 500 jobs in the area. Plans are also being developed for the archive collections to be made available to the public and for exhibition and cultural space at the college being available for general community use. The new campus may be particularly beneficial to young people as well as BAME people in terms of education, learning and employment opportunities. Other benefits of the new college campus are likely to be widely shared in the Southwark/London area and may provide benefits to groups with protected characteristics, including in relation to cultural identity. The new building would be closer to both tube stations making it more accessible for students, staff, and visitors.

An increased night-time economy associated with the redevelopment may particularly benefit young people through employment and leisure opportunities. Equality effects may be experienced where there

²⁵ https://www.theherdse1.com/

are patterns in terms of affected residents and their having protected characteristics. For example, an increased night-time economy may decrease feeling of safety for older residents.

As part of the s106 agreement the Developer has agreed that first refusal will also be given to a bingo operator to take a portion of the leisure space in the new town centre. This will help to provide a community and leisure facility for older people including those from BAME groups, replacing the now closed bingo hall on-site.

7.5.3 Improved open space

The improved open space of the proposed redevelopment is likely to bring improvements in feelings of safety, actual safety, and security, inclusive access, and access to open space. Disabled people are likely to particularly benefit from inclusive access improvements, enabling them to share the physical and mental health benefits of the overall redevelopment. Other groups may also particularly benefit from access, safety, and security improvements, in relation to needs and priorities associated with their protected characteristics.

7.5.4 Improved connectivity and accessibility

Most people living in the opportunity area and the wider Southwark area are likely to benefit from improved connectivity and accessibility associated with the redevelopment. Improvements are being made to rail, underground, and road stations/routes allowing quicker and easier access to and from other areas of Southwark and London. Additionally, the underground pedestrian road crossings have been replaced with more direct over ground crossings. This will improve feelings of safety, actual safety, and security and inclusive access. Most groups should benefit but particularly older and disabled people.

A new Northern Line entrance, escalators and ticket hall will improve accessibility and address safety concerns identified by TfL.

Increased sustainable travel as a result of the implementation of the sustainable travel patterns commitment. This would include improved pedestrian permeability and increased site wide cycle facilities and public realm improvements.

The scheme will deliver an additional 60 cycle hire docking points, split between two new locations: one primarily serving the East Site and one the West. As a measure to stimulate use of cycle hire use and contribute to sustainable travel, it is proposed that membership of the cycle hire scheme is secured for each new property for a period of 3 years as part of the 'welcome package'. This will be secured via the s106 agreement.

The redevelopment is also expected to result in improvements to the accessibility of the public realm, streetscape, and safety through:

- Improvements in the Underground station, making access and egress to platforms faster;
- Linking the new centre to the Elephant and Castle mainline station more efficiently, improving transport accessibility;
- Creating a new public square in the heart of the town centre, improving the pedestrian environment, and creating a place of social exchange; and
- Connecting streets to the north and south of the new development on the Elephant Park and those to the East and West by the railway viaduct, shopping centre and Elephant Road, improving overall accessibility and helping to encourage walking and cycling in the area.

These improvements will particularly benefit older people, disabled people, young people, women, and children.

7.5.5 Access, safety and security during demolition and construction

The Environmental Impact Assessment (EIA) identifies minor adverse effects during the demolition and construction phases. These include the following temporary effects:

 New access roads from the site would lead to increased traffic flows arising from demolition and construction related traffic onto and off the site.

- There would be a local increase in disturbance of pedestrian and cycle routes during the demolition and construction with effects of minor significance.
- There would be a minor effect on public transport users as a result of the demolition and construction phases causing temporary effects to local routes.
- As a result of construction and demolition, under a worst-case scenario there would be moderate, temporary increases in noise at adjacent sensitive receptors at Oswin Street and Metropolitan Tabernacle.

The Environmental Statement (ES) also considers that some parts of the site could be occupied whilst others are being constructed. Demolition and construction environmental management plans have been secured through the s106 agreement to mitigate against impacts. It is recommended that the plans provide a focus on the needs to local residents and visitors to the area with protected characteristics. This includes those who are most likely to be sensitive to accessibility, safety and security impacts of construction including older people, people with disabilities, women, pregnant women, BAME groups and young people.

7.5.6 Noise increases during construction

The Environmental Impact Assessment identified as a result of construction and demolition, under a worst-case scenario there would be moderate, temporary increases in noise at adjacent sensitive receptors at Oswin Street and Metropolitan Tabernacle. The ES also considers that some parts of the site could be occupied whilst others are being constructed. A full construction management plan is being secured through the s106 agreement. With mitigation in place the ES predicts that the impact of noise arising from construction and demolition activities would be insignificant to local, temporary, adverse and of moderate significance.

Further work has been undertaken to consider how demolishing the existing shopping centre would impact on how noise from Corsica Studios is experienced by neighbouring residential properties. The shopping centre currently acts as a shield and removing it could result in neighbouring properties experiencing greater levels of noise from the venue, even though the noise levels themselves would not have increased. An s106 financial contribution includes provision for sound proofing of Corsica Studios.

Construction and other noise associated with the development may have a differential impact on groups with protected characteristics who are more sensitive to increase in noise level. This includes children, older people and people with autism. The s106 agreement contains an obligation for the Developer to produce demolition and construction environmental management plans for each site prior to the demolition stage. It is recommended that considers the demographics of neighbouring residents with respect to appropriate noise mitigation.

7.5.7 Community cohesion

The redevelopment includes provision for improving access to and quality of public space, including seating, shelter from the road, and access to amenities. This is likely to increase community cohesion foster a sense of place and other benefits. Most people will share this benefit. However, consideration must be given to potential barriers to accessing this for groups with protected characteristics, such as access provision for older people and disabled people. Additionally, the mix of type and usage of shops, businesses, and facilities on offer, as well as public space will differ from what currently exists. For instance, BAME people who work or shop at the market may experience a loss of community cohesion where the cluster of services they use is dispersed or lost.

7.6 Engagement

As highlighted above, the engagement of business owners during the re-development process is a key component to the successful continuation or relocation of businesses. In this context, an issue identified through the survey is that BAME business owners may be less willing or able to engage in the redevelopment process relative to White business owners.

When businesses were asked whether they have participated in any consultation activities organised over the last year by the Developer, 81% percent of respondents stated that they have taken part in

consultation activities and 12% stated that they had not. This is compared to the 27% who had taken part in consultation activities and 73% who had not in 2016.

The trader's panel is the body constituted in the s106 agreement that presents the views and opinions of traders to the developer and the Council. It meets once a month at the shopping centre and has 12 representatives from local traders sitting on the group. It has a right to comment on important processes affecting local businesses, such as relocation.

Throughout the development process community engagement has been carried out and it is recommended that this continue through the process. Equality effects may be experienced during this, in that affected residents with protected characteristics may be under represented. For instance, local young people and BAME people may face barriers to partaking in community engagement processes effectively and therefore be under represented. Conversely, other groups with protected characteristics such as older people may be over represented. As such potential equality effects associated with community engagement should be considered at each stage of the project.

7.7 Summary of potential impacts

Table 7-1 provides a summary of the equality impacts of the proposed redevelopment. This provides an assessment of groups with protected characteristics who are likely to be disproportionately or differentially affected by each of the impacts.

The table also provides an overview of committed mitigation measures in place to minimise adverse impacts as well as activities in place to enhance opportunities resulting from beneficial impacts. High level recommendations are provided for further consideration.

Table 7-1: Summary of equality impacts

Impact (negative)	Affected group(s)	Committed mitigation measures (if any)	Further recommendations (if applicable)
Business			
Potential direct impact of business closure/non-viability of business following the closure of the shopping centre, arches and market.	BAME business owners	Agreements under s106, Schedule 2, part 6 and Schedule 3, part 6 including: Local business support and relocation strategy Relocation fund Relocation database Independent Business Advisor to support businesses within planning application boundary Trader Panel Castle Square – temporary retail space Pastor Street vision for cluster of affordable retail 10% affordable retail space on West site (S106, Schedule 3, part 6) Affordable workspace management plan Additionally, affordable cluster of alternative retail space is available to traders at Elephant One and Perronet House and Elephant Park	 During the period leading up to the closure pf the centre, continue to signpost affected business to Tree Shepherd and other support mechanisms. Continued planned support to help existing businesses find alternative locations or premises. Marketing and advertising advice are likely to provide an important component of this support so that businesses are able to inform existing and new customers of their planned relocation.
Employment			
Potential direct of loss of employment for employees of existing businesses due to site closure and redevelopment	BAME employees including Asian/Asian British, Black/Black British and Latin American	 Skills and Employment Plan identifying sustainable employment opportunities for unemployed Southwark residents in the end use of the development (s106, Schedule 2, part 4) Southwark Works provides additional business support for retraining and helping people into employment. They have been working with local residents and businesses for 14 years and continue to provide support through: professional advice on employment and training, help with CV writing, interview techniques, access to training courses in a range of industries, 	

		advice on money management and helping businesses that are looking to recruit local talent.	
Communities			
Potential adverse impact on customers of existing shops/ businesses at existing site due to site closure and redevelopment	BAME Groups (Black African, African Caribbean and Latin American and Asian)	 Agreements under s106, Schedule 2, part 6 including: 10% affordable retail space on West site (S106) First refusal will also be given to a bingo operator to take a portion of the leisure space in the new town centre. Castle Square – temporary retail space Pastor Street vision for cluster of affordable retail Other alternative retail space available to traders at Elephant One and Perronet House and Castle Square and Elephant Park with the prospect of businesses clustering at these sites. Follow the herd marketing campaign 	Developer to ensure continued operation and promotion of the 'Follow the Herd' campaign and regular updates to track location of businesses in the area. Increased marketing should be undertaken by the Developer to make customers aware of relocation plans to install confidence in the scheme and keep them informed about the new locations of the shops and businesses they visit in the area.
Potential adverse impacts on local community during demolition and construction phase of redevelopment	Groups with protected characteristics who may be more sensitive to safety, security and accessibility construction impacts such as children, older people and people disabilities, pregnant women	Demolition and construction environmental management plan to be submitted 6 months prior to demolition works (s106 Schedules 2 and 3, part 8)	 Specific consideration the needs of groups with protected characteristics within construction management plans (CMPs) including for accessibility, safety and security issues. Key walking routes and crossing points in the area should be maintained or diverted where possible and appropriate security provided where natural surveillance has been limited. We expect the construction management plan to do this.
Potential increase in noise levels for local residents during construction and operational phase of redevelopment	Groups with protected characteristics who may be more sensitive to increases in noise levels including children, older people and people with certain disabilities.	 Demolition and construction environmental management plan to be submitted 6 months prior to demolition works (s106 Schedules 2 and 3, part 8) Contribution for soundproofing of Corsica studios (s106) Committed noise monitoring 	Developer to identify noise sensitive locations. Specific consideration of the needs of groups with protected characteristics who are more sensitive to increases in noise levels should be identified where possible with additional analysis or survey work.
Impact (positive)	Affected group(s)	Committed mitigation measures (if any)	Further recommendations (if applicable)

Business			
Share in benefits of new employment and training opportunities	Unemployed people in the area including young people, BAME groups (who are currently over-represented as employees on the existing site), people with disabilities.	 Agreements under s106, Schedule 2, part 4 including: Construction work-place Co-ordinator to be appointed with responsibilities for local recruitment and training including of unemployed Southwark residents and construction industry apprentices. Skills and Employment Plan identifying sustainable employment opportunities for unemployed Southwark residents in the end use of the development. Local Procurement targets for 10% of construction related activity (S106 Schedule 2, part 5). Employment and Training Plan to ensure local people access jobs in the final scheme. Identify how Sustainable Employment Opportunities will be filled and define key milestones to achieve. Identify skills and training gaps required to gain such Sustained Employment in the End Use of the East Site of the Development, including the need for pre-employment training. Encourage applications from suitable Unemployed Southwark Residents by liaising with the local Jobcentre Plus, employment service providers including Southwark Works, voluntary and community sector, training providers and careers service providers, including the Southwark Education Business Alliance 	
Provision of new wheelchair accessible and adaptable residential properties on site	People with disabilities requiring use a wheelchair	 10% of the housing would meet the M4(3) wheelchair standards 90% of the housing would meet the M4(2) accessible and adaptable standards Mobility scooter parking on site Disabled parking 	
Provision of 330 new affordable homes on site	BAME Groups (Black African, African Caribbean and Latin American and Asian), single- parent households, and children in low-income families, people with	Agreements under s106, Schedule 2, part 2 and Schedule 3, part 2 including: • 35% of new housing will be affordable homes including 116 socially rented on West site • 30-year covenant on homes delivered at market rent • 24% of social rented homes will be 3 bedroom	

	disabilities (including wheelchair users)	commitme to be used	play space provision on East site and Developer nt to a payment in lieu of £62,000 to Southwark Council to build children's play space in the vicinity. Not meeting on site. (s106 schedules 2 and Schedule 3, part 11)	
Communities				
New leisure, educational and community facilities	BAME Groups (Black African, African Caribbean and Latin American and Asian), young people, older people and people with disabilities, religious groups and other groups who may benefit from free community space for events.	of the leison Reasonab community and use of	al will also be given to a bingo operator to take a portion are space in the new town centre. le endeavours made to ensure occupiers provide a space for monthly groups with protected characteristics exhibition space for residents and community groups at an College of Communications.	
Improved public realm and open space	Older people, disabled people, young people, and women and children.		and accessible design principles have been considered ures would be incorporated into the design.	
Improved connectivity and accessibility	Older people, disabled people, young people, and women and children.	Agreemer - Transpor	ts under s106, Schedule 2, part 7 and Schedule 3, part 7 t Works	

8 Recommendations and Conclusion

8.1 Introduction

The results of this EqIA have highlighted several recommendations to strengthen, secure or enhance positive equality impacts and to mitigate for potential negative equality impacts. It also sets out conclusions on the overall impact of the shopping centre redevelopment proposals for equality.

8.2 Recommendations

- During the period leading up until the closure of the shopping centre the Developers and the London Borough of Southwark should continue to signpost existing business owners and employees to Tree Shepherd and other relevant business support and/or training providers to increase their capabilities to effectively respond to the changes resulting from the proposed redevelopment.
- The developer should undertake a baseline study and subsequent on-going monitoring the progression of the planning application, and construction, including equality and diversity monitoring that includes employee numbers.
- During the period leading up until the closure of the shopping centre, continued planned support
 to help existing businesses find alternative locations or premises will be important to ensure that
 businesses' existing customer bases with shared equality characteristics are able to continue to
 access convenience goods and services. Marketing and advertising advice are likely to provide an
 important component of this support so that businesses can inform existing and new customers of
 their planned relocation.
- The developer should, as a matter of priority, publish and regularly update information relating to the potential relocation of businesses on its website and the 'Follow the Herd' website and via the distribution of print versions. This should include information on the timescales for property acquisition; the likely date by which premises will need to be vacated; the likely date around which new units will be allocated; and the phasing of the development). This would help widen awareness amongst affected members of the community of the timescales and procedures involved, and opportunities for them to express their views on the redevelopment and to make their own plans.
- Increased marketing should be undertaken to make customers aware of relocation plans to install
 confidence in the scheme and keep the informed about the new locations of the shops and
 businesses they visit in the area.
- The existing stakeholder engagement work which includes the traders panel, all traders meetings, one to one meetings, and stakeholders consultation events and meetings should continue with all affected groups, including existing shop owners, employees on the site, and other affected business owners and residents in the area up until the closure of the centre. Engagement should take account of the differences in levels of understanding/engagement among the business owners and employees, as well as the implications these can have in terms of creating potential barriers to their take-up of available support and development of their own plans.
- Following the closure of the centre, continued but lighter touch business support should be made available to ensure the traders settle into their new premises for the first year of trading.
- Consideration of specific need and requirements of groups with protected characteristics during
 the construction stage should be included as part of the demolition and construction management
 plans. This should focus on actions to mitigate against noise, access, safety, and security issues
 associated with demolition and construction activities.

8.3 Conclusion

The grant of planning consent enables the redevelopment to commence. This will move the project a step towards realising the identified positive equality effects arising from the planned development. These include:

- 979 new homes, on a site where none currently exist. 36% of these will be affordable, including 116 social rented homes managed by Southwark Council or another registered provider and be offered in priority to people living and working in Southwark.
- A new Northern Line entrance, escalators, and ticket hall with new accessible toilets.
- A new building for London College of Communication and a centre for UAL's core university services, ensuring the leading education establishment which has 16.3% more BAME students than the UK average can remain and expand in the area. It will secure existing jobs in Elephant and Castle as well as relocating UAL staff to the area, alongside a more permeable space for public exhibitions and events.
- Around 18,234m² of retail facilities, financial and professional institutions, cafes, and restaurants and drinking establishments.
- Space for community leisure uses.
- On-site affordable retail and workspace facilities.
- Creation of job opportunities during construction, with 1,230 construction workers per year needed across the ten-year build time and almost 2,000 full-time jobs being provided in the new town centre.
- High quality public realm including new safer pedestrian routes, railway arches and a public square.

People sharing protected characteristics are likely to be able to share in the benefits of the scheme and the Council and Developer can maximise this sharing of benefits through the explicit measures in their approach to future letting of premises and overall site management to encourage equal opportunities.

The s106 agreement sets out a detailed set of obligations on the part of both the Council and the Developer to avoid or minimise negative equality effects. These include conditions for the affordable housing and retail space, local procurement, and employment, transport, and financial contributions. To further help mitigate against potential negative equality impacts, the Council should consider the recommended mitigation measures set out above.

The EqIA also identified positive support for the proposed redevelopment by both customers and the businesses of the shopping centre. Customers have indicated that the shopping centre needs modernisation and improvement and that redevelopment would be generally positive for the local area however, interviews with customers showed that support for the plans has decreased since 2016, with concern around the future for existing businesses. During the period leading up to the closure of the centre, more engagement with communities and promotion of alternative sites is therefore required to raise awareness and minimise impacts of relocation for customers and business. Many of the businesses welcome the proposition to create a new campus for the London College of Communication, new retail space and improved transport links were cited as key benefits of the scheme. The provision of affordable housing was also identified as potentially having a significant benefit to businesses and residents in the area.

However, the scheme will also mean that previously identified potential negative equality effects of the planned development may still arise. This includes the potential closure of BAME owned businesses, loss of employment and changes in access to goods and services for BAME employees and customers. In addition, impacts identified within the Environmental Statement could give rise to negative effects for other groups with shared protected characteristics including children, older people, and people with disabilities.

It is not considered that residual, negative equality effects of the proposed development, will amount to illegal discrimination. However, it is necessary for the committed mitigation in the S106 agreement and other measures adopted by the Council alongside recommendations outlined above to be implemented, enforced, and monitored to help minimise adverse effects and realise the benefits of the redevelopment proposals for groups with shared protected characteristics.

Appendix A – Policy Review

Legislation / Policy / Guidance	Summary/Key Equality Objectives	
Legislation and Guidance		
	The 2010 Equality Act replaced previous anti-discrimination laws with a single act to make the law simpler and to remove inconsistencies. This makes the law easier for people to understand and comply with. The act also strengthened protection in some situations.	
	The act covers nine protected characteristics, which cannot be used as a reason to treat people unfairly. Every person has one or more of the protected characteristics, so the act protects everyone against unfair treatment. The protected characteristics are:	
	• age	
	disability	
	gender reassignment	
	marriage and civil partnership	
	pregnancy and maternity	
	• race	
	religion or belief	
	• sex	
	sexual orientation	
Equality Act 2010 and Public Sector Equality Duty (PSED)	Section 149 of the Equality Act sets out the Public Sector Equality Duty (PSED) to which Southwark Council, as a public body, is subject in carrying out all its functions, including in the exercise of its CPO powers.	
	Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:	
	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;	
	Advance equality of opportunity between people who share a protected characteristic and those who do not; and	
	Foster good relations between people who share a protected characteristic and those who do not.	
	These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:	
	Removing or minimising disadvantages suffered by people due to their protected characteristics;	
	Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and	
	Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.	
	Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this	

Legislation / Policy / Guidance	Summary/Key Equality Objectives
	characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.
Human Rights Act 1998	An Act to give further effect to rights and freedoms guaranteed under the European Convention on Human Rights.
The Essential Guide to the Public Sector Equality Duty (Equality and Human Rights Commission (EHRC), 2014)	Provides an overview of the public sector equality duty (PSED) and explains how public authorities can meet the requirements.
Engagement and the Equality Duty and guide for public authorities (EHRC, 2014)	A guide to the purpose of engagement, how it can be used to comply with the PSED, who public authorities should engage with and when, some methods that can be used, and success factors for engagement.
Meeting the Equality Duty in Policy and Decision-Making England (and non-devolved public authorities in Scotland and Wales) (EHRC, 2014)	Provides advice on the general equality duty for decision and policymaking. Stresses importance of an integrated assessment that is not an add-on at the end.
Involvement and the public	This guide addresses the involvement of people when preparing and publishing a set of equality outcomes, as a closely related activity to evidence gathering.
Involvement and the public sector duty (EHRC, 2016)	The guide states that "the purpose of involvement is to enable equality groups and communities to contribute to the preparation of a set of equality outcomes". This involvement is "likely to make the biggest difference in tackling inequality within [an] organisation's sphere of influence."
	Provides the reasons for and purpose of the impact assessment of policies and practices, and advises on how to do this.
	Policy considerations regarding the elimination of discrimination include whether it may result in less favourable treatment for a particular group, if it may give rise to indirect discrimination or unlawful harassment or victimisation and whether it builds in reasonable adjustments where necessary.
Assessing impact and the public sector duty (EHRC, 2016)	When determining if a policy advances equality of opportunity, considerations include how it will remove or minimise disadvantage, if it meets the needs of different groups, if it encourages increased participation of particular groups, and if it takes account of disabled people's impairments.
	When determining how a policy will affect good relations, considerations include whether it will help to tackle discrimination and promote understanding.
	An informed judgement at the end of this process can take four main steps:
	Option 1: No major change;
	Option 2: Adjust the policy;
	Option 3: Continue the policy;
	Option 4: Stop and remove the policy.
Mainstreaming the equality duty (EHRC, 2016)	Mainstreaming relates to integrating equality into the day-to-day working of an authority. This report provides advice on how an authority can mainstream the equality duty.

Legislation / Policy / Guidance Summary/Key Equality Objectives Equality Act 2010: Public Sector Equality Duty What Do I A quick start guide on the PSED for public sector organisations. **Need To Know? A Quick Start** Includes ensuring knowledge, timeliness, consideration of the aims of the **Guide for Public Sector** Equality Duty, sufficient information, no delegation and review. **Organisations** (Government **Equalities Office, 2011) National Planning Framework (and other relevant documents)** The National Planning Policy Framework (NPPF) was adopted in July 2018 and updated with minor revisions in February 2019. It consolidates the Government's economic, environmental and social planning policies for England into a single document and describes how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the Government's development aims. While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system: The economic role contributes to building "a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure"; The social role supports strong, vibrant and healthy communities by "providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-**National Planning Policy** being"; and **Framework** The environmental role contributes to protecting and enhancing the (NPPF) (2019) "natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy". The NPPF identifies key principles that local planning authorities should ensure that they consider, including: Local strategies to improve health, social and cultural wellbeing for The delivery of sufficient community and cultural facilities and services to meet local needs; The requirement to plan for the needs of different groups within communities. In Chapter 8, the NPPF outlines how planning policy should help promote healthy communities by taking a positive and collaborative approach to enable development to be brought forward. The NPPF emphasises that planning policies and decisions should aim to create places which offer:

opportunities for social interaction and meetings between members of the community through the delivery of mixed-use developments, strong neighbourhood centres and active street frontages; safe and accessible environments which include social, recreational and cultural facilities and services the community needs; a sufficient choice of school places to meet

Legislation / Policy / Guidance	Summary/Key Equality Objectives
	the needs of existing and new communities; and access to high quality open spaces and opportunities for sport and recreation.
	Additional, recent NPPG has been taken into consideration during the preparation of this report, including:
	Guidance on promoting healthy and safe communities
	Housing and economic needs assessment
	Housing needs of different groups
National Planning Practice Guidance	Housing for older and disabled people
(NPPG) (updated 2019)	Housing supply and delivery
(M 1 0) (apatica 2010)	Natural environment
	Neighbourhood planning
	Noise
	Open space, sports and recreation facilities, public rights of way and local green space
	Argues that in order to ensure a socially sustainable transport future, a people-centric approach to understanding transport accessibility and inclusion must be developed.
Euturo of mobility, inoqualities	Accessibility through inadequate transport provision is a problem in the UK in regards to accessing jobs, learning, healthcare, food, shopping and leisure. This can also create social isolation. Mobility and accessibility inequalities are highly correlated with social disadvantage.
Future of mobility: inequalities in mobility and access in the UK (Government Office for Science, 2019)	Effects from road traffic can also lead to reduced quality of life, through pedestrian causalities / fatalities, and air and noise pollution. Low income households and other vulnerable population groups, such as children, the elderly, people with mental disabilities or long-term illnesses, are more exposed to these effects.
	Land-use and public service planning have more of an influence on the provision of transport services compared to the transport system. However, the lack of private vehicle access in low-income households and limited public services in peripheral social housing estates, exacerbates the problem. Policies must therefore recognise the social value of transport.
	Through an analysis of transport patterns in the UK, it is demonstrated that these contribute to "substantial and persistent inequalities." Whilst some people benefit from accessibility, others are held back by inaccessibility. This latter group with the worst access opportunities are also more likely to suffer from the ill-effects of other people's travel.
Fairness in a car-dependent society (Sustainable Development Commission, 2011)	A sustainable transport hierarchy is recommended for the Government and Devolved Administrations to adopt as a transport decision-making tool. Each step in the hierarchy is only progressed once all actions in the former have been taken. This moves from demand reduction for powered transport (best); to modal shift to more sustainable and space efficient modes; to efficiency improvements of existing modes; to capacity increases for powered transport (worst).
	It is also recommended that inequalities are addressed through improving the handling of social and distributional impacts in transport decision-making and appraisal and that reducing transport inequalities should be a specific goal of transport policy.

Legislation / Policy / Guidance	Summary/Key Equality Objectives
	'Fair Society Healthy Lives', was published in February 2010, and concluded that reducing health inequalities would require action on six policy objectives:
	Give every child the best start in life
Fair Society Healthy Lives (The Marmot Review) (2010)	Enable all children, young people and adults to maximise their capabilities and have control over their lives
	Create fair employment and good work for all
	Ensure healthy standard of living for all
	Create and develop healthy and sustainable places and communities
	Strengthen the role and impact of ill-health prevention.
London-wide Policy and Plans	
	The London Plan was adopted with minor alterations in March 2016. The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within the city. The London Plan policies were subject to Equalities Impact Assessment (EqIA) as part of an integrated Impact Assessment (IIA).
	A number of policies outlined in the Plan are relevant to the proposed regeneration, including tackling deprivation, promoting equality and enabling different groups to share in the benefits of development, specifically:
London Plan (2016)	Policy 2.9 Inner London Strategic planning requires that boroughs and other stakeholders should work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting there.
	Policy 3.1 'Ensuring Equal Life Chances for All' requires that development proposals should protect and enhance facilities that meet the needs of particular groups and communities. The plan does not support proposals involving loss of these facilities without adequate justification or provision for replacement.
	Policy 3.2 'Improving Health and Addressing Health Inequalities' is also relevant, requiring due regard to the impact of development proposals on health inequalities in London.
	Policies 3.17 – 3.19 concern the provision of social infrastructure, including health and social care, education, sports and recreation facilities.
	 Housing policies 3.3 – 3.16 concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities. Policy 3.8 'Housing choice' requires ninety percent of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings', and ten per cent of new housing to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. Designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

Legislation / Policy / Guidance	Summary/Key Equality Objectives	
	 Policy 4.12 Improving Opportunities for all requires that Strategic development proposals should support local employment, skills development and training opportunities. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, with Londoners from Black, Asian and minority ethnic (BAME) groups more than twice as likely to be unemployed as those from White groups. 	
	Policy 7.1 Lifetime Neighbourhoods policy for development which enable people to live healthy active lives, and maximise opportunity for community diversity and inclusion, and design of places that meet the needs of the community at all stages of people lives.	
	The new Draft London Plan was published for public consultation in September 2017. It includes the following policies relevant to the proposed regeneration:	
	Policy E11 states that development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.	
	Policy GG1 seeks to build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:	
	Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city;	
	Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation;	
Draft London Plan (2019)	Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish;	
	Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time;	
	Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements; and	
	Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.	
London Housing Strategy (2018)	he London Housing Strategy sets out the Mayor's plans to tackle the capital's housing crisis and his vision to provide all Londoners with a good quality home they can afford. The strategy follows on from consultation on a draft version last year and has been considered by the London Assembly	

Legislation / Policy / Guidance	Summary/Key Equality Objectives
	and Secretary of State for Housing, Communities and Local Government. The strategy was formally adopted in August 2018.
The London Housing Strategy Implementation Plan (2018)	The Mayor has published a high level implementation plan, which includes key policies, proposals and actions; Mayoral targets or milestones where these have been agreed; and headline indicators of success.
Better homes for local people - The Mayor's Good Practice Guide to Estate Regeneration (2018)	The Mayor's Good Practice Guide to Estate Regeneration sets out the expectations for how local authorities and housing associations should engage with residents as part of all estate regeneration schemes, whether or not they include the demolition of homes. The guide outlines the Mayor's three Better Homes for Local People principles:
	1. An increase in affordable housing - Local authorities should consider alternative options for demolition. Should demolition be pursued then like-for-like provision of floorspace for affordable housing on estate regeneration projects should be provided. Gap funding is available through GLA housing grant funding to ensure financial viability of affordable housing provision if required. Where possible, local authorities should also be trying to increase the density of estates to maximise potential for an increase in affordable homes. Landlords should adopt local lettings policies for new affordable homes for rent to help ensure that local people benefit from the additional homes being built.
	2. Full rights to return or remain for social tenants - Where estate regeneration plans involve the demolition of existing homes Councils and housing associations should seek to phase projects wherever possible, with the aim of ensuring that households can remain on the estate by moving no more than once. Social tenants who have to move as a result of estate regeneration plans, either through a single move or a temporary move off the estate, should be:
	provided with a full right to a property on the regenerated estate of a suitable size, at the same or a similar level of rent, and with the same security of tenure. Households who are currently overcrowded should be offered homes large enough for their needs. Households who under-occupy their current homes should not automatically qualify for a new home with the same number of bedrooms. For example, landlords may choose to limit the number of bedrooms offered to under-occupiers to a maximum of one greater than their need.
	awarded high priority in the local allocations policy should they need to move into a new home temporarily as a result of estate regeneration. Any offer of alternative accommodation should be reasonable, in that it meets the needs of the household in terms of the number of bedrooms and any special requirements (such as wheelchair accessibility or adaptations).
	offered the maximum home loss compensation permitted by legislation by landlords if they meet the statutory criteria and are displaced from their homes due to estate regeneration.
	awarded 'disturbance costs' of moving home by the landlord. This means paying the reasonable costs of moving, such as removal costs, telephone and utility connection and installation costs, and the provision of new carpets and curtains. Tenants who must move more than once should receive home loss payments for each move.
	Furthermore, Councils and landlords should work together to make sure that private tenants on estates being considered for regeneration are aware of their options and rights, including signposting them towards alternative housing options. Councils may also have duties towards private tenants under homelessness legislation. Additional support and assistance should be offered to more vulnerable households living on estates, regardless of

Legislation / Policy / Guidance Summary/Key Equality Objectives their tenure. In some cases, this may mean that they want to move out of the area or into specialist accommodation. Where Councils or housing associations propose to let homes on shortterm tenancies, they should ensure that new tenants are fully informed about any plans to regenerate the estate and are aware of their rights, including how they differ from those on secure tenancies. Short-term tenants should be reminded of these differences to avoid confusion at a later stage. They should also be given as much advance notice as possible of planned regeneration, so that alternative accommodation can be found if necessary. A fair deal for leaseholders and freeholders - Leaseholders and freeholders affected by estate regeneration should be treated fairly and fully compensated if their homes are to be demolished. Where it is necessary to acquire homes owned by leaseholders and freeholders, landlords should: always seek to do so by negotiation in the first instance to help avoid a compulsory purchase process, which creates uncertainty for the household and can lead to significant delays. Offer market value (plus home loss payments where appropriate) in the first instance. Where compulsory purchase is required, the rights of resident and non-resident leaseholders and freeholders are set out in legislation. The purchase should be based on a value of the home undertaken by an independent valuer, paid for by the landlord if requested by the leaseholder or freeholder. The valuation must reflect the value of the property before the impact of any regeneration or proposed regeneration is considered. Consider enabling resident leaseholders and freeholders to combine market value and home loss payments towards the purchase price for a new home. Consider paying for other costs that might be borne by resident leaseholders and freeholders, such as the cost of moving home or setting up new utility connections. Councils and housing associations are also encouraged to consider other ways to support resident leaseholders and freeholders including: support to use their equity to buy a home on the open market in the local area, with the Council or housing association owning the difference between the value of this equity and the market price of the home (either on a shared equity or shared ownership basis); offer the right to a new home on the regenerated estate through shared equity or shared ownership basis; enable home swaps, or early buy-back arrangements; provide assistance throughout any process of buying a new home. Equal Life Chances for All, the Mayor's equality strategy revised in June 2014, sets out priorities for achieving equality across a range of dimensions. It emphasises enabling the most vulnerable and disadvantaged people to benefit from London's success; supporting **Equal Life Chances for All** deprived communities, vulnerable people and promoting community (2014)cohesion; supporting businesses to consider social issues in their corporate planning to bring real change to people's quality of life; increasing the levels of employment of excluded groups; and decreasing the difference in income between the equality groups and others from deprived

communities and the wider community.

Legislation / Policy / Guidance	Summary/Key Equality Objectives
Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2018)	The Mayor's Equality, Diversity and Inclusion Strategy (EDIS) was published in May 2018. The strategy sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality, as well as the challenges and disadvantage facing London can be a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential. The strategy sets out 33 equality, diversity and inclusion objectives which include working with Councils and other partners to: Improve the supply of homes available to meet Londoners' diverse housing needs, including for accessible and adapted housing, specialist and supported accommodation, and Gypsy and Traveller sites;
	 Regenerate the most deprived parts of London in a way that supports good growth and opens up opportunities for the most disadvantaged groups;
	Protect and provide the social infrastructure needed by London's diverse communities;
	Promote the use of inclusive design through planning, procurement and commissioning of projects and programmes; and
	Support effective ways to involve communities in the development of their neighbourhoods and the wider city.
	Objectives also include working with employers, education and skills providers, and voluntary and community organisations so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London. This includes providing employability and skills support for those who are disadvantaged in London's skills, enterprise and jobs market and increasing the diversity of the workforces in vital sectors in London. These include digital, construction, creative and the built environment.
Homes for London: the London Housing strategy (2014)	The London Housing Strategy was formally adopted in October 2014. The Strategy identifies its emphasis as to deliver significant new housing across all tenures to address demand and support London's continued economic growth. Its long-term ambition is to increase supply to 42,000 new homes per annum, of which 17,000 should be affordable (including 5,000 for long-term market rent). The Strategy has a particular focus on low- and middle-income working households, whilst also addressing the needs of vulnerable and older households.
GLA Affordable Housing and Viability Supplementary Planning Guidance (2017)	GLA's new affordable housing and viability supplementary planning guidance (SPG), published on 16 August 2017, sets out key policies including:
	• A new 'threshold' approach to viability which does not require applicants to submit viability information if a development is delivering at least 35 per cent affordable housing, a proportion of which must be in prescribed affordable housing tenures. On public land, this threshold rises to 50 per cent affordable housing. Applicants must undertake a full viability process if they propose to deliver less than 35 per cent affordable housing (50 per cent on public land). The aim of this guidance to incentivise the provision of higher levels of affordable housing on development sites;
	Guidance on London Living Rent, an intermediate affordable housing product that is specific to London. This flexible product has rents set

Legislation / Policy / Guidance	Summary/Key Equality Objectives
	based on ward level incomes and house prices and is eligible to households that earn under £60,000 per annum;
	Guidance on the vacant building credit (a national policy which provides an incentive for brownfield development on sites containing vacant buildings by offering a developer a financial credit equivalent to any affordable housing contribution) which identifies it is not suitable in London apart from in exceptional circumstances;
	Guidance on viability assessments that aims to increase transparency and clarify the inputs into the valuations; and
	Guidance on build to rent development aims to provide a specific planning, affordable housing and viability pathway to developments which meet set build to rent characteristics. The aim is to facilitate the delivery of build to rent developments across London.
A Fairer London: The 2015 Living Wage in London	This is the eleventh London Living Wage report from the GLA and calculates the wage for 2015 at £ £9.40 per hour (a 2.7 per cent increase on the 2014 wage). In the Mayor's '2020 Vision' for London he pledged to make the Living Wage the norm across the capital. At the time of publication, there were 700 accredited London Living Wage employers plus a number who have chosen not to be accredited. Accredited Living Wage employers alone have provided over 30,000 London workers the benefits of the Living Wage since 2011 (at the time of publication).
Accessible London: Achieving an Inclusive Environment SPG (2014)	This SPG provides guidance on the implementation of London Plan Policy 7.2 An inclusive environment and of other policies in the Plan with specific reference to inclusive design. It also provides guidance on Lifetime Neighbourhoods to support London Plan Policy 7.1 Building London's neighbourhoods and communities. One of the Mayor's aims for London is that everyone, whether resident, visitor or worker, can participate and enjoy all that the city has to offer. To help achieve this aim the London Plan 2011 includes several policies which promote an inclusive environment to help ensure that all of London's diverse communities can contribute to London's growing economy and enjoy a high quality of life.
Our Healthier South East London (2014)	Our Healthier South East London is a five-year commissioning strategy which aims to improve health, reduce health inequalities and ensure all health services in south east London meet safety and quality standards consistently and are sustainable in the longer term.
	Planning for Equality and Diversity in London SPG:
Planning for Equality and Diversity in London SPG (2007)	Provides guidance to boroughs, partners and developers on the implementation of policies in the London Plan which relate to equalities issues and addressing the needs of London's diverse communities;
	Sets out some of the tools for promoting equality and diversity in planning processes;
	Highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination in the planning context;
	Sets out overarching principles and the key spatial issues for planning for equality; and
	Examines in greater detail the spatial needs of London's diverse communities and identifies how spatial planning can be used to try and address these.

Legislation / Policy / Guidance	Summary/Key Equality Objectives
Responding to the needs of faith communities: Report and evidence (2008)	CAG Consultants with Diverse Ethics and Land Use Consultants were commissioned by the GLA in late 2007 to explore the needs of faith communities in relation to places of worship in London. This document reports on our findings and conclusions from the research and engagement process with faith communities and planning authorities in relation to places of worship in London.
Local Policy and Plans	
Southwark Core Strategy (2011)	The Council's Core Strategy includes planning policies which are relevant to promoting equality and tackling existing disadvantage, including policies on housing and density community facilities and open space. This was subject to a full Equalities Impact Assessment (EqIA) at each key stage of the Core Strategy.
	The project area is a focus of numerous sections in the Southwark Core Strategy and it is noted that there are high levels of poverty within the Elephant and Castle area. As such it is the focus of one of a number of regeneration programmes, and has been identified as an opportunity area. The Southwark Core Strategy states that the vision for this opportunity area is to: "facilitate regeneration of the Elephant and Castle into a more desirable place for both existing and new residents" and that it will be "a leading example for sustainable development".
	The Southwark Core Strategy incorporates recommendations from the London Plan and sets out a slightly different hierarchy by reclassifying two of the District Centres as a single Major Town Centre due to the potential increase in floor space expected over the next 20 years. The Core Strategy Strategic Policy 3 identifies Elephant and Castle and Walworth Road as a single Major Town Centre. This reflects that potential regeneration will help to consolidate Elephant and Castle and Walworth Road, creating a centre large enough to be classified as a Major Centre.
	The Core Strategy Strategic Policy 10 – Jobs and businesses – also includes policies to address the workspace requirements of local businesses. The policy outlines the Council's commitment to ensure that local people and businesses benefit from opportunities which are generated from development and encourages the provision of flexible space to help meet the needs of the local office market and independent retailers. The policy indicates that small and medium sized enterprises (SMEs) make up over 99% of the total number of businesses in Southwark and the protection of small workspace units is required to help ensure a supply of suitable, accessible and affordable premises for SMEs in the borough. This policy applies to both business (B class) units as well as retail (A class) units.
New Southwark Plan (proposed submission version)	The New Southwark Plan will be a new borough-wide planning and regeneration strategy up to 2033. Once finalised and adopted, it will replace the Core Strategy (2011) and Southwark Plan (2007) policies. The Council has published the proposed submission version of the New Southwark Plan and consultation of this closed in May 2019.
	The New Southwark Plan contains six types of policies: Implementation policies which set out how the Council will implement the New Southwark Plan as the Council's primary planning and regeneration strategy, alongside the policies in our wider Development Plan, including our Area Action Plans, the London Plan and any neighbourhood plans;

Legislation / Policy / Guidance **Summary/Key Equality Objectives** Strategic policies which set out the overall strategy for delivering the Council's key aims and commitments; Development management policies set out further detail which is required to deliver the strategic policies; Area Visions which provide the strategic vision for the future of Southwark's distinct places and neighbourhoods. They set out infrastructure improvements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs; Site Allocations which are planning policies which apply to key potential development sites of strategic importance. Site Allocations are needed to ensure that a when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs and infrastructure; and Planning Policies Map whereby some planning policies only apply in defined areas, for example, conservation areas. The Planning Policies Map shows planning designations where specific planning policies must be applied. The Plan sets out a vision for the Elephant and Castle Opportunity Area that includes plans for supporting the area's function as a major town centre for all Southwark residents and a central London location that attracts global business, research, teaching, shopping, flexible business spaces and cultural activities. It also sets out a vision for providing as many homes as possible at a range of different tenures including social housing supported by community facilities; providing opportunities for existing small businesses, particularly those from minority ethnic groups, to relocate and continue trading; supporting the creation of a distinctive environment through a mix of innovative and enduring new architecture, heritage buildings, open spaces and quality public realm that provides greenery, safety, connectivity and reduces exposure to air pollution; and improving the train station and enable new transport infrastructure links with the surrounding areas by providing safe and accessible walking, cycling and public transport routes. The Elephant & Castle SPD sets out Southwark Council's vision for the Elephant and Castle Opportunity Area. It is an opportunity area planning framework (OAPF) which will which will guide development over the next 15 years and will be used by the Mayor of London to guide his decisions on planning matters in the area. The SPD replaces the Elephant and Castle Enterprise Quarter SPD (2008). The Elephant & Castle SPD provides guidance on: The infrastructure and funding required to ensure that growth in the **Elephant & Castle Opportunity** area can be accommodated sustainably, including for example, **Area Supplementary Planning** improving social and community infrastructure, upgrading of public Document (SPD) (2012) transport and public spaces; The mix of shops, businesses and other activities such as arts, leisure and cultural provision; The amount of new homes that may be built and their location; The design and built form of new buildings, including the height, bulk and massing; The character of areas and heritage assets;

Legislation / Policy / Guidance	Summary/Key Equality Objectives
	Public realm improvements and the creation and enhancement of open spaces and improvements to the connections between them;
	Tree cover and opportunities for new tree planting to reinforce character, help adapt to climate change and provide habitat for wildlife;
	The public transport, walking and cycling network improvements which will be required to accommodate growth and development; and
	Environmental standards which new development will need to meet.
	The Council, in line with the Elephant & Castle SPD, plans to renew business space in the area and provide more opportunities for local people and small and medium sized businesses (SMEs). Consideration will be given to identifying sites and developing policies to accommodate a range of employment premises and opportunities of different types, sizes and costs to meet the different needs of the local community. The SPD proposes that all developments of retail space in excess of 1,000sqm should provide a proportion of floor space as affordable business space. According to the SPD, priority for such space will be given to businesses displaced by development in the opportunity area.
Southwark Council's Approach to equality: delivering a fairer future for all (2011)	The Southwark Council's 'approach to equality: delivering a fairer future for all' document sets out Southwark Council's approach to meeting the public sector equality duty (PSED) and explains what people in the borough can expect from the Council in terms of the way it plans and delivers its services, and what the Council is committed to doing. It also explains the Council's approach to advancing equality opportunity in the borough by making equality part of its day-to-day business. In particular, the Council seeks to:
	"Improve the quality of life for Southwark's people through better access to services and creating sustainable mixed communities with opportunities for local people that come from being in the heart of London;
	 Improve social cohesion by promoting positive relationships and a sense of community and belonging, by reducing fear and tensions, and encouraging civic responsibility so that the contributions individuals and groups make to their communities are properly valued;
	Promote people's rights and responsibilities. We will do this by ensuring that the Council does all it should in providing leadership and by encouraging its partners to do likewise. We will act to protect the rights of those who live in Southwark by ensuring that abuse; mistreatment or discrimination is identified and dealt with; and
	Ensuring we have a workforce that understands and is committed to achieving these goals and retains the confidence of our local communities."

Appendix B – Equalities baseline

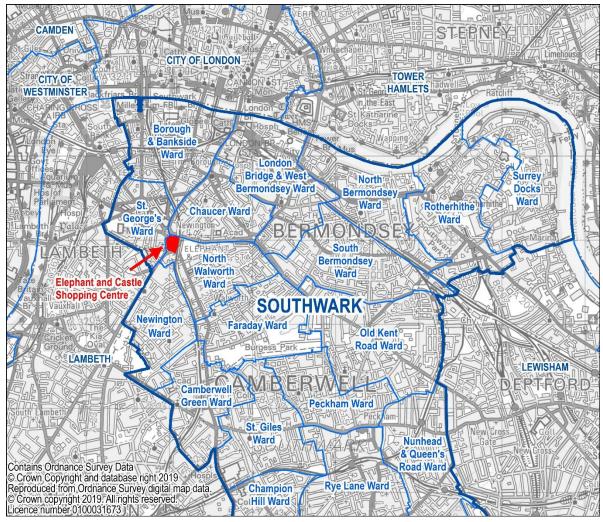
A baseline profile of the population living and working within the study area is necessary for the identification of potential equality impacts in order that an assessment can be made as to the potential level of impact the regeneration may have on groups with protected characteristics.

The section outlines the equalities baseline relevant to the proposed regeneration. This includes analysis of Census 2011 data and other datasets from the Office for National Statistics (ONS).

While the Elephant and Castle shopping centre is located within North Walworth ward, additional wards within the Elephant and Castle Opportunity Area have been considered, as Elephant and Castle shopping centre's influence as a major centre is likely to extend beyond the boundaries of the ward it is situated in (Error! Reference source not found.). In May 2018, there were changes to the ward boundaries in Southwark, as shown in Error! Reference source not found.. However, for the purpose of this report and data consistencies with national and local datasets, the former boundaries of

Southwark have been used in the analysis.

Figure B- 1: Ward boundaries



This section provides baseline information drawing on a range of data sources, including the 2011 Census. Data is presented at a Greater London, LB Southwark, and Ward level (Cathedrals Ward, East Walworth Ward, Faraday Ward, Newington Ward, Chaucer Ward, and Camberwell Green Ward) where available.

B.1 Age baseline

Table B-1: Age breakdown by different geographical areas

Age (years)	Cathedrals	East Walworth	Camberwell Green	Chaucer	Faraday	Newington	Southwark	London
0-15	11.3%	18.1%	20.7%	14.6%	22.9%	16.1%	18.7%	20.5%
16-64	81.5%	72.7%	71.0%	79.5%	69.5%	75.5%	73.2%	67.7%
65 and over	7.3%	9.2%	8.3%	6.0%	7.6%	8.4%	8.2%	11.8%

Source: ONS, Mid-Year Population Projections 2017²⁶

Cathedrals Ward has a much lower percentage of children and older people when compared to Southwark or London. However, GLA Population Projections estimate that by 2031, the proportion of 0-15 year old's living in the Borough will increase by approximately 9.5% on 2016 levels. The working age population of 16-64 year olds will experience a similar rate of population increase over the same time period, at 10.5%. The greatest population increase is expected in the over 65 years age group, which will increase considerably on 2016 levels, to 32.7%²⁷.

B.2 Disability baseline

With the exception of Cathedrals (6.7%) and Chaucer (5.6%) Wards, all wards have a higher proportion of residents who consider that their day-to-day activities are 'limited a lot' by disability or illness when compared with the LB Southwark (7.7%) and London (8.1%) but overall the affected wards are very close to the Southwark average. The proportion of residents within the wards in the Opportunity Area whose activities are 'not limited' by a disability or illness are broadly in line with the proportion in LB Southwark (84.3%) and London (83.2%); the exception being Chaucer Ward which is slightly higher (88.4%). The proportion of people who are 'limited a little' by a disability or illness varies across the wards within the Opportunity Area, however Chaucer Ward (6%) is somewhat lower than the other wards, LB Southwark (8%), and London levels (8.8%) (Shown in Table B- 2).

Table B- 2: Limiting long-term illness or disability by different geographical areas

	Cathedrals	East Walworth	Camberwell Green	Chaucer	Faraday	Newington	Six ward mean	Southwark	London
Day-to-day activities limited a lot	6.7%	9.1%	8.9%	5.6%	8.2%	8.5%	7.8%	7.7%	8.1%
Day-to-day activities limited a little	7.5%	8.6%	8.7%	6%	9.4%	9%	8.2%	8%	8.8%
Day-to-day activities not limited	85.8%	82.3%	82.3%	88.4%	82.4%	82.6%	84%	84.3%	83.2%

Source: ONS, DC3602EW - Long-term health problem or disability by NS-SeC by sex by age, (2013)

Data collected by Transport for London (TfL) suggests that around 12.4% of the population of London currently experiences reduced mobility, including 1.2% of residents who are wheelchair users and 4.4% who have difficulty walking. These figures vary significantly by age group: only 0.3% of people aged

²⁶ Office for National Statistics (2019)

https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimentalarcessed September 2019

²⁷ GLA Round Population Projections 2011 (2014 release) http://data.london.gov.uk/dataset/2011-round-population-projections

under 25 years old have walking difficulties, compared with 17.5% of those aged 60 years and over. TfL estimates that approximately 29.6% of people in London over the age of 60 experience reduced mobility in some way²⁸.

B.3 Sex baseline

The majority of wards within the Elephant and Castle Opportunity Area have similar proportions of males and females to the LB Southwark and London averages; with an approximately even split. Newington is the only ward which has a slightly higher proportion of males (51%) whereas all other wards have a higher proportion of females. See Table B- 3 for details.

Table B- 3: Population breakdown by sex and geographical area

Sex	Cathedrals	East Walworth	Camberwell Green	Chaucer	Faraday	Newington	Southwark	London
Male	50.6%	48.7%	49.4%	48.6%	49.7%	51.2%	49.8%	49.8%
Female	49.4%	51.3%	50.6%	51.4%	50.3%	48.8%	50.2%	50.2%

Source: ONS, Mid-Year Population Projections 2017²⁹

B.4 Sexual Orientation and Gender Reassignment baseline

The ONS Integrated Household Survey (IHS) recently introduced questions on sexual orientation³⁰. Data from the 2014 survey indicates that 1.1% of UK residents identified themselves as Gay or Lesbian; 0.5% as Bisexual; 98.1% as Heterosexual or straight; and 0.3% as an 'other' sexual identity.

London as a region has the largest proportion of adults identifying as Lesbian, Gay, or Bisexual (LGB), at 2.6% (with other regions in the UK ranging from 1.0% in the East Midlands to 1.8% in the South East). Estimates relating to numbers of people identifying with a specific sexual orientation are not available at borough level or below, due to the small sample size of this dataset.

B.5 Race baseline

As outlined in Table B- 4, with the exception of Cathedrals Ward, all wards within the Opportunity Area have a lower proportion of White residents, and correspondingly a higher proportion of Black and Minority Ethnic (BAME) residents than the LB Southwark or London averages.

Chaucer Ward has almost twice as many Asian residents (17.2%) than the other wards in the Opportunity Area and LB Southwark (9.4%); however, the proportion remains lower than the London average (18.5%). The proportions of people belonging to Mixed Ethnic groups within all wards is in line with the LB Southwark (6.2%), however slightly higher than the London (5.0%) average.

Within the Camberwell Green and Faraday Wards, there are considerably higher proportions of Black people (42.4% and 40.3% respectively) than in the other wards, LB Southwark (26.9%) or London (13.3%) averages. By contrast, Cathedrals Ward has a somewhat lower proportion of Black people (16.0%) than the in the other wards in the Opportunity Area.

With the exception of Cathedrals Ward (2.7%), all other Wards in the Opportunity Area have a higher total proportion of Other Ethnic groups than in both LB Southwark (3.2%), and London (3.4%).

²⁸ Transport for London, (2010); Londoners With Reduced Mobility

²⁹ Office for National Statistics (2019)

https://www.ons.gov.uk/peopleopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimentalaccessed September 2019

³⁰ ONS, (2015); Integrated Household Survey, January to December 2014: Experimental Statistics [online] available at: https://www.ons.gov.uk/search?q=integrated+household+survey, accessed August 2019

Table B- 4: Ethnic groups by different geographical areas

Ethnic group		Cathedrals	East Walworth	Camberwell Green	Chaucer	Faraday	Newington	Southwark	London
White	British	44.3%	33.1%	26.7%	33.6%	26.4%	35.7%	39.7%	44.9%
	Irish	2.7%	2.2%	1.8%	2.6%	1.8%	2.5%	2.2%	2.2%
	Gypsy or Traveller	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%
	Other	14.5%	12.8%	10.3%	13.8%	11.0%	13.5%	12.3%	12.6%
Mixed/ Multiple Ethnic	White/ Black Caribbean	1.6%	2.4%	2.2%	1.5%	2.4%	1.9%	2.0%	1.5%
Groups	White and Black African	1.1%	1.1%	1.5%	1.0%	1.3%	1.5%	1.3%	0.8%
	White and Asian	1.0%	1.1%	0.7%	1.3%	0.5%	0.9%	1.0%	1.2%
	Other	2.0%	2.1%	1.9%	2.0%	2.2%	2.3%	1.9%	1.5%
Asian/	Indian	3.3%	1.3%	1.2%	4.5%	0.6%	1.2%	2.0%	6.6%
Asian British	Pakistani	0.9%	0.4%	0.3%	0.9%	0.4%	0.4%	0.6%	2.7%
	Bangladeshi	2.8%	2.6%	1.5%	4.0%	2.8%	2.0%	1.4%	2.7%
	Chinese	4.2%	3.1%	2.0%	3.6%	2.7%	3.2%	2.8%	1.5%
	Other	3.0%	2.9%	3.0%	4.2%	3.1%	2.2%	2.7%	4.9%
Black/	African	10.2%	19.9%	28.1%	15.9%	28.2%	19.0%	16.4%	7.0%
Black/ African/ Caribbea n/ Black	Caribbean	3.0%	5.4%	8.7%	3.6%	5.8%	5.4%	6.2%	4.2%
British	Other Black	2.7%	5.2%	5.5%	3.5%	6.3%	4.3%	4.2%	2.1%
Other Ethnic	Arab	1.2%	1.0%	0.9%	1.4%	0.8%	1.2%	0.8%	1.3%
Group	Other	1.5%	3.4%	3.4%	2.6%	3.5%	2.9%	2.4%	2.1%

Source: ONS DC2101EW - Ethnic group by sex by age, Census 2011, (2014)

B.6 Religion or belief baseline

The percentage of the population at ward level who identify as Christian is broadly comparable to that of Southwark (52.2%) and typically higher than the proportion of Christians in London (48.4%), aside from Cathedrals (46.3%) and Chaucer (46.5%) Wards which are slightly lower.

Within all wards in the Opportunity Area, Buddhism is slightly more represented than the London average (1%), while Hinduism and Sikhism are significantly less represented than London average (5% and 1.5% respectively). The proportion of Jewish residents within all wards and in the LB Southwark (0.3%) is broadly similar; considerably lower than the London average (1.8%). The proportion of residents who follow 'Other' religions is similar in all wards, the LB Southwark, and London (at approximately 0.5%). See Table B- 5 for further details.

Table B- 5: Religion or belief by different geographical areas

Religion	Cathedrals	East Walworth	Camberwell Green	Chaucer	Faraday	Newington	Southwark	London
Christian	46.3%	53.1%	57.0%	46.5%	57.0%	52.5%	52.5%	48.4%
Buddhist	1.1%	1.8%	1.4%	1.5%	1.7%	1.5%	1.3%	1.0%
Hindu	1.9%	0.8%	0.6%	3.0%	0.4%	0.8%	1.3%	5.0%
Jewish	0.5%	0.1%	0.2%	0.6%	0.2%	0.2%	0.3%	1.8%
Muslim	8.9%	11.9%	11.2%	12.3%	13.6%	10.6%	8.5%	12.4%
Sikh	0.5%	0.1%	0.1%	0.4%	0.1%	0.2%	0.2%	1.5%
Other religion	0.5%	0.5%	0.4%	0.5%	0.6%	0.4%	0.5%	0.6%
No religion	31.9%	23.5%	20.5%	27.0%	18.1%	25.3%	26.7%	20.7%
Religion not stated	8.3%	8.2%	8.6%	8.4%	8.4%	8.6%	8.5%	8.5%

Source: ONS, Mid-Year Population Projections 2014 (November 2015)

B.7 Socio-economic status

Socio-economic status considers an individual's or family's economic and social position in relation to others, based on several factors including levels of deprivation, employment, education, health / health inequality, and housing. Additional baseline information relevant to this analysis has been provided in this section and includes data on: access to services and facilities; public realm and open space; transport and connectivity; safety, security, and well-being; and community cohesion.

B.7.1 Deprivation

According to the Index of Multiple Deprivation 2015, LB Southwark is the 41st most deprived borough out of the 326 local authorities in England. The borough is also ranked as the 8th most deprived of the 33 London boroughs³¹.

The Index of Multiple Deprivation 2015 revealed that wards within the Elephant and Castle Opportunity Area fall within the top 20% and 30% most deprived wards in England³². Other parts of the borough experience more severe deprivation however and fall within the top 10% most deprived in England.

The LB Southwark ranks 7th highest of the 33 London boroughs for the 'Health, deprivation, disability' domain, 9th highest for the 'Income deprivation' domain, and 17th highest for the 'Education, Skills, and Training' domain.

B.7.2 Employment

Between 2017 and 2018 the total number of employees increased in the UK by 229,500 (0.8%), from 30.3 million to 30.5 million. All regions saw an increase in the estimated number of employees with the exception of the North East (down 8,900, or 0.8%) and the West Midlands (down 18,200, or 0.7%). The South East showed the greatest increase in terms of the total number of employees (up 43,700, or

³¹ London Borough of Southwark, (2015); JSNA Statistics.

³² Department for Communities and Local Government, (2016); IMD Explorer. Available at: http://dclgapps.communities.gov.uk/imd/ idmap.html, accessed August 2019

1.1%). London showed a slight increase (0.5%) in terms of the total number of employees over the same period.³³

LB Southwark has a core business district within and surrounding the Elephant and Castle Opportunity Area, and to the north of the borough along the River Thames. The Opportunity Area has a predominance of office and small business uses.

Table B-6 presents a detailed breakdown of employment sectors by geographical area. The sectors that employ the highest proportions of people within the LB Southwark are: Professional, scientific and technical activities (22.9%); Administrative and support services (10.8%); and Human health and social work activities (10.4%), with low levels of employment in sectors such as: construction (2.5%); and manufacturing (1%)³⁴. This is reflected in the educational attainment of LB Southwark residents, with 43.1% having degree level qualifications or above, as outlined in Section 5.7.3 above.

At a ward level, employment by sector differs considerably. Within the Opportunity Area, the most common employment sectors are: Administrative and support services; Human health and social work activities; Education; and Arts, entertainment, and recreation. There are also high concentrations of employment by sector in certain wards, with 22.9% people in East Walworth and 25.7% people in Faraday ward employed in the Wholesale and retail trade, and 30% people in Camberwell Green employed in Transportation and storage. In Newington, half of employees work in Public administration and defence and 39.1% of Chaucer's employees work in Human health and social work activities.

The variation in employment sectors, and higher prevalence of people employed in sectors which require lower levels of qualifications, may reflect the lower levels of educational attainment in some wards. High levels of employment in sectors such as wholesale and retail may also indicate a considerable demand for these types of services in certain locations.

Table B- 6: Employee Jobs by Broad Sector Group across different geographical areas

	Cathedrals	East Walworth	Camberwell Green	Chaucer	Faraday	Newington	Southwark	London
Agriculture, forestry and fishing	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%
Mining and quarrying	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
Manufacturing	0.5%	3.6%	1.0%	0.5%	0.3%	0.3%	1.0%	2.2%
Electricity, gas, steam and air conditioning supply	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.4%
Water supply; sewerage, waste management and remediation activities	0.0%	0.0%	0.0%	0.0%	0.0%	3.8%	0.1%	0.3%
Construction	1.6%	7.1%	1.5%	2.2%	1.7%	1.3%	2.5%	3.6%
Wholesale and retail trade; repair of motor vehicles and motorcycles	3.2%	22.9%	12.0%	3.9%	25.7%	5.0%	6.7%	12.0%
Transportation and storage	7.6%	2.9%	30.0%	0.7%	4.3%	0.9%	4.6%	4.1%
Accommodation and food service activities	7.6%	11.4%	14.0%	3.5%	4.3%	3.1%	7.1%	8.4%

³³ ONS (2019) Business Register and Employment Survey (BRES)

³⁴ ONS, (2019); Business Register and Employment Survey (BRES); Available at : https://www.nomisweb.co.uk/datasets/newbres6pub

	Cathedrals	East Walworth	Camberwell Green	Chaucer	Faraday	Newington	Southwark	London
Information and communication	16.5%	2.9%	1.0%	3.5%	2.9%	2.5%	10.0%	7.9%
Financial and insurance activities	4.4%	0.3%	1.5%	0.9%	2.3%	0.9%	2.9%	7.0%
Real estate activities	2.5%	6.4%	1.0%	1.3%	0.6%	1.6%	2.5%	2.7%
Professional, scientific and technical activities	21.5%	6.4%	3.0%	15.2%	5.7%	5.0%	22.9%	13.7%
Administrative and support service activities	12.7%	5.7%	18.0%	15.2%	7.1%	11.3 %	10.8%	10.9%
Public administration and defence; compulsory social security	2.8%	0.0%	1.0%	4.3%	1.1%	50.0 %	5.4%	4.3%
Education	6.3%	14.3%	12.0%	3.9%	17.1%	2.5%	7.9%	7.4%
Human health and social work activities	5.7%	5.7%	4.5%	39.1%	20.0%	2.5%	10.4%	10.3%
Arts, entertainment and recreation	1.6%	2.9%	2.5%	1.5%	2.3%	0.9%	1.9%	2.5%
Agriculture, forestry and fishing	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%

Source: ONS, (2018); Business Register and Employment Survey (BRES)

Southwark has an unemployment rate of 4.7% which is slightly higher than the unemployment rate in London as a whole (4.6%) and above UK levels (3.9%)³⁵.

B.7.3 Education

Of the six Wards within the Opportunity Area, Cathedrals, Chaucer, and Newington have a higher proportion of residents who have attained NVQ Level 4 (degree level) or above than the LB Southwark average (43.1%). Degree level attainment in the LB Southwark is somewhat higher than the London average (37.7%).

The proportion of residents with no qualifications is higher than the LB Southwark (16.3%) and London (17.6%) average. Levels are higher in all wards except Chaucer (11.3%) and Cathedrals (12.7%).

Table B-7: Educational attainment by different geographical areas

	Cathedrals	East Walworth	Camberwell Green	Chaucer	Faraday	Newington	Southwark	London
No qualifications	12.7%	20.8%	19.3%	11.3%	21.8%	19.4%	16.3%	17.6%
Level 1 qualifications	8.0%	10.5%	11.3%	7.3%	13.0%	9.7%	9.4%	10.7%

³⁵ Source: ONS annual population survey. Labour market profile for Southwark. Employment and unemployment (Oct 2018-Sep 2019)

Level 2 qualifications	9.1%	10.3%	11.6%	8.3%	12.8%	10.6%	10.2%	11.8%
Apprenticeship	0.8%	1.2%	1.2%	0.8%	1.2%	1.4%	1.1%	1.6%
Level 3 qualifications	15.2%	13.1%	10.5%	14.5%	10.3%	11.1%	10.5%	10.5%
Level 4 qualifications and above	45.8%	32.4%	34.3%	48.8%	28.6%	37.5%	43.1%	37.7%
Other qualifications	8.5%	11.7%	11.7%	9.0%	12.2%	10.4%	9.3%	10.0%

Source: ONS, LC5102EW - Highest level of qualification by age

B.7.4 Health Inequalities

There is a tendency for people belonging to protected characteristic groups, particularly young people, older people, disabled people, and BAME people, to experience poorer health³⁶. Health within LB Southwark is mixed, with higher rates of deprivation than the England average, and 25% of children live in low-income families³⁷. Mental wellbeing and resilience in young people is a priority in Southwark and key recommendations from the Southwark Annual Public Health Report are to "improve the physical health of adolescents by increasing their uptake of health promoting opportunities and their use of primary care services"; "Continue to support whole school approaches to improving mental wellbeing, including the implementation of evidence-based bullying prevention programmes"; and "support leisure and youth services to have whole setting based approaches to improving mental wellbeing" - reflecting the need to reduce health inequalities particularly in young people³⁸.

In terms of health issues within the borough, the rate of alcohol-related harm hospital and self-harm hospital stays is better than the average for England. However, rates of statutory homelessness, violent crime and early deaths from cancer are worse than average. Rates of sexually transmitted infections are also worse than average.³⁹

Local health priorities in the LB Southwark include "making urban regeneration work for all communities", "supporting the creation of sustainable, high quality, and effective local health and social care systems" and "improving health, wellbeing and tackling inequalities for all of Southwark's residents".⁴⁰

B.7.5 Housing

There are high proportions of social rented housing, and low levels of privately owned or rented housing within the LB Southwark and all Wards within the Opportunity Area. 43.7% of housing in LB Southwark is socially rented, compared with 24.1% in London. In Camberwell Green and Faraday Wards the proportion is considerably higher (at 63.5% and 68.4% respectively).

The proportion of privately rented housing within the LB Southwark (24.9%) is broadly the same as levels within London (26.4%). Rates in Camberwell Green, Faraday, and Newington Wards are slightly lower than LB Southwark levels, however Cathedrals, Chaucer, and East Walworth Wards are somewhat higher than both the LB Southwark, and London levels (at 30.9%, 31%, and 28.5% respectively). By contrast, rates of privately owned or shared ownership housing within all Wards in the

https://www.southwark.gov.uk/search?q=health+priorities, accessed September 2019

³⁶ Equality and Human Rights Commission, (2010); How Fair is Britain? report. Available at: http://www.equalityhumanrights.com/ publication/ how-fair-britain, accessed September 2019

³⁷ Public Health England, (2018); Southwark Health Profile 2018. Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E09000028?place_name=Southwark&search_type=parent-area*, accessed September 2019

profiles/area-search-results/Eusuuuuuzorpiade name-oodamanassa...

38 London Borough of Southwark, (2019); 2018 Southwark Annual Public Health Report

³⁹ Public Health England, (2018); *Southwark Health Profile 2018*. Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E09000028?place_name=Southwark&search_type=parent-area*, accessed September 2019

⁴⁰ Director of Public Health (2017), *Update on Public Health priorities*. Available at:

Opportunity Area is somewhat lower than the LB Southwark (31.4%) and considerably lower than London (49.5%) levels.

Within the LB Southwark, 15.3% of households are overcrowded (occupancy rating bedrooms), less than the London average of 11.3%. Within London, Brent, Tower Hamlets, Haringey and Southwark all have high levels of overcrowding. The proportion of overcrowding within wards in the Opportunity Area is higher than the Borough average (18%); the lowest proportion within the former Cathedrals Ward (11.7%) and the highest proportion within Camberwell Green Ward (19.9%). There is evidence to suggest that overcrowding is more likely to occur among ethnic minority households in London⁴¹⁴² and is also likely to be more detrimental to people belonging to certain protected groups, for example, young people and disabled people⁴³.

B.7.6 Access to Services and Facilities

Since the last EqIA in 2016, a number of businesses have closed or relocated outside of the shopping centre. These include the closure of: Hannibal House, the Coronet theatre, the bingo hall, the bowling centre, Santander bank. Additionally, the outdoor market has declined.

The redevelopment of the Elephant and Castle shopping centre will also result in the loss or relocation of all the remaining shops and businesses within the shopping centre. There are also two charities that provide help to those suffering from the effects of crime and young people affected by strokes. These types of facilities typically provide community resources and events for older people, children and youths. They can also provide space for cultural activities and serve wider purposes such as offering affordable hireable space, education resources, and establishing a support network for people belonging to protected characteristic groups.

B.7.7 Public Realm and Open Space

Open spaces and public realm offer opportunities for active and passive recreation, places to meet, and can help to improve health, wellbeing, and community cohesion. Safe and accessible spaces should cater to the needs of all people, and provide places where people of different ages, sexes, ethnicities, and abilities can enjoy together. The Elephant and Castle sub-area identified in LB Southwark's Open Space Strategy⁴⁴ has a total of "0.7ha of park provision per 1,000 population, which is below the standard of 0.72ha per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth".

The sub-area has the highest population density of any of the eight sub-areas in the borough. Additionally, the area has "the second highest proportion of housing units with no access to private open space (after Bankside)". Both of these indicators suggest that there is high demand for open space within the sub-area. The Open Space Strategy also reports that residents within the sub-area reported that safety fears often prevented them using open spaces⁴⁵.

People sharing protected characteristics may be disadvantaged if they are unable to access public open space, and for certain protected groups there are considerable advantages associated with access to open space; for example, young and older people are likely to benefit from opportunities for active and passive recreation and socialising with others⁴⁶.

B.7.8 Transport and Connectivity

The Elephant and Castle shopping centre benefits from excellent public transport connectivity (with a variety of local bus, rail and London Overground connections). The site has a Public Transport

⁴¹ Ministry of Housing, Communities and Local Government (MHCLG) (2018) English Housing Survey; Overcrowded Households. Available at: https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowdedhouseholds/latest, accessed January 2020.

42 Elahi, F. and Khan, O. (2016) Ethnic Inequalities in London: capital for all. London: Runnymede Trust.

⁴³ Equality and Human Rights Commission, (2010); How Fair is Britain? report. Available at: http://www.equalityhumanrights.com/ publication/ how-fair-britain, accessed September 2019.

⁴⁴ London Borough of Southwark, (2013); Open Space Strategy. Available at: https://www.southwark.gov.uk/planning-anddence-base/environment-and-sustainability, accessed September 2019

⁴⁵ London Borough of Southwark, (2013); Open Space Strategy. Available at: https://www.southwark.gov.uk/planning-and-at-16 uilding-control/planning-policy-and-transport-policy/evidence-base/environment-and-sustainability, accessed September 2019

⁴⁶ Equality and Human Rights Commission, (2010); How Fair is Britain? report. Available at: https://www.equalityhumanrights.com/en/publication-download/how-fair-britain, accessed September 2019

Accessibility Level (PTAL) rating of 6b; the highest level, emphasising the area's importance as a diverse residential, business and leisure destination⁴⁷ for local residents.

The Opportunity Area SPD⁴⁸ notes that the locality is a key transport interchange, but emphasises that connectivity and linkages between buses, London Underground, and London Overground services are generally poor. This may be restrictive for people belonging to certain protected characteristic groups; particularly older people, younger people, pregnant women (and those with pushchairs or buggies) and disabled people⁴⁹. Numerous pedestrian and cycle links are available, however the borough is aiming to improve their safety and reduce the severance created by major roads on many circulation routes.

Elephant and Castle Northern Line Station is currently served by two lifts and experiences passenger capacity problems. Transport for London estimate that in the morning peak 30% of passengers entering the station are using the spiral emergency stairwell rather than queuing for one of only two lifts, and there are times when staff are required to manage congestion by 'holding' passengers outside the station.

Regeneration of the opportunity area will create a highly integrated and efficient public transport hub which will comprise an improved Northern Line station with a new ticket hall and escalators under the shopping centre, enhanced conditions for bus and rail users and an improved interchange between the various modes. The escalators will be fitted out by London Underground and will replace the current lifts which are inadequate to cope with predicted increases in passenger demand.

B.7.9 Safety, security, and well-being

Reported crime has increased by over 20% across London Boroughs over the last five years. Southwark has a higher reported crime rate in comparison to the average of other boroughs.⁵⁰ In July 2019, the highest proportions of crime within the borough were theft, violence against a person and vehicle offences.⁵¹

The feeling of safety and security within a person's local area are key to ensuring their personal wellbeing. All people are vulnerable to feelings of being unsafe, however these may be particularly acute for people belonging to certain protected characteristic groups, including young people, older people, disabled people, women, and people belonging to a particular ethnicity, or sexual orientation⁵².

B.7.10 Community Cohesion

To ensure healthy communities which are functional, safe, and enjoyable places to live and work, it is important to promote community cohesion and good relations between different groups. Encouraging civic engagement and ensuring dialogue with all people in the community; particularly those belonging to protected characteristic groups, is an important step in working towards community cohesion. For people belonging to protected characteristic groups, their feelings of a lack of cohesion (or exclusion) may be more acute than other people.

The Southwark Conversation took place in 2018 which was a discussion with local people about change in the borough and aimed to develop a deeper understanding of perceptions and experience of regeneration in the local area. From this, it was found that 58% of respondents mentioned a sense of community when asked what they think makes a place a 'good neighbourhood to live in'.⁵³

⁴⁷ Transport for London, (2019); Public Transport Accessibility. Available at: https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with

webcat/webcat?Input=SE1+6TE&PlaceHolderText=eg.+NW1+6XE+or+530273%2C+179613&type=Ptal, accessed September 2019

⁴⁸ London Borough of Southwark, (2012); Elephant and Castle Opportunity Area Supplementary Planning Document

⁴⁹ Equality and Human Rights Commission, (2010); *How Fair is Britain?* report. Available at: http://www.equalityhumanrights.com/ publication/ how-fair-britain, accessed September 2019

⁵⁰ London Crime Statistics (2019); Available at: https://www.finder.com/uk/london-crime-statistics accessed September 2019

⁵¹ Metropolitan Police (2019) Crime Statistics. Available at: https://www.met.police.uk/sd/stats-and-data/met/crime-data-dashboard/ accessed September 2019

⁵² Equality and Human Rights Commission, (2010); *How Fair is Britain?* report. Available at: http://www.equalityhumanrights.com/ publication/ how-fair-britain, accessed September 2019

⁵³ Southwark Council (2018) The Southwark Conversation. Available at: https://www.southwark.gov.uk/engagement-and-consultations/have-your-say/community-conversations/southwark-conversation accessed September 2019

Appendix C – Letter of Authority

Chief Executive's Department

Direct dial: 020 7525 5450

21 August 2019

To whom it may concern

Elephant and Castle shopping centre usage survey

This survey has been commissioned by Southwark Council to update an Equalities Analysis for the shopping centre as part of the Council's public sector equalities duty. The survey follows on from previous survey work at the shopping centre carried out in 2016 and 2017, and has been designed to develop a detailed understanding of the usage of the shopping centre. The survey is part of the standard consultation process undertaken with any community affected by a large development proposal. If you would like to read more about the previous equalities work please visit this link to download the three previous survey reports:

https://www.southwark.gov.uk/regeneration/elephant-and-castle?chapter=5

The research is being carried out by **AECOM**, an independent research consultancy on behalf of Southwark Council.

This is genuine research that is being conducted under the Market Research Society's (MRS) Code of Conduct – you can check AECOM's MRS membership by visiting:

https://www.mrs.org.uk/company_partner/company_partner_members/full_a-z_listing and http://www.theresearchbuyersguide.com/freephone/alpha/A

Your answers will be treated in strict confidence in accordance with the Data Protection Act. They are used for statistical research purposes only. Names and addresses are never included with the results.

If you have any questions please call Andy Baker at AECOM on 07881 10 20 47. If you wish to speak to someone at Southwark Council about this research, please call me on 020 7525 5450 or Jon Abbott 020 7525 4902

Thank you for your help.

Yours faithfully

Dan Taylor

Programme manager

020 7525 5450

Appendix D – Business Survey

Elephant and Castle Shopping Centre - Business Survey

This survey has been commissioned by Southwark Council to update an Equalities Analysis for the shopping centre as part of the Council's public sector equalities duty. The survey follows on from previous survey work at the shopping centre carried out in 2016 and 2017 and has been designed to develop a detailed understanding of the usage of the shopping centre.

The survey is part of the standard consultation process undertaken with any community affected by a large development proposal. Your answers will be treated in strict confidence in accordance with the Data Protection Act and GDPR. They are used for statistical research purposes only. Names and addresses are never included with the results.

The survey will take no longer than 10 minutes

Date Time	ocation- Including Floor		
Q1	What is your position with	in the busines	s?
	I own the business		O1
	I am the business manager		O2
	Other – I have the permission of	the owner or mana	ger to respond to this survey
	ANY OTHER RESPONSES - PL	EASE CLOSE	()4
B/I= =4 :-	46 - 1 6 - 1 - 1 - 4 - 4 6		The best and Cooking Tick and only
	the leasehold status of your prosecutions	emises here at I	Elephant and Castle? Tick one only License-holder for a market stall
	seholder	emises here at I	
Main lea Sub-leas	seholder seholder	<u>1</u> <u>2</u>	License-holder for a market stall Don't know
Main lea	seholder seholder Which of the following best t	<u>1</u> <u>2</u>	License-holder for a market stall
Main lea Sub-leas	seholder seholder	<u>1</u> <u>2</u>	License-holder for a market stall Don't know
Main lea Sub-leas	seholder which of the following best followings lindependent shop or business	<u>1</u> <u>2</u>	License-holder for a market stall Don't know
Main lea Sub-leas	which of the following best for the landependent shop or business Franchise	<u>1</u> <u>2</u>	License-holder for a market stall Don't know
Main lea Sub-leas	which of the following best for the land pendent shop or business Franchise Local outlet of a national chain	o 1 2	License-holder for a market stall Don't know

	Q4	How many leases do you hold within the sh	opping	g centre area Tick one only
		One		O ₁
		Two		O ₂
		Three		03
		Four		
		Five		04
				05
		More than five		O 6
Q5	What one o		1? Plea	se use the space below to provide more detail. <i>Tick</i>
	Bar			01
	Beau	ty/hair salon		02
	Bettin	g shop		03
	Cloth	ing/shoe shop		04
	Comr	nunity organisation / charity / advice services		05
	Fast f	ood outlet/takeaway		06
	Finan	cial services (including money transfer services, pawn shops)		07
	Healt	h shop		08
		re facility		09
		e phone shop / electrical goods		010
		ous organisation		O ₁₁
	Resta			O 12
		alist food shop		O 13
		rmarket/general food shop		014
		es and other services		15
		(Please specify in the box below)		016
Q6	How	long has the business/organisation operated in i	te curr	ont premises? Tick one only
QU			Curre	ent premises: Tick one only
		than 12 months	O ₁	
		een one and two years	<u>O</u> 2	
	Betwe	een two and five years	O 3	
Q7	Inclu	ding the owner or manager how many people are	emplo	oyed at the premises? Tick one only
		person	O1	
		een two and five people	<u>2</u>	
	Betwe	een five and ten people	<u>О</u> з	
	Betwe	een ten and twenty	Q 4	
	More	than twenty people	O 5	
Q8		ding the owner or manager, how many people we	ork at tl	he premises full-time (31 hours a week or more)?
	One p	person	O ₁	
	Betwe	een two and five people	O 2	
	Betwe	een five and ten people	Оз	
	Betwe	een ten and twenty	O 4	
	More	than twenty people	O 5	
Q9		ding the owner or manager, how many people we	ork at ti	he premises part-time (30 hours a week or less)?
		person	O 1	
	-	een two and five people	\tilde{O}_2	
		een five and ten people	O ₂	
		een ten and twenty	04	
		than twenty people	O ₅	
	wore	man wenty people	U5	

Q10	To the best of your knowledge, to which e count of employees (full time and part time				belong? P	lease provide a
	White	, agae. eac	O1	,		
	Mixed/Multiple Ethnic Groups		O ₂			
	Asian/Asian British		<u>О</u> з			
	Black/African/Caribbean/Black British		O4			
	Latin American		O 5			
	Arab		O6			
	Other -(Please specify in the box below)		O7			
Q11	Please indicate how far you agree with	each of the fo	llowing state			
		Agree Strongly	Agree	Neither agree nor disagree	Disagree	Disagree strongly
	Most of our customers/clients are from the local community	0	0	0	0	0
	This business provides goods or services that					
	serve the needs of people from a shared ethnic background - PROMPT FOR SURVEY STAFF -					
	for example is there a particular race or ethnic	0		0	0	0
	group that relies on the services provided by your business or organisation					
	This business provides goods or services that serve the needs of people with a shared religious					
	identity - PROMPT FOR SURVEY STAFF - for	\circ	\circ			
	example is there a particular religious group that relies on the services provided by your business					
	or organisation					
	This business forms part of a community of other nearby businesses that primarily cater to people					
	from the same shared cultural or religious					
	background - PROMPT FOR SURVEY STAFF - by this, we mean do you think the businesses in the area cater for a specific ethnic group or	0	0	0	0	0
	religious community					
Q12	Thinking about Elephant and Castle sh the following where 1 is very poor and	opping centre	as a locatio	on for business ho	ow do you	rate it on each of
	the following where i is very poor and	Very poor	Poor	Average	Good	Very good
	Transport links	0		0		0
	Availability of commercial units	0	0	0	0	0
	Competitive rental rates of commercial units	0	0	0	0	0
	Existing level of footfall	0	0	0	0	0
	Hub for culturally specific shops and service- providers	\circ	\circ	0	\circ	0
	General attractiveness as destination	\circ	\circ	0	\circ	0
Q13	There are proposed plans to redevelop Were you aware of this before today?		Castle Shop	pping Centre		
	Yes	rick one only	○ 1			
	No		02			
	Don't know		O ₃			
Q14	Have you (or your organisation) partici					
	developers (Delancey in conjunction w year? Tick one only	ith APG (a Du	tch pension	provider and ass	et manage	r) over the last
	Yes		O 1			
	No		O2			
	Don't know		○ 3			

	The regeneration proposes to create a new following aims of the project do you feel wi				
		significant benefit	Yes, slight benefit	No benefit	Don't know/N
	Improved transport links with new access to London Underground	O O	O O	O	O
	The reprovision of the same amount of retail space in an open air layout across three connected levels, with convenience shops at ground level, high street shops on first floor and new restaurants and leisure on the second floor	0	0	0	0
	Increased number of local residents living in new housing in the town centre	0	0	0	0
	New campus for the London College for Communication	0	\circ	\circ	0
C	Should the development go ahead it is likely sentre. If the project obtains planning permisousiness? <i>Tick one only</i>				
F	Relocate your business within the Elephant and Castle	O ₁			
	Relocate your business within the Southwark borough	O2			
ŀ	Relocate your business elsewhere	O ₃			
(Close your business	O4			
(Other (please specify in the box below)	<u></u>			
	And why do you say that?				
	How confident are you that you will be able	to relocate w	ithin the new E	Elephant and Castle	e town centre
		to relocate w	rithin the new E	Elephant and Castle	e town centre
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident	0:	rithin the new E 1 2 3 4	Elephant and Castle	e town centre
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident Not very confident	0:	1 2 3 4	Elephant and Castle	e town centre
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident Not very confident No at all confident	res (if any) do	1 2 3 4 5 you consider w	ould be helpful in e	nabling you t
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident Not very confident No at all confident And why do you say that? If the development progresses what measur continue to operate your business	0:	1 2 3 4 5 you consider w		nabling you t
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident Not very confident No at all confident And why do you say that? If the development progresses what measur continue to operate your business Business advice	res (if any) do	1 2 3 4 5 you consider w	ould be helpful in e	nabling you t
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident Not very confident No at all confident And why do you say that? If the development progresses what measur continue to operate your business Business advice Assistance in finding alternative accommodation	res (if any) do	1 2 3 4 5 you consider w	ould be helpful in e	nabling you t
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident Not very confident No at all confident And why do you say that? If the development progresses what measur continue to operate your business Business advice Assistance in finding alternative accommodation Affordable business space	res (if any) do	1 2 3 4 5 you consider w	ould be helpful in e	nabling you t
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident Not very confident No at all confident And why do you say that? If the development progresses what measur continue to operate your business Business advice Assistance in finding alternative accommodation	res (if any) do	1 2 3 4 5 you consider w	ould be helpful in e	nabling you t
	How confident are you that you will be able immediate area? Tick one only Very confident Fairly confident Neither confident nor unconfident Not very confident No at all confident And why do you say that? If the development progresses what measur continue to operate your business Business advice Assistance in finding alternative accommodation Affordable business space Support with the upfront costs (e.g. help with shop	res (if any) do	1 2 3 4 5 you consider w	ould be helpful in e	nabling you t

DIVERSITY QUESTIONNAIRE

By answering these optional questions, you will help Southwark Council ensure that their consideration of the planning application is informed by a good understanding of the diversity characteristics of those directly affected by the development. All information will be treated in the strictest of confidence and will only be used to inform the Equality Impact Assessment (EqIA).

Q22	Please r	ecord gender;				
	Male		() 1		
	Female		(<u></u> 2		
Q23	What is	your age group?				
	Under 18	3	() 1		
	18-24		(<u>)</u> 2		
	25-34		() з		
	35-44		() 4		
	45-54		() 5		
	55-64		(<u></u> 6		
	65-74		(<u>7</u>		
	75 +		(○ 8		
	Refused		(<u>)</u> 9		
Q24		the following ethnic groups do you feel	you belong	to?		
		glish/Welsh/Scottish/Northern Irish/British	O1		Asian/Asian British: Bangladeshi	O1
	White: Iris		02		Asian/Asian British: Chinese	O1:
		psy or Irish Traveller	03		Asian/Asian British: Other Asian	O1:
	White: Oth	ner White Itiple ethnic group: White and Black Caribbean	04		Black/African/Caribbean/Black British: African	O1-
		05		Black/African/Caribbean/Black British: Caribbean	O1:	
		Itiple ethnic group: White and Black African Itiple ethnic group: White and Asian	06		Black/African/Caribbean/Black British: Other Black Arab	O16
		Itiple ethnic group: Other Mixed	07		Latin American	O1
		an British: Indian	09		Other Ethnic Group (please specify in the box below)	O ₁
		an British: Pakistani	010		Refused	O20
	Q25	What is your religion?				
		Christianity			O1	
		Hinduism			02	
		Islam			03	
		Sikhism			04	
		Judaism			05	
		Buddhism			06	
		Rastafarianism			07	
		No religion			08	
		Refused/Prefer not to say			09	
		Other (please specify in the box below	')		010	
	Q26	Do you have a disability				
	G,ZO				O.	
		Yes			<u>U1</u>	
		No			O2	
		Prefer not to say			()3	

THANK AND CLOSE

Other- (Please specify) OPEN BOX

Appendix E – Customer Survey

Elephant and Castle Shopping Centre - On Street Survey

This survey has been commissioned by Southwark Council to update an Equalities Analysis for the shopping centre as part of the Council's public sector equalities duty. The survey follows on from previous survey work at the shopping centre carried out in 2016 and 2017 and has been designed to develop a detailed understanding of the usage of the shopping centre.

The survey is part of the standard consultation process undertaken with any community affected by a large development proposal. Your answers will be treated in strict confidence in accordance with the Data Protection Act and GDPR. They are used for statistical research purposes only. Names and addresses are never included with the results.

The survey will take no longer than 10 minutes

Q1	To enable us to map use of the shoppi not be contacted. INTERVIEWER TO S		be great if you could tell us your postcode. Y	ou will
	SE10	O1	SE17 3	09
	SE14	02	SE5 0	O 10
	SE16	03	Elsewhere in Southwark	O11
	SE1 7	O ₀₄	Elsewhere in South London – specify borough OPEN BOX	\bigcirc_{12}
	SE11 4	05	Elsewhere in Greater London	13
	SE11 6	06	Outside Greater London	14
	SE17 1	O7	Refused	O 15
	SE17 2	08		
Q2	How do you usually travel to Eleph duration). Please tick one only	ant and Castle? P	lease select the one main mode you use (lo	ongest
	On foot		○ 1	
	By bike		O ₂	
	By underground (tube)		3	
	By train		4	
	By bus		0 5	
	By car / motorbike		6	
	Other- please specify OPEN BOX		O 7	
Q3	What is the main purpose of your visit t	o the Elephant and	d Castle Shopping Centre today? Please tick	one only
	Shopping within the centre	O ₁		
	Shopping at the market	O2		
	Visit hairdresser / other service	○ 3		
	Meet friends	O4		
	Eat at a restaurant / café /take-away	O ₅		
	I work in the centre	O 6		
	I attend the London College of Communication	O7		
	To access the train station	08		

O9

How frequently on average do you	visit this Shopp	ing Centre?	Please tick one	only	
First visit today CLOSE		O ₁		•	
Five days a week or more often		02			
Two- three times a week		O ₃			
Once a week		03			
Once every few weeks		O ₅			
•					
Once every month		O ₆			
Once every six months or less		O 7			
How do you rate Elephant and Castle TICK ONE ONLY PER ROW	Shopping Cent	re based on e	ach of the follo	wing charac	teristics? Plea
	Very poor	Poor	Average	Good	Very good
Location/ease of getting here	\circ	\circ	\circ	\circ	\circ
Range of goods/services available	\circ	\circ	\circ	\circ	\circ
Culturally-specific goods/services in a single location	\circ	\circ	\circ	\circ	\circ
Affordability of goods and services	0	0	0		0
General feeling of being welcome/safe here	0	\circ	0	\circ	0
There are proposed plans to redevelor Were you aware of this before today?			oing Centre		
		•			
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent, do you	Castle including orking in Londor	g new shops, n and a new c	provider and ass offices and leis ampus for Lond	ure facilities on College o	as well as nev
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent do you Strongly Support	n with APG (a Du Castle including orking in Londor I support these I	tch pension pg new shops, nand a new caproposals? Pl	provider and ass offices and leis ampus for Lond	set manager) ure facilities lon College o	wishes to as well as new
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent do you Strongly Support Support Neutral	with APG (a Du Castle includin orking in Londor I support these I	tch pension pg new shops, n and a new caproposals? Pl	provider and ass offices and leis ampus for Lond	set manager) ure facilities lon College o	wishes to as well as new
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent do you Strongly Support Support Neutral Have Reservations	n with APG (a Du Castle includin orking in Londor I support these I	tch pension pg new shops, n and a new coproposals? Pl	provider and ass offices and leis ampus for Lond	set manager) ure facilities lon College o	wishes to as well as new
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent do you Strongly Support Support Neutral Have Reservations Oppose	n with APG (a Du Castle includin orking in Londor I support these I	tch pension pg new shops, n and a new caproposals? Pl	provider and ass offices and leis ampus for Lond	set manager) ure facilities lon College o	wishes to as well as new
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent do you Strongly Support Support Neutral Have Reservations	n with APG (a Du Castle includin orking in Londor I support these I	tch pension pg new shops, n and a new coproposals? Pl	provider and ass offices and leis ampus for Lond	set manager) ure facilities lon College o	wishes to as well as ne
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent do you Strongly Support Support Neutral Have Reservations Oppose	with APG (a Du Castle including orking in Londor I support these I	tch pension pg new shops, n and a new coproposals? Pl 1 2 3 4 5	provider and ass offices and leis ampus for Lond lease tick one on	set manager) ure facilities on College o	wishes to as well as nev f
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent do you strongly Support Support Neutral Have Reservations Oppose Why do you say that? (Assuming it is successful) what impare	with APG (a Du Castle including orking in Londor I support these I	tch pension pg new shops, and a new caproposals? Pl	provider and ass offices and leis ampus for Lond lease tick one on	set manager) cure facilities on College o ly	wishes to as well as new f
The developer Delancey in conjunction create a new town centre at Elephant & homes for rent for people living and we Communication, to what extent do you Strongly Support Support Neutral Have Reservations Oppose Why do you say that? (Assuming it is successful) what imparhave on the local community in Elepha	th with APG (a Du Castle including orking in Londor U support these part of the second ct (if any) do you ant and Castle.	tch pension pg new shops, and a new caproposals? Pl	provider and assoffices and leis ampus for Lond lease tick one on opposed redevelopesses write details in	set manager) sure facilities on College o ly ppment of thi	wishes to as well as new of
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(J11	currently use at Elephant & Castle?	ict of a new dev	elopment here would have on the facilities to	nat you
		Budget shops	01	Food shops (cultural foods)	06
		Clothes shops	02	Market stalls	07
		Community services/charities	03	Restaurants or cafes	08
		Culturally-specific shops or services	04	Other (please specify) OPEN BOX	09
		Food shops (supermarkets)	05	None of the above	10
C	Q12	Why do you say this?			
(Q13	What do you think will be the main effects for	or the local com	munity of the proposals for a new town centre a	at Elephant &
		Castle?		, , ,	
		Don't know	\bigcirc_1	Main effects for the local community (Please write comments in box)	\bigcirc_2
Q14	INT	uld the development go ahead what type of ERVIEWER TO SELECT ALL MENTIONE ESS CODE 1 MENTIONED		services would you like to see incorporated POMPT	within it?
		o it the same/ what is there now – INTERVIEWER PROMPT FOR MORE DETAILS- SELECT FROM DOW		High street shops/branded chain stores	07
	Cafe	s and restaurants	02	Market style- retail	08
	Cultu	ıral facilities	03	Service retail (hairdressers, dry cleaners, etc.)	09
	Depa	artment stores	04	Small-scale convenience stores	10
		l shops (cultural foods)	05	Other – please specify OPEN BOX	11
		shops (supermarkets)	06		
By und trea Ele	answe derstar ated in ephant	nding of the diversity characteristics of tho the strictest of confidence and will only be	se directly affe e used to inforr	nsure that their decision making is informed cted by the re-development. All information in the council's decision making in relation to al will be identified and the data will be repo	will be o the
Q1		Please record gender;			
	ı	Male	O 1	Female	O2
Q1	6 V	Vhat is your age group?			
		Under 18	O ₁	55-64	O ₆
		18-24	O ₂	65-74	06 07 08
		25-34	O3	75 +	O8
		35-44	O 4	Refused	<u>O</u> 9
	4	45-54	O ₅		

Q17	Which of the following ethnic groups do	you feel you	belong to?		
	White: English/Welsh/Scottish/Northern Irish/Britisl	h 🔾 01	Asian/Asian B	ritish: Bangladeshi	O11
	White: Irish	02	Asian/Asian B	ritish: Chinese	O 12
	White: Gypsy or Irish Traveller	03	Asian/Asian B	ritish: Other Asian	O 13
	White: Other White	04	Black/African/	Caribbean/Black British: African	O 14
	Mixed/multiple ethnic group: White and Black Caril	bbean 🔾 05	Black/African/	Caribbean/Black British: Caribbean	O 15
	Mixed/multiple ethnic group: White and Black Afric	an Oo6	Black/African/	Caribbean/Black British: Other Black	()16
	Mixed/multiple ethnic group: White and Asian	07	Arab		O 17
	Mixed/multiple ethnic group: Other Mixed	08	Latin America	n	O 18
	Asian/Asian British: Indian	09	Other Ethnic (Group (please specify below)	O 19
	Asian/Asian British: Pakistani	O 10	Refused		O 20
Q18	What is your religion?				
	Christianity	O01	Buddhism		00
	Hinduism	02	Rastafarianism	ı	07
	Islam	03	No religion		30 🔾
	Sikhism	04	Refused/Prefe	not to say	09
	Judaism	05	Other (please	specify)	010
Q19	Do you have a disability				
	Yes O1 N	lo	O 2	Prefer not to say	Эз

THANK AND CLOSE

Appendix F – Report for Southwark Council by the London College of Communication (LCC)

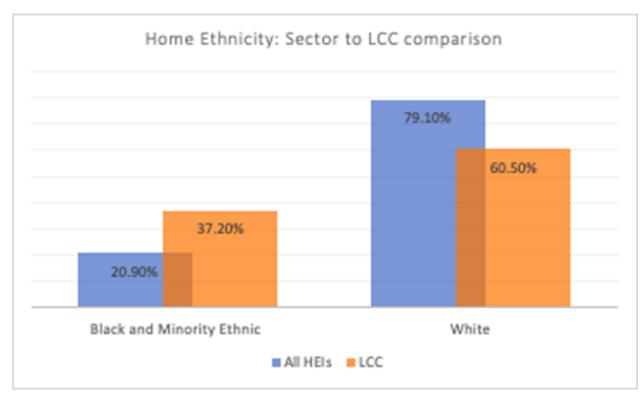
Received 21st November 2019

Student data

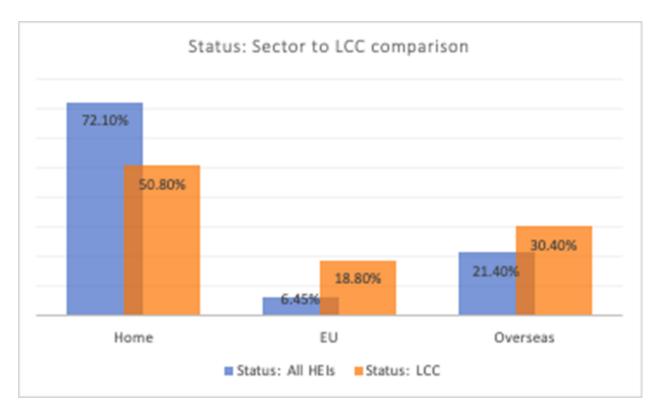
Student profiles, all years (total student numbers 4338)

Age	Disability	Ethnicity of home students	Gender	Status
17 and under: 0.5%	Declared disability: 14.6%	BAME: 37.2%	Female: 66.9%	Home: 50.8%
18-20: 46.4%	No declared disability: 85.3%	White: 60.5%	Male: 33%	EU: 18.8%
21-24: 41.1%		Unknown: 2.4%	Non-binary: 0%	Overseas: 30.4%
25-29: 7.9%			Other: 0.1%	
30 and over: 4.2%				

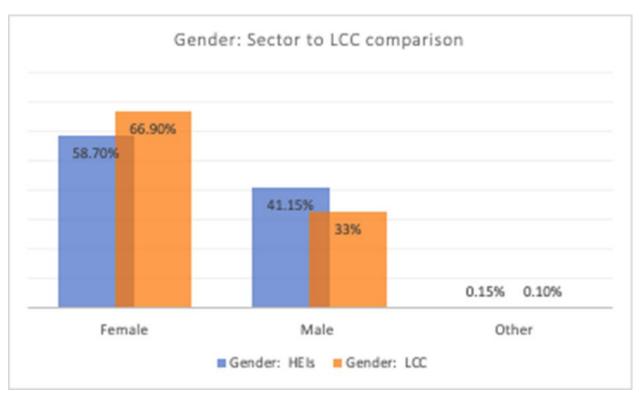
LCC have drawn several observations from this data when benchmarked against the higher education sector:



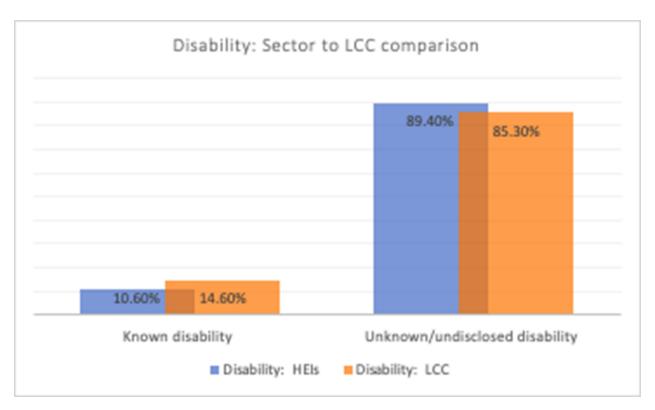
Compared to the Higher Education Institute (HEI) sector average, LCC has 16.3% more BAME Home students and 18.6% fewer White Home students.



Compared to the HEI sector average, LCC has 21.3% fewer Home students, 12.35% more EU students, and 9% more Overseas students.



Compared to the HEI sector average, LCC has 8.2% more female students and 8.15% fewer male students.



Compared to the HEI sector average, LCC has 4% more students with a declared disability.

Applications from London, 2018/2019 recruitment

Total applicants	Applicants made an offer	% of applicants made an offer	Applicants accepting an offer	% of offers accepted	Same course enrolments
1438	1007	70	321	31.9	304

When comparing with data from the 2017/2018 recruitment cycle, this shows a drop of:

- 5.1% in applicants from London
- 3.9% in London applicants accepting an offer
- 6.2% in enrolment

However, there was a drop in Creative Education higher education applications overall in 2018/2019, and the regional data for London shows the smallest drop in applications, offers and enrolment. The South East showed an application drop of 8.3%, with the largest drop being observed in Scotland of 46.7%. Interestingly, the percentage drop of London's BAME applicants to LCC was only 2%.

Applications from Southwark permanent residents, 2018/2019 recruitment

Number of applicants	Applicants made an offer	Applicants accepting an offer	Same course enrolments
61	43	20	18

Partnerships

Over the past 12 months, LCC has facilitated several local engagement projects, a snapshot of these are provided below:

Portrait of a London Road

The exhibition Portrait of a London Road: 1904, 1975, 2019, curated at the LCC Photography and the Archive Research Centre, features a remarkable set of recently discovered archival photographs of

London Road from 1975 alongside images of the same road in 1904 and 2019. The images document the business owners, situated between the historical landmark of St George's Circus and the famous Elephant and Castle roundabout, stood proudly in front of their shop fronts in 1975. It has received a huge amount of press coverage both locally and across London and the many local visitors have been fascinated by this glimpse into the Elephant and Castle history.

Shop Front

In 2017 LCC graduates embarked upon a unique community design project, delivering free creative solutions and materials to 25 local Elephant and Castle traders. Supported by funding from Southwark's High Street Challenge Fund, the Shop Front project saw five LCC graduate designers from a range of courses matched with traders from the Elephant & Castle area, creating new logos, branding, menus, window vinyls and display materials. Based in the LCC Studio in the Elephant and Castle Shopping Centre, the pop-up studio also offered design advice and guidance to drop-in business clients, including practical tips and a special workshop on how good design can benefit small business led by LCC staff and graduates.

Where Walworth Eats (www.wherewalwortheats.co.uk)

The 2019 Where Walworth Eats project, funded again by Southwark's High Street Challenge created an interactive map to show the best places to eat and find healthy food in the area. The map highlighted the many different cuisines and cultures that can be found in Elephant and Castle and was available online and in print to students at the college as well as to people working in the area. Where Walworth Eats also helped local restaurants market their businesses with support from LCC students, graduates and staff which ranged from food photography to social media and web marketing advice and tuition. Out of 65 businesses documented and contacted on and round the Walworth Road, 27 signed up for support.

Talent Works

Talent Works Studio is a pop-up creative studio for charities and social enterprises in Southwark and Lambeth. Building on a three-year iterative programme of creative support, the Studio was in action three times throughout 2018/2019. Each time, around 30 students worked on briefs from up to 18 clients. In just eight days the students working collaboratively and across disciplines created work that helped their clients get their message across. Clients ranged from youth clubs to Pensioners' Centres, from tenants' groups to After School projects. The work created covered print design, websites, film, social media and branding.

Business, cultural and community partnerships

For monitoring purposes, the LCC segments their engagement into three categories: business, cultural and community. The active partnerships currently in place at the LCC are as follows:

Business partnerships

Partner Organisation	Description of partnership activity
Lend Lease	Maker Space
	Elephant Park
London Borough of Southwark	Where Walworth Eats
LSBU	ACE-IT CreaTech
	Higher Digital Skills
n/a	Recruiting local mentors for PG Mentoring Scheme
Mercato Metropolitano	Rooftop Farm
Consortium led by Lambeth Council with LBs of Southwark, Lewisham and Wandsworth. UAL	South London Innovation Corridor

Partner Organisation	Description of partnership activity
one of HE partners alongside LSBU, Goldsmiths and RCA	
Duckie	Posh Club
Mercato Metropolitano	Advertising
Creative Enterprise Programme	Branding for Creative Enterprise programme launch

Cultural partnerships

Partner Organisation	Description of partnership activity
Dulwich Picture Gallery	British Surrealism Lates
	Rembrandt Late
Art on Underground	Art on Underground event and exhibition
Corsica Studio	2020 event
Siobhan Davies	Illustration briefs for Block 2

Community partnerships

Partner Organisation	Description of partnership activity
Pre-16/Primary Schools: Charlotte Sharman, Robert Browning, Beomund, Charles Dickens, Snowsfield and Tower Bridge, The Grange, Kintore Way, Mayflower Federation, Alfred Salter, St Francis Catholic School, Angel Oak Academy, Dog Kennel Hill, The Belham School, Bellenden School, St John's & st Clements, Hollydale, St Anthony's, Dulwich Hamlet Junior, Dulwich Wood, Brunswick Park, Galleywall, English Martyrs RC, Southwark Park	CPD & Mapping Project (& Exhibition)
British & Columbian Chamber	Venue hire
N/A	Creation of Public e-newsletter
N/A	Designing volunteering service for students
Notting Hill Genesis (Aylesbury Estate)	Youth and After-School 3-day annual summer workshops
Southwark College (FE)	Post 16 progression work / UAL Insights
Pre 16/ Secondary Schools: Ark Globe Academy, Ark All Saints Academy, Notre Dame RC Secondary School for Girls, East Dulwich Charter School (and Oasis Academy South Bank in previous years)	Pre-16 in-school and in-College, enhancing curriculum and creative futures workshops
Photofusion Photography Centre, Brixton, Charlotte Sharman Primary School, Angel Oak Primary School	BA2 Photography, Participation & Community Engagement Unit

Partner Organisation	Description of partnership activity
Southwark Pensioners Forum	Workshops
Southwark Local Access Fund	Social enterprise and charity support
United Saint Saviours	Photography Project
Pembroke House	Walworth Living Room workshops
Open House London	LCC 2020
Cinema Museum	Screen Public School Programme
Local Schools	Public Programme workshops
Draper Hall	Erasmus Project
Guys & St Thomas's	Branding project for BA GB&I to create healthy take away brand

Southwark and Lambeth Engagement Group

This year, LCC established the Southwark and Lambeth Engagement group. Its purpose is to bring together key staff representatives to capture and coordinate the College's engagement activity in Southwark and Lambeth to support a joined-up and enhanced engagement plan.

The group brings together expertise from across the College to capture and coordinate LCC's broad and varied engagement in Southwark and Lambeth to include their interactions with local businesses, communities, cultural institutions, educational institutions, and government. As well as allowing them to identify new opportunities for engagement with our local community, it also considers how they can connect these to their Knowledge Exchange and Placemaking work.

The group meets termly and is chaired by LCC Head of College and Pro Vice Chancellor of UAL.

Audience data

In the last year, the LCC had 2030 members of the public sign into their building for events and exhibitions. Out of that 2030, 14% were Southwark residents and 7% were Lambeth residents.

45% of their sign-ins were from elsewhere in London, with 34% coming from outside the city.

Staff data

LCC has 634 members of staff based at Elephant and Castle.

71 members of staff located at Elephant and Castle are Southwark residents. This does not include hourly staff due to the way that LCC report on this data, so the likelihood is that the actual figure is higher.

When LCC move to the new site, total staff numbers are expected to increase to 1162 as they consolidate staff from their central office.

Digital data

LCC's digital channels are influential and wide-reaching:

- 3 million-page views per year to the LCC website
- 25k+ Facebook likes
- 22k+ Instagram followers
- 20k+ Twitter followers

Their national and international audiences, and their highly engaged internal audience are interested in LCC's local area and related cultural activities and organisations. They promote these on their channels, recent examples include:

- Castle Place project campaign on Twitter
- Annual Elefest event on Twitter
- Great Get Together event on Twitter
- Kicked to the Kerb, Southwark Council project on Twitter
- Local area page highlights
- Elephant's atmosphere and specific hotspots on LCC website
- Student illustrated guide to Elephant and Castle

Ends.

