

Appendix F

Core Strategy publication/submission version equalities impact assessment (available in the members' offices and on the internet)

Appendix F for Planning Committee Report and Cabinet Report: Core Strategy

Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	Core strategy final version and proposals map changes (available on the internet and with report)
Appendix B	Inspector's report on the Core Strategy (available in the members offices and on the internet)
Appendix C	Consultation and sustainability statement (available in the members offices and on the internet)
Appendix D	Core strategy publication/submission version consultation report (available in the members offices and on the internet)
Appendix E	Core strategy publication/submission version sustainability appraisal (available in the members offices and on the internet)
Appendix F	Core Strategy publication/submission version equalities impact assessment (available in the members offices and on the internet)
Appendix G	Core Strategy publication/ submission version appropriate assessment (available in the members offices and on the internet)

REVITALISE



Core strategy

CDCS15 Equalities Impact Assessment

March 2010



EQUALITIES IMPACT ASSESSMENT

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

This is the Equalities Impact Assessment for the core strategy.

The core strategy is one of the most important documents in the local development framework. The Planning and Compulsory Purchase Act (2004) introduced the local development framework (LDF) as a replacement for unitary development plans. LDFs are designed to take a more pro-active approach to the planning system, linking with key partners to deliver specific plans for areas. The core strategy is the over-arching document in the LDF and all other LDF documents must be in line with the policies in the core strategy. Other documents in Southwark's LDF include the Peckham and Nunhead, Aylesbury, Canada Water, Camberwell and Old Kent Road area action plans and supplementary planning documents for a number of topics and areas.

The core strategy sets out the vision for what type of place Southwark will be in the future. It will shape the development of the borough up to the year 2026 by providing clear objectives, policies and a delivery plan to make development happen in the right place at the right time. The core strategy must help to achieve the vision and objectives set out in Southwark Alliance's sustainable community strategy, Southwark 2016

The core strategy includes:

- A vision that sets out what type of place Southwark will be in the future
- Objectives that show how that vision will be achieved

- A strategy for all future development. This includes a clear spatial strategy which will set out how much growth will take place in the borough and where development will happen and planning policies to get the right kind of development
- A key diagram and changes to the proposals map that shows how different areas will develop and sets out areas of growth
- A delivery and implementation plan that will show how the strategy for Southwark will be achieved and who will help to make it happen
- A monitoring plan that shows how the core strategy policies will be monitored to make sure that they are being correctly implemented to achieve the overall vision.

The core strategy has been developed and prepared in accordance with statutory regulations and in consultation with the local community. The community have been consulted on the core strategy in accordance with our Statement of Community Involvement (2008) and the core strategy consultation strategy. The core strategy has been prepared in a number of stages as set out below

- The first stage was the Issues and Options stage which identified the challenges relating to development in the borough and set out a number of different options for how development could take place.

The Issues and Options core strategy was formally consulted on from November 3 to the December 15 2008.

- The second stage in preparing the core strategy was called the Preferred Options and this set out the way development in the borough should take place based on the results of consultation on the Issues and Options.

The Preferred Options core strategy was formally consulted on from June 9 to July 23 2009.

- The final stage of consultation was the publications/submission stage of the core strategy. This stage set out the final approach proposed for development in the borough. We formally consulted on this stage from January 22 to March 5 2010.

This Equality Impact Assessment (EQIA) includes our assessment of the following

- Core strategy issues and options. This is set out in the scoping section 1 of the EQIA.
- Core strategy preferred options. This is set out in section 2 assessments of impacts of the EQIA. At this stage we revisited the scoping section and carried out the section 2 assessment.
- Core strategy publications/submission. At this stage of the core strategy we revisited both section 1 and 2 of the EQIA. We have set out a new (second) section 2 (assessment of impacts) to show how we have progressed the development of the core strategy and the EQIA. This sets out further considerations at the publications/submission stage to ensure that we have carried out a full EQIA of the core strategy. It needs to be read alongside the first two sections on the issues and options and preferred options EQIA.
- Final comments received from the Equalities and Diversity Panel at the second stage 2 of the EQIA on the core strategy publication/submission core strategy.

The EQIA shows a clear audit trail of how we have developed the core strategy taking into account the findings from the EQIA and how we have revised the EQIA at each stage of the preparation of the core strategy.

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

The core strategy is a new planning policy document. It replaces some of the policies in the existing adopted Southwark Plan (Unitary Development Plan, 2007).

CORE STRATEGY– ISSUES & OPTIONS

EQUALITIES IMPACT ASSESSMENT

STAGE ONE: SCOPING

THIS SECTION OF THE EQIA WAS CARRIED OUT AT THE ISSUES AND OPTIONS STAGE OF THE CORE STRATEGY. THIS SECTION FEEDS INTO THE STAGE TWO FOR THE PREFERRED OPTIONS AND PUBLICATION/SUBMISSION CORE STRATEGY. THE CORE STRATEGY WORDING HAS BEEN UPDATED AT EACH STAGE.

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

We identified potential barriers that could prevent our equalities target groups (race, faith and belief, age, disability, sexuality, gender and Travellers and Gypsies) from benefiting fully from the core strategy. These barriers could create differential impacts on certain groups and reduce social cohesion. We also identified how the core strategy may have positive impacts on these groups and how it may improve social cohesion.

These impacts can be split into two categories; impacts created through the production of the core strategy in terms of public consultation and impacts associated with the implementation of the core strategy. More detail on the way we consulted on the document is available in our consultation strategy, plans and report.

4.1 Impacts associated with consultation on the core strategy

There are a number of barriers associated with consultation on all our planning policy documents which may create problems for social cohesion. It is important that everyone is offered the ability to be involved in the preparation of the core strategy and that the final document reflects the views of our diverse community. We have prepared a consultation strategy and a consultation plan for the every stage of consultation on the core strategy. These set out how we plan to consult the local community, developers and stakeholders. After each stage of consultation we prepared a consultation report which sets out the findings of our consultation and the different methods we used to consult the local community. These documents are in accordance with our adopted Statement of Community Involvement (SCI), which sets out how and when we will involve the community in the development of planning documents and applications for planning permission. Within the SCI, we have identified barriers to involving equalities target groups and ways to overcome them. These include English not being someone's first language, problems accessing information, people not feeling safe attending evening meetings and the documents using too much jargon. Please refer to [Appendix A](#) of this document for the full list of barriers to consultation.

4.2 Impacts associated with the objectives and implementation of the Core strategy

The core strategy issues and options paper is split into three main sections. The equalities impact of the proposals in each of the three sections is set out below.

- **Vision and objectives**

The vision and objectives of the core strategy are directly related to Southwark 2016, the sustainable community strategy for Southwark. As Southwark 2016 was subject to an Equalities Impact Assessment, it is expected that the vision and objectives of the core strategy will be able to demonstrate that they have

adequately taken into account equalities issues. However in order to make sure that the core strategy is assessed correctly and completely, the vision and objectives are set out below;

Core strategy Vision;

By 2026 Southwark will be a world class quarter of a world city with a thriving economy and improved job opportunities for local people. There will be less economic and social differences between communities and places. The creation of mixed communities and the provision of a wide range of housing will improve links between communities. All development will promote environmental sustainability.

Core strategy objectives (please note these are the same as the objectives in Southwark 2016):

Improve individual life chances:

- Achieve economic well being
- Achieve educational potential
- Be healthy
- Stay safe
- Enjoy cultural and leisure opportunities
- Value diversity and be active citizens

Deliver quality public services:

- Public services that are accessible and integrated, customer focused, efficient and modern

Make the borough a better place for people:

- Create mixed communities
- Promote sustainable use of resources
- Provide more and better homes
- Create a vibrant economy
- Have a liveable public realm
- Ensure conservation and protection

Make sure positive change happens

- Provide enough funding for regeneration to positively transform the image of Southwark

The vision of the core strategy seeks to create a more balanced borough with less economic and social differences between communities and places. This is directly linked to the vision of the Southwark 2016 which

recognises that there are vast differences in the borough between different places and communities and aims to reduce these differences. The vision is likely to have a positive impact on those people in equalities target groups (race, faith and belief, age, disability and sexuality) as well as gypsies and travellers, refugees and asylum seekers as these people are more likely to live in deprived areas and not be as wealthy as other people.

By aiming to improve the social and economic quality of life for residents in these specific equality groups, residents in other equality target groups such as age, gender and sexuality may feel that this is a barrier to their representation in the core strategy. In order to overcome this, as many residents as possible will be consulted widely on the vision of the document. Furthermore the objectives of the core strategy, which are the same as the objectives of Southwark 2016, are applicable to all equalities target groups so this should overcome the barrier identified in the vision.

Core strategy key policy issues

The likely barriers, differential impacts and impacts on social cohesion were discussed at the EQIA workshop held on 11 August 2008. These can have both negative and positive impacts. We need to consider all of the issues below when writing the core strategy.

Housing

The core strategy will introduce a number of policies on housing. This will include looking at: how much new housing we should build, where the new housing should be located, how much family housing we should provide, how much wheelchair housing we should provide, how much should be affordable housing, and whether we should allocate areas for specialist housing such as student housing, and gypsies and travellers sites. We need to consider:

- Ensuring there is an adequate supply of housing suitable for wheelchair users. Without this, disabled people may not be housed in dwellings that meet their needs.
- Access to specialist housing such as care homes and supported housing. This is likely to have the greatest impact on elderly people and people with disabilities.
- Supply of housing so that we ensure we have enough dwellings to house everyone. If we do not allocate enough sites for housing, we may find we do not have enough space to build housing to meet local need. This may result in the building of more one and two bedroom dwellings which may have a negative impact on some groups, such as some groups and some ethnic groups which are more likely to have larger families.
- Affordable housing. We may vary the amount of affordable housing we require through the core strategy. If we reduce the amount, it is likely to have a negative impact on those in poverty. This is often particular equality groups, such as asylum seekers who are new to the country and have little money.
- As part of affordable housing, we require a percentage to be intermediate housing, which is often shared ownership. This may not be suitable for all religious groups, such as Muslims or people from other cultures who may not want to take out a mortgage for religious or cultural reasons.
- As part of the core strategy we will look at how we can successfully create mixed communities with a range of housing types and tenures. This should help to improve social cohesion.
- Allocating sites for student housing may have a differential impact. For example, young people may benefit from the increased bars and shops in the area due to the increase in students, but older people may object to the noise of so many young people.
- By improving areas, there is always the likelihood that house prices will rise which may cause conflict between groups. For example new people may move into the area and be able to afford the new housing whilst existing groups may have to continue to live in less desirable housing.
- The core strategy may provide guidance on the allocation of sites for Travellers and Gypsies. This will have differential impacts on different groups and may have an impact on community cohesion. This could be

either a positive or a negative impact as it may cause friction between groups as land could be designated for Travellers and Gypsies (and other groups may feel their needs are being prioritised above their own needs), or it may improve relations by showing acceptance for these sites. It will clearly have the most positive impact on Travellers and Gypsies.

- The core strategy includes issues and options to improve the quality of future housing. This should have a positive impact on all groups.
- We may encourage more or less family housing in different areas. When we encourage a higher amount of family housing, this will have a positive impact on certain groups such as religious and ethnic groups who are more likely to have larger families. It may have a less positive impact on groups who are more likely to live alone and do not want family housing.
- People currently living in the area may feel resentful towards large numbers of people moving in. This tension could be further exacerbated if people moving into the area buy up newer and higher quality housing.
- New housing may only meet the needs of some people, and other people may feel it does not meet their needs and that other groups are being prioritised over their needs. This could cause tension between different groups.
- Communities may be split up by regeneration which could have a negative impact on all the equality groups.

Transport

The core strategy encourages more walking, cycling and public transport, and reduce car use in the borough. We need to consider the impact on transport infrastructure when we look at designating areas for growth. We need to consider:

- Some areas may see greater improvements to public transport than other areas. This can have an impact on all the equality groups in terms of access to employment, shops, leisure facilities and education. It may

have a particular impact on groups less likely to have access to a car such as young people and single parents (particularly women).

- We may encourage car-free developments which can have a negative impact on some groups who need a car more than others. For example, families with young children, elderly people, and disabled people.
- We need to consider pedestrian and cyclist links. This should have a positive impact for everyone, particularly those groups most likely to not have access to a car. However, we also need to consider that not everyone can cycle or walk easily through areas, such as disabled people, elderly people and parents with young children and buggies.
- Whilst the core strategy suggests how to and where to improve transport infrastructure, many projects are reliant on central and regional government funding. Sometimes funding gets cut or we have to wait longer than expected for funding to come through. This may cause tension and anger between communities as expectations are not always met. This may have a particularly negative impact on those people most reliant on public transport; often children older people and parents with young children (who are predominantly women).
- Some people may not feel safe using public transport, for example women and members of the LGBT community and certain faiths. Similarly walking routes may not feel safe for these people.
- Disabled access may be provided but sometimes it may be segregated from other access routes causing more isolation from the rest of the community.
- Public transport could continue to be unaffordable to some groups. This can limit access to job opportunities, leisure facilities, education etc.

Employment

The core strategy looks at whether we should release some of our protected employment land for other uses (such as housing), and whether we should allow other uses on the rest of our land currently used for employment. It will look at both industrial land and land used for offices. We need to consider:

- Having the right types of jobs in the right areas and suited to people's skills. Local people may not have the skills to access job opportunities that are created through the regeneration of areas and therefore may not benefit from these new opportunities. This may impact on some groups more than others such as young people, people without qualifications, people without English as their first language, single parents with childcare problems etc.
- We may allocate areas for industry. This may have an impact on local people's amenity, particularly people who are less able to move elsewhere or who are at home a lot, such as parents with young children, disabled people and elderly people.
- Certain groups may experience discrimination in accessing jobs such as young black men.
- Groups may feel it is unfair for land to remain as employment land when there is a need for housing. This could create tension between groups.

Community Facilities

The core strategy looks at the provision and location of community facilities. This may include faith centres, youth centres, community centres and libraries. We need to consider:

- Providing locations where places of worship can go. This will have a positive impact on certain faith groups and may have a negative impact on some other groups who may object to the noise of places of worship.
- Options for where we should improve sports facilities/put in new sports facilities may have a differential impact on different groups. For example, a sports centre catering for football may have more of a positive impact on boys than girls. It may also have differential impacts on people with disabilities.
- Improving sports facilities may have a differential impact as they may become more expensive and not affordable to everyone. This can harm social cohesion.
- Improving community facilities is likely to impact positively on everyone and may help resolve tensions between different groups as places for people to come together and interact.

Education

The core strategy looks at the provision of educational facilities, including pre-school, primary and secondary schools, and further and higher education. We will be linking in with some of the 'Schools for the Future' work. We need to consider:

- At the moment there is a “postcode lottery” when it comes to access to schools, which results in people living in more affluent areas usually having access to better schools. Through the core strategy we can help ensure there are more and better schools, which will have a positive impact on all the equality target groups.
- Some equality target groups achieve a lot better than others in the education system. By improving access to and provision of schools, we will hopefully benefit all the equality groups.

Health

The core strategy looks at where we should locate new health facilities and the idea of whether we should be allocating land for large health facilities. We need to consider:

- Where we choose to locate health facilities can have an impact on different groups. For example, if we allocate land for a large health facility, other GP surgeries may close down, and some groups may find it difficult to get to the polyclinic. For example those groups which are least likely to have access to a car.

Shopping and town centres

We will be looking at whether we should focus future retail development and which areas of the borough have the most capacity for growth. We will also be looking at whether we should encourage a night time economy (such as restaurants, bars and cinemas) in certain areas of the borough. We need to consider:

- We may choose to focus shops in just a few areas. If we do this, then it may have an impact on others areas as money may be redirected and local shops may close down. This could have varied impacts on

different groups, such as a negative impact on elderly people who may be less able to travel further away for the better shops.

- When we choose to improve shopping in some areas, these areas may undergo gentrification and increased rent, meaning some of the existing local shops may be pushed out. This will have an impact on local shop owners. It may also cause tension between groups, between those who can and those who cannot afford the inflated rents.
- We may encourage more leisure and night time economy activities in certain areas. This may have an impact on some groups, such as increased drinking may increase violence against young people and may intimidate older people.

Cultural and tourist facilities

The core strategy looks at where we should locate tourist attractions. We need to consider:

- Meeting needs of different groups in the borough. Tourist and cultural attractions should also meet the needs of local people. If they are too expensive, certain groups such as young people may not be able to enjoy the facility.
- Locating tourist attractions may cause frictions between groups as it means less land available for local needs such as housing, sports facilities or community facilities. This causes friction between groups who do use the facility and those who don't.

Core strategy spatial options

The core strategy sets out a spatial strategy for the borough which provides a clear guide for future development and sets out where development will take place. At this issues and options stage two different

spatial strategies are being put forward for consideration. The equalities implications for each of these strategies are considered below.

Spatial option 1. Growth Areas: Create Growth Areas for new housing, shops, offices, community facilities, tourism and culture facilities. The Growth Areas will be the Central Activities Zone, Elephant and Castle, London Bridge and Bankside, Peckham, Canada Water and Camberwell. These are areas with good public transport links.

Under this option new development, jobs, shops and community facilities would be concentrated in the growth areas. As these areas can often be more deprived this would have a positive impact on residents in equalities target groups such as race and ethnicity, faith and belief and disability groups, Travellers and Gypsies and asylum seekers who tend to live in more deprived areas. The differential impact of this may be that residents living in other areas of the borough, in other equalities target groups such as sexuality, no faith, gender and age are located further away from jobs and services such as shops and community facilities. However a barrier to overcome this is that this option would also locate some development in town centres which provide local services to meet the needs of other equalities target groups.

The area-based approach to family housing could again be seen to have a more positive impact on the equalities target groups who live in these specific areas such as those in certain race, ethnicity, faith and belief equalities target groups as they may be more in need of family housing. However this would mean that less family housing would be provided in other areas in the borough as a result of this policy, this may have a differential impact on other equalities target groups living outside of these areas. A way to overcome this would be to ensure that where more family housing is provided it is based on a clear understanding of where the greatest need is. Southwark Council are also preparing a housing strategy that will inform this policy. In addition the local community will be consulted on this approach.

This option would apply an overall affordable housing target for the borough but the amount of affordable housing required would vary according to different areas, so we would require more affordable housing in areas where house prices are highest such as Bankside and London Bridge and more private housing in areas where there is a lot of social housing already such as Peckham and Elephant and Castle. This may have a positive impact on younger people who are more likely to want to live in areas such as Bankside and London Bridge as these areas traditionally have more flats and not as much family housing. However directing more private housing to areas such as Elephant and Castle may create an issue for people who live in those areas and want to purchase a home but cannot afford to do so. This is more likely to affect people in race, ethnicity, faith and belief equalities target groups who are more likely to live in these areas. The impact of this will be mitigated by carrying out consultation on these proposals to seek views from the local community. Also more private housing in these deprived areas would be likely to bring in more money from section 106 planning obligation agreements which could be used for the benefit of the wider local community (such as to improve parks or provide a new community facility) and could benefit specific equalities target groups.

Sites could be allocated for student housing in Peckham, Camberwell and Elephant and Castle. This may have a negative impact on equalities target groups living in these areas, particularly those in the faith, age, race and ethnicity target groups. A large proportion of people in these areas come from BME groups. These equalities target groups may feel that the land could have been set aside for a different use such as more housing or jobs for the local community or for a new community facility. A way to overcome this would be to ask local people, as part of the core strategy consultation, if specific sites should be allocated for student housing or if they would prefer the council to deal with applications for student housing on an individual basis.

Under this option major transport improvements in the growth areas would be possible as services, shops, tourist and cultural and community facilities would be more centralised. As a result many of the existing

services and community facilities would become more accessible to people in specific equality groups, such as faith and belief, race and ethnicity, who are more likely to live in these growth areas. Centralised services may also have a more positive impact on younger people who are more likely to use public transport compared to older people or those with a physical disability who may be reliant on cars to reach local services and would therefore find it more difficult to park in busy town centres. A way to overcome this would be to ensure that adequate parking is required in all new development for disabled people. We will also need to consult on an alternative core strategy option to have more localised community facilities.

Increasing employment opportunities is an important factor in addressing barriers for many of the equalities target groups, particularly those in faith and belief, race and ethnicity equalities target groups who suffer from economic deprivation and high unemployment levels. This option would see the greatest provision of new jobs in the growth areas. This would bring about many advantages for these equalities target groups as these areas tend to already have good public transport accessibility so jobs would be easier to get to.

Spatial option 2. Housing led growth: New housing will be allowed throughout the borough. It will not be focused in specific places.

Under this option new housing would be distributed across the borough, Southwark would meet and exceed the London Plan target for new homes. As there is a general need for more housing throughout the borough this is likely to have a positive impact on all equalities target groups. It may have more of a positive impact on young people who are keen to get onto the property ladder as more housing will provide more opportunities for this. The provision of more housing will result in more opportunities for affordable housing, this may also have a positive impact on those in the more deprived equalities target groups, and younger people who may not be able to afford to purchase a property on the open market. This may also have a positive impact on those in the

sexual orientation equalities target groups who may find it difficult to purchase a property if they are single, as opposed to being in a couple with a joint higher income.

This option would also set a standard requirement for the provision of affordable housing throughout the borough. There would be no area-based policies as in Option 1. This would mean that we could not ask for more or less affordable housing in certain areas to achieve wider regeneration and social and economic benefits. It is likely that this option would result in more affordable housing being provided than in Option 1. This could have a positive impact on the equalities group that tend to be income deprived as it may make it easier to find an affordable home. Alternatively this may have a negative impact on equalities target groups who live in deprived areas as under Option 1 we would try to create more balanced communities by introducing more private housing. If we continue to provide affordable homes in areas that are already deprived these places may just continue to be deprived.

Sites would not be allocated for student housing and instead applications will continue to be dealt with on an individual basis. This may have a negative impact on younger people who would be most likely to benefit from student accommodation, if they are students themselves and also who would benefit more from student nightlife such as bar and cafes. This would have a more positive impact on all other equalities target groups who may object to allocating sites for student housing and would prefer a more individual approach.

This option would be likely to result in less new jobs being provided in the borough overall, as more housing would be developed rather than new employment land. This is likely to have more of a negative impact on those equalities target groups who suffer from high unemployment. However the jobs that would be provided under this option would more likely to be located throughout the borough and not just confined to the growth areas. This may make it easier for people to walk to work or get to work quicker and improve their access to jobs.

Under this option, services and community facilities would be more spread out across the borough. More localised services may have a negative impact on younger people who are more likely to use public transport than compared to older people or those with a physical disability who may be reliant on cars to reach local services and would therefore find it more convenient to drive to local services rather than to drive and park in town centres. We will consult on an alternative option to have more centralised community facilities.

CORE STRATEGY – PREFERRED OPTIONS

EQUALITIES IMPACT ASSESSMENT

STAGE TWO: ASSESSMENT OF IMPACTS

THIS SECTION OF THE EQIA WAS CARRIED OUT AT THE PREFERRED OPTIONS STAGE OF THE CORE STRATEGY. THE CORE STRATEGY WORDING HAS BEEN UPDATED AT EACH STAGE.

Part A: Feedback from the Equalities and Diversity panel

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

As part of the issues and options consultation on the core strategy, the EqIA was taken to Equalities and Diversity Panel on September 16 2008. The Equalities and Diversity Panel made comments on the EqIA and these have been incorporated into the preparation of this Equalities Impact Assessment and the core strategy preferred options.

At the issues and options stage, the Equalities and Diversity panel advised us to consider the following issues. We have set out below how we have taken these comments forward.

- Hostels and homelessness

We have addressed this through our policies to increase affordable housing and family housing. We are also looking at all potential sites (above 0.25 hectares) across the whole borough which will help us to provide more housing across Southwark. This will help to provide more homes for everyone.

- Asylum seekers in Elephant and Castle and Peckham.
The core strategy is a strategic document and does not go into the detail of how to provide more housing and help for asylum seekers. By having policies to provide more housing (see above in response to hostels and homelessness) we will ensure there is more housing for everyone across the whole borough and that there is affordable housing, including housing that asylum seekers can be housed in.
- Overcrowding of existing Traveller and Gypsy sites.
At this stage of consultation, we are waiting for a study to be released by the Mayor on how many new Traveller and Gypsy pitches we should provide in Southwark. This information may be put into the publications/submission version of the core strategy.
- Importance of education.
Policy 4 of the preferred options sets out how we will have a joined up approach to how we will use our existing community facilities, including schools. We will continue to build new schools through the Southwark Schools for the Future Programme and require section 106 payments for schools. Our objective 1B also sets out that we want to achieve educational potential.
- Importance of disabled housing and Lifetime Homes.
We are addressing this through our policies for wheelchair homes and lifetime homes which will be set out in our Development Management Development Plan Document or our Housing Development Plan Document.

Part B: Purpose and aims of policy/strategy

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

The core strategy, when adopted, will be part of Southwark's Local Development Framework. The core strategy will be the main document setting out the strategic policies which will be used for deciding what sort of development should take place within the borough, and when, where and how it should happen.

3. What are its aims?

The overall approach

The core strategy sets out a spatial strategy for the borough which provides a clear guide for future development and sets out where development will take place. At this stage the preferred options are being put forward for consideration. The equalities implications for choosing these options are considered below.

The core strategy sets out what we would like Southwark to be like. The vision set out in the preferred options is:

Southwark will be a world class quarter of a world city with a thriving economy and improved job opportunities for local people. There will be less economic and social differences between communities and places. The creation of mixed communities and the provision of a wide range of housing will improve links between communities. All development will promote environmental sustainability.

We are taking forward a growth areas approach with development in town centres and areas with good public transport. We will prioritise development in: Central Activities Zone, Elephant and Castle Opportunity Area,

Peckham Action Area, Canada Water Action Area, Bankside, Borough and London Bridge Opportunity Area, Aylesbury Action Area, West Camberwell housing regeneration area and Old Kent Road regeneration area.

Under this option new development, jobs, shops and community facilities would be concentrated in the growth areas; mostly in the Central Activities Zone, the cores of the action areas and the opportunity areas. As these areas contain concentrations of the most deprived parts of Southwark this would have a positive impact on residents in equalities target groups such as race and ethnicity, faith and belief, and disability groups, gypsies and travellers and asylum seekers who tend to live in more deprived areas. The differential impact of this may be that residents living in other areas of the borough, in other equalities target groups such as sexuality, no faith, gender and age, are located further away from jobs and services such as shops and community facilities.

The area-based approach to family housing will have a more positive impact on the equalities target groups who live in these specific areas such as those in the faith and belief, race and ethnicity equalities target groups as they may be more in need of family housing. However this would mean that less family housing would be provided in other areas in the borough as a result of this policy. This may have a differential impact on other equalities target groups living outside of these areas. A way to overcome this would be to ensure that where more family housing is provided it is based on a clear understanding of where the greatest need is. Our Housing Strategy and other housing studies inform this policy. In addition the local community will be consulted on this approach.

This option would apply an overall affordable housing target for the borough but the amount of affordable housing required would vary according to different areas, so we would require more affordable housing in areas where house prices are higher, and more private housing in areas where there is a lot of social housing already such as Peckham and Elephant and Castle. This may have a positive impact on younger people who are more likely to want to live in areas such as Bankside and London Bridge as these areas traditionally have more flats

and not as much family housing. However directing more private housing to areas such as Elephant and Castle may create an issue for people who live in those areas and want to purchase a home but cannot afford to do so. This is more likely to affect people in race, ethnicity, faith and belief equalities target groups who are more likely to live in these areas. To better understand the possible impacts of this approach we will be carrying out consultation on these proposals to seek views from the local community. Also more private housing in these deprived areas would be likely to bring in more money from Section 106 agreements which could be used for the benefit of the wider local community (such as to improve parks or provide a new community facility) and would benefit specific equalities target groups.

We also need to consider the benefits of regeneration of areas versus improvements to tenants homes to ensure that we consider the needs of current residents in addition to how areas can be improved.

Sites could be allocated for student housing in Peckham, Camberwell and Elephant and Castle. This may have a negative impact on equalities target groups living in these areas, particularly those in the faith and belief, age, race and ethnicity equalities target groups. A large proportion of people in these areas come from BME groups. These equalities target groups may feel that the land could have been set aside for a different use such as more housing or jobs for the local community or for a new community facility. To help address this we are asking local people, as part of the core strategy consultation, if specific sites should be allocated for student housing or if they would prefer the council to deal with applications for student housing on an individual basis.

Under the preferred options major transport improvements in the growth areas would be supported as services, shops, tourist, cultural and community facilities would be more centralised here. As a result of transport improvements many of the existing services and community facilities would become more accessible to people in specific equality groups, such as faith and belief, race and ethnicity, who are more likely to live in these growth areas. Centralised services may also have a more positive impact on younger people who are more

likely to use public transport compared to older people or those with a physical disability who may be reliant on cars to reach local services and would therefore find it more difficult to park in busy town centres. A way to overcome this would be to ensure that adequate parking is required in all new development for disabled people. We are also protecting local services and shopping areas outside of growth areas.

Increasing employment opportunities is an important factor in addressing barriers for many of the equalities target groups, particularly those in faith and belief, race and ethnicity equalities target groups who suffer from economic deprivation and high unemployment levels. This option would see the greatest provision of new jobs in the growth areas. This would bring about many advantages for these equalities target groups as these areas tend to already have good public transport accessibility so jobs would be easier to get to.

Approach to different areas

Central Activities Zone

We will continue to support the regeneration of the area and there are opportunities for a considerable amount of new development. We will support new homes, businesses and tourism and other services, improved streets and spaces and community facilities. New hotels and student accommodation are changing the character of some areas. We are considering limiting these and directing them to areas where there are fewer. We will facilitate improvements to the stations, public transport, walking and cycling infrastructure as these are important to enable people to get to and around the area. It is particularly important to link the Elephant and Castle with London Bridge and Bankside. We will also facilitate local employment and training schemes which are needed to make sure that local people can access jobs.

The River Thames, Elephant and Castle opportunity area and Borough, Bankside and London Bridge opportunity area are all within the Central Activities Zone.

River Thames

We will continue to protect and improve the Thames policy area to maintain the characteristics that help make it a special area. These characteristics include a diverse range of activities in many parts of it, the Thames Path, historic conservation areas, and some of London's finest panoramas and views. We will continue to encourage the many different types of development using the central activities zone and strategic cultural areas policies. These include tourism such as the Tate in Bankside and offices in London Bridge mixed in with new homes. There is little potential for development in the riverside sites from Shad Thames along to Rotherhithe so they are unlikely to change.

Also the Thames can act as a barrier to attracting businesses into Southwark and for residents travelling into central London for work. We will encourage river transport to increase use of the Thames and link the south of the river with the City to ensure continued and improved access.

The height of tall buildings is lower than in the rest of Southwark in the Thames policy area at 25 metres. This is to provide more control of developments next to the riverside to make sure the character is retained.

We will continue to require all new developments along the Thames to provide access to the river walk as there are still some areas where people cannot walk along the river.

Elephant and Castle opportunity area

There is an SPG for the central part of Elephant and Castle and an SPD for the Enterprise Zone.

Elephant and Castle has lots of potential for redevelopment and we will be transforming it into an attractive part of central London with. It will become a desirable place for high density living, shopping, leisure and study that is very accessible from other places in Southwark and London. We will use our land at the heart of the area to stimulate development of up to 75,000 sqm of new shops community, health and leisure facilities and 6,000 new homes. We will support the university to grow and there will be up to 12,000 sqm of more offices, hotels, small businesses, cultural, creative and other activities that will increase vitality and create 4,200 jobs especially in the Enterprise Zone and Core Area. We will protect a route for a tram or public transport corridor, to pass through the centre. The tube stations will be transformed and public transport will improve to make this very accessible area even easier to get to. The public realm and cycle ways will be linked up and improved with a new street pattern that will make it easy and safe to get around.

Borough, Bankside and London Bridge opportunity area

We are preparing a supplementary planning document for Borough, Bankside and London Bridge opportunity area. We will be consulting on this from July.

We will continue to maintain the character which helps make Borough and Bankside a unique location, facilitating positive change that combines the area's historic character with the best attributes of new developments. We need to achieve this in the context of significant pressure for development. We will protect and facilitate growth of businesses, culture, arts and tourism along with allowing new housing. We will also encourage provision of new community and youth facilities. Although these activities are important for the area to thrive, we need to balance growth with protection of the area's historic character and improvements to support increased population living and working in the area. To achieve this we will not support tall buildings except for at

the northern end of Blackfriars Road. Design excellence will be required to make sure developments enhance this varied and interesting place. We will also focus on improvement of current open spaces to provide essential areas for relaxation and play and we will continue to make the area easier to get around by enhancing cycling routes and the public realm. New hotels and student accommodation are changing the character of some areas. We are considering limiting these and directing them to areas where there are fewer of these uses.

We will continue to create a more cohesive and vibrant London Bridge within the context of the area's historic character through new developments. Although already busy, there are a number of large development sites that could contribute to more thriving activity through new homes and businesses mixed with the hospital, health organisations and tourism. We will be supporting excellently designed tall buildings to add interest to the skyline, increase the capacity for homes and jobs and to provide local landmarks. We will improve the public realm within a strategy for improving access around the area by walking and cycling.

Together, Borough, Bankside and London Bridge will provide over 2,500 new homes and 30,000 new jobs by 2026.

Canada Water (and Rotherhithe) action area

We are preparing an area action plan for Canada Water. We finished consulting on the issues and options stage in February 2009 and will be consulting on the preferred option stage June to August 2009.

Over the next 15 years, we will work with landowners and the local community to transform Canada Water into a town centre. It will have a much more diverse range of shops than at present, including a new department store and independent shops. These will be accommodated in generally mixed use developments with new homes above. As well as shops and homes, the centre will have leisure and civic facilities, offices, restaurants and cafes. The centre will have a distinctive identity which reflects its unique location around the former dock basin. It

will have an open environment with a high street feel, and high quality public realm and open spaces. Car parking will be shared between town centre uses. The centre must reach out to the wider area, ensuring that it is accessible, particularly on foot, by bicycle and by public transport. In conjunction with this, we will work with TfL to improve the road network around Lower Road.

Outside the town centre and core area of the AAP, development will be less dense and should reflect the leafy and suburban character of much of the AAP area.

Across the AAP area, development will contribute to achieving a great network of parks and open spaces, which together with the docks and the River Thames, can help make Rotherhithe known as an attractive destination to visit, relax in and have fun. It will provide a good range of quality homes and successful schools to help make Rotherhithe a desirable place to live, particularly for families.

Peckham and Nunhead

Peckham town centre is the largest in Southwark and will continue to play a major role and provide a mix of activities. We are preparing an area action plan covering Peckham that will help regenerate the area and build on its growing role as a centre for creativity. Consultation on the issues and options stage of the action plan closes on the 25th May.

There are a number of development opportunities in Peckham. We will work with landowners to bring forward key sites for development that will have knock-on benefits for the area so that it becomes a safe place with a healthy community. This will include providing more housing in the area to provide choice for people on a range of incomes and a mix of uses including shops, cafes, businesses and cultural and leisure uses. We are currently consulting on what could be built on particular sites in and around the town centre, this includes the possibility of creating a new public square in front of Peckham Rye Station. There is also the opportunity to extend the town

centre so that exciting new spaces and activates are provided in and around the railway lines and Copeland Road industrial land.

There will be an improved environment so that the area looks better, including more trees and improvements to parks. New developments will build on Peckham's history. But there will be a mix of historic buildings and exciting new architecture, such as the Peckham Library. We are consulting on whether to have a new conservation area in the town centre as this could help regenerate Peckham, as happened in Bermondsey Street. The scale of development would stay much the same except in the town centre where there could be some taller buildings and more intense development on some sites. We are consulting on these options through the area action plan. Shopfronts will be improved and new development will need to make sure it does not impact on the residential areas which immediately surround the town centre.

There will be huge improvements to transport if the tram or a similar scheme came to Peckham. But there are also other improvements planned such as the East London Line Extension and we will look at how traffic can flow better through the area.

Nunhead

We would protect the character and scale of development in Nunhead so that it continues to be mostly low density housing. There will not be much new development apart from small infill housing development. There are local shopping areas in Nunhead that will be protected and will be improved through streetscape and shopfront schemes.

Nunhead has a number of important large open spaces including Nunhead Cemetery which will continue to be protected.

Aylesbury action area

We have prepared an area action plan for Aylesbury. This will be submitted to the Secretary of State in May for Examination before final agreement by the council.

We will use the guidance established in the Aylesbury Area Action Plan to achieve a phased redevelopment of the Aylesbury Estate over the period 2009 to 2027, which will deliver a new and more balanced mixed community with far better living conditions. The Plan will deliver quality private, intermediate, and social rented housing, the latter based on Parker Morris +10% standards. There will be a significant proportion of family homes with 23% houses, together with all the facilities needed by families, to make sure that the whole area is family-friendly. The new development will broadly keep the existing street structure but will be arranged on a more secure and permeable layout with good street frontages. The new homes will overlook the streets and spaces so that there will be much better natural security. Good urban design and high quality architecture will enable us to provide homes for 4,200 households, many more than at present. These will benefit from the highly accessible position of the Aylesbury area with its good transport links to the centre of London and the emerging centre at Elephant and Castle. Design excellence will be at the core of the redevelopment and we will emphasise and control design quality at each stage of the project to create a varied and interesting new residential neighbourhood. To reinforce its image as a place for families to live, the Plan will also deliver an excellent range of quality public and private open spaces, and will provide new local opportunities for shopping and employment in Thurlow Street and East Street, as well as supporting existing town centres.

Herne Hill town centre

Herne Hill is partly in Lambeth and partly in Southwark, there are few development sites in the Southwark area. We are consulting on a Dulwich Supplementary Planning Document until June which includes the Southwark part of Herne Hill. This will inform the next stage of the core strategy. We will also be contributing to a master plan for the whole area that is being prepared.

We will continue to protect shops and services to retain the range of independent shops, art galleries, bars and restaurants that give Herne Hill character. We will support development of the railway arches into niche businesses or other activities that provide vibrancy to the town centre. We will work with Lambeth to tackle traffic congestion.

Camberwell town centre

We will continue to protect this successful, attractive town centre which has many small and medium sized businesses. Many of them are independently run which helps to give Camberwell a special character. Butterfly Walk is the only large development site and there are few small sites, so the emphasis is on protection rather than development. We will also facilitate Camberwell as a creative place with artistic influences clustering around Camberwell College of the Arts. We will also support large health institutions as they add to the vibrancy of the area and provide employment.

The Blue

We will continue to protect the Blue as a local shopping centre providing essential services for local people.

Dulwich town centre

We are consulting on a Dulwich Supplementary Planning Document until September 2009. This will inform the next stage of the core strategy.

We will continue to protect Dulwich Village as a historic area for homes, shops, local services and open spaces that retains an original shopping street and nearly all of its original 18th and 19th century buildings.

Lordship Lane town centre

We are consulting on a Dulwich Supplementary Planning Document until September 2009 which includes Lordship Lane. This will inform the next stage of the core strategy.

We will continue to protect Lordship Lane as a distinct and vibrant area with a variety of shops, cafes and bars providing amenities for the local residents. This is to retain the interesting character of this popular area created by the specialist businesses, cafes and unusual shop fronts.

Old Kent Road regeneration area

We will prepare an area action plan to facilitate regeneration of the Old Kent road. We will set out an integrated plan for housing and employment and small, local shops to complement the multiple retailers already there. We want to create a stronger sense of place at a scale that is comfortable to walk around. We would like new homes to overlook new streets and spaces so that there will be much better natural security. The area will benefit from good urban design and high quality architecture to change the image to a place rather than a busy road. These must be within a strategy for improved accessibility for pedestrians, cyclists and public transport users, and an enhanced public realm.

West Camberwell housing regeneration area

West Camberwell is a large area of council housing which could be developed as a catalyst for regeneration taking advantage of the good transport links. Although we are not proposing to plan out this regeneration in the short term, there is potential for growth so we are flagging this up in the core strategy.

Bermondsey Spa

Bermondsey Spa was an action area in the Southwark plan. This was because there was a large housing regeneration project taking place. Most of the housing has been built or projects are underway. There are only a

few sites left to develop so this area no longer needs to be described as an action area with targets and an implementation plan as the regeneration is nearly complete.

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

- **Eliminate discrimination**
- **Promote equality of opportunity**
- **Promote community cohesion and good relations between different groups**

Housing and Density

The preferred option aims to develop a mixed community through the balanced provision of social rented, intermediate and private housing which should contribute to the promotion of community cohesion and good relations between different groups. The type and size of homes will reflect the housing needs of the residents living in Southwark. The core strategy seeks to promote a range of housing types. The preferred option promotes development that will continue to deliver high levels of affordable housing whilst increasing the provision of family accommodation in the borough. The dwelling mix in the preferred option is derived from Southwark's borough-wide housing needs assessment. There will be higher residential densities in some areas but these will only be in locations with good existing and future public transport links and where there are good local facilities.

Education

The aim of the preferred option is to ensure we continue to protect community uses, including educational uses and to make sure our Southwark Schools for the Future programme can be delivered. This will help promote equality of opportunity by providing more schools across the borough and improving existing schools.

Transport

The preferred option is intended to help ensure that homes, jobs, shops and other services in the new neighbourhood are accessible and to promote sustainable transport choices. In general this means prioritising cycling and walking in the layout and design of new development, discouraging car use through locating higher density development in areas which have very good public transport accessibility, and restricting the amount of parking to the minimum which is needed to ensure that the development can operate effectively. This approach is in line with government policy and is intended to promote healthier lifestyles and reduce carbon emissions arising from car use and dependency on fossil fuels. In principle, this approach benefits all members of the community. Car ownership levels tend to be lower among the young and elderly. Therefore a policy which seeks to promote walking and cycling, creating routes which are safe from conflict with vehicles, which prioritises non-car users, and which also maximises opportunities to use public transport should benefit these groups in particular, promoting inclusivity and equality of access to jobs, services etc. It should be noted however that there are certain groups who may rely on using a car. This might include the elderly, people with disabilities and parents with young children. The preferred options seek to mitigate the impact of a general presumption in favour of low parking levels by prioritising parking for people with disabilities, even within what are otherwise “car free” developments. The preferred option seeks to ensure that parking spaces are provided equitably across housing tenures which should help promote social cohesion.

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

Community facilities

The preferred options report looks to protect all community facilities unless it can be demonstrated that there is no need for them any more. It also will encourage new community facilities. This should help to improve community cohesion.

Open spaces and wildlife

Our preferred options policies protect all existing open spaces and propose some new open spaces to protect. This will help to improve community cohesion and eliminate discrimination by ensuring everyone has access to open spaces

Consultation

The stage 1 EqIA highlighted the need to ensure that the methods used to consult and engage people in the preparation of the core strategy are open accessible to all members of the community. To help address this issue the council has prepared a consultation strategy which sets out the principles of how it will consult and the importance of reducing barriers to consultation. It emphasises that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

At issues and options stage a variety of means were used to publicise, consult and engage with local people. These are described in detail in the consultation statement which accompanies the preferred options report and is summarised below:

- **Publicity:** Consultation on the core strategy issues and options report was widely publicised through a mailout to contacts on Southwark's Planning Policy database, Southwark's website, a newspaper advert, making information available in libraries and council offices
- Officers attending community councils and area housing forums to raise awareness of the consultation
- A number of workshops and drop in sessions were held across the borough in order to enable local people to find out more about the document and how it effects their area.

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

While the council's responsibility for eliminating discrimination and promoting equality of opportunity and social cohesion are not specifically referred to in the preferred options report, the objectives of the core strategy consistently refer to the aim of creating a strong community and neighbourhoods in which the needs of all groups are taken into account. The consultation strategy for the core strategy does refer specifically to the need to ensure that in accordance with Southwark's Equalities Scheme 2005-2008 to ensure the Equalities priorities groups are involved and that arrangements are made to include under-represented groups and individuals.

Part C: Application of this policy/strategy

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

Consultation on the core strategy will be monitored at each stage of the plan preparation process to ensure that all groups will be engaged as effectively as possible. The consultation plan which accompanies the preferred

option report contains more details on this. A consultation statement has also been prepared with the preferred option report setting out who was consulted at the issues and options stage and how this was carried out. When the draft core strategy is submitted to the Secretary of State, the council will also submit a consultation statement (Statement of Compliance) demonstrating that the consultation on the preferred option has been carried out meets statutory minimums and meets the requirements of Southwark's Statement of Community Involvement.

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

The preferred option aims to contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community relations. In the long term the core strategy should help to improve relations between different groups and should not discriminate against any particular individuals.

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

In preparing the preferred options report, the findings of the EqIA scoping have been considered and the report has been prepared iteratively with the stage 2 EqIA. This stage 2 assessment recognises those areas where the core strategy may have differential impacts and where appropriate mitigation measures are proposed to address these. The council will take all representations on the preferred options into account and there will be a further opportunity to adjust policies prior to the submission of the draft plan to the secretary of state, should this be necessary or appropriate.

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

As is noted above, the council monitors participation in the core strategy preparation process to ensure that all groups have the opportunity to be involved. Where there is evidence that some groups have not been engaged, the council can seek to address this at the next stage. The consultation which has been carried out will be reported in the consultation statement to be submitted to the secretary of state.

The council's team in the Analytical Hub prepares periodic updates on demographic changes in the population, including changes relating to ethnicity, age, faith and belief. The council also monitors economic activity, health and pupil attainment in schools. Biannually the council also commissions a residents' survey to ascertain how local people feel about their area and whether it is improving. These analyses are carried out at community council level. These analyses are also reported in the council's annual monitoring report which assesses the impact of all development in the borough.

Once the core strategy has been adopted, the AMR will report annually on the implementation of the core strategy, using indicators such as new housing built in the borough, social rented and intermediate housing built, new retail and business space built, including small business units, average household income, the percentage of residents who feel safe at night, business start ups and the local employment rate.

Organisations such as the PCT may have their own strategies for monitoring the impact of their policies on key equalities target groups. The preparation of the core strategy may enable the council and PCT to identify a set of key indicators for Southwark. The council will ensure that a monitoring framework is put in place to assess this aspect of the core strategy. The need to provide high quality schools is a key objective of the core strategy and in this respect it seeks to support the Southwark Schools for the Future Programme and the Academies

Programme. An EqIA has already been carried out for the SSF secondary schools programme, which assesses the impact on equalities up to outline business case stage. The council has also prepared an EqIA for the SSF primary schools programme and details of the monitoring framework will be identified as part of that process.

CORE STRATEGY – PUBLICATIONS/SUBMISSION VERSION

EQUALITIES IMPACT ASSESSMENT

STAGE TWO: ASSESSMENT OF IMPACTS

THIS SECTION OF THE EQIA WAS CARRIED OUT AT THE PUBLICATIONS/SUBMISSION VERSION STAGE OF THE CORE STRATEGY. THE STAGE ONE AND STAGE 2 (PREFERRED OPTIONS EQIA) WERE REVIEWED TO INFORM THIS STAGE OF THE EQIA. THE CORE STRATEGY WORDING HAS BEEN UPDATED AT EACH STAGE.

Part A: Feedback from the Equalities and Diversity panel

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

As part of the preferred options consultation on the core strategy, the EqIA was taken to Equalities and Diversity Panel on June 16 2009. The Equalities and Diversity Panel made comments on the EqIA and these have been incorporated into the preparation of this Equalities Impact Assessment and the core strategy publications/submission version. We will be attending another Equalities and Diversity Panel between October and December 2009 to update the panel on our publications/submission version.

At the preferred options stage, the Equalities and Diversity panel advised us to consider the following issues. We have set out below how we have taken these comments forward.

- How will the core strategy respond to hostels, homelessness and asylum seekers?

The housing strategy will provide the framework for meeting the housing needs of vulnerable people. In addition, the core strategy is looking at increasing large housing (3+ bedrooms) and increasing minimum space standards.

- Will wheelchair accommodation be spread across larger housing?

This is too detailed to be addressed in the core strategy. When we consulted on the issues and options core strategy we considered having a policy on wheelchair housing. We have since decided that this is too detailed a policy to be in the core strategy. Instead, we will prepare a housing development plan document (DPD) and a development management DPD which will consider this issue. These will both be used to make decisions on planning applications, alongside the core strategy. We will save our current unitary development plan (Southwark Plan, 2007) policy and use to the wheelchair standards set out in our Residential Design Standards Supplementary Planning Document, 2008 (SPD) to make sure new development makes provision for wheelchair users.

- In lifetime homes, the walls need to be of sufficient strength to put on a grab rail, or a stair lift, etc. Materials used should be covered in lifetime homes standard.

The Lifetime Homes Standards are a series of sixteen national standards intended to make homes more easily adaptable for lifetime use. The core strategy is a strategic planning document and does not look at the detailed design of buildings.

- The fact that employment sites will be protected should be discussed in the EqIA.

We have added this in to our assessment of the publications/submission version of the core strategy as set out in the section below.

- There is nothing specific about a VCS support/ resource centre and will there be provision for a borough wide facility?

Policy 4 in our publications/submission version sets out how we will facilitate a network of community facilities that meet the needs of local communities. The core strategy will encourage new community facilities where there is a local need and an identified occupier for the space. This will help to improve community cohesion and ensure that community facilities are well used and supported in the long term.

- The term faith and belief is incorrect, and should be religion and belief, as it is a legal term that includes people who have no religion or no belief.

This is consistent with our Statement of Community Involvement (SCI).

Part B: Purpose and aims of policy/strategy

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

The core strategy, when adopted, will be part of Southwark's Local Development Framework. The core strategy will be the main document setting out the strategic policies which will be used for deciding what sort of development should take place within the borough, and when, where and how it should happen.

3. What are its aims?

The overall approach

The core strategy sets out a spatial strategy for the borough which provides a clear guide for future development and sets out where development will take place. At this stage the final approach to development is being put forward. The approach builds on the approaches set out in the issues and options and preferred options. The additional equalities implications for this final approach are considered in the sections below.

The core strategy sets out what we want would like Southwark to be like. The vision set out in the publications/submission version is as below. This has been amended throughout the core strategy preparation due to responses from consultation. The vision now reflects the needs of all of the communities and different equalities target groups in Southwark. It is now more locally distinctive and reflects the unique characteristics of Southwark.

We will make sure that Southwark improves as a place where local facilities, the transport network and infrastructure is supporting the fast pace of change in growth areas such as Borough, Bankside and London Bridge, Elephant and Castle, Canada Water, Peckham and Nunhead and the Aylesbury, where we are increasing homes by around 10% from 123,945 to 148,398, office space by around 30% from 1,255,000 to 1,674,885 and people working by around 15 % from 165,800 to 190,800 between 2009 and 2026.

We will make sure that this regeneration is as sustainable as possible by setting high environmental and design standards along with protecting and improving a network of open space and heritage throughout the borough.

Set beneath the River Thames, Southwark is made up of a diverse group of places with distinct identities where people who live, learn, work and have fun here can benefit from the vibrancy of our cultures and communities. We have set out unique visions to show the successful places that we want them to be.

We have also set out separate visions for the different areas of the borough to reflect their different characteristics. This will help to address local issues and overcome inequalities in the borough. We considered the equalities impact of these different area visions at the preferred options stage of consultation and the key issues for each area remain the same. The majority of these area visions will be developed into policies and guidance in area action plans and area supplementary planning documents. As part of the plan preparation process for these documents we will carry out a detailed EqIA on each of these documents. This has already been done/is ongoing for some of these areas including Aylesbury, Peckham and Nunhead, Canada Water and Dulwich.

The publications/submission of the core strategy sets out how new development, jobs, shops and community facilities would be concentrated in the certain areas; mostly in the Central Activities Zone, the cores of the action areas and the opportunity areas. These are our growth areas. As these areas contain concentrations of the most deprived parts of Southwark this would have a positive impact on residents in equalities target groups such as faith and belief, no faith, race and ethnicity, disability groups, Travellers and Gypsies and asylum seekers who tend to live in more deprived areas. The differential impact of this may be that residents living in other areas of the borough, in other equalities target groups such as sexuality, gender and age, are located further away from jobs and services such as shops, employment and community facilities.

The main core strategy submission/publication document sets out the detail on all of all policies and approaches.

- 4. Could these aims be in conflict with the Council's responsibility to:**
- **Eliminate discrimination**

- **Promote equality of opportunity**
- **Promote community cohesion and good relations between different groups**

We set out the significant changes to the publication/submission core strategy from the preferred options core strategy where they need to be re-evaluated to see whether they are in conflict with the council's responsibility as set out above. Where there is no additional information, the same evaluation applies as set out at the preferred options consultation.

Housing

Some of the housing policies have changed slightly from the preferred options core strategy.

We have amended our approach to affordable housing to require the maximum amount of affordable housing possible across the whole of the borough. This should have a positive impact on all equality groups and help to promote equality of opportunity by offering affordable housing across the whole of Southwark. We will consider changing the required tenure mix within our housing development plan document.

We will allow student housing only in the town centres and in areas with good access to public transport services. This may have a negative impact on equalities target groups living in these areas, particularly those in the age, race and ethnicity equalities target groups. A large proportion of people in these areas come from BME groups. These equalities target groups may feel that the land could have been set aside for a different use such as more housing or jobs for the local community or for a new community facility. However, it may also promote cohesion between different groups as student housing will be located in the areas most suitable to accommodate it. Furthermore, we will require a section 106 agreement and affordable housing within student housing schemes which will have a positive impact by making sure that the communities where new student housing is located also benefit from the development.

We have now set out criteria for how we may allocate Traveller and Gypsy sites in the future. This may improve community cohesion and good relation by making sure that new sites are located in suitable areas. We are also protected the four existing Traveller and Gypsy sites. This will have a very positive impact on the Traveller and Gypsy group.

Employment

Through policy 10 of the core strategy we are protecting some of our employment areas. At the equalities and diversity panel on the preferred options stage of the core strategy, it was raised that the EqlA did not go into enough detail on the protection of employment sites. Protecting employment sites should have a positive impact on discrimination and opportunity by increasing the amount of jobs in the borough and protecting the jobs already there. Through our employment and enterprise strategies we will work to ensure that these jobs are suitable for all of the different groups in the community.

Community facilities

The publications/submission version aims to facilitate a network of community facilities that meet the needs of local communities. Community facilities will be protected unless it can be demonstrated that there is no need for them any more. We will encourage new community facilities where there is a local need and an identified occupier for the space. This should help to improve community cohesion and ensure that community facilities are easily accessible so that everyone can benefit from access to a range of community facilities.

Consultation

The stage 1 EqlA highlighted the need to ensure that the methods used to consult and engage people in the preparation of the core strategy are open accessible to all members of the community. To help address this issue the council has prepared a consultation strategy which sets out the principles of how it will consult and the

importance of reducing barriers to consultation. It emphasises that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

At Preferred Options stage a variety of means were used to publicise, consult and engage with local people. These are described in detail in the Consultation Statement which accompanies the Publications/submission version and are summarised below:

- **Publicity:** Consultation on the core strategy Preferred Options was widely publicised through a mailout to contacts on Southwark's Planning Policy database, Southwark's website, a newspaper advert, making information available in libraries and council offices
- Officers attending community councils and area housing forums to raise awareness of the consultation
- A number of workshops and drop in sessions were held across the borough in order to enable local people to find out more about the document and how it affects their area.

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

The core strategy reflects the objectives of Southwark 2016 and through the implementation plan there is a commitment to meeting this. We have also amended policy 1 of the core strategy to make a specific commitment to continuing to carry out equalities impact assessment on all out development plan documents. The consultation strategy for the core strategy does refer specifically to the need to ensure that in accordance

with Southwark's Equalities Scheme 2005-2008 to ensure the Equalities priorities groups are involved and that arrangements are made to include under-represented groups and individuals.

Part C: Application of this policy/strategy

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

Consultation on the core strategy has been reviewed at each stage of the plan preparation process to ensure that all groups have been engaged as effectively as possible. The consultation plan and consultation statement which accompanies the publications/submission version contains more details on this. When the draft core strategy is submitted to the Secretary of State, the council will also submit a consultation statement (Statement of Compliance) demonstrating that the consultation on the publication/submission version has been carried out meets statutory minimums and meets the requirements of Southwark's Statement of Community Involvement.

Our implementation and delivery plan within section 6 of the core strategy sets out detail of how we will implement our policies to ensure that they are implemented consistently and fairly.

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

The publications/s version aims to contribute to eliminate discrimination, promote equality of opportunity and promote social cohesion and good community relations. This EqIA has set out the likely impact of the core strategy and overall it will be positive for all groups. In the long term the core strategy should help to improve relations between different groups and should not discriminate against any particular individuals.

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

In preparing the publications/submission core strategy, the findings of the EqlA scoping have been considered and the report has been prepared iteratively with the stage 2 EqlA. This second stage 2 assessment recognises those areas where the core strategy may have differential impacts and where appropriate mitigation measures are proposed to address these. The council will take all representations on the publications/submission version into account however there will not be any further opportunity to adjust policies prior to the submission of the draft plan to the secretary of state.

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

As is noted above, the council monitored and reviewed participation in the core strategy preparation process to ensure that all groups had the opportunity to be involved. The consultation that has been carried out will be reported in the consultation statement to be submitted to the secretary of state.

The council's team in the Analytical Hub prepares periodic updates on demographic changes in the population, including changes relating to ethnicity and age. The council also monitors economic activity, health and pupil attainment in schools. Biannually the council also commissions a residents' survey to ascertain how local people feel about their area and whether it is improving. These analyses are carried out at community council level. These analyses are also reported in the council's annual monitoring report (AMR) which assesses the impact of all development in the borough.

Once the core strategy has been adopted, the AMR will report annually on the implementation of the core strategy, using indicators such as new housing built in the borough, social rented and intermediate housing built, new retail and business space built, including small business units, average household income, the percentage of residents who feel safe at night, business start ups and the local employment rate. The monitoring framework is set out within section 7 of the core strategy.

Organisations such as the Primary Care Trust (PCT) may have their own strategies for monitoring the impact of their policies on key equalities target groups. The preparation of the core strategy may enable the council and PCT to identify a set of key indicators for Southwark. The council will ensure that a monitoring framework is put in place to assess this aspect of the core strategy. The need to provide high quality schools is a key objective of the Core strategy and in this respect it seeks to support the Southwark Schools for the Future Programme and the Academies Programme. An EqIA has already been carried out for the SSF secondary schools programme, which assesses the impact on equalities up to outline business case stage. The council has also prepared an EqIA for the SSF primary schools programme and details of the monitoring framework will be identified as part of that process.

Further feedback from the Equalities and Diversity Panel

The publications/submission core strategy and the EQIA was presented to the Equalities and Diversity Panel for the fourth time on November 17 2009. The main comments raised were:

- Clarification regarding new Traveller and Gypsy sites

The Housing Development Plan Document will manage the need to allocate new Traveller and Gypsy sites. This is set out in policy 9 of the core strategy and will be consulted on in 2011.

- Questions regarding the student housing policy

Explanation provided of the purpose of policy 8 as set out in the core strategy.

- The EQIA should be amended to read Travellers and Gypsies rather than gypsies and travellers because they are a separate ethnic group and as Travellers are the predominant group in Southwark. Policy 9 of the core strategy has been reworded to refer to Travellers and Gypsies, as has the wording within this EQIA.
- Question raised on how the core strategy related to Lifetime Homes Standards Policy 4.3 of the Southwark Plan is being saved and this requires Lifetime Homes Standards. This will be reviewed through the preparation of the Housing Development Plan Document.
- Concern raised on there being many empty council buildings which are currently not being utilised. Other parts of the council are looking at asset management with regard to council property.

APPENDIX A: Barriers to community involvement with different equalities target groups and how to overcome them
(extract from Southwark Statement of Community Involvement (January 2008))

1. Voluntary groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>The voluntary sector in Southwark is made up of around 18,000 individuals delivering services through 1,600 organisations, groups and projects. In 2001-2 Southwark Council supported around 300 voluntary and community groups with an investment of around £10m in grant-aid, service agreements and contracts.</p>	<p>These barriers are generic barriers faced by many voluntary groups.</p> <ul style="list-style-type: none"> • Need for prior knowledge and experience; • Jargon and legal terms; • Other funding commitments and priorities than planning; • Lack of time; and • Knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Provision of information and training about planning focused on these groups; • Ensure that a range of community involvement methods are used that are accessible to these groups; • Make sure that groups are added on to relevant mailing lists; and • Hold/attend meetings at appropriate times that are accessible to these groups. • Translators and interpreters to be used where appropriate.

2. Community groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Southwark is lucky in having a large number of community groups that are involved with a diverse range of</p>	<p>These barriers are generic barriers faced by many community groups:</p> <ul style="list-style-type: none"> • Need for prior knowledge and 	<ul style="list-style-type: none"> • Provision of information and training in planning focused on these groups; • Ensure that a range of community

issues.	<ul style="list-style-type: none"> experience; • Jargon and legal terms; • Lack of time; • Other priorities than planning; • Accessing information barriers. 	<ul style="list-style-type: none"> involvement methods are used that are accessible to these groups; • Make sure that groups are added on to relevant mailing lists; and • Hold/attend meetings at times that are accessible to these groups. • Translators and interpreters to be used where appropriate.
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3. Business – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>There are 11 000 businesses in Southwark. These range from large international and national organisations to small family owned businesses. Approximately 96% of the total businesses in Southwark comprise less than 50 employees of which, approximately 20% are Black and Minority Ethnic businesses. Many businesses are members of Southwark Chamber of Commerce and other local groupings.</p>	<ul style="list-style-type: none"> • Accessing information outside of business hours (this is particularly a problem for small businesses); • Attending community meetings that do not address their needs; • Not understanding planning influences on their issues; • Other priorities than planning. 	<ul style="list-style-type: none"> • Ensuring that information is available at places which are open outside of normal office hours; • Hold/attend meetings at times that are accessible; and • Provide information and training focused at businesses. • Translators and interpreters to be used where appropriate.

4. Environmentalist and amenity groups – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
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<p>A wide range of people express their concern for their environment through membership groups such as Friends of the Earth or Greenpeace. Some of these larger organisations have active local branches. Some people get involved in local groups with the aim of protecting or improving a particular area or amenity such as the Friends of Burgess Park or the Dulwich Society.</p>	<ul style="list-style-type: none"> • Other priorities than planning; • Attending community meetings that do not address their issues; • Jargon and legalistic terms; and • May not be aware of how other planning issues may affect their area of interest. 	<ul style="list-style-type: none"> • Provide information to ensure these groups are aware of how planning influences their area; • Use plain English; and • Translators and interpreters to be used where appropriate. .
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5. Neighbourhood, tenants and residents groups – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>There are approximately 232 neighbourhood, tenants and residents groups in Southwark. Many are formally consulted by us to provide residents views about social and private housing. These groups meet, many of them very regularly, to discuss matters affecting the local area including estate improvements.</p>	<ul style="list-style-type: none"> • Other priorities than planning; • Suffer from ‘consultation fatigue’ as they get consulted on a number of our initiatives and programmes; • Need prior understanding and knowledge of planning issues; and • Finding the time to get involved in planning. 	<ul style="list-style-type: none"> • Coordinate consultation between different parts of the council to ensure that groups are not overwhelmed with consultations; • Make sure that groups are added on to relevant mailing lists; • Provide focused information; and • Hold/attend meetings at accessible times. • Translators and interpreters to be used where appropriate.

6. Health organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Health service organisations provide important services to the community. Formal structures can be used to consult and gain feedback from local health organisations on how healthy living issues and requirements might influence or affect planning.	<ul style="list-style-type: none"> • Limited time to access and absorb detailed planning information; • Other priorities than planning; and • May not understand how planning impacts on health. 	<ul style="list-style-type: none"> • Hold/attend meetings at appropriate times; and • Ensure that information is easily accessible, relevant and understandable. • Translators and interpreters to be used where appropriate.

7. Transport organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Transport for London and the public transport providers are statutory consultees. There are smaller local groups that are interested in the improvement of cycling, walking and public transport infrastructure.	<ul style="list-style-type: none"> • Other priorities than planning; and • May not be aware of how other planning issues may affect their area of interest. 	<ul style="list-style-type: none"> • Provide information to ensure these groups are aware of how planning affects them. • Translators and interpreters to be used where appropriate.

8. Refugee and Asylum seekers – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The Southwark Refugee Communities Forum (SRCF) was established by Refugee Community Organisations (RCO) in 2003 to	<ul style="list-style-type: none"> • Need for prior knowledge and experience • English may not be their first language 	<ul style="list-style-type: none"> • Avoid jargon and ensure that all information is given in plain English • Ensure that all written information is available in different languages

<p>enable the voices of refugees themselves to be heard. The membership of SRCF currently includes 28 Southwark-based Refugee Community Organisations. An estimated 7,000 people from refugee backgrounds across Southwark are in direct contact with SRCF members and participate in their activities on a regular basis.</p>	<ul style="list-style-type: none"> • Other priorities than planning • Discrimination • Lack of knowledge of how and where to access information • Difficult to gain access to these groups, as they may not be recognised local community groups on our database 	<ul style="list-style-type: none"> • Provide information and training that is focused on these groups • Use a range of community involvement methods to ensure that they are accessible to all. • Source local knowledge about how to engage groups and those for our mailing lists. • Translators and interpreters to be used where appropriate.
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9. Individuals and groups from other boroughs – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>A number of issues in Southwark have an impact on our neighbouring boroughs such as Lambeth and Lewisham. Groups and residents that are on the borders of Southwark should be included in matters that affect them.</p>	<ul style="list-style-type: none"> • Need for prior knowledge and experience; • Other priorities in their own borough and other than planning; • English as a first language; and • Lack of knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Provision of information in appropriate locations; • Hold/attend meetings/events at appropriate locations that are accessible and appropriate to these groups. • Translators and interpreters to be used where appropriate.

10. Residents and individuals (including newcomers to the borough) – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Residents and individuals in the borough may not belong to a</p>	<ul style="list-style-type: none"> • Need for prior knowledge and experience; 	<ul style="list-style-type: none"> • Provision of information and training in planning focused on these groups;

<p>specific group, but it is important that they are able to engage and get involved with issues and decisions that impact on them.</p>	<ul style="list-style-type: none"> • Jargon and legal terms; • English may not be their first language; • Discrimination; • Problems accessing information; • Other priorities than planning; and • Lack of knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Ensure that a range of community involvement methods are used that are accessible; • Source local knowledge about how to engage individuals; and • Add onto our mailing lists. • Translators and interpreters to be used where appropriate.
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11. Black and minority ethnic groups (including travellers and gypsies) - Equalities Target Group – Race

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Southwark is a very ethnically diverse borough. As a result there are many established and new groups and organisations that address issues relevant to each different community.</p>	<ul style="list-style-type: none"> • Jargon and legal terms; • Need for prior knowledge; • English may not be the first language; • Other priorities than planning; • Discrimination; • Problems accessing information; • We may not be aware of their existence. 	<ul style="list-style-type: none"> • Avoid jargon; Use plain English; • Translators and interpreters to be used where appropriate. • Training groups in planning and council officers in understanding equality and diversity issues; • Coordinate council consultations; • Range of involvement methods; and • Gain local knowledge about how to engage groups; and • Add to mailing lists.

12. Religious groups - Equalities Target Group –Faith/Belief

Description	Barriers to involvement	Measures to overcome barriers to consultation
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<p>organisations are a valuable consultation link due to their very strong links to local communities. groups have a contribution to make to social inclusion and community cohesion that is separate from promoting religion. As they are involved in running community services, community development and leadership representing community interests.</p>	<ul style="list-style-type: none"> • Needs not being understood; • Need for prior knowledge and experience; • English may not be their first language; • Other priorities than planning; • Discrimination; • Accessing information; and • May not understand how planning affects their group. 	<ul style="list-style-type: none"> • Avoid jargon; Use plain English; • Translators and interpreters to be used where appropriate. • Training groups and individuals in planning and • Training council officers to understand and belief issues; • Coordinate our consultations; • Range of involvement methods; and • Gain local knowledge about how to engage groups; and • Add to mailing lists.
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13. Older people Forum's Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Pensioner forums help represent older people's views and are able to represent many local people over particular issues that are affected by planning.</p>	<ul style="list-style-type: none"> • Older people may not feel safe attending meetings in the evenings; • A lack of respect for their views; and • Lack of knowledge of how and where to access information; • Other priorities than planning. 	<ul style="list-style-type: none"> • Provision of information in appropriate locations; • Hold/attend meetings/events at accessible times; • We listen to the views and feedback ; and • Make information relevant. • Translators and interpreters to be used where appropriate.

14. Education and young people - Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
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<p>Schools, colleges, learning institutions and youth agencies are important aspects of the community, particularly as finding ways of involving young people have been identified as a priority by a large number of people</p>	<ul style="list-style-type: none"> • May not be aware of the impact planning can have on them and/or how they can have an input; • English may not be a first language; and • May not be able to attend meetings in the evenings or during the day in term time. • Other priorities than planning. 	<ul style="list-style-type: none"> • Provide information that is focused at young people; • Attend schools and after-school centres and local youth forums to consult them on planning issues; • Translators and interpreters to be used where appropriate; and • Hold/attend meetings/events at accessible times.
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15. Disability Forum - Equalities Target Group – Disability

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>This forum helps to identify planning issues including safety, access and housing from the perspective of disabled people.</p>	<ul style="list-style-type: none"> • Venues for meetings may not be accessible; and • Written or verbal material is not always appropriate. • Other priorities than planning. 	<ul style="list-style-type: none"> • Hold/attend meetings/events at accessible locations; and • Ensure that all written information is available in different formats such as Braille, large print and audio. • Translators and interpreters to be used where appropriate.

16. Lesbian, gay, bisexual and transgender - Equalities Target Group – Sexuality

Description	Barriers to involvement	Measures to overcome barriers to consultation

<p>The Southwark Anti Homophobic Forum (SAHF) is the longest established LGBT Forum of its kind and works to meet the needs of the LGBT community in key areas including education, safety in the home, the streets and housing. The Southwark LGBT Network is a social support group for LGBT people and their friends who live and work in Southwark.</p>	<ul style="list-style-type: none">• Do not feel secure in raising LGBT issues at open events;• Other priorities than planning;	<ul style="list-style-type: none">• Hold specific LGBT consultation events;• Avoid jargon and use plain English;• Hold/attend meetings/events at convenient times and ensure that the venue is accessible and a safe environment.• Translators and interpreters to be used where appropriate.
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