Southwark Council

Draft Bankside, Borough and London Bridge Supplementary Planning Document
Planning Committee

No.	Title
Appendix A	Draft Bankside, Borough and London Bridge SPD
Appendix B	Consultation Plan and Consultation Report
Appendix C	Sustainability Appraisal
Appendix D	Equalities Impact Assessment

19 January 2010

BANKSIDE, BOROUGH AND LONDON BRIDGE SUPPLEMENTARY PLANNING DOCUMENT

EQUALITIES IMPACT ASSESSMENT

Stage One: Scoping

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

This is the Equalities Impact Assessment for Bankside, Borough and London Bridge Supplementary Planning Document

The Bankside, Borough and London Bridge Supplementary Planning Document (SPD) will provide additional planning guidance for the area, which will help to facilitate change in a sustainable way that will benefit the community and make the area a better place to live, work and visit. Although the SPD will not set new planning policies it will provide further planning guidance on a variety of topics, such as transport, employment, tall buildings and the public realm. The guidance will be specific to Bankside, Borough and London Bridge and will focus on delivery and implementation.

The Bankside, Borough and London Bridge SPD will be developed and prepared in accordance with statutory regulations and in close consultation with the local community. The guidance in the SPD must be in general conformity with national and regional guidance and policy and contribute towards meeting local needs. The council's policies and strategies must also be evidenced to ensure that they are robust, meet local needs and can be justified.

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

The Bankside, Borough and London Bridge SPD will be a new planning document and will form part of the council's Local Development Framework, which will contain all the council's planning policies used to guide how land is used in the borough and in the determination of planning applications. Current planning policy for Bankside, Borough and London Bridge exists in the Southwark Plan (the council's Unitary Development Plan). These policies will gradually be replaced by those set out in the emerging core strategy and the Bankside, Borough and London Bridge SPD reflects these changes. The SPD cannot create new policy. It provides guidance on how current policies will be applied in Bankside, Borough and London Bridge to reflect local issues.

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

This is the first opportunity to consider equalities impacts in the preparation of the SPD, however the council did undertake an EqIA of the Southwark Plan. Although this did not use the current methodology it still provides an indication of the likely impacts of planning policies on Southwark's equality target groups. The findings are summarised below.

Key findings:
- Provision of small local businesses which are easily accessible by local communities encourages the closure of development gaps for the local communities through an increased sense of belonging, redressing disadvantage and equality of access to services.
- By ensuring that new developments are safe and secure, disadvantage is addressed, community relations are improved and equality of opportunity is promoted.
- Protection of residential accommodation reduces discrimination and promotes equality of opportunity through providing inclusive and accessible housing for communities within the borough.
- Provision of accommodation other than houses and flats recognises the diverse needs of communities within the borough and promotes equality of opportunity since communities that will benefit are frequently the marginalized.
- The protection of transport impacts creates a sustainable, inclusive and accessible borough for its residents, future residents, users and occupiers.
- Public transport improvements assist in the creation of an accessible and inclusive borough by focusing on sustainable forms of transport as well as being socially inclusive. Accessible and inclusive transport links promote equality of opportunity and prevent barriers of exclusion and discrimination.
- Mini cab offices in the borough make transportation in the borough accessible to those who may not have access to public transport or private car use.

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

Community and Stakeholder Involvement

In preparing and developing the Bankside, Borough and London Bridge SPD, the council will have to carry out consultation in accordance with statutory regulations and the Statement of Community Involvement, which sets out how and when Southwark Council will involve the community in the alteration and development of town planning documents and applications for planning permission. National policy states that local planning authorities should involve the community at an early stage in the process and should continue to involve the community throughout the process of preparing development plan documents using methods appropriate to the communities concerned (paras. 4.20 of PPS12). The council has prepared a consultation plan for the SPD. In preparing the consultation plan the following issues have been considered:

Considerations:

- Certain groups may not be able to access information and consultations as easily as others i.e. disabled people, those who do not have English as their first language, young people, those who support vulnerable people such as women who are most likely to care for children, older people and those with limiting illnesses.
- People may not feel safe in attending public information or consultation events at certain times of the day, in particular after dark, such as older people and women
- Information may not be presented in a way that engages people effectively, such as material only printed in English, information is presented in a complicated format or language.
- Certain groups may not feel comfortable expressing their views in public due to fear of discrimination. These include LGBT community, faith groups, young people and the BME community.
- Certain groups may not understand what relevance the Bankside, Borough and London Bridge SPD has to them and therefore they do not become involved in the process.

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- People may misunderstand the purpose of the Bankside, Borough and London Bridge SPD has and what can be achieved which may result in tensions between groups if it does not deliver what they expect.
- Certain groups may have a negative perception of the council or disappointing experiences of community consultations which stop them becoming involved in the process.
- If people do not feel that they can access information at an early stage or have problems accessing it, they may become disillusioned in the process and lose interest i.e. BME groups, young and elderly people and disabled people.
- Some people may not be aware how to express their views or how these will feed into the process i.e. children and young people.
- There may be differences in the needs and aspirations between different groups which may result in conflict.
- People may feel as though certain groups are having a greater impact on how the SPD is developed which may increase tensions in the community.

Housing

Meeting housing need is one of the most challenging issues that national, regional and local government is faced with. Everyone should have the opportunity of a decent home. Housing should not reinforce social distinctions and should meet the housing needs of the whole community, creating mixed and inclusive communities and housing choice. The Core Strategy sets out the current policy on housing provision in Southwark. One of the strategic targets for the area is to provide at least 1,900 new homes by 2026. The SPD cannot make new policy but can provide guidance on how these policies will be applied in Bankside, Borough and London Bridge. The following issues need to be considered:

Considerations
- Bankside, Borough and London Bridge has a number of existing residential communities, including a number of council estates plus private housing. Recent years has seen as increase in housing built but much of the stock remains social housing and 1, 2 and 3 bedroom flats.
- The SPD needs to support the provision of the right housing type and mix for the local community. Failing to do this could intensify or result in overcrowding and poor quality accommodation which in turn disproportionately affects older people, the young and the BME community. An appropriate range of affordable, permanent and temporary accommodation may not be provided to meet the needs of specific user groups such as refugee and asylum seekers and travellers.
- The regeneration of the area may result in a rise in house prices and housing may become unaffordable to those currently living in the area, especially, lone parents, disabled people, the BME community and elderly people. This may also result in a dilution of the community as people are forced to move out of the area as they no longer can afford to live there.
- 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 cater for a broad market and fail to cater for the needs of specific groups such as disabled people, families with children, young people, and older people.
- People may feel that the needs of certain groups are being prioritised over others such as the need to have designated locations for Travellers and those with larger families.
- Redevelopment and regeneration of areas may result in the disruption of communities.

Transport and Movement

National, regional and local policy states that sustainable methods of transport should be promoted. It is the intention that the capacity of public transport should be increased, the quality and integration of the transport system should be improved and a co-ordinated approach to improvements to transport integration and facilitating greater use of public transport, walking and cycling should be sought. In addition to seeking greater use of pedestrian and cycle routes, the safety and perception of safety should also be improved regarding existing and new routes. The SPD cannot make new policy but can provide guidance on how these policies will be applied in Bankside, Borough and London Bridge. The following issues need to be considered:

Considerations

• Bankside, Borough and London Bridge has major transport infrastructure providing access to a number of locations across London and the UK. A number of improvements are planned such as the Thameslink Programme which will deliver increased capacity and new stations. The high level of transport accessibility is a key part of the opportunity area's potential.

• Transport services and pedestrian/cycle routes may continue to feel unsafe for certain user groups. Some people may continue to feel unsafe when travelling on public transport or along pedestrian/cycle routes and fear for their personal safety such as women and young people or they fear discrimination such as members of the BME community, the LGBT community or people following a certain faith, such as Muslims and Sikhs.

• Older people and young people may not have the opportunity to be independently mobile if reliable, convenient, safe and cheap public transport is not made available to them. This could further exacerbate the need for parents and carers to continue to use unsustainable forms of transport, such as the car. This also puts pressure on ensuring the availability of accessible parking spaces in areas where required.

• Disabled access may be provided but it may be segregated from other access routes, which exacerbates separation and isolation from the rest of the community.

• Public transport could continue to be unaffordable to those on lower incomes such as the BME community, young people (i.e. those who do not have access to free travel) refugees and asylum seekers. This may limit their job and further education opportunities and inclusion in the wider community. It may limit them to one particular area that cannot provide all of the facilities and opportunities they need

• People may have different priorities in terms of transport such as parents with children, disabled people and those on lower incomes. Tensions may arise if people think that the needs of any one user-group are being prioritised above their own.

• The fear of crime could continue to make people feel isolated if they do not feel safe travelling from their homes to use and enjoy facilities and services within the area i.e. women, members of the BME community, members of certain faith groups, young people, members of the LGBT community and older people.

• The needs of individuals and groups may not be taken into account when designing new open spaces and areas of the public realm and result in people not feeling safe to use them for pedestrian and cycle movement around the area.

Employment

Bankside, Borough and London Bridge is a major business location, providing both high quality offices to support the City economy and second hand businesses space for small businesses. One of the strategic targets for the area is to provide over 25,000 new jobs by 2026. The

guidance in the Bankside, Borough and London Bridge SPD must be in accordance with national and regional guidance and policy and contribute towards meeting the aims and objectives of the council's community strategy whilst meeting local needs for employment in the area. Through the development and implementation of the SPD, improvements will be proposed for the growth and improvement of the local economy. This will lead to greater investment and lead to a growth in jobs in the area. Consideration needs to be given to ensure guidance will accommodate a range of employment premises and opportunities of different types and sizes and costs to meet the different needs of the community. Alongside developing employment opportunities, consideration should be given to providing the local community with the skills and education required to take advantage of new employment opportunities in the local and wider area. In developing guidance on employment for Bankside, Borough and London Bridge, consideration should be given to the following:

Considerations

- People may feel excluded from new job opportunities created in the area such as women who can only work part time due to other commitments such as childcare. This could also exacerbate problems of child poverty in the area where this results in more households without an adult in employment.
- Certain groups may experience discrimination in accessing employment opportunities such as a members of certain faith groups and members of the BME community (especially young black men) and disabled people. The inability to access opportunities to work could further lead to poverty, social exclusion and isolation from the wider community.
- Local people may not have the skills to access job opportunities that are created and therefore will not benefit from these new opportunities. This could create tensions in the community if there continues to be a high level of unemployment.
- The SPD will need to ensure that a range of business units are provided so that small and medium enterprises (SMEs) are able to find space within the area. BME businesses are strongly represented in SMEs in Southwark and the failure to provide space suitable for small businesses could have a significant impact on the BME community.
- SMEs can also be affected in other ways by development. It will be important to ensure that SMEs are able to compete for contracts to deliver goods and services which are generated in larger business hubs.
- There may be conflicting priorities for the expansion and control of the night time economy. Younger people may feel strongly that there is a need for a more vibrant night time economy, which could act as a way to make the area safer in the evening and at night by having an increased footfall at these times. Elderly people may feel threatened by this in terms of the people that the night time economy might attract and the noise that it will create.
- There may be physical barriers to jobs outside of the Bankside, Borough and London Bridge area. Accessibility to these opportunities may be hindered by poor quality transport links in and out of the area. This may affect both existing and new residents, especially those with lower incomes.

Design and Heritage

The Bankside, Borough and London Bridge area is expected to undergo significant change through the development and implementation of a number of major development s including the redevelopment of London Bridge station. This will see increased investment and development activity, which provides significant opportunities to improve the built environment and public

realm in the area. There are significant historic assets including a number of conservation areas, listed buildings, archaeology remains and other important buildings. New development will need to be sensitive to the historic environment as Banskide, Borough and London Bridge. Consideration should be given to the following issues in the development and implementation of guidance on design and heritage:

Considerations

- Design may also have an impact on social cohesion. Development will need to respect the important heritage of the area. Failure to do this could exacerbate the feeling that the incoming population are taking precedence over the needs of local people. It could also result in a feeling of alienation among groups who have lived in the area many years and particularly the elderly.
- If the public realm and the environmental quality of the area is not improved, certain groups may feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, older people and women.
- The needs of certain groups may not be properly considered which may mean that they are unable to use the services and facilities in and around the area. For instance, older people may not be provided with basic facilities such as accessible and safe places to meet, public toilets and street furniture, such as benches, which provide a respite when they are passing through the area.
- The built environment and the public realm may ignore the needs of disabled people which results in creating barriers to inclusion in the wider community and opportunities to decent housing, jobs and access to leisure and community facilities. In contrast, the needs of disabled people may be considered but result in the public realm being designed in a way that segregates disabled people from the wider community.
- High quality design standards in the area may result in higher costs for SME businesses i.e. high quality shop fronts, which may threaten the viability of these businesses.
- The development of tall buildings and higher density residential schemes may reduce accessibility to private and communal open space, especially important for families with young children.

Open spaces

Through the development and implementation of the Bankside, Borough and London Bridge SPD and the emerging core strategy, the area will experience significant changes through growth in employment, housing and population. The area is already recognised as an area of open space deficiency and therefore this will be an important consideration for new development. In addition to the overall quantity of open space, the location and use of the space is also important to ensure that the open spaces are accessible to all. The following considerations need to be taken into account when developing and implementing guidance on the provision of open space within Bankside, Borough and London Bridge:

Considerations

- The needs of different user groups may not be properly considered which will result in certain groups feeling excluded. This may occur where there are conflicting priorities of how the spaces should be used, i.e. elderly people and women may wish to use the space for informal recreation such as a meeting place whereas other groups, such as young people, may wish to use the space for more formal and active recreation. This may cause tensions between groups if it is perceived that one group's needs are being prioritised.

- The poor design of open spaces may make them feel unsafe and result in misuse. This may exclude certain groups as they may fear for their personal safety, such as women, members of the BME community, members of the LGBT community, members of different faith groups, older people. Poor design may also result in poor access and limit the use of these spaces for disabled people and mothers with children.
- Poorly designed and inaccessible open spaces in the area may restrict the ability for people to gain from the health benefits active recreation and the educational benefits of sporting activities or ecology, depending on the functionality of the open space. In addition, open spaces can act as a social meeting place and a deficit of open space could have a detrimental effect on inclusion and social cohesion.
- A lack of play space for children can have detrimental effects on their physical and mental well being.

Community facilities

Through the development and implementation of the Bankside, Borough and London Bridge SPD, the area will experience significant growth in population. The council will need to propose improvements to the community infrastructure to meet the additional needs of the whole community resulting from new development. The following considerations will have to be taken into account when developing guidance for community facilities in Bankside, Borough and London Bridge:

Considerations

- The area would benefit from improvements to leisure facilities, youth facilities and a new school will be needed by 2018 to accommodate growth.
- A lack of adequate, accessible and affordable community facilities could act to isolate certain members of the community, such as women who may need a respite from supporting others such as children and those with limiting illnesses or older people who may live alone and need to interact with others.
- Tensions between certain groups may remain unresolved if there are no facilities for people to interact in informal surroundings. Social cohesion may be threatened by a deficit of community facilities in the area i.e. between different faith groups, BME groups and those who are unable to speak English.
- Social cohesion may be threatened by a lack of faith premises being available for the whole population of the area. BME groups may not be properly considered if faith premises are not provided for the full spectrum of religious beliefs.
- People on lower incomes may feel isolated from the rest of the community if they are unable to access affordable leisure and community facilities. This may result in isolation and social exclusion.
- A lack of appropriate community facilitates may create boredom through a lack of things to do. This could result in a rise in anti social behaviour problems, particularly with young people.
- The needs of certain groups may not be properly considered when deciding on the number and type of community facilities that are considered appropriate for the area. For instance the need for meeting places for older people, BME groups, faith groups and the need for high quality childcare and play, leisure, cultural and educational facilities for children and young people.
- If poorly designed and located, the use of these facilities may be limited. For instance, disabled people may not be physically able to access the facilities, those on lower incomes may not be able to afford to use them, such as older people, young people and

refugee and asylum seekers. Some people may not be able to travel distances due to other commitments, such as women with dependants.

- People having different priorities for the use of community facilities, i.e. for women it may be health and childcare, for young people it may be youth clubs and sporting facilities and for other groups it may be informal meeting places. Tensions could arise among different groups in the community if it is perceived that the needs of one group are being prioritised above others.

- Educational facilities need to be of a high standard and be available to all groups to use in flexible and coordinated ways as people will have different needs and uses for facilities. For example, schools are needed for the young population as well as the adult population seeking skills to improve access to employment. People may have different priorities for the use of educational facilities, i.e. for parents it may be before and after childcare, for young people it may be youth clubs and sporting facilities and for other groups it may be informal meeting places or temporary places of worship. Tensions could arise among different groups in the community if it is perceived that the needs of one group are being prioritised above others.