

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

POLICIES, STRATEGIES AND PLANS

Stage one: scoping

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

What are design and access statements?

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

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

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

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

Differences to previous Draft Supplementary Planning Guidance

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

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

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

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

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

Issues to consider may include:

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

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

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

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

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

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

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

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

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

Stage two: assessment of impacts

Part A: Feedback from the equalities and diversity panel

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

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

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

Part B: Purpose and aims of policy/strategy

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

The purpose of the SPD is to clarify what Southwark Council expects applicants to include in a design and access statement. It provides further information on policy 3.12 in the emerging Southwark Plan and policies 4B.1 and 4B.5 of the London Plan. The SPD will be a material consideration in the determination of planning applications.

The SPD provides information for a range of people, including developers, architects and consultants working on commercial and residential developments as well as householders making alterations to a property in a conservation area. It will also be used by planning officers, councilors and members of the public in making decisions and understanding what to expect from a good design and access statement.

3. What are its aims?

The aims of the SPD are:

- To add further detail to the UDP Part 1 vision and strategy for Southwark;
- To provide additional clarification on the application of generic and area specific UDP Part 2 policies, with specific regard to urban design;
- To provide urban design advice with the aim of improving the quality of information submitted with planning applications;
- To provide guidance to developers to inform the design process, and the formation of design concepts and development proposals;
- To provide a framework for assessing the suitability of information submitted with planning applications, in order to validate an application, and also inform the assessment process.
- To provide specific information on what is required in a design and access statement.
- To provide advice on access and the need to ensure developments are accessible to all members of the community.

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

The council has the responsibility to:

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

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

Corporate Values	How does this SPD address this value?	Shortfalls
<p>Equality and diversity – promoting equality for everyone, and responding to the needs of the diverse communities.</p>	<ul style="list-style-type: none"> • The SPD seeks to improve the quality of design and access for everyone. All of the community should benefit from the SPD. In particular it responds to the needs of certain groups who may benefit more than others from improved access, including disabled people, elderly people and parents with young children. 	None
<p>Community involvement and cohesion – engaging with all sectors of the community so that the vision is representative, reflects local needs and encourages good community spirit and relations.</p>	<ul style="list-style-type: none"> • The SPD clarifies how to write, read and use design and access statements and this should have a positive impact on community involvement. • By explaining what needs to be included in a design and access statement, the local communities are better equipped to comment on the design and access elements of planning application as part of the consultation process. 	None
<p>Investing in young people – targeting efforts on those who will provide for the future needs of Southwark Council</p>	<ul style="list-style-type: none"> • The SPD will help to provide better quality buildings and spaces with improved access. This should benefit everyone including young people. 	None
<p>Fairness – delivering priorities in a way that eliminates unfair disadvantages against any person or group in Southwark Council</p>	<ul style="list-style-type: none"> • Consultation on all planning applications will be carried out in accordance with Southwark’s draft Statement of Community Involvement, which sets out how all groups will be involved in the consultation process. • There is no differentiation between different groups on what must be included in a design and access statement. 	None
<p>Sustainability - ensuring that actions today benefit future generations</p>	<ul style="list-style-type: none"> • The SPD will improve the quality of design and access to buildings. This will have a positive impact for future generations as buildings will be better designed and so should be 	None

	<p>suitable for many years to come.</p> <ul style="list-style-type: none"> • The SPD has been subject to a full sustainability appraisal. 	
<p>Quality – ensuring that quality rather than quantity drives the vision to continuously improve the borough</p>	<ul style="list-style-type: none"> • The main focus of the SPD is on improving the quality of the environment through improved design and access. 	None
<p>Value for money – using scarce resources efficiently</p>	<ul style="list-style-type: none"> • The SPD does not cover using resources. 	None

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?

Paragraph 63: Circular 01/2006 Guidance on Changes to the Development Control System states that: “Design and access statements help to ensure development proposals are based on a thoughtful design process and sustainable approach to access; they allow the applicant to explain and justify their proposals; and they help all those assessing the application to understand the design and access rationale that underpins them. Statements should improve the quality of proposals.”

Part C: Application of this policy/strategy

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

A consultation plan was prepared which set out how the Council ensures all groups are aware of, and have a chance to comment on the SPD.

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

The SPD will benefit everyone through improved access and design. It will not be discriminating against any group or individual in its implementation as the same information will be required regardless of group. It is unlikely to cause conflict between different groups as the document will improve the environment for everyone and not just certain groups or individuals.

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

Presentations about the SPD were given at Community Councils and Area Forums. Offers of presentations and further information were also made available. If desired by the local community, there is the possibility of giving further presentations to certain groups who will benefit most from the positive outcomes, such as disability groups. This can also be done after the adoption of the document to ensure as many people as possible are aware of and can benefit from the document.

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

The assessor has not identified any specific reasons why any group would be negatively impacted on. It is suggested that any negative impacts on equalities groups that may occur would be derived from an omission, or lack of detail in the Statement of Community Involvement rather than an intentional outcome. However, the Statement of Community Involvement will be continuously monitored and updated through the Annual Monitoring Report which should act to address any omissions or lack of detail that are identified through the monitoring process.