

**Equalities Impact Assessment (EQIA)
of the
Residential Design Standards
Supplementary Planning Document (SPD)**

Stage one: scoping

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

The Residential Design Standards Supplementary Planning Document

The Residential Design Standards Supplementary Planning Document (SPD) will set out the council's required design standards for residential development. The SPD will provide a framework to ensure that all new housing development is accessible and of a high quality, and does not have a negative impact on the amenity, privacy and aesthetics of surrounding areas.

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

The Residential Design Standards SPD will replace the existing adopted Standards, Controls and Guidelines for Residential Development Supplementary Planning Guidance (SPG) (1997) and the draft Residential Design Standards SPG (2002). There is a need to produce a new SPD because both the adopted and draft SPGs are considerably out-of-date and have been superseded by a number of national, regional and local planning policy documents.

The new Residential Design Standards SPD will form part of the council's Local Development Framework, which will contain all of the council's planning policies used to guide how land is used in the borough and in the determination of planning applications. Existing policy for residential design standards is contained within the council's existing development plan which consists of the London Plan (2004) and the council's Unitary Development Plan (2007), known as the Southwark Plan. The SPD will provide further policy guidance to support policies 3A.A and 4B.5 of the London Plan, and policies 4.1, 4.2 and 4.3 of the Southwark Plan. Once adopted the Residential Design Standards SPD will be a material consideration in the determination of planning applications.

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 existing adopted residential design SPG and draft SPG were not reviewed under the EqIA programme as they were both written prior to the 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?

A scoping exercise has been carried out to identify the likely impact of the SPD on the six equality groups (age, disability, faith & belief, gender, race & ethnicity and sexual orientation) and on gypsies, travelers, refugees and asylum seekers and the results are outlined below.

A number of potential barriers that could prevent certain groups from benefiting fully from the SPD were identified which could create differential impacts on certain groups. These impacts can be split into two categories; impacts created through the production of the SPD in terms of public consultation, and impacts associated with the implementation of the SPD and objectives that the SPD seeks to deliver.

Impacts created through the production of the SPD in terms of public consultation

The SPD will be developed in accordance with the council's Statement of Community Involvement. However, there are a number of issues that need to be considered to ensure an effective consultation involving all members of the community:

- Certain groups may not be able to access the information and consultation documents as easily as others, for example those who do not have English as their first language, young people, people who are unable to attend consultation meetings due to caring responsibilities, older people and people with disabilities.
- Certain groups may not feel safe attending community consultation events at certain times of the day, such as women and older people.
- Certain groups such as the lesbian, gay, Trans and bisexual community, faith groups, young people, asylum seekers, gypsies and the BME community, may be afraid to express their views in public meetings for fear of discrimination.
- People may perceive that some groups have more of an influence on council policies and that the council does not take the views of all the groups into consideration. This could create tension between different groups.
- Frequently it is the same groups of people involved in consultation exercises. This may discourage other groups of people from becoming involved in consultation due to lack of knowledge of how to get involved or the feeling that their views will not be taken into consideration.
- Information may be delivered in a way that engages some groups more effectively than others. For example consultation material as written documents may not engage young people as effectively as older people.

Impacts associated with the implementation and objectives of the SPD

The overall aim of the SPD is to raise the quality of residential development for everyone in the borough. This should produce a positive impact for all of the community but could potentially have a differential impact on certain groups. In addition certain groups may find it harder to benefit from the outcomes of the SPD than others. Their key concerns are:

- The SPD will set out space standards for all residential development. This is likely to have a positive impact on all of the community. However some groups may feel that the minimum room size requirements are not adequate to meet their need such as parents with young children who may require larger rooms for the children to play in, and elderly people who may spend more time in the home due to mobility restrictions.
- The SPD will provide clear guidance on wheelchair housing and Lifetime Homes standards. This will provide a greater benefit for certain groups, principally disabled people and older people. Other people may not feel their needs are being addressed.
- The SPD will set out standards for amenity space. This will have a positive impact on particular groups such as disabled people, older people, young people and teenagers, travelers and certain BME communities who otherwise may have restricted access to amenity space.
- By improving the design standards within the borough there is a possibility that house prices could increase as developers may charge more for having to meet minimum space standards, amenity space standards etc. This could prove problematic for certain groups who may then not be able to afford housing in their local area, particularly for lone parents, disabled people, the BME community, refugees and asylum seekers, and elderly people.
- The SPD will provide design requirements for housing to meet specific need such as supported housing, sheltered houses, hostels and travelers sites. This will impact positively on certain groups, especially elderly people, disabled people, travelers and gypsies, and refugees and asylum seekers. Other groups may not feel that their needs are being addressed
- The SPD will provide design guidance for tall buildings. This may negatively impact on certain groups, particularly disabled people, elderly people and parents with young children as this type of housing is unlikely to meet their required need.

Stage two: assessment of impacts

Part A: Feedback from the equalities and diversity panel

The Residential Design Standards EQIA was presented to the Equalities and Diversity Panel on 17 July 2007.

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

1. Should look at specific needs of different faith and ethnic groups such as Jewish people may need a second kitchen. The SPD cannot cover such detail as development cannot be specified to meet such a need. There is no planning basis to require development to be designed for different faith and ethnic groups.
2. 10% of housing should be for wheelchair users. This is the case for major developments (of 10 units or more)
3. The SPD should allocate for Traveler's housing needs. The SPD provides guidance on traveler and gypsy sites.
4. The SPD should look at the car parking for wheelchair users and blue badge holders. We confirmed this would be covered by the Transport for Sustainable Development SPD. The Residential Design Standards SPD refers to the Transport SPD, within which all issues of parking and garages are covered.
5. The Racial Equalities Group submitted written comments as they could not attend the meeting. They suggested adding Trans community to one of the groups who could be affected by the SPD. This has been added above. They also suggested consulting with the community through the Southwark Anti Homophobic Forum. This will be suggested to the Forum when the document is out for consultation.

Part B: Purpose and aims of policy/strategy

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

The overall purpose of the draft SPD is to set out the standard of design expected from residential development in Southwark. It provides a framework to ensure that all residential development, including new dwellings, extensions, alterations and conversions are sustainable and of a high standard of design.

3. What are its aims?

The aims of the SPD are to:

1. Provide a clear set of standards to guide the design of residential development
 2. To provide design guidelines for a wide range of dwelling types required to meet housing need
- To ensure a high standard of housing for all new residential developments

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**

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 all new residential development. This will be beneficial for everyone, and will have a more beneficial impact on some equalities groups than others. For example, families with children may benefit most from having set requirements for play areas and amenity spaces 	<ul style="list-style-type: none"> • The only short fall is that there is a possibility that having more design quality requirements may increase the cost of housing, making it unaffordable to some groups. However, affordable housing (social rented and intermediate housing) must be affordable to people within a threshold of incomes (as set by the Mayor) and so this should continue to ensure equality. Furthermore, much recent evidence shows that house prices are falling.
<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 was fully consulted on, in accordance with our Statement of Community Involvement. • The SPD will make it more clear to everyone what design standards we require in all residential developments. By having a document setting this out, this makes it easier for everyone to see how we make our decisions on planning applications. 	<p>None</p>

<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. In particular the SPD sets standards on amenity space and children’s play areas. This should benefit everyone, particularly young people. 	<p>None</p>
<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 Statement of Community Involvement, which sets out how all groups will be involved in the consultation process. • The SPD was also consulted on in accordance with the Statement of Community Involvement 	<p>None</p>
<p>Sustainability - ensuring that actions today benefit future generations</p>	<ul style="list-style-type: none"> • The SPD will improve the quality of design of residential development. This will have a positive impact for future generations as buildings will be better designed and so should be suitable for many years to come. • The SPD has been subject to a full sustainability appraisal. 	<p>None</p>
<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. 	<p>None</p>
<p>Value for money – using scarce resources efficiently</p>	<ul style="list-style-type: none"> • The SPD does not cover using resources. 	<p>None</p>

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 whole of the SPD is a commitment to quality, through requiring new residential development to meet the design standards in the SPD.

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?

We prepared a consultation plan which set out how we ensure all groups are aware of, and have a chance to comment on the SPD. All planning applications are treated fairly in accordance with our policies and guidance.

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 be beneficial to everyone by requiring a higher quality of design for residential development. It will not be discriminating against any group or individual in its implementation as the same information will be required regardless of group in planning applications. It is unlikely to cause conflict between different groups as the document will improve the living 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. We will be happy to visit groups after the adoption of the SPD if they feel it will be useful to ensure they have a positive outcome 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?

We have not identified any specific reasons why any group would be negatively impacted on. There is a small chance that some groups may not be able to afford housing in the borough should house prices increase as a result of this SPD. We think this is unlikely to happen and as set out above, eligibility for affordable housing could be the case if these circumstances were to arise.

We will monitor the impact of this SPD on different groups through our Annual Monitoring Report.

