SUSTAINABILITY ASSESSMENTS SUPPLEMENTARY PLANNING DOCUMENT (SPD)

EQUALITIES IMPACT ASSESSMENT

Stage One: Scoping

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

Sustainable development is about achieving environmental, social and economic aims in a balanced way that can be enjoyed by everyone, now and in the long term. The way we design and build our urban environment plays an important role in sustainability.

The reason for preparing the Sustainability Assessment Supplementary Planning Document (the SPD) is to provide guidance on how to carry out a sustainability assessment of planning applications. This should help make the planning process simpler and clearer by setting out a clear picture what should be completed and submitted with planning applications; setting out minimum standards which proposals will be expected to meet, as well as preferred standards; and guidance on what needs to be submitted along with the checklist.

This will assist members and council officers implement the policies effectively, will inform the community of the issues associated with sustainability and provide detailed advice to guide developers to inform their proposals. Once adopted, the SPD will be used in the determination of planning applications.

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

The SPD provides guidance on policies which have already been adopted in the Southwark Plan. It does not provide new policies but rather seeks to explain in more detail how the policies in the UDP should be implemented.

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 final version of the Southwark Plan was subjected to a combined sustainability appraisal and equalities impact assessment. This was carried out in February 2005.

Paragraph 3.1 of the appraisal which summarises the findings stated that:

“As can be seen from table 4, the policies of the emerging Southwark Plan with Final Changes are acceptable with respect to equalities impact. The Housing and Sustainable Transport Chapters scored best receiving scores of 2.3 and 2.25 respectively.”

The EqIA technical appendix indicated that no differential impacts arising from the environmental policies of the plan (which include policy 3.3) were identified. With regard to the environmental policies, the assessment stated that “direct references to creation of opportunity and evidence of how and where the policies impact on marginalized and hard to reach communities are included.”

Since the 2005 EqIA was carried out, the council has adopted the 2005-2008 Equalities Scheme and the methodology for undertaking EqIAs has been amended. It is considered however that the 2005 assessment provides a useful starting point for undertaking an EqIA of the draft Sustainability Assessment SPD.

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**

It is considered that the Sustainability Assessment SPD will have mainly positive impacts on the equalities target groups. Part of the rationale of the SPD is encourage developers to consider the wider social, economic and environmental impacts of development from the outset when preparing planning applications. It helps identify and measure key impacts early on and allows where necessary for measures to be put in place to mitigate any harmful or negative impacts.

It reinforces requirements already in the UDP and embedded in other planning guidance documents which will have positive impacts for equalities. This includes a requirement to consider the accessibility of the development in the preparation of a design and access statement, the need to incorporate a range dwellings sizes and incorporate features such as lifetime homes standards. It recognizes the need expressed in the Residential Design Standards SPD to incorporate play facilities for children in new development, while the obligation to increase energy efficiency and include renewable technologies will help those groups who are more likely to experience fuel poverty, such as the elderly.

While the SPD covers much of the territory that is already set out in other documents, such as the Residential Design Standards SPD, the Transport SPD and the Design and Access Statements SPD, it also addresses several issues which currently do not have supplementary guidance, such as retail, town centres and business. In addition to the minimum standards set out in the UDP, the SPD introduces preferred standards, which may be embedded in development plans at a future date.
With regard to business, the SPD encourages developers to consider procuring a proportion of goods and services locally, which will assist small businesses. It also promotes the creation of small business space in new development and the provision of support services to businesses which may be displaced by development. Measures such as these may have positive impacts particularly for BME groups in view of the fact that a high proportion of small and medium sized enterprises (SMEs) in Southwark are BME businesses.

With regard to retail, the SPD encourages developers to consider allocating a percentage of new retail floorspace to independent traders, rather than multiples. Again, this has the potential to support locally based SMEs. The SPD also requires developers to consider carefully the impact of proposals on the health and vitality of town centres and to promote town centre locations over out of centre locations. The protection and enhancement of the town centres is important, particularly to those groups who are less likely to have access to a car, such as the elderly.

For very large scale developments, the SPD suggests that both health impact assessments and equalities impact assessments are carried out. While these are currently undertaken very infrequently, the SPD indicates that developers should consider undertaking these to inform their proposals.

Given that the draft SPD is primarily about processes, ie it sets out the issues that developers will be expected to consider, rather than prescribing outcomes, few negative impacts have been identified. The most significant of these is that compliance with the SPD will require additional resources from developers, and undertaking a sustainability assessment may not be straightforward for those not familiar with the planning system.

The intention of the SPD is to make sustainability assessments more straightforward and careful consideration has been given to ensure that it is expressed in plain English. In order to try and streamline the process, avoid duplication and so minimise impact on resources, many of the questions contained in the assessment can be answered through information which is provided through existing frameworks, such as that provided by the Code for Sustainable Homes or BREEAM. Therefore while completing the sustainability assessment will take some time and consideration, generally it will not involve undertaking additional assessments, other than those which are already commonly undertaken and required.

Stage two: assessment of impacts

**Part A: Feedback from the equalities and diversity panel**
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 during the period of consultation.

**What feedback did the panel give you at stage one?**
The panel did not have any comments regarding the content of the document. The panel however, emphasized that consultation on the document should be in line with the council’s statement of community involvement and that consultation should be meaningful.

**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 provide further guidance on how to carry out a sustainability assessment of a planning application. This will help to ensure we deliver sustainable development to meet the needs of the local people.

3. **What are its aims?**
The aims of the SPD are to:
• Provide a checklist which should be completed and submitted with planning applications.
• Set out minimum standards which proposals will be expected to meet, as well as preferred standards
• Guidance on what evidence needs to be submitted along with the checklist.

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.

<table>
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<tr>
<th>Corporate Values</th>
<th>How does this SPD address this value?</th>
<th>Shortfalls</th>
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<tr>
<td>Equality and diversity – promoting equality for everyone, and responding to the needs of the diverse communities.</td>
<td>• The SPD seeks to ensure all new contributes towards sustainability. This helps promote equality for everyone as it ensures new development is designed and built so that it has a positive impact on the environment.</td>
<td>None</td>
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| 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. | • The SPD was fully consulted on, in accordance with our Statement of Community Involvement.  
• The SPD sets out how we encourage sustainable development in Southwark. By having a document setting this out, this makes it easier for everyone to see how we make our decisions on planning applications. | None |
| Investing in young people – targeting efforts on those who will provide for the future needs of Southwark Council | • The SPD seeks to improve the environment and improve social and economic wellbeing. This SPD therefore helps to invest in young people. | None |
| Fairness – delivering priorities in a way that eliminates unfair disadvantages against any person or group in Southwark Council | • 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 | None |
### Sustainability - ensuring that actions today benefit future generations

- The SPD has been subject to a full sustainability appraisal.

### Quality – ensuring that quality rather than quantity drives the vision to continuously improve the borough

- The purpose of the SPD is to ensure consistency in the delivery of high quality sustainable development.

### Value for money – using scarce resources efficiently

- The SPD seeks to improve the quality of the built environment whilst improving social and economic opportunities at a minimal or neutral cost.

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?

It is not mentioned specifically within the SPD, but the whole SPD is about ensuring all new development contributes to sustainable development.

**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?**

   Potentially, yes. There is an issue regarding the additional standards and information that will now need to be complied with. There is evidence to suggest that this additional information might act as a barrier for some BME groups who in the past have had difficulty complying with existing information requirements. However, the SPD has sought to be as clear as possible in setting out what is required and also includes signposts to good practice guidance and the Willowbrook centre.

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 will monitor the impact of this SPD on different groups through our Annual Monitoring Report.
Annex 1: Related projects and EQIAs

The Southwark Plan

Key findings:
• The Southwark Plan is one of the most important tools the council has to make sure the growth of Southwark happens in a way that protects and improves the environment and the quality of life for residents now and in the future. The policies in the UDP are intended to promoting equality of opportunity through the provision of attractive, accessible environments for communities within the borough.

Southwark 2016

Key findings:
• Migration in and out of the borough is high: this makes it difficult to measure the success of interventions (because the beneficiaries may have moved on and another, more disadvantaged group, taken their place). It is also makes it more difficult to predict the composition of the borough over the next 10 years.
• Southwark’s population will continue to grow so that by 2016 it could be between 286,000 and 301,000. That means anything from 14,000 to 20,000 more households needed than in 2001.
• By 2016 around 43% of the population is expected to be from black and minority ethnic backgrounds, with many different faiths and cultures.
• Southwark’s population ranges from those who enjoy significant affluence to those in severe poverty. Southwark is becoming more socially and geographically divided.
• 39% of local authority homes and 40% of private rented properties do not yet meet the decent homes standard.