



Main Modifications to the New Southwark Plan Equalities Impact Assessment

(June, 2021)

Summary of the EQIA

The need to conduct an equalities analysis is mandatory for Councils to carry out their Public Sector Equalities duty and through adopting a new local plan we deem it crucial to address the needs of our residents, mitigate against potential negative impacts and also foster good relations with established communities in our borough. We recognise that any scale of change on people such as minor to large scale development can have a significant impact on people hence why we drafted the strategic policy SP2 in the New Southwark Plan. SP2 is the strategic policy that sets out how we consider the impact of change on people, ensuring we achieve our equality objectives set for our division/department.

A summary based on the initial analysis in the following section is set out below. This summary section shall concisely convey the positive/negative impacts identified for all of the New Southwark Plan's policies and Area Visions, in addition to illustrating how the strategic policy SP2 aligns in principle with other policies.

Area Visions 1 - 16

All Area Visions and Site Allocations were acknowledged to have a positive impact across all protected characteristic groups as these all broadly aim to deliver housing where appropriate to meet local need, improve walking and cycling connectivity and preserve and enhance character. These aims help to achieve regeneration for all, ensuring that neighbourhoods are improved for everyone to feel pride in their communities.

Data from July 2018 sets out there is currently over 314,200 people living in Southwark, and with projections set out by the GLA the population of Southwark is estimated to increase by almost 20% by the year 2030. This increase roughly equates to 60,000 additional residents in the borough and potential new communities.

Through producing Area Visions that meet SP2's objective to promote wellbeing and reduce inequalities so that everyone is able to benefit from regeneration would ensure that the borough is designing areas that meet the need of existing residents as well as those that are predicted to emerge in the years to come.

[Source: Southwark's JSNA- Overview of Southwark's Population JSNA Factsheet]

SP1 Homes for all

Negative impacts: In relation to strategic policy SP1: Homes for all no negative impacts have been identified.

Protected characteristic impacted negatively:

NONE

Positive impacts: Ensuring the delivery of quality affordable homes will result in a positive impact on all protected characteristics long term time frame. The delivery of homes under SP1 are delivered to meet a range of specialist needs with policies addressing a wide range of housing needs. This provides more stability and home security for people, and promotes improved mental health and wellbeing.

The delivery of quality affordable homes also meets the vision and objectives set out in strategic policy SP2 Southwark Together, because it ensures that everyone can benefit from regeneration by delivering homes to meet the needs of the diverse communities in Southwark. This investment in programmes of new homes delivery is reflected in SP2, as it recognises the wider benefits of homes delivery and its impacts on the wellbeing of individuals and communities, as it enables everyone to feel proud of their home. SP1 aims to ensure that vulnerable residents and families are helped to find the right housing to live in as independently as possible. This demonstrates the need to ensure that housing put forward gives consideration to the needs of various disability types through the implementation of adaptable homes. Through recognising this need we aim to meet wider regeneration for all objectives because it ensures that all residents benefit from healthy, good quality, safe and affordable homes.

SP1 promotes a good housing mix that is tenure blind. This creates more social cohesion and reduces inequalities as the quality of housing is good for all regardless. This is reflected in SP2, which encourages more positive relationships between homes and the public realm, which provides opportunity for greener and safer streets and more natural surveillance.

By improving and investing in housing, alongside increasing pride in residents for their communities, you can indirectly foster good relations amongst this group in addition to others. This extends to improvements of public realm that can contribute to this sense of pride of place in communities that has wider benefits for reducing anti-social behaviour.

Protected characteristic impacted positively:

All protected characteristics will benefit from the positive impacts of Strategic Policy 1 Homes for all and associated policies, and those with Socio-Economic Disadvantage shall also benefit.

SP1 aims to deliver 11,000 new council homes by 2043. This aims to meet housing need and mitigate against loss of council homes from right to buy and a lack generally of affordable housing. This links to SP2 because it strengthens the support in regeneration areas for those who are vulnerable or face greater disadvantage. The provision of more affordable homes, meets local need and promotes through mixed communities policies and blind tenure promotes greater social cohesion too.

Policy P11 safeguards the borough's four existing Gypsy and Traveller sites as shown in the Policies Map, as well as setting out criteria for the identification of new sites to meet any identified need for additional Gypsy and Traveller accommodation. The safeguarding of existing Gypsy and Travellers sites is expected to have a positive impact on this group and contributes to providing a significant number of pitches for culturally appropriate accommodation.

The Gypsy and Traveller Accommodation Assessment Report (May 2020) does not identify any need for additional Gypsy and Traveller pitches in Southwark. However the report did identify a demand for 43 pitches for those who do not meet the Planning Policy for Traveller Sites (PPTS 2015) definition but who seek culturally appropriate accommodation.

It is recognised that the national PPTS definition for gypsies and travellers is likely to have a negative impact on those who fall outside of this definition, particularly for those who also fall under another protected characteristic that would directly impact someone's ability to travel such as those with disabilities. This is set out under each protected characteristic in the full EQIA.

Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who will be impacted by development.

SP2 Southwark Together

Negative impacts: In relation to strategic policy SP2 no negative impacts have been identified.

Protected characteristic impacted negatively:

NONE

Positive impacts: Ensuring the revitalisation of our places and neighbourhoods will result in a positive impact on all protected characteristics. It will create new opportunities for residents and local businesses, promote wellbeing and reduce inequalities so that people have better lives in stronger communities.

Protected characteristic impacted positively:

The strategic objective of SP2 will ensure that the revitalisation of our places and neighbourhoods through good growth and new development has a positive impact on the diverse communities that live in Southwark. SP2 includes all principles of the Southwark Stands Together initiative and to ensure accessibility, inclusivity, and interaction for all, regardless of disability, age, race, religion or belief, sex, sexual orientation, pregnancy and maternity, marriage or civil partnership or gender, and allow all to participate equally, confidently and independently in everyday activities across the borough.

All will benefit from the activities, homes, jobs, education and places created, including access to play spaces, leisure activities, squares and shops, buildings and improvements to the natural environment.

The mitigation of and adaptation of our places and neighbourhoods to climate change to meet the 2050 net zero carbon will deliver interim and long-term positive impacts for all.

Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who will be impacted by development.

SP3 A great start in life

Negative impacts: In relation to strategic policy SP3 no negative impacts have been identified.

Protected characteristic impacted negatively:

NONE

Positive impacts: Ensuring the delivery of quality education facilities will result in a positive impact on all protected characteristics long term time frame.

Protected characteristic impacted positively:

All protected characteristics and those with socio-economic disadvantage shall benefit.

The improvement of education facilities and provision delivers positive impacts for all. It improves the quality and access to education and training, and increases accessibility to resources such as libraries as well as encouraging interactions between all age groups and improving early education support for parents. This provides specific benefits to the protected characteristics of age, pregnancy and maternity and socio-economic disadvantage.

SP3 aims to improve education from early years to further education. By ensuring greater education for all, it improves the employability of residents and improves quality of life for wider families too.

As policy SP3 aims to provide a safe, stable and healthy environments for all it demonstrates how the needs of new mothers and parents are being met, as well as those who are vulnerable because of their age, and economic status.

In terms of disability, there are specific positive impacts delivered by SP3 because it aims to offer young people and families, including those who are more vulnerable or have special educational needs the right support at the right time. This ensures that all have access to education, regardless of ability.

There are no specific impacts on the protected characteristics of race and ethnicity, sexual orientation, religion and belief, gender reassignment, or sex. The impact of objective of giving all young people the best start in life in a safe, stable and healthy environment can benefit everyone.

Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who will be impacted by development.

SP4 A Green and Inclusive Economy

Negative impacts: In relation to strategic policy SP4 no negative impacts have been identified.

Protected characteristic impacted negatively:

NONE

Positive Impacts: Data obtained and collated in Appendix 3 of the IIA sets out economy and employment figures in addition to retail and town centres at a borough wide level. This data set does not go in to detail highlighting specific intel per protected characteristic group, but demonstrates on a broad scale the need for residents borough wide. Due to this we anticipate that we are meeting the needs of all which will result in positive impacts.

Protected characteristic impacted positively:

All protected characteristics and those with socio-economic disadvantage shall benefit.

SP4 aims to develop a strong economy by working with local businesses and other partners to make sure our residents are equipped with the skills and knowledge to access the many exciting opportunities that being in Southwark brings. Namely, improving education through in lieu payments to improve employability and access to opportunity so residents of all ages can benefit.

It makes provisions for those with disabilities, by aiming to work with our residents to assist them to be and stay financially independent. This achieves wider regeneration for all aims because it meets our ambition to improve life opportunities and good health and wellbeing. It also feeds into our council wide aim of creating a fairer future for all.

SP4 aims to develop a strong economy for all existing and new residents, businesses and workers. This is achieved by ensuring the delivery of 500 new affordable small business units. This ensures equality of access to opportunity for all, regardless of socio-economic background. This delivers specific positive benefits for those who are from lower socio-economic backgrounds because it provides affordable small business units to promote a strong local economy for all.

There are no specific benefits to Gender Reassignment, Sex, Sexual Orientation, Marriage and Civil Partnership, Pregnancy and Maternity, Race, and Religion and Belief, but they will benefit and be positively impacted by wider regeneration for all aims.

SP4 aims to ensure the delivery of 500 new affordable small business units. This removes barriers of access to starting a business, and supports new and emerging small and micro businesses. This has wider benefits for the local economy because it ensures the vibrancy of town centres and high streets, and increases footfall. This contributes to a stronger local business network and thriving local economy. This achieves wider Regeneration for all aims because it ensures that our all existing residents and neighbourhoods benefit from good growth. Namely, the improvements to town centres and high streets to ensure these are locations that enterprises will grow and prosper. This achieves the aim of regeneration for all to ensure that everyone has improved access to employment, and can benefit from the wider positive impacts of regeneration.

Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who will be impacted by development.

SP5 Thriving Neighbourhoods and Tackling Inequalities

Negative impacts: In relation to policy SP5 there are no negative impacts that have been identified.

Protected characteristic impacted negatively:

NONE

Positive impacts: Policy SP5 is deemed to result in a positive impact for all residents in Southwark as SP5 aims to encourage healthy and more active lives. SP5 aims to extend opportunities to all to maintain and improve their health and wellbeing. This achieves regeneration for all because it aligns with SP2's aim to design for diverse communities and allow all to participate equally and confidently in everyday activities.

Protected characteristic impacted positively:

All protected characteristics and those with socio-economic disadvantage shall benefit.

SP5 delivers positive impacts for all, because it aims to build resilient communities and foster a greater sense of place by addressing health and inequalities.

SP5 aims to maintain and improve the health and wellbeing of our residents by encouraging healthy lives by tackling the causes of ill health and inequalities. This includes tackling poor air quality relating to the use of motorised vehicles by promoting the use of sustainable forms of transport. This impacts people who are very young and elderly, as they are more vulnerable to ill health. SP5 aims to improve access to healthcare and community health facilities to combat this. SP5 also sets out that Southwark is an age friendly borough, and considers this role in its plan making.

SP5 aims to encourage healthier lives. The impacts for those who have a disability are positive. SP5 promotes the concept of active design, to find more innovative solutions to accessibility, finding alternatives for lifts. SP5 also enables people to remain in their homes longer, and makes provisions for vulnerable residents to live independent lives. This is achieved by regeneration for all, because it enables independence for all, and ensures everyone can benefit from regeneration activities, and from an improved quality of life.

There are positive impacts for expectant mothers, from SP5. It aims to deliver greater access to healthcare and community health facilities, to provide additional support.

SP5 illustrates positive impacts for those from all socio economic backgrounds by ensuring all council homes are warm, dry and safe. This aligns with the aim of regeneration for all to strengthen support in all regeneration areas to tackle causes of inequality.

There are no specific impacts for the protected characteristics of Marriage and Civil Partnership, Gender Reassignment, Race, Religion and Belief, Sex, and Sexual Orientation. But they will experience positive impacts more generally of regeneration. SP5 aims to deliver a safer walking and cycling network. This promotes a healthier and more active lifestyle and reduces car journeys. This achieves wider regeneration aims because it improves accessibility, and therefore promotes more inclusive spaces that foster a greater sense of community.

Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who will be impacted by development.

SP6 Climate Emergency

Data obtained and collated in Appendix 3 of the IIA sets out figures for energy and climate change; air quality; biodiversity; open space; soil; flood risk in addition to water resource and quality at a borough wide level. This data set does not go in to detail highlighting specific intel per protected characteristic group, but demonstrates on a broad scale the need for residents borough wide. Due to this we anticipate that we are meeting the needs of all which will result in positive impacts, but we will need to conduct needs assessment specifically to understand in detail the need of those residents that relate to 1 or more the protected characteristic groups.

Negative impacts: In relation to policy SP6 no negative impacts have been established.

Protected characteristic impacted negatively:

NONE

Positive impacts:

SP6 aims to improve the quality of our open spaces by improving and protecting our green corridors. This makes our open spaces safer and more pleasant to spend time in which fosters a greater sense of place. This achieves regeneration for all because it promotes a greater sense of inclusion in public spaces, by improving the attractiveness and openness of

green corridors, it promotes improved navigability which has wider benefits for revitalising neighbourhoods and improving the public realm for all.

With regard to age, Children and the elderly are vulnerable to poor air quality. The Council has declared a climate emergency and as such are taking a stronger stance on combatting climate change- namely, improving air quality. This is achieved by improving energy efficiency and promoting more active and public travel modes that are convenient, safe and attractive for all. This achieves regeneration for all in line with SP2 because it contributes to a safer and more attractive environment that instils a pride of place in communities and promotes a greater sense of health and wellbeing.

Pregnant and expectant mothers are vulnerable to poor air quality. The Council has declared a climate emergency and as such are taking a stronger stance on combatting climate change- namely improving air quality. This is achieved by improving energy efficiency and promoting more active and public travel modes that are convenient, safe and attractive for all. This achieves regeneration for all in line with SP2 because it contributes to a safer and more attractive environment that instils a pride of place in communities and promotes a greater sense of health and wellbeing.

Those from a socio economic disadvantage will be positively impacted by the improvements to walking, cycling and public transport. SP6 aims to prioritise these more affordable and more sustainable modes to make them more convenient, safe and attractive. This achieves our wider regeneration for all goals because it improves access for all residents to more active and healthier lifestyle, but also to employment opportunities and amenities.

There are no specific benefits for Gender Reassignment, Marriage and Civil Partnership, Race, Religion and Belief, Sex, and Sexual Orientation. The cumulative benefits of the policy will apply to all of the above characteristics.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who will be impacted by development.

IP1: Infrastructure

Negative impacts: In relation to policy IP1 there are no long term negative impacts which have been established. However on a short term scale it should be acknowledge that the construction of new transport infrastructure can lead to changes that would impact the way in which the following protected characteristics navigate in their daily excursions, making access, movement and (physical and mental) health a detrimental impact on their quality of life.

Protected characteristic impacted negatively:

AGE- DISABILITY – PREGNANCY & MATERNITY -

Positive impacts: Implementation of IP1 will provide residents with equal access to all facilities and services that shall emerge from regeneration, ensuring existing residents and communities can benefit also. Further to this paragraph 1 of SP2 also discusses development that can benefit everyone and allow residents to feel a sense of belonging, which overall demonstrates that IP1 has a positive impact on all protected characteristics.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

IP1 Mitigation:

Overall the positive impacts of this policy outweigh the negative, but we will continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR. This is to ensure we are up to date with all groups who will be impacted by development.

IP2 Transport infrastructure

Negative impacts: In relation to policy IP2 there are no long term negative impacts which have been established. However on a short term scale it should be acknowledge that the construction of new transport infrastructure can lead to changes that would impact the way in which the following protected characteristics navigate in their daily excursions, making access, movement and (physical and mental) health a detrimental impact on their quality of life.

Protected characteristic impacted negatively:

AGE- DISABILITY – PREGNANCY & MATERNITY -

Positive impacts: Ensuring the implementation of transport infrastructure through IP2 shall result in a positive impact on all protected characteristics on a long term time frame, as Transport infrastructure improvements, linked to development will result in better public transport accessibility around the borough, and across London. SP2 carries on the IP2 objective in paragraph 2 of the strategic policy ensuring that our policies create an equal opportunity for all.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

IP2 Mitigation:

Overall the positive impacts of this policy outweigh the negative, but we will continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR. This is to ensure we are up to date with all groups who will be impacted by development.

IP3: Community infrastructure levy (CIL) and Section 106 planning obligations

Negative impacts: In relation to policy IP3 no negative impacts have been established.

Protected characteristic impacted negatively:

NONE

Positive impacts: Policy IP3 is deemed to result in a positive impact for all residents in Southwark as people living, working and visiting Southwark shall benefit from the investment of upgraded infrastructure through these planning obligations. This policy objective is reflective in paragraph 2 and 7 of SP2 which allows for communities to work with the council, to decide prioritisation and spending of CIL, s106 and other regeneration-linked funds. This as a result advances equal opportunity for all residents including protected characteristics and fosters good community relations.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

IP3 Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who will be impacted by development.

IP4: Enforcement against unlawful development

Negative impacts: In relation to the written policy IP4 no negative impacts have been established. However the implementation of the policy potentially presents negative impacts against groups that are not fully aware of policies in the local plan or who do not understand how the planning process works, making them feel discriminated against

Protected characteristic impacted negatively:

NONE

Positive impacts: IP4 overall has a positive impact on all protected characteristics as its aim is to take action against developments that are in breach of planning regulations and can cause a detrimental impact on neighbouring residents health and wellbeing due to poor quality accommodation. Detailed further in points 7 and 9 of SP2 this implementation policy allows for residents of all communities to feel included and able to assist the Council in identifying unlawful development. This will ensure the quality of housing stock is protected and shall remain in good condition to serve the borough's current and future most vulnerable residents.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

IP4 Mitigation:

Overall the positive impacts of this policy outweigh the negative, but we will continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR. This is to ensure that groups who are not entirely connected within the planning process can be acknowledged and targeted for inclusion moving forward.

IP5 Compulsory purchase order (CPO)

Negative impacts: In relation to policy IP5 no negative impacts have been established.

Protected characteristic impacted negatively:

NONE

Positive impacts: IP5 as an implementation policy would have a positive impact on all protected characteristics as its objectives reflect in SP2 through paragraphs 2, 7 and 9. As a last resort, Compulsory Purchase Orders will ensure development potential is delivered in accordance with NSP objectives - to maximise opportunities for all. In addition to this by having input from communities to the plans and objectives of policy documents would ensure that the most vulnerable residents have services and facilities delivered on time, and to appropriately address their individual needs.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

IP5 Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who could be potentially impacted.

IP6 Monitoring development

Negative impacts: In relation to policy IP6 no negative impacts have been established.

Protected characteristic impacted negatively:

NONE

Positive impacts: Paragraphs 1 and 9 of SP2 demonstrates that IP6 would allow for regular monitoring of regeneration schemes which the Council would record and track to ensure the effective delivery of social regeneration objectives. Also collaboratively working across Council services would enable data to be shared effectively and monitored well, to prioritise delivery of services.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

IP6 Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who could be potentially impacted.

IP7 Statement of Community Involvement

Negative impacts: In relation to policy IP7 no negative impacts have been established.

Protected characteristic impacted negatively:

NONE

Positive impacts: The Statement of Community Involvement sets out how all residents and stakeholders' have the opportunity to input to the development process ensuring the needs of Southwark's diverse communities shape all future development and is reflective of all voices in the borough. IP7 is considered to have a positive impact on all protected characteristics as the policy aims to foster good relations with communities and residents. The implementation of IP7 would enable us to receive valued input from Southwark's diverse communities continues to helps to shape future development.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

IP7 Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who could be potentially impacted.

IP8 Local Development Scheme

Negative impacts: In relation to policy IP8 no negative impacts have been established.

Protected characteristic impacted negatively:

NONE

Positive impacts: IP8 will have a positive impact on all protected characteristics as it ensures Stakeholders and Council partners plan, collaborate and increase efficiency of development by publishing up-to-date, accessible and transparent policy timelines. All residents, businesses and stakeholders are well-informed of the Council's future work – including dates outlining the preparation, consultation and adoption of planning policy and guidance documents. By having an implementation policy that encourages transparency ensures that all residents are not disadvantaged and enables them to be apart of the planning process.

Protected characteristic impacted positively:

ALL 9 PROTECTED CHARACTERISTICS AND THOSE WITH SOCIO-ECONOMIC DISADVANTAGE SHALL BENEFIT

IP8 Mitigation:

Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our NSP policies and IIA indicators, in addition to the AMR to ensure we are up to date with all groups who could be potentially impacted.

Appendix 1 sets out and identifies the data and evidence behind each policy and the needs of each protected characteristic. This allows us to identify where there are gaps in data, and how we can work towards strengthening the data for each protected characteristic. The policies currently address the needs of each protected characteristic as set out in the EQIA for the NSP. This evidence will allow us to continue to assess our policies against the needs of each protected characteristic