



Old Kent Road Area Action Plan  
Proposed Submission Version  
October 2024  
Equalities Impact Assessment

**EQIA Document 02: Summary of the EQIA**

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# Summary of the EQIA

## Introduction

1. The need to conduct an equalities analysis is mandatory for Councils to carry out their Public Sector Equality Duty. 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. This is why we have drafted the Area Action Plan (AAP) for the Old Kent Road Opportunity Area.
2. A summary based on the initial analysis is set out below. This summary section concisely conveys the positive/negative impacts identified for all of the Old Kent Road Area Action Plan's policy objectives. It also sets out how each have also addressed the three strands of the Public Sector Equality Duty.

## Vision and Strategy

### Negative impacts:

3. In relation to the plan objectives for Vision and Strategy, no negative impacts have been identified.

### Protected characteristic(s) impacted negatively:

4. None.

### Positive impacts:

5. The Vision and Strategy sections of the AAP set out to deliver a masterplan which achieves the strategic objectives of:
  - delivering homes, employment, green space, community facilities, play space and youth facilities;
  - addressing climate change;
  - making movement easier, more appealing and more sustainable;
  - promoting high quality design.
6. This has positive impacts for all because it considers the need and character of the local area with respect to the design of its spaces, building and land uses. The delivery of the Old Kent Road AAP masterplan creates greater cohesion between existing and new residents through the delivery of a series of open and green spaces to encourage more active travel modes and encounter, but also through the delivery of affordable homes, employment and community facilities that are accessible for all.

### Protected characteristic(s) impacted positively:

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

Mitigation:

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

**Delivery**

9. The 'Delivery' objectives encompass:
  - AAP1 'The Masterplan'; and
  - AAP2 'Bakerloo Line Upgrade and Extension'.

Negative impacts:

10. In relation to the plan objectives for the delivery of the Masterplan and the Bakerloo Line Extension, no negative impacts have been identified.

Protected characteristic(s) impacted negatively:

11. None.

Positive impacts:

12. The objectives for the 'Delivery' policies are very much focussed on bringing forward new development supported by public transport improvements, the Bakerloo Line Extension (and its precursor, the Bakerloop bus, as part of Phase 1) being the critical element of this. The delivery of this tube line extension will deliver improved public transport accessibility to the Old Kent Road Opportunity Area. This delivers development with higher capacity for housing, employment and other services. This also delivers benefits to local residents who can have improved access to transport, affordable housing, employment and other services for all.

Protected characteristic(s) impacted positively:

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

Mitigation:

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

Addressed three strands of the Public Sector Equality Duty:

15. The 'Delivery' policies address the three strands of the PSED by bringing forward new jobs and homes in the Old Kent Road Opportunity Area, while also ensures infrastructural investment is delivered in tandem to support this growth. This will

bring socioeconomic improvements for all protected characteristics, in so doing ensuring that all residents have access housing, employment, public transport and other services. This means that discrimination is mitigated against in terms of growth, infrastructural investment, and access to services.

## **Housing**

The 'Housing' objectives are encompassed by the following policies:

- AAP3 'Homes for All; and
- AAP4 'Student Housing'.

### Negative impacts:

In relation to the plan objectives for the delivery of the Housing policies, no negative impacts have been identified.

### Protected characteristic(s) impacted negatively:

16. None.

### Positive impacts:

17. The objectives for the 'Housing' policies sets out a strategy for the delivery of 20,000 new homes across the opportunity area, including a wide range of homes sizes and home types to meet the needs of local residents. This improves accessibility to quality affordable homes for all, which provides a greater sense of security and inclusion for residents. The 'Housing' policies also recognise the need for, and economic benefits brought by, Purpose Built Student Accommodation; this will deliver high quality managed accommodation for the area's student population, while also ensuring that such developments are designed to help foster mixed and inclusive communities.

### Protected characteristic(s) impacted positively:

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

### Mitigation:

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

### Addressed three strands of the Public Sector Equality Duty:

20. The 'Housing' polices address the three strands of the PSED by delivery affordable housing that is available to those with protected characteristics, in so doing ensuring that all residents have access to safe and good quality housing. This means that discrimination is mitigated against in terms of housing.

## **Strong Local Economy**

21. The 'Strong Local Economy' objectives are encompassed by the following policies:
- AAP5 'Businesses and Workspace - The Bow Tie';
  - AAP6 'Life Sciences; and
  - AAP7 'Town Centre, Leisure and Entertainment'.

### Negative impacts:

22. In relation to the plan objectives for a Strong Local Economy, no negative impacts have been identified.

### Protected characteristic(s) impacted negatively:

23. None.

### Positive impacts:

24. The objectives for a 'Strong Local Economy' sets out a strategy to deliver more vibrant town centres with greater employment opportunities for local residents, while leveraging the Old Kent Road Opportunity Area's location at heart of the South Central London Life Sciences district to bring more employers and businesses within this sector to the area.

### Protected characteristic(s) impacted positively:

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

### Mitigation:

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

### Addressed three strands of the Public Sector Equality Duty:

27. The 'Strong Local Economy' policies address the three strands of the PSED by providing more vibrant town centres with greater employment opportunities (including in the emerging Life Sciences sector) that are available to those with protected characteristics. The policies ensure that all residents can participate in, and benefit from, a strong local economy. This means that discrimination is mitigated against in terms of employment and economics.

## **Movement, Parks and Healthy Streets**

28. The 'Movement, Parks and Healthy Streets' objectives are encompassed by the following policies:

- AAP8 'Movement – People, Place, Experience'; and
- AAP9 'The Greener Belt – Parks and Healthy Streets'.

Negative impacts:

29. In relation to the plan objectives for Movement, Parks and Healthy Streets, no negative impacts have been identified.

Protected characteristic(s) impacted negatively:

30. None.

Positive impacts:

31. The objectives for Movement, Parks and Healthy Streets sets out a strategy for the prioritising of walking and cycling and the delivery of inclusive and accessible streets and public realm. This will be complemented by enhancements to, and delivery of brand new, parks; some of these new open spaces will link together, creating a green spine east-to-west through the Opportunity Area, providing quieter and safer routes for active travel.
32. Policy AAP8 promotes car free development with the exception of disabled car parking spaces. It also sets out a servicing strategy that places preference on off-street servicing, consolidation and promotion of deliveries by cargo bikes and quadricycles – all of which will create cleaner, greener and more welcoming spaces to travel through for all sections of society.

Protected characteristic(s) impacted positively:

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

Mitigation:

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

Addressed three strands of the Public Sector Equality Duty:

35. The 'Movement, Parks and Healthy Streets' policies address the three strands of the PSED by providing greater access to public open space and sustainable modes of public transport, while reducing the amount of motorised traffic (and the dominance this has on the local environment) . These greener and cleaner spaces, as well as the major new public transport infrastructure, will be fully available to those with protected characteristics. This means that discrimination is mitigated against in terms of movement and access to open space.

**Design**

36. The 'Design' objectives are encompassed by the following policies:
- AAP10 'Tall Buildings - The Stations and the Crossings';
  - AAP11 'Character and Heritage'; and
  - AAP12 'Design'.

Negative impacts:

37. In relation to the plan objectives for Design, no negative impacts have been identified.

Protected characteristic(s) impacted negatively:

38. None.

Positive impacts:

39. The objectives for Design sets out a strategy for the delivery of inclusive and accessible buildings that also delivers proper amenity and communal open spaces. These buildings are to be high quality and form part of coherent town- and street-scapes, aiding wayfinding and legibility for all.

Protected characteristic(s) impacted positively:

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

Mitigation:

41. Although the impacts of this policy are all positive, we will still continuously monitor our data and annually review our policies (both in the Southwark Plan and the AAP) and IIA indicators, in addition to the AMR. This to ensure we are up to date with all groups who will be impacted by development. These policies are also designed to respond to the local character and landmarks in the Old Kent Road Opportunity Area to promote a sense of place for all.

Addressed three strands of the Public Sector Equality Duty:

42. The 'Design' policies address the three strands of the PSED by delivering inclusive and accessible buildings that achieve a high quality of design and form part of coherent town- and street-scape. This high quality design will be enjoyed by those with protected characteristics. This means that discrimination is mitigated against in terms of design.

### **Climate and Environmental Quality**

43. The 'Climate and Environmental Quality' objectives are encompassed by the following policies:
- AAP13 'Climate Emergency'; and
  - AAP14 'Water Management, Air and Noise Quality'.

Negative impacts:

44. In relation to the plan objectives for Climate and Environmental Quality, no negative impacts have been identified.

Protected characteristic(s) impacted negatively:

45. None.

Positive impacts:

46. The objectives for Climate and Environmental Quality sets out a strategy for the delivery of green spaces to address the deficiency of open and green space currently in the Old Kent Road Opportunity Area, along with a strategy for tackling the Climate Emergency. This delivers spaces for recreation and exercise that are accessible to all, while ensuring new development plays its part in minimising emissions and creating an environment that mitigates against --and is adapted to-- climate change and global warming

Protected characteristic(s) impacted positively:

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

Mitigation:

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

Addressed three strands of the Public Sector Equality Duty:

49. The 'Climate and Environmental Quality' policies address the three strands of the PSED by delivering inclusive and accessible buildings that achieve a high quality of design and form part of coherent town- and street-scape. This high quality design will be enjoyed by those with protected characteristics. This means that discrimination is mitigated against in terms of climate and environment.

**Great Start in Life – Child and Youth Provision**

50. The 'Great Start in Life objectives are encompassed by the following policies:
- AAP15 'Great Start in Life – Child and Youth Provision'.

Negative impacts:

51. In relation to the plan objectives for Great Start in Life – Child and Youth Provision no negative impacts have been identified.

Protected characteristic impacted negatively:



52. None.

Positive impacts:

53. The plan objectives for Great Start in Life – Child and Youth Provision sets out a strategy for the delivery of community facilities, play space and education for children and youth in the Old Kent Road opportunity Area. This addresses the need to provide safe spaces for young people and to improve recreation and education opportunities. By improving these facilities for young people, other residents also benefit from improved facilities and accessible space.

Protected characteristic impacted positively:

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

Mitigation:

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

Addressed three strands of the Public Sector Equality Duty:

56. The 'Great Start in Life – Child and Youth Provision' policies address the three strands of the PSED by delivering inclusive and accessible community facilities, play space and education for children and youth available to those with protected characteristics. This means that discrimination is mitigated against in education, recreation and community engagement.

**Sub areas and site allocations**

Sub Areas 1-5:

57. All Sub Areas 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.

58. These aims help to achieve regeneration for all, ensuring that neighbourhoods are improved for everyone to feel pride in their communities.

59. The masterplans for each sub area aim to promote wellbeing and reduce inequalities so that everyone is able to benefit from regeneration..

Negative impacts:

60. In relation to Sub Areas 1, 2, 3, 4 and 5 no negative impacts have been identified for any of the protected characteristics.

Protected characteristic(s) impacted negatively:

61. None.

Positive impacts:

62. By producing a masterplan for each sub area and site allocation, the Old Kent Road AAP can respond to the needs in the local area. The masterplan is delivering a number of affordable homes, jobs, education and community facilities that are accessible to local residents. Connectivity is also a crucial element that has been considered alongside movement, to encourage safer and more active travel modes. Recognition of the current green and open space deficiency in the Opportunity Area has also informed the sub areas and site allocations – the benefits of this (a range of enhanced and new parks, the Trim Trail, the potential lido etc.) will be available to all with protected characteristics.

Protected characteristic(s) impacted positively:

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

Mitigation:

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

Addressed three strands of the Public Sector Equality Duty:

65. The sub areas and site allocations address the three strands of the PSED by setting how a number of affordable homes, jobs, education and community facilities will be delivered across the OA, ensuring that they are accessible to those with protected characteristics. This means that discrimination is mitigated against in across all the plan objectives.

**Conclusion on how the AAP addresses the Public Sector Equality Duty**

66. In conclusion, all the policies and sub-areas within the AAP cumulatively address the three strands of the PSED.

67. With regard to the first strand, the policies have due regard to eliminating unlawful discrimination in housing, employment and the public realm by delivering a range of affordable and accessible homes, workspace and employment.

68. With regard to the second strand, the policies have due regard to advance equality of opportunity between people who share a protected characteristic and those who

do not. This is achieved through the delivery of education, training and community facilities that are accessible for all. This ensures greater opportunity for all to access improved amenities and services. By supporting the local economy to grow and provide more diverse employment opportunities for local people, it also promotes equality of opportunity for local residents.

69. With regard to the third strand, the policies have due regard to foster or encourage good relations between people who share a protected characteristic and those who don't. This is achieved through improving mobility and connectivity for all residents, along with new community and town centre facilities designed to foster integration and community cohesion.