

# Dulwich Supplementary Planning Document

**Equalities Analysis** 

July 2013

# Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates			Dulwich Supplementary Planning Document				
Equality analysis author		Kate Johnson					
Strategic Director:		Simon Bevan					
Department		Chief Executive		Division		Planning Policy	
Period analysis undertaken		June 2013					
Date of review (if applicable)		N/A					
Sign- off	Alison Squires	Position		ng Policy Leader	Date	July 2013	

# 1.1 Brief description of policy/decision/business plan

The Dulwich Supplementary Planning Document (SPD) sets out our visions for Dulwich, as set out in the adopted Core Strategy. The SPD provides further planning guidance on the policies set out in the Core Strategy and the saved Southwark Plan for issues that relate specifically to development in Dulwich. The SPD will ensure that development respects the historic character and reflects local distinctiveness.

The SPD provides guidance on:

- Conserving heritage assets
- Appropriate types of new development
- Protecting and improving open spaces
- Improving transport and accessibility
- Protecting and improving shopping areas
- Development opportunities
- Community Infrastructure Levy (CIL) and Section 106 planning obligations

The SPD will assist members and council officers in implementing the policies effectively, inform the community of the issues associated with development in the area and will provide detailed advice to guide developers to inform their proposals. The SPD will be a material consideration to be taken into account in determining planning application.

The Dulwich SPD is being prepared in accordance with statutory regulations and in close consultation with the local community. We consulted the local community on the Dulwich SPD 2013 in accordance with our Statement of Community Involvement (2008). The community has also been consulted on a previous version of the draft SPD in 2009 and an earlier draft Dulwich SPG in 2004.

# Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders							
Key users of the department or service	Planning is a statutory function carried out by local authorities. The development of planning policies and the impacts of planning decisions can affect everyone with an interest in land in the borough. This can include residents, landowners, developers, local businesses and their employees, community organisations, statutory consultees and interest groups.						
	The Dulwich SPD will have an impact on anyone in the borough with an interest in Dulwich and the surrounding area, particularly residents, local community groups, landowners and developers.						
	We have previously prepared draft Dulwich Supplementary Planning Guidance (SPG) in 2004 and an earlier version of the draft Dulwich SPD in 2009. Both of these documents were subject to public consultation. Consultation on the draft Dulwich SPD 2009 was carried out in accordance with our adopted Statement of Community Involvement (SCI) (2008).						
	Our Statement of Community Involvement (SCI) sets out our approach to consultation on all our planning documents. The SCI identifies a number of barriers for consultation for different groups and we will seek to address these issues by using different consultation methods in order tor each all groups. <u>http://www.southwark.gov.uk/info/856/planning_policy/1238/statement_o_f_community_involvement_sci</u>						
Key stakeholders were/are involved in this policy/decision/busi	We carried out Equalities Impact Assessments on the previous versions of the SPD. The findings of these EQIAs have been used to inform the approach set out in the SPD. We have revised the format of our Equalities Impact Assessments in order to meet the requirements of the Equalities Act 2010.						
ness plan	In accordance with our SCI, all organisations and individuals on our mailing list are notified when the documents were available for consultation. Information was also available on our website to raise awareness of the consultation. We attended a ran a number of workshops and presentations including to the Dulwich community council. Our consultation report sets out further detail on how we consulted with the community on each stage in the preparation of the SPD.						
	All comments received during the previous consultation stages were considered when preparing the Dulwich SPD and changes have been made where appropriate in light of comments received. The interim consultation report can be found on our website at; <u>http://www.southwark.gov.uk/info/200151/supplementary planning documents and guidance/1247/dulwich spd</u>						
	We consulted on the Dulwich SPD until 22 April 2013. Following the consultation, we have looked at all the representations we received and prepared officer comments on the representations. We have amended the Dulwich SPD to reflect any changes as necessary.						

This section considers the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and Human Rights, the equality information on which above analysis is based and mitigating actions to be taken.

The guidance in the SPD may have many similar impacts on the different groups with protected characteristics. We have set out below some of the key impacts we have identified. Overall, we have assessed the guidance and consider that the overall impact of the SPD will be postive on all residents and people who work in and visit the borough. Further information is also set out in our sustainability appraisal, where we have assessed the guidance in the SPD against 17 sustainable development objectives to assess the social, environmental and economic impacts of the plan. Our sustainability appraisal is available to view on our website at:

http://www.southwark.gov.uk/info/200151/supplementary planning documents and guidance/1247 /dulwich\_spd

**Age** - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

# Potential impacts (positive and negative) of proposed policy/decision/business plan

#### Heritage and conservation

The SPD recognises that Dulwich has a distinct character and it seeks to retain and enhance the existing historic environment and heritage assets. The protection of areas for heritage and conservation purposes restricts the amount and scale of development which may limit the opportunities for creating new jobs and housing for those that are seeking employment or better quality housing. This may disproportionately affect young people who are seeking affordable accommodation in the area and access to new jobs. Limiting development may also result in more limited range of housing stock which can also impact on families looking for larger accommodation and the elderly who may wish to downsize to smaller properties but remain within the local area. The housing policies in the core strategy seek to ensure a mix of housing tenure is provided across the borough.

# Built environment

Dulwich is predominantly a residential area and has a good mixture of house types, but the large proportion of houses has a clear impact on the character of the area and the sort of housing that we would want to promote in Dulwich. It is not anticipated that there will be significant opportunities for new housing in Dulwich as there are very few sites for development. The Dulwich SPD therefore sets out guidance on some types of alterations that may be considered acceptable to properties in Dulwich.

Seeking to protect against the subdivision of large properties will help to provide more large houses in the area, this will benefit young families who require larger homes. Allowing appropriate extensions to existing housing will give existing residents the flexibility to extend or alter their properties which may benefit young families and the elderly in particular by enabling people to remain in their homes for longer.

# Natural environment

The area currently benefits from a high provision of good quality open spaces which will benefit all groups in the community. These spaces are an integral part of Dulwich's identity and local character. The impact of protecting large areas of open space may reduce the supply of land for new housing. If we do not allocate enough sites for housing, we may find we do not have enough space to build housing to our housing need and southwark wide target. Our core strategy has identified key areas for growth in the borough to ensure that we can meet our housing targets whilst protecting existing open spaces. Dulwich is not identified as a key growth area. Improving areas through access to and improved quality of open spaces may result in a rise in house prices which may cause conflict between groups. For example young people who wish to stay in the area may not be able to afford the new housing whilst new resident's move into the area. The housing policies in the core strategy seek to ensure a mix of housing tenure is provided, including at least 35% affordable housing and all major new developments across the borough.

Ensuring that open spaces are maintained to a high standard and are accessible to all will help to improve the quality of life for all groups but especially for the young and the elderly who may not have the means to travel far for access to open space. Improving links between spaces can improve access to open spaces and promote sustainable transport. This will have a positive impact on those with reduced mobility, including the elderly.

Protecting and improving open spaces will help to encourage the local community to take pride in their surroundings, which may in turn reduce levels of crime and fear of crime. This will have a particularly positive benefit to more vulnerable groups such as the elderly.

#### Transport and accessibility

The SPD focuses on promoting sustainable transport choices. In general, this means prioritising cycling and walking in the layout and design of new development, discouraging car use by improving access to public transport and reducing reliance on the car.

Certain groups including the elderly may rely on using a car. It is therefore very important that a reduction in car parking and promotion of sustainable modes of transport is undertaken in tandem with improvements in public transport and the public realm so that these groups are not disadvantaged. The SPD sets out where links in Dulwich need to be improved. Our transport plan also sets out further objectives for improving access to public transport.

If walking and cycling routes are poorly lit, secluded or at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as the elderly. Our transport plan sets out how we will encourage active transport in the borough by encouraging safe and attractive walking and cycling routes.

#### Town and local centres

Unemployment in Dulwich is much lower than in other areas of the borough and the proportion of young adults in Dulwich is lower than the borough overall. The SPD seeks to protect and encourage more businesses in the area. Dulwich also has two District Town Centres at Herne Hill and Lordship Lane and one Local Centre, Dulwich Village as well as a number of protected shopping frontages. The SPD seeks to protect the vitality and viability of these existing centres.

There may be conflicting priorities for the expansion and control of the night time economy. Younger people may feel strongly that there is a need for a more vibrant night time economy, which could act as a way to make the town centre safer in the evening and at night by having an increased footfall at these times. Elderly people may feel threatened by this in terms of the people that the night time economy might attract and the noise that it will create. The SPD sets out guidance on developments for evening and night time activity will need to take into account impact on residential amenity.

Local people may not have the skills to access job opportunities that currently exist in Dulwich. This can disproportionately affect young people in the area trying to get into the job market. This could act to create tensions in the community if there continues to be further provision of these types of job opportunities. This may also lead to resentment towards new people coming into the area and being successful in securing employment. Our core strategy policies seek to protect existing jobs in the borough and encourage a wide range of employment opportunities.

# Equality information on which above analysis is based

Consideration has been given to specific impacts that might arise as a result of the implementation of the Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the implementation of the guidance set out in the Dulwich SPD will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions taken through the SPD in the main section above.

**Disability** - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

# Possible impacts (positive and negative) of proposed policy/decision/business plan

# Heritage and conservation

The SPD recognises that Dulwich has a distinct character and it seeks to retain and enhance the existing historic environment and heritage assets. The protection of areas for heritage and conservation purposes restricts the amount and scale of development which may limit the opportunities for new housing. This may disproportionately affect disabled people who are seeking specific types of accommodation in the area that meets their needs. The housing policies in the core strategy seek to provide at least 10% of new accommodation in major developments is designed to by Wheelchair accessible.

Focusing on the heritage and conservation value of an area may mean that the built environment and the public realm may not meet the needs of disabled people. This can result in creating barriers to inclusion in the wider community and opportunities to decent housing, jobs and access to leisure and community facilities. In contrast, the needs of disabled people may be considered but results in the public realm being designed in a way that segregates and separates disabled people from the wider community. We will require design and access statements to be submitted with planning applications setting out how any works in the public realm will improve accessibility.

# **Built environment**

Dulwich is predominantly a residential area and has a good mixture of house types, but the large proportion of houses has a clear impact on the character of the area and the sort of housing that we would want to promote in Dulwich. It is not anticipated that there will be significant opportunities for new housing in Dulwich as there are very few sites for development. The Dulwich SPD therefore sets out guidance on some types of alterations that may be considered acceptable to properties in Dulwich.

Seeking to protect against the subdivision of large properties will help to provide more large houses in the area, this may benefit people with disabilities who require properties with ground flood access. Allowing appropriate extensions to existing housing will give existing residents the flexibility to extend or alter their properties which may benefit people with disabilities in particular by enabling people to remain in their homes for longer.

Some in-fill development can increase traffic and parking issues in residential areas, which would have a negative impact on residential amenity and particularly those with mobility issues. The SPD seeks to ensure that in-fill development only occurs in appropriate locations where there would be no adverse impact on traffic and parking.

Allowing appropriate extensions to existing housing will give existing residents the flexibility to extend or alter their properties which may benefit those with disabilities in particular by enabling people to remain in their homes for longer.

# Natural environment

The area currently benefits from a high provision of good quality open spaces which benefit all groups in the community. These spaces are an integral part of Dulwich's identity and local character. The impact of protecting large areas of open space may reduce the supply of land for new housing. If we do not allocate enough sites for housing, we may find we do not have enough space to build housing to our housing need and southwark wide target. Our core strategy has identified key areas for growth in the borough to ensure that we can meet our housing targets whilst protecting existing open spaces. Dulwich is not identified as a key growth area.

Ensuring that open spaces are maintained to a high standard and are accessible to all will help to improve the quality of life for all groups but especially for those with reduced mobility who may not have the means to travel far for access to open space. Improving links between spaces can improve access to open spaces and promote sustainable transport. This will also have a positive impact on those with reduced mobility. Further information is set out in our open space strategy on our approach to improving the accessibility of open spaces.

# Transport and accessibility

The SPD focuses on promoting sustainable transport choices. In general, this means prioritising cycling and walking in the layout and design of new development, discouraging car use by improving access to public transport and reducing reliance on the car.

Certain groups may rely on using a car including disabled people. It will be very important that a reduction in car parking and promotion of sustainable modes of transport is undertaken in tandem with improvements in public transport and the public realm so that these groups are not disadvantaged.

There is a need to ensure that disabled people's needs are taken into account, this should continue to be an important consideration to avoid circumstances where disabled people continue to find it difficult in accessing convenient and reliable public transport due to poor design and management. This could act to create further barriers to their inclusion within the wider community and limit their access to job opportunities, leisure activities and housing options. This could make disabled people unnecessarily dependent on others and limit their inclusion. Our transport plan also sets out further objectives for improving access to public transport.

Disabled access may be provided but they may be segregated from other access routes, this can further exacerbate separation and isolation from the rest of the community. We will require design and access statements to be submitted with planning applications setting out how any development will be accessibly and consider the needs or people with disabilities.

If walking and cycling routes are poorly lit, secluded or at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as disabled people. Our transport plan sets out how we will encourage active transport in the borough by encouraging safe and attractive walking and cycling routes.

#### Town and local centres

Unemployment in Dulwich is much lower than in other areas of the borough and the proportion of young adults in Dulwich is lower than the borough overall. The SPD seeks to protect and encourage more businesses in the area. Dulwich also has two District Town Centres at Herne Hill and Lordship Lane and one Local Centre, Dulwich Village as well as a number of protected shopping frontages. The SPD seeks to protect the vitality and viability of these existing centres.

Certain groups may experience discrimination in accessing employment opportunities such as disabled people. The inability to access opportunities to work could further lead to poverty, social exclusion and isolation from the wider community. Our core strategy policies seek to protect existing jobs in the borough and encourage a wide range of employment opportunities.

# Equality information on which above analysis is based

Consideration has been given to specific impacts that might arise as a result of the implementation of the draft Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the implementation of the guidance set out in the draft Dulwich SPD will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, with have highlighted the mitigating actions taken through the SPD in the main section above.

**Gender reassignment -** The process of transitioning from one gender to another.

Possible impacts (positive and negative) of proposed policy/decision/business plan

No specific impacts identified. The implementation of the Dulwich SPD should benefit all groups by ensuring the right type of development is delivered that is needed to support a healthy, safe and prosperous community and a fairer future for all in Dulwich.

# Equality information on which above analysis is based.

Consideration has been given to specific impacts that might arise as a result of the implementation of the Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

No specific impacts have been identified that would affect people differently as a result of their sexual orientation.

**Marriage and civil partnership** - Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.

Possible impacts (positive and negative) of proposed policy/decision/business plan

# **Built environment**

Dulwich is predominantly a residential area and has a good mixture of house types, but the large proportion of houses has a clear impact on the character of the area and the sort of housing that we would want to promote in Dulwich. It is not anticipated that there will be significant opportunities for new housing in Dulwich as there are very few sites for development. The Dulwich SPD therefore sets out guidance on some types of alterations that may be considered acceptable to properties in Dulwich.

Seeking to protect against the subdivision of large properties will help to provide more large houses in the area, this will benefit those who are married or in civil partnerships who require larger homes.

# Equality information on which above analysis is based

Consideration has been given to specific impacts that might arise as a result of the implementation of the Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the implementation of the guidance set out in the Dulwich SPD will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions taken through the SPD in the main section above.

**Pregnancy and maternity -** Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

# Possible impacts (positive and negative) of proposed policy/decision/business plan

#### Heritage and conservation

The SPD recognises that Dulwich has a distinct character and it seeks to retain and enhance the existing historic environment and heritage assets.

The built environment and the public realm may not meet the needs of pregnant women or women with young children which can result in creating barriers to inclusion in the wider community and opportunities to decent housing, jobs and access to leisure and community facilities. We will require design and access statements to be submitted with planning applications setting out how any works in the public realm will improve accessibility.

#### **Built environment**

Dulwich is predominantly a residential area and has a good mixture of house types, but the large proportion of houses has a clear impact on the character of the area and the sort of housing that we would want to promote in Dulwich. It is not anticipated that there will be significant opportunities for new housing in Dulwich as there are very few sites for development. The Dulwich SPD therefore sets out guidance on some types of alterations that may be considered acceptable to properties in Dulwich.

Seeking to protect against the subdivision of large properties will help to provide more large houses in the area, this will benefit young families who require larger homes.

Some in-fill development can increase traffic and parking issues in residential areas, which would have a negative impact on residential amenity and particularly on families with young children. The SPD seeks to ensure that in-fill development only occurs in appropriate locations where there would be no adverse impact on traffic and parking.

Allowing appropriate extensions to existing housing will give existing residents the flexibility to extend or alter their properties which may benefit young families who require more space to do not wish to move from their homes.

# Natural environment

The area currently benefits from a high provision of good quality open spaces which benefit all groups in the community. These spaces are an integral part of Dulwich's identity and local character. The impact of protecting large areas of open space may reduce the supply of land for new housing. If we do not allocate enough sites for housing, we may find we do not have enough space to build housing to our housing need and southwark wide target. Our core strategy has identified key areas for growth in the borough to ensure that we can meet our housing targets whilst protecting existing open spaces. Dulwich is not identified as a key growth area.

Ensuring that open spaces are maintained to a high standard and are accessible to all will help to improve the quality of life for all groups but especially for pregnant women and those with young children who may not have the means to travel far for access to open space. Improving links between spaces can improve access to open spaces and promote sustainable transport. This will also have a positive impact on pregnant women and those with young children who may not be able to travel far for access to open space.

# Transport and accessibility

The SPD focuses on promoting sustainable transport choices. In general, this means prioritising cycling and walking in the layout and design of new development, discouraging car use by improving access to public transport and reducing reliance on the car.

Transport services may feel unsafe for certain user groups. Some people may feel unsafe when travelling on public transport and fear for their personal safety such as pregnant women. In the same way, walking routes may continue to feel unsafe for these groups.

Certain groups may rely on using a car. This might include pregnant women and those with young children. It will be very important that a reduction in car parking and promotion of sustainable modes of transport is undertaken in tandem with improvements in public transport and the public realm so that these groups are not disadvantaged and so they do not feel that other groups are receiving favourable treatment.

If walking and cycling routes are poorly lit, secluded or at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups including pregnant women. Our transport plan sets out how we will encourage active transport in the borough by encouraging safe and attractive walking and cycling routes.

#### Town and local centres

Unemployment in Dulwich is much lower than in other areas of the borough and the proportion of young adults in Dulwich is lower than the borough overall. The SPD seeks to protect and encourage more businesses in the area. Dulwich also has two District Town Centres at Herne Hill and Lordship Lane and one Local Centre, Dulwich Village as well as a number of protected shopping frontages. The SPD seeks to protect the vitality and viability of these existing centres.

Certain groups may experience discrimination in accessing employment opportunities such as pregnant women and those with young children. The inability to access opportunities to work could further lead to poverty, social exclusion and isolation from the wider community. Our core strategy policies seek to protect existing jobs in the borough and encourage a wider range of employment opportunities.

# Equality information on which above analysis is based

Consideration has been given to specific impacts that might arise as a result of the implementation of the Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the implementation of the guidance set out in the Dulwich SPD will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions taken through the SPD in the main section above.

**Race** - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

# Possible impacts (positive and negative) of proposed policy/decision/business plan

#### Heritage and conservation

The SPD recognises that Dulwich has a distinct character and it seeks to retain and enhance the existing historic environment and heritage assets.

High quality design standards in the area may result in higher costs for SME businesses i.e. by having to provide high quality shop fronts, which may threaten the viability of these businesses. These business are often run by ethnic minority groups and therefore these groups may be disproportionately affected. Our core strategy policies seek to protect existing jobs in the borough and encourage a wider range of employment opportunities.

#### **Built environment**

Dulwich is predominantly a residential area and has a good mixture of house types, but the large proportion of houses has a clear impact on the character of the area and the sort of housing that we would want to promote in Dulwich. It is not anticipated that there will be significant opportunities for new housing in Dulwich as there are very few sites for development. The Dulwich SPD therefore sets out guidance on some types of alterations that may be considered acceptable to properties in Dulwich.

Seeking to protect against the subdivision of large properties will help to provide more large houses in the area, this will benefit certain ethnic minority groups who require larger homes. Allowing appropriate extensions to existing housing will give existing residents the flexibility to extend or alter their properties which may benefit certain ethnic groups who have family members that wish to live together in larger properties.

#### Natural environment

The area currently benefits from a high provision of good quality open spaces which benefit all groups in the community. These spaces are an integral part of Dulwich's identity and local character. The impact of protecting large areas of open space may reduce the supply of land for new housing. If we do not allocate enough sites for housing, we may find we do not have enough space to build housing to our housing need and southwark wide target.

By limiting the opportunities for major developments to come forward, this may result in more smaller units as policies requiring a mix of units will not apply. This may have a negative impact on some ethnic groups which are more likely to have larger families. Our core strategy has

identified key areas for growth in the borough to ensure that we can meet our housing targets whilst protecting existing open spaces. Dulwich is not identified as a key growth area.

Protecting and improving open spaces will help to encourage the local community to take pride in their surroundings, which may in turn reduce levels of crime and fear of crime. This will have a particularly positive benefit to more vulnerable groups such as certain ethnic minority groups.

# Transport and accessibility

The SPD focuses on promoting sustainable transport choices. In general, this means prioritising cycling and walking in the layout and design of new development, discouraging car use by improving access to public transport and reducing reliance on the car.

Transport services may feel unsafe for certain user groups. Some people may feel unsafe when travelling on public transport and fear for their personal safety such as members of the BME community. In the same way, walking routes may continue to feel unsafe for these groups. Our transport plan sets out how we will encourage active transport in the borough by encouraging safe and attractive walking and cycling routes.

Public transport could continue to be unaffordable to those on lower incomes such as the BME community. This may limit their job opportunities and inclusion in the wider community. It may limit them to one particular area. Our transport plan also sets out further objectives for improving access to public transport.

#### Town and local centres

Unemployment in Dulwich is much lower than in other areas of the borough and the proportion of young adults in Dulwich is lower than the borough overall. The SPD seeks to protect and encourage more businesses in the area. Dulwich also has two District Town Centres at Herne Hill and Lordship Lane and one Local Centre, Dulwich Village as well as a number of protected shopping frontages. The SPD seeks to protect the vitality and viability of these existing centres.

Certain groups may experience discrimination in accessing employment opportunities such as members of the BME community (especially young black men). The inability to access opportunities to work could further lead to poverty, social exclusion and isolation from the wider community. Our core strategy policies seek to protect existing jobs in the borough and encourage a wider range of employment opportunities.

# Equality information on which above analysis is based

Consideration has been given to specific impacts that might arise as a result of the implementation of the Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the implementation of the guidance set out in the Dulwich SPD will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions taken through the SPD in the main section above.

**Religion and belief** - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

# Possible impacts (positive and negative) of proposed policy/decision/business plan

# Built environment

Dulwich is predominantly a residential area and has a good mixture of house types, but the large proportion of houses has a clear impact on the character of the area and the sort of housing that we would want to promote in Dulwich. It is not anticipated that there will be significant opportunities for new housing in Dulwich as there are very few sites for development. The Dulwich SPD therefore sets out guidance on some types of alterations that may be considered acceptable to properties in Dulwich.

Seeking to protect against the subdivision of large properties will help to provide more large houses in the area which can benefit certain religious groups who require larger homes. Allowing appropriate extensions to existing housing will give existing residents the flexibility to extend or alter their properties which may benefit certain religious groups who have family members that wish to live together in larger properties.

# Natural environment

The area currently benefits from a high provision of good quality open spaces which benefit all groups in the community. These spaces are an integral part of Dulwich's identity and local character. The impact of protecting large areas of open space may reduce the supply of land for new housing. If we do not allocate enough sites for housing, we may find we do not have enough space to build housing to our housing need and southwark wide target.

By limiting the opportunities for major developments to come forward, this may result in more smaller units as policies requiring a mix of units will not apply. This may have a negative impact on some groups, such as some religious groups which are more likely to have larger families. Our core strategy has identified key areas for growth in the borough to ensure that we can meet our housing targets whilst protecting existing open spaces. Dulwich is not identified as a key growth area.

Protecting and improving open spaces will help to encourage the local community to take pride in their surroundings, which may in turn reduce levels of crime and fear of crime. This will have a particularly positive benefit to more vulnerable groups including some religious groups.

# Transport and accessibility

The SPD focuses on promoting sustainable transport choices. In general, this means prioritising cycling and walking in the layout and design of new development, discouraging car use by improving access to public transport and reducing reliance on the car.

Transport services may feel unsafe for certain user groups. Some people may feel unsafe when travelling on public transport and fear for their personal safety such as women (especially pregnant women) and young people or they fear discrimination such as people following a certain faith. In the same way, walking routes may continue to feel unsafe for these groups. Our transport plan sets out how we will encourage active transport in the borough by encouraging safe and attractive walking and cycling routes.

#### Town and local centres

Unemployment in Dulwich is much lower than in other areas of the borough and the proportion of young adults in Dulwich is lower than the borough overall. The SPD seeks to protect and encourage more businesses in the area. Dulwich also has two District Town Centres at Herne Hill and Lordship Lane and one Local Centre, Dulwich Village as well as a number of protected shopping frontages. The SPD seeks to protect the vitality and viability of these existing centres.

Certain groups may experience discrimination in accessing employment opportunities such as members of certain faith groups. The inability to access opportunities to work could further lead to poverty, social exclusion and isolation from the wider community. Our core strategy policies seek to protect existing jobs in the borough and encourage a wider range of employment opportunities.

# Equality information on which above analysis is based

Consideration has been given to specific impacts that might arise as a result of the implementation of the Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the implementation of the guidance set out in the Dulwich SPD will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions taken through the SPD in the main section above.

# Sex - A man or a woman.

# Possible impacts (positive and negative) of proposed policy/decision/business plan

#### **Natural environment**

The area currently benefits from a high provision of good quality open spaces which benefit all groups in the community. These spaces are an integral part of Dulwich's identity and local character.

Protecting and improving open spaces will help to encourage the local community to take pride in their surroundings, which may in turn reduce levels of crime and fear of crime. This will have a particularly positive benefit to more vulnerable groups including women.

#### Transport and accessibility

The SPD focuses on promoting sustainable transport choices. In general, this means prioritising cycling and walking in the layout and design of new development, discouraging car use by improving access to public transport and reducing reliance on the car.

Transport services may feel unsafe for certain user groups. Some people may feel unsafe when travelling on public transport and fear for their personal safety such as women. In the same way, walking routes may continue to feel unsafe for these groups. If walking and cycling routes are poorly lit, secluded or at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups including women. Our transport plan sets out how we will encourage active transport in the borough by encouraging safe and attractive walking and cycling routes.

#### Equality information on which above analysis is based

Consideration has been given to specific impacts that might arise as a result of the implementation of the Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the implementation of the guidance set out in the Dulwich SPD will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions taken through the SPD in the main section above.

**Sexual orientation** - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

# Possible impacts (positive and negative) of proposed policy/decision/business plan

# Natural environment

The area currently benefits from a high provision of good quality open spaces which benefit all groups in the community.

Protecting and improving open spaces will help to encourage the local community to take pride in their surroundings, which may in turn reduce levels of crime and fear of crime. This will have a particularly positive benefit to more vulnerable groups including LGBT groups.

# Transport and accessibility

The SPD focuses on promoting sustainable transport choices. In general, this means prioritising cycling and walking in the layout and design of new development, discouraging car use by improving access to public transport and reducing reliance on the car.

Transport services may feel unsafe for certain user groups. Some people may feel unsafe when travelling on public transport and fear for their personal safety including LGBT groups. In the same way, walking routes may continue to feel unsafe for these groups. If walking and cycling routes are poorly lit, secluded or at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups including LGBT groups. Our transport plan sets out how we will encourage active transport in the borough by encouraging safe and attractive walking and cycling routes.

# Town and local centres

Unemployment in Dulwich is much lower than in other areas of the borough and the proportion of young adults in Dulwich is lower than the borough overall. The SPD seeks to protect and encourage more businesses in the area. Dulwich also has two District Town Centres at Herne Hill and Lordship Lane and one Local Centre, Dulwich Village as well as a number of protected shopping frontages. The SPD seeks to protect the vitality and viability of these existing centres.

Certain groups may experience discrimination in accessing employment opportunities including LGBT groups. The inability to access opportunities to work could further lead to poverty, social exclusion and isolation from the wider community. Our core strategy policies seek to protect existing jobs in the borough and encourage a wider range of employment opportunities.

# Information on which above analysis is based

Consideration has been given to specific impacts that might arise as a result of the implementation of the Dulwich SPD. In addition we have considered the Equalities Impact Assessments carried out on the Core Strategy and previous versions of the SPD. The Equalities Analysis has also been informed by feedback through consultation events and responses, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the implementation of the guidance set out in the Dulwich SPD will largely give rise to positive impacts. Where there are uncertain or possible negative impacts, we have highlighted the mitigating actions taken through the SPD in the main section above.

# **Human Rights**

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

Possible impacts (positive and negative) of proposed policy/decision/business plan

The implementation of the Dulwich SPD will have no impacts on the Articles that are set out in the Human Rights Act.

Information on which above analysis is based

Mitigating actions to be taken

N/A

# 5. Further actions

Based on the initial analysis above, please detail the key areas identified as requiring more detailed analysis or key mitigating actions.

Number	Description of Issue	Action	Timeframe
1	Monitoring the impact of the policies in the Dulwich SPD on groups with protected characteristics	Report on development impacts in Dulwich in the Authority's Monitoring Report (AMR)	AMR to be published annually
2			
3			
4			
5			
6			
7			