

Step 1: Clarifying Aims

Q1. Outline the aims/objectives/scope of this piece of work

Southwark Station falls within the GLA designated Bankside, Borough and London Bridge Opportunity Area. Due to its central location and high level of public transport accessibility the GLA has set out a vision for the whole opportunity area that includes the provision of up to 500,000 sqm of new business floorspace and 25,000 new jobs transforming the area into a key new employment destination essential in meeting demand for employment floorspace in London.

Based on the demand for employment floorspace/new residential development in the area, London Borough of Southwark (LBS) published their Blackfriars Road Supplementary Planning Document (SPD) to help define and coordinate the improvements in and around the Blackfriars Road area. This included the identification of the airspace above Southwark station as a suitable location for large scale development due to its connectivity and ability to contribute to meeting demand for the growth set out in the GLA's Opportunity Area. This SPD was required due to the scale of growth and development being proposed. There is a need to ensure that the pressure for residential development is balanced with the need for vibrant streets with places for leisure and business and a pleasant environment.

Prior to the development of the SPD, LBS undertook an Equalities Analysis consultation (in addition to the boroughs existing Core Strategy Equalities Impact Assessment (EQIA) to consider the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010, on which the analysis is based and mitigating actions are proposed. LBS assessed the guidance and concluded that the overall impact of implementing the SPD will be positive on all residents and people who work in and visit the borough across the 9 protected characteristics.

Southwark underground station was built during the 1990's as part of the Jubilee Line extension project. The substructure was designed and built to accommodate a future tall building above the station. The site has been allocated for development via LB Southwark in who have identified (in both their existing and emerging Local Plans) that due to the sites high public transport accessibility and location inside the GLA's Bankside, Borough and London Bridge Opportunity Area Planning Framework, it is an appropriate development site for large scale development to meet the demand for growth in the area. TfL Property Development and the London Borough of Southwark are now working together to deliver an office led development above and around Southwark Station that would result in the creation of over 2000 new jobs in the borough and significantly improve public realm around the station. The proposals coming forward are being developed with Planners in response to the SPD and the Southwark EQIA and these principles continue to be key design considerations for the team.

The subject area comprises of the airspace above and land around Southwark Station (please see map in appendix **). The development area comprises of a strip of land which runs from Blackfriars Road in the East to the buildings on the Western Side of Joan Street to the West and Land south of Isabella Street to the North to the Cut to the South. The decision to explore commercially viable development options for Southwark OSD was taken by TfL as part of the strategic business plan review to help establish revenue streams to support the wider operational network across London. The work that was done by LBS in developing the SPD supported TfL's decision to undertake the redevelopment. TfL's own design standards combined with stringent industry standards such as the below list, also added weight to the decision rationale:

- BREEAM (this scheme is aiming for 'Outstanding' rating)
- Secured by Design
- Well building
- Wired Scorecard
- TFL – Sustainable Development Framework
- TFL – Healthy Streets
- Mayors Design Advocates (MDA)

The principal business objectives for the development are as follows:

- Develop new office residential building of 18,000 sq m to create over 2000 jobs.
- Develop associated retail units on the ground floor of development to serve office workers and wider community
- Develop affordable workspace as a cultural hub aimed at supporting cultural uses in the area.

Southwark station already has step free access and no works are envisaged to upgrade facilities within the station at present. In June 2019 TfL received planning permission to build a second entrance to Southwark and Waterloo East stations on Greet Street in Lambeth in order to alleviate forecast future overcrowding in Southwark Station. There is currently no timescale for the delivery of this second station entrance. There are no plans to shut the Blackfriars Road entrance to Southwark Station in the construction of this over station development. The airspace above and the area around the station have been designated as surplus to operational requirements in a Mayors Opinion. Programme Milestones are:

July 2019: Initial public consultation on principal of development

September 2019: Public consultation on planning application

March 2020: Submit Planning Application

March 2021: Start on Site.

This document assesses the Equalities impact of the proposed development, drawing out a profile of the surrounding area and assessing the impacts on local communities (especially focusing on those with protected characteristics) and TfL customers in the pre-construction phase, construction phase and post construction phase of the project.



Q2. Does this work impact on staff or customers? Please provide details of how.

The proposed development will impact upon both Staff and Customers.

Staff

Staff will mainly be impacted by the construction of the station. While there are no plans to shut the station entrance it is likely that the noise of construction will impact upon LUL station staff during the construction stage. Minor changes may be need to the internal station layout which may also impact staff although it is envisaged that works could be carried out outside of operational hours. A construction method statement which will be submitted with the application will identify the potential impacts of the construction phase on staff and identify mitigations to prevent negative impacts.

It is anticipated that post construction (building in operation) impacts will occur to station staff, primarily through the increased number of passengers using the station who will be working in the new office building. There may also be 'back of house' improvements made in the station which will impact on how station staff remove waste and integrate with the new development.

The building will create a new 'destination' in Southwark and could be used by a government dept/organisation. From a security perspective this will bring greater risk from a terrorist attack which will have an impact on all stakeholders using or associated with the new development. Station staff may be required to undertake additional security training as a result. We will continue to monitor review the impacts on staff pre, during and post construction in the design stage of the development.

Customers

In July 2019 we carried out two days of public consultations on the development which identified that we are proposing to develop over and around Southwark stations and aimed to capture the views of the local community and customers in order to shape the development uses and design. The consultation was held in local building adjacent to the proposed development and consultation was extensively advertised by TfL and the council including online and via local leaflet drop and post. The consultation location was accessible.

The findings (appendix 1) found that most customers/the local community were supportive of the principal of development but raised the following key concerns.

- Height,
- Overlooking of adjacent properties
- Massing and impact on sunlight and daylight on adjacent properties
- Lack of retail options to serve community
- Lack of open space to serve local community in area

The development team has responded positively to these comments and incorporated them into the design of the development. A further consultation on the development proposal will take place in October 2019 where customers perceptions of the development can be capture.

Minimal disruption to customers is expected during the construction period with the station entrance and step free access remaining available and key pedestrian linkages remaining open. The development may involve the stopping up of Joan Street. A construction method statement will be provided with the planning application identifying how issues relating to noise, dust and other construction issues would be mitigated.

Overall the development will have as positive impact on customers with improved public realm and linkages around Southwark station. The development will create 2,000 jobs in the local area including an element of affordable workspace which will be available for local cultural groups and businesses.



Step 2: The Evidence Base

Q3. Record here the data you have gathered about the diversity of the people potentially impacted by this work. You should also include any research on the issues affecting inclusion in relation to your work

Consider evidence in relation to all relevant protected characteristics;

- Age
- Disability including carers¹
- Gender
- Gender reassignment
- Marriage/civil partnership
- Other – refugees, low income, homeless people
- Pregnancy/maternity
- Race
- Religion or belief
- Sexual orientation

To date, the concept of development has been established and we have consulted with key officer and elected representatives of the GLA and the London Borough of Southwark as well as from around Transport for London. We have also carried out an early stage consultation with the local community which was aimed at assessing support for the development and what uses that the community would like to see included on the site.

Further to the initial consultation that we have already carried out with the local community, we are intending to carry out a further detailed programme of engagement with local groups and residents are represented starting in September 2019. We will continue work with our communications consultants, borough contacts and stakeholder engagement team to identify stakeholder groups including equality groups in the local area which are harder to reach, and we will update future EQIA's with our method and progress.

We have sourced demographic data from a range of locations (including Census, LB Southwark Data, the GLA published and the NHS) This data has revealed key statistics which it will important to take into account of in all stages of the proposed development. A full list of data sources can be found in Appendix **.

Age

LB Southwark data identifies that the Cathedral's ward has a population of 16,140. The age profile of the ward is representative of London with the vast majority of the population falling within the 16-44 age group. There are 1,790 under 16 children living within the ward area and 1,160 over the age of 65. The development must take account of these age groups.

Disability

The Annual Population Survey 09/10 estimates there are 36,600 people in Southwark with a disability, 17.5% of the adult population, more than Lambeth (14.6%), Lewisham (15.2%) and London (16.2%) but less than England (19.2%). In Southwark there are more adult women with disability (19,300 (19.4%)) than men (17,300 (15.9%)), this is broadly consistent with other areas. 19,700 (54%) of adults with a disability in Southwark are considered economically active, a higher proportion than near neighbour boroughs and London (52%) but slightly less than England (55%). Of those people 2,700 (13.7%) are unemployed, this rate is higher than near neighbours and England (10.8%) but similar to London (13.9%).

¹ Including those with physical, mental and hidden impairments as well as **carers** who provide unpaid care for a friend or family member who due to illness, disability, or a mental health issue cannot cope without their support



Gender

2011 Census data shows the borough's population consists of 50.56% male and 49.44% female.

Gender Reassignment

The Census does not gather data on gender reassignment. Although there has been some work to estimate the number of transgender people in the UK population, estimates vary enormously from 1 in 200 to 1 in 1000 and there is no publicly available statistical data on which to make reliable estimates.

Marriage and Civil Partnership

2011 Census data for Cathedrals Ward identified the following.

Single (never married or never registered a same-sex civil partnership)	Married	In a registered same-sex civil partnership	Separated (but still legally married or still legally in a same-sex civil partnership)	Divorced or formerly in a same-sex civil partnership which is now legally dissolved	Widowed or surviving partner from a same-sex civil partnership
8687	2736	205	348	919	449

Other- deprivation

Ward profile data identifies that 29% of the population in the Cathedrals Ward are in the most deprived quintile nationally. This compares with 38% for the rest of the borough and 20% for England.

Pregnancy/Maternity

ONS data identifies that there were 4,181 births in Southwark in 2018. This is higher than the average for London Boroughs which is 3,657

Race

Ethnic group	Cathedrals	Southwark	London
White	62%	54%	60%
Mixed	6%	6%	5%
Asian	14%	9%	19%
Black	16%	27%	13%
Other	3%	4%	3%

Religion

GLA data (2018) identifies that Southwark has 50.5% Christian, 5.8 Muslim%, 2.4% other and 41.2% no religion.

Sexual Orientation

There is no data on Sexual orientation. However, Southwark is anecdotally known for having a significant LGBTQ+ population, both historically and currently. Office for National Statistics experimental research suggests that the borough is the local authority area with the second highest LGBTQ+ population in the UK, after Lambeth, at around 5% of the population. 1



Step 3: Impact

Q4. Given the evidence listed in step 2, consider and describe what potential short, medium and longer term negative impacts this work could have on people related to their protected characteristics?

Protected Characteristic		Explain the potential negative impact
Age	Y	<p>Short Term – older people may become confused with temporary site logistics and how this affects their movement patterns around the site</p> <p>Medium Term – none currently</p> <p>Long Term – There is always a risk that without the engagement with older people and unless the application of access standards in the designs are reviewed in context by an Access Consultant (NRAC) that we will inadvertently not deliver an inclusive design</p>
Disability including carers	Y	<p>Short Term – movement around the site perimeter may increase pedestrian journey times. .</p> <p>Medium Term – The closure of Joan Street may remove a useful drop off /pick up point for carers visiting nearby residents with disabilities</p> <p>Long Term – There is always a risk that without the engagement with disabled people and unless the application of access standards in the designs are reviewed in context by an Access Consultant (NRAC) that we will inadvertently not deliver an inclusive design</p>
Gender	Y	<p>Short Term – None, but these will be monitored during the development process</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - There is always a risk that unless the designs are reviewed in context by an Access Consultant (NRAC) that we will inadvertently not deliver an inclusive design that ensures that safety and security issues which tend to have a gender impact will be picked up</p>



<p>Gender reassignment</p>	<p>Y</p>	<p>Short Term – None, but these will be monitored during the development process</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - There is always a risk that unless the designs are reviewed in context by an Access Consultant (NRAC) that we will inadvertently not deliver an inclusive design that ensures that safety and security issues which tend to have an impact on trans people will be picked up</p>
<p>Marriage/civil partnership</p>	<p>N</p>	<p>Short Term – None, but these will be monitored during the development process</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - None, but these will be monitored during the development process</p>
<p>Other – e.g. refugees, low income, homeless people</p>	<p>Y</p>	<p>Short Term – The loss of The Platform building which provides local artists with studio space.</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term – we need to be mindful of the changes in use of facilities that result from any regeneration project and how the current facilities may (or may not) serve the specific needs of the local community compared with what replaces them</p>
<p>Pregnancy/maternity</p>	<p>Y</p>	<p>Short Term – None, but these will be monitored during the development process</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - There is always a risk that unless the designs are reviewed in context by an Access Consultant (NRAC) that we will inadvertently not deliver an inclusive design in a way that would be supportive of women who are pregnant and cater for the needs of those with new born children.</p>



<p>Race</p>	<p>Y</p>	<p>Short Term – None, but these will be monitored during the development process</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - we need to be mindful of the changes in use of facilities that result from any regeneration project and how the current facilities may (or may not) serve the specific needs of the local community compared with what replaces them</p>
<p>Religion or belief</p>	<p>Y/N</p>	<p>Short Term – None, but these will be monitored during the development process</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - we need to be mindful of the changes in use of facilities that result from any regeneration project and how the current facilities may (or may not) serve the specific needs of the local community compared with what replaces them</p>
<p>Sexual orientation</p>	<p>Y</p>	<p>Short Term – None, but these will be monitored during the development process</p> <p>Medium Term – None, but these will be monitored during the development process</p> <p>Long Term - There is always a risk that unless the designs are reviewed in context by an Access Consultant (NRAC) that we will inadvertently not deliver an inclusive design that ensures that safety and security issues which tend to have a bigger impact on LGB Londoners will be picked up</p>



Q5. Given the evidence listed in step 2, consider and describe what potential positive impacts this work could have on people related to their protected characteristics?

Protected Characteristic		Explain the potential positive impact
Age	Y	<p>A safer more secure environment for younger people (everyone).</p> <p>Affordable office rents will provide greater opportunity to young start up businesses</p>
Disability including carers	Y	<p>The proposal will provide level access at street level creating easy-access for all A full accessibility strategy will be developed as design progresses.</p> <p>We understand that accessibility is though much more than step-free access given the majority of disabled people are not mobility impaired so we will work with our own Independent Disability Advisory Group and an Access Consultant to ensure we deliver an inclusive design</p> <p>The closure of Joan Street will greatly reduce the impact of vehicles on the site. Vehicular access will be required from the north for deliveries but this will be a managed operation</p>
Gender	Y	<p>Improvements to safety and security should have a positive gender impact</p>
Gender reassignment	Y	<p>Improvements to safety and security should have a positive impact on trans people</p>
Marriage/civil partnership	N	<p>None specific to this characteristic over an above general positive impacts considered for the community</p>



<p>Other – e.g. refugees, low income, homeless people</p>	<p>Y</p>	<p>The regeneration of the area will be done in a way that adheres to the Mayor’s good growth principles which ensure that local people – including those from lower socio-economic groups benefits from the scheme.</p>
<p>Pregnancy/maternity</p>	<p>Y</p>	<p>The delivery of an inclusively designed scheme will ensure that the needs of this group will be included in the final designs</p>
<p>Race</p>	<p>Y</p>	<p>Given the high representation of BAME communities in this area, we will continue to engage and involve this community to ensure that the outcomes of this scheme pay their part in tackling existing rates of socio-economic disadvantage experienced by this group</p>
<p>Religion or belief</p>	<p>Y</p>	<p>The office development and indeed the civic space on the ground and first floors could include faith rooms to facilitate daily religious practices.</p> <p>Given the high representation of communities with minority beliefs in this area, we will continue to engage and involve this community to ensure that the outcomes of this scheme pay their part in tackling existing rates of socio-economic disadvantage experienced by this group</p>
<p>Sexual orientation</p>	<p>Y</p>	<p>Improvements to safety and security should have a positive impact on LGB people</p>



Step 4: Consultation

Q6. How has consultation with those who share a protected characteristic informed your work?

List the groups you intend to consult with or have consulted and reference any previous relevant consultation? ²	If consultation has taken place what issues were raised in relation to one or more of the protected characteristics?
<p>Unique - LGBTQ+ Disability Community Group, Southwark LGBT Network, Inclusive Women, OBAC - Organisation of Blind Africans & Caribbeans, London Senior Social, Black Lives and More (BLAM), CareTrade Charitable Trust, Camden Society, Bede House, The Redeemed Christian Church of God, Shekinah Glory of the Living God (RCCGSGLG), Camberwell Community Building, South London Inter Faith Group (SLIFG), St Andrew's Church, Baitul Aziz Islamic Cultural Centre, Working Families, Britain Has Class, Link Age Southwark Rerezent Radio, Group Pregnancy Care</p>	<p>We have prepared communications strategy with communications consultants Portland which sets out how we will contact local groups with key protected characteristics as a part of public consultation starting in October.</p>
<p>Resident Groups: Applegarth House Tenant Management Organisation (TMO), Nelson Square Community Association, Bankside Residents Forum, Styles House TRA, Lambeth Estate Residents Association, Peabody Estate, residents of Tait & Benson.</p>	

² This could include our staff networks, the Independent Disability Advisory Group, the Valuing People Group, local minority groups etc.



Q7. Where relevant, record any consultation you have had with other projects / teams who you are working with to deliver this piece of work. This is really important where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

London Underground

We are in regular communication with LU colleagues and station staff and have formal lines of communication with Infrastructure Protection (IP) in order to mitigate the impact of the development during and post construction.

LB Southwark

Pivotal to the OSD and planning application process is the land swap deal with LBS. This is predicated on the Council's TMO submitting a planning application simultaneously with the OSD for a separate scheme, adjacent the OSD site. The OSD team are ensuring there are regular meetings with the TMO to monitor their progress and designs. This is intrinsic to the delivery of the OSD – a negative impact for the community would be the scheme not coming forward.



Step 5: Informed Decision-Making

Q8. In light of the assessment now made, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Please remember to review this as and when the piece of work changes

<p>1. Change the work to mitigate against potential negative impacts found</p>	<p>Many of the negative impacts will be mitigated through the design process or during construction. Any main contractor working on this project will need to sign up to the Considerate Constructors Scheme (CCS).</p> <p>A Construction management plan will be produced prior to start on site. We will ensure continuous consultation with stakeholders complies with the Southwark development engagement charter policy document Any third party JV partner will be required to sign up to all of these principles .</p>
<p>2. Continue the work as is because no potential negative impacts found</p>	
<p>3. Justify and continue the work despite negative impacts (please provide justification)</p>	
<p>4. Stop the work because discrimination is unjustifiable and no obvious ways to mitigate</p>	



<p>Low Income</p> <p>3) <i>The loss of The Platform building which provides local artists with studio space.</i></p> <p>Mitigation:</p> <p>The new scheme will be re-providing affordable workspace for local businesses. A minimum of 75% below market rent. Further discounting to rents are being considered in order provide genuinely affordable rents for those on low incomes.</p>	<p>As part of the planning application</p>	<p>TfL</p>
<p>Disability including carers, Gender, Gender reassignment, Marriage/civil partnership, Other – e.g. refugees, low income, homeless people, Pregnancy/maternity, Race, Religion or belief, Sexual orientation</p> <p>3) There is always a risk that unless the designs are reviewed in context by an Access Consultant (NRAC) that we will inadvertently not deliver an inclusive design that ensures that safety and security issues which tend to have an impact on people who have protected characteristics will be picked up</p> <p>4) We need to be mindful of the changes in use of facilities that result from any regeneration project and how the current facilities may (or may not) serve the specific needs of the local community compared with what replaces them</p> <p>Mitigation</p> <p>We will include analysis by an access consultant (NRAC) within the final planning application documentation which considers inclusive design and safety and security issue impacts on people who have protected characteristics.</p> <p>We will analysis the current uses of facilities on the development by people with protected characteristics an ensure these taken into account in the design and uses of the new development.</p>	<p>As part of planning application</p> <p>As part of planning application</p>	<p>TfL</p> <p>TfL</p>

