4 EQUALITY AND PROTECTED CHARACTERISTICS

4.1 This section considers the regeneration benefits of the scheme in the context of their effect on equalities groups, or protected characteristics as defined by the Equality Act 2010.

4.2 A full analysis of baseline data, using publicly accessible datasets for a number of socio-economic indicators including all protected characteristics, is included at PART 2 of this report for reference.

Construction Activity

4.3 The 8-year construction period has the potential to lead to local effects on amenity, disruption to access and services, and environmental effects for protected groups, particularly older people, disabled people and those with long-term life-limiting illness.

4.4 This will be a temporary effect, and will be mitigated through construction activities being subject to a Site Wide Code of Construction Practice (COCP) which will be prepared in consultation with the Council and is committed to in a Section 106 Agreement. These elements will include the following environmental management control measures to minimise and where possible negate adverse effects, meeting required standards as identified in the consented outline planning application and committed to be requirements and obligations:

- Dust suppression and air quality controls;
- Noise and vibration techniques;
- Waste management and recycling strategy;
- Results of site investigations and proposals to deal with environmental issues;
- Site management requirements to deal with environmental issues; and
- Construction logistic proposals.

4.5 The impact on amenity for particularly sensitive groups will therefore be mitigated by monitoring the effects of the construction activities, identifying where unacceptable impacts may occur and implementing appropriate schemes to reduce the impacts.

Summary:

<table>
<thead>
<tr>
<th>Potential effect on equalities groups or protected characteristics</th>
<th>Temporary construction noise, disruption to access and services can disproportionately affect older people, disabled people and those with long-term life-limiting illness if not managed adequately.</th>
</tr>
</thead>
</table>
| New Bermondsey | Any potential negative effects will be mitigated by:  
- Stringent monitoring and implementing environmental management measures as secured in the COCP and Section 106, including:  
  - Dust suppression and air quality controls;  
  - Noise and vibration techniques;  
  - Waste management and recycling strategy;  
  - Results of site investigations and proposals to deal with environmental issues;  
  - Site management requirements to deal with environmental issues; and  
  - Construction logistic proposals. |
Housing

4.6 Access to affordable, decent standard housing is essential for building sustainable communities and reducing pressure on housing waiting lists, offering more opportunities for vulnerable groups (e.g. older people, younger people, low-income households) to improve their standard of living. At present, the local area faces problems in terms of overcrowding, a long housing waiting list and unaffordability.

4.7 Adding affordable, well-designed housing is also essential to reducing health inequalities, particularly for vulnerable groups, for example elderly or young people, and low-income groups. The Marmot Review into Health Inequalities (2010) identified that bad housing conditions – which also includes factors such as homelessness, temporary accommodation, overcrowding, insecurity, and housing in poor physical condition – constitute a risk to health, and this is most likely to affect the more vulnerable groups in society.

Accessible Homes

4.8 The area around New Bermondsey has a high proportion of residents claiming Employment Support Allowance due to disability (6.8% of local residents – May 2015); and according to the 2011 Census, around 6% of all residents in New Cross identified that day-to-day activities were limited a lot by long-term illness or disability.

4.9 All new homes at New Bermondsey will meet Building Regulations 2010 Part M (2&3) Schedule 1 requirements and be built to Lifetime Homes standards as a minimum, with at least 10% of all units provided across all tenures throughout the Proposed Development will be wheelchair accessible or designed so as to be easily adaptable for wheelchair users or people with impaired mobility, and will accord with the standards set out in the South East London Housing Partnership Wheelchair Homes Design Guide (2009) or other guidance/standards as agreed with the local planning authority over time, including the London Plan Policy 3.8, the Mayor’s Housing SPG, and the Draft Interim Housing SPG (2015). The Draft Interim Housing SPG requires that from October 2015 90% of homes should meet building regulation M4 (2) – ‘accessible and adaptable dwellings’.

4.10 The approved range of dwelling sizes and tenure mix (private, intermediate and social rented) and commitments to meeting accessibility standards, and the provision of wheelchair accessible and easily adaptable housing – controlled by the planning conditions and obligations agreed as part of the planning permission granted – provides a positive benefit in terms of housing accessibility and accords with requirements of Lewisham’s Core Strategy and housing policies in the London Plan.

4.11 The design standards will anticipate the needs of current and future residents and visitors with disabilities, older people with limited mobility, and other groups such as parents with children.

4.12 Given that New Bermondsey will bring forward a significant number of new, accessible homes (many likely to be in the private rented sector) and flexible business space, given rates of background turnover in the private rented sector, this impact is likely to be minimal.
Summary:

<table>
<thead>
<tr>
<th>Potential effect on equalities groups or protected characteristics</th>
<th>New homes should account for different accessibility needs, including those shared by disabled people, older people, people with limited mobility, and parents with children.</th>
</tr>
</thead>
</table>
| New Bermondsey | New Bermondsey will provide a significant uplift in homes, that will:  
- Meet Building Regulations 2010 Part M (2&3) Schedule 1 and be built to Lifetime Homes standards as a minimum;  
- Meet the requirements for accessible and adaptable dwellings in the Draft Interim Housing SPG;  
- Include at least 10% of homes across all tenures that are wheelchair accessible or designed according with current and future standards so as to be easily adaptable for wheelchair users or people with impaired mobility;  
These elements are secured through the Section 106 Agreement. |

Existing Live/Work Premises

4.13 Renewal and the Council have engaged with the owners/occupiers of the two live/work units (one of which is occupied and one of which is vacant) throughout the planning application and consultation programme, and have engaged in discussions regarding the proposed development and the CPO as required by the CPO process.

4.14 Through this engagement, Renewal has been able to ascertain the protected characteristics of any occupiers that have the potential to lead to an adverse effect from the process, and develop measures to ensure that the process does not discriminate against owners/occupiers on this basis. The following actions have been taken:
• At the request of owners (at a meeting on the 20 July 2016), Renewal will prioritise contact where an owner/occupier’s preference is for verbal or text communication during negotiations (instead of by email or written communication), where a protected characteristic may present difficulties for people engaging with consultation materials and other communication in order for this not to be a barrier to their engagement in the process or reflect unfairly on their identified protected characteristic(s).

• As advised by owners/occupiers consulted, any meetings can be requested to be held at a neutral venue not to adversely affect protected characteristics.

• Renewal has paid for owners/occupiers with protected characteristics to receive independent valuation advice and suggested that the independent advisors could undertake negotiations on the interest holder’s behalf to reduce any adverse effects on people, caused by the process, that are exacerbated by a protected characteristic.

4.15 Any existing tenants operating businesses or commercial activities from live/work units will also be subject to mitigation secured in the S.106 Agreement, specifically via the Relocation Strategy (summarised at paragraph 4.33 of this document) in relation to their business activities.

Summary:

<table>
<thead>
<tr>
<th>Potential effect on equalities groups or protected characteristics</th>
<th>The development will require the removal of two live/work units in Excelsior Works. Negotiations are underway with owners/occupiers of the occupied live/work unit with regard to the purchase of the property by Renewal. Through consultation, Renewal has been able to identify the owner’s protected characteristics that may be affected by the process and develop and agree processes to alleviate any undue adverse effects related to these characteristics. Measures are also in place to assist in the relocation of the commercial/business activities of live-work tenants, detailed in the following section.</th>
</tr>
</thead>
</table>
| New Bermondsey | New Bermondsey will:  
• Bring forward a significant uplift in new homes in the area – with up to 2,400 new homes on the site. |

Tenures and Allocations

4.16 Social rented units in a range of sizes will be provided at New Bermondsey, with the allocation of these dwellings subject to the usual legal protections on equalities as applied by the Local Authority or commissioned housing management company under the Housing Act and Lewisham’s Housing Allocation Scheme Policy (October 2012). Housing allocations in Lewisham are intended to prioritise vulnerable groups including people with medical needs and disabilities, or those moving due to racial, sexual or other harassment.

4.17 While not discriminating in favour of any particular group, the allocation of social housing to reflect need can be expected to offer significant benefits to children, pregnant women, and also Black, Asian and Minority Ethnic (BAME) residents (groups identified as experiencing disproportionately high rates of housing need). By the nature of its location and the ethnic make-up of the local population, provision of social rented
housing at New Bermondsey would be expected to have a beneficial effect on alleviating the housing problems faced by some residents with protected characteristics.

4.18 The latest available lettings data\textsuperscript{37} shows that 36% of all people placed in social rented accommodation in Lewisham from 2002-7 were children (compared to approximately 20% of the general population of the borough who are children), and that 50% of all lettings were to families. As such, provision of new social housing will be expected to benefit children, pregnant women, disabled residents and families. Lettings policies prioritise the re-housing of families living in temporary, unfit, overcrowded or unsuitable accommodation.

### Summary:

<table>
<thead>
<tr>
<th>Potential effect on equalities groups or protected characteristics</th>
<th>The tenure mix of new homes can help to ensure benefits to equalities groups and those with protected characteristics including disabled people, older people, BAME groups, younger people and other vulnerable groups</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Bermondsey</td>
<td>New Bermondsey will deliver a significant uplift of 2,400 new homes, which will:</td>
</tr>
<tr>
<td></td>
<td>• Be in a range of tenures including affordable tenures that are particularly sought after and beneficial to vulnerable people, families, those in housing need and groups with protected characteristics;</td>
</tr>
<tr>
<td></td>
<td>• Include social rented homes that will be subject to legal protections (including those in the Housing Act and Lewisham Council’s allocations policies) on lettings so as not to discriminate against any groups.</td>
</tr>
</tbody>
</table>

### Employment

4.19 The needs of unemployed and economically inactive residents locally differs from other areas, partly due to the demographic profile – there are a higher number of students, a younger population with shorter duration of JSA claims, and a different profile of occupational skills, including between men and women.

4.20 Some protected groups may be unevenly represented in terms of barriers to accessing work, skills and qualification level, language and cultural factors, family requirements and need for flexible and/or part-time working. For example, in Lewisham and London, BME groups account for around a third of all JSA claimants.

In Lewisham, the breakdown of BME JSA claimants is weighted towards ‘Black and Black British’ and ‘Asian’ groups compared to the London average. There are also inequalities in terms of gross earnings between Lewisham and London, including between men and women – with earnings lower in Lewisham than London average for both sexes.

4.21 When New Bermondsey is operational, with a mixture of retail, commercial, hospitality, community and healthcare uses, it will offer a range of different jobs with different skill levels, and there will be many uses that will provide opportunities for local people requiring entry-level jobs. It is anticipated that there will be around 2,000 new jobs created by the development, compared to 366 currently on-site.

4.22 The retail and hotel floorspace will be particularly important for local employment as it provides many opportunities that are suitable for people without high level qualifications. Such employment is therefore of particular benefit to local deprived areas, with a high proportion of BAME residents, unemployed residents and people looking for flexible, entry-level work including people returning to work. In addition, research by

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\textsuperscript{37} CORE Lettings, National Housebuilding Federation
the GLA (2006) found that retail jobs in London go disproportionately to a number of key equalities groups, including young people, women, and BAME people.

4.23 As detailed in the outline Planning Application, the benefits of a large construction project such as this will be enhanced by tapping into jobs brokerage schemes for local unemployed people, and by fostering links with young people in local education institutions to give them the opportunity to learn important skills while being offered the chance to earn money close to where they live. To this end, Renewal have consulted with the Council’s Local Labour and Business Co-ordinator and prior to the Outline Planning Application met with the New Cross-based 170 Community Project who run training and access to employment courses for the local community, the New Cross Gate NDC and Action 4 Employment (now trading as PeoplePlus) about ways in which the scheme can enable local residents to access the job opportunities at New Bermondsey.

4.24 Additionally, the proposals for New Bermondsey include a commitment, via Section 106, to fully participate in the Local Labour and Business Scheme, and to achieve a target of at least 50% employment of local people and businesses through a Local Employment Strategy which sets out reasonable endeavours to promote and recruit employees, contractors and suppliers from Lewisham during the construction and operational phase of the development to ensure that benefits are felt locally.

4.25 As such, the proposals offer significant benefit to protected groups through the creation of jobs that meet skills and operational needs, and these benefits are ensured and enhanced through committed brokerage schemes tailored to local ‘hard to reach’ groups.

Summary:

<table>
<thead>
<tr>
<th>Potential effect on equalities groups or protected characteristics</th>
<th>Creating new jobs provides social and economic benefits to current and future residents and can be enhanced to improve employment and skills development opportunities of all equalities groups.</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Bermondsey</td>
<td>New Bermondsey is a long-term project that will:</td>
</tr>
<tr>
<td></td>
<td>• Create up to 470 FTE jobs in a range of sectors in the construction phase;</td>
</tr>
<tr>
<td></td>
<td>• Create and support up to 2,000 jobs in a range of business, retail, service and other sectors when the development is complete - This is a significant number and range of jobs including different skill level and flexibility, suitable for different groups and needs of protected groups;</td>
</tr>
<tr>
<td></td>
<td>• Ensure the continuation of jobs at Millwall FC and the Lions Community Centre within the site;</td>
</tr>
<tr>
<td></td>
<td>• Commit to brokerage schemes via Section 106 Agreement to match jobs with local employment and skills needs;</td>
</tr>
</tbody>
</table>

Existing Businesses

4.26 Some protected characteristics of business owners could have the potential to unfairly affect their ability to engage with the CPO, compared to those without those protected characteristics.