



**THE LONDON BOROUGH OF  
LEWISHAM (THE WHARVES,  
DEPTFORD)**

**COMPULSORY PURCHASE ORDER  
2017**

**STATEMENT OF REASONS:  
REGENERATION STATEMENT AND  
EQUALITIES IMPACT ASSESSMENT**

June 2017

Our Ref: Q50322

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# 1 INTRODUCTION

- 1.1 The London Borough of Lewisham ('Lewisham') granted planning permission for the redevelopment of The Wharves site ('Site') on the 23rd March 2016. (Application Reference: DC/15/092295; subsequent 96A submitted on 25/01/17 (DC/17/099912), decision pending).
- 1.2 References in this Report to the Scheme are to the development as consented, but also include any variations to the permission.
- 1.3 This Report has been provided to support the case for compulsory acquisition of the Order Land (as shown on the Order Map appended to Lewisham's draft Statement of Reasons) by Lewisham (for planning purposes pursuant to its powers under Section 226 (1)(a) of the Town and Country Planning (1990) Act) This Report demonstrates that the comprehensive development of the Site is required to make sure that this Site meets its full potential to contribute to the regeneration of the north of Lewisham and to generate substantial public benefit by delivering new homes and jobs.
- 1.4 As a comprehensive development, the plans will transform the Site and the neighbourhood around it bringing social, economic and environmental benefits to existing and new residents and businesses. and transforming the local economy in a way that piecemeal development would not achieve.
- 1.5 In Local and London-wide planning policies, the Site has been allocated to play a key role in delivering Lewisham's aims for housing delivery, economic development and regeneration.
- 1.6 Lewisham wants the Scheme to deliver a sustainable high density residential development with open spaces, accessible new routes, recreation facilities, local shops and services and flexible business space<sup>1</sup>.
- 1.7 The regeneration and public benefits that will be generated by the Scheme are set out in this Report. The Report also considers any potential effects on Equalities and Protected Groups/Characteristics that may come about as a result of the development.

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<sup>1</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document, Section 8.4.2

1.8 This Report is presented in three parts:

**1. Site Context**

This Section sets out the existing site conditions and uses, the policy context of the proposals and the key regeneration challenges facing Lewisham.

**2. Regeneration Statement**

This Section sets out how the Scheme responds to the context to deliver on local and London ambitions, making a substantial and long lasting impact.

**3. Equalities Impact Assessment**

This Section appraises the elements of the development where Protected Groups or Protected Characteristics (as defined in the Equalities Act 2010) may be affected – or have the potential to be affected – by the Scheme. This includes both positive and negative effects.

## 2 SITE CONTEXT

### a) Existing Site Conditions

- 2.1 The Site is currently under-utilised and the majority of buildings are vacant and, given their age and deteriorating condition, are considered to have little, if any, potential for re-use, with the exception of the Victoria public house, which will be restored and retained.
- 2.2 The remaining tenants on-site are:
- Spaces Personal Storage Limited;
  - Safestore Personal Storage Limited;
  - Shell U.K. Limited; and,
  - Veolia ES (UK) Limited.
- 2.3 The Grand Surrey Canal previously ran through the centre of the Site from north-west to the south corner, but was backfilled in the 1970s. The route of the canal is no longer visible or accessible.
- 2.4 The Site in its entirety offers a significant regeneration opportunity and this has been recognised by local and London Policy as set out below.

**Figure 1: The former uses at The Site**



**b) Policy Overview**

2.5 The Site (referred to in policy as ‘Oxestalls Road’) is recognised in planning policy as an asset to the economic growth, regeneration and housing delivery for Lewisham. It is allocated as part of Regeneration and Growth Area<sup>2</sup>, as part of an Opportunity Area<sup>3</sup>, as Mixed Use Employment Location<sup>4</sup> and as a Strategic Site<sup>5</sup>. It has been repeatedly identified as part of London that provides a major opportunity to make a substantial contribution to London’s need for homes and jobs.

2.6 Figure 2 sets the Scheme in context of the planned growth areas and policy allocations in north Lewisham and north Southwark. Further detail on each of these policy designations is set out below.

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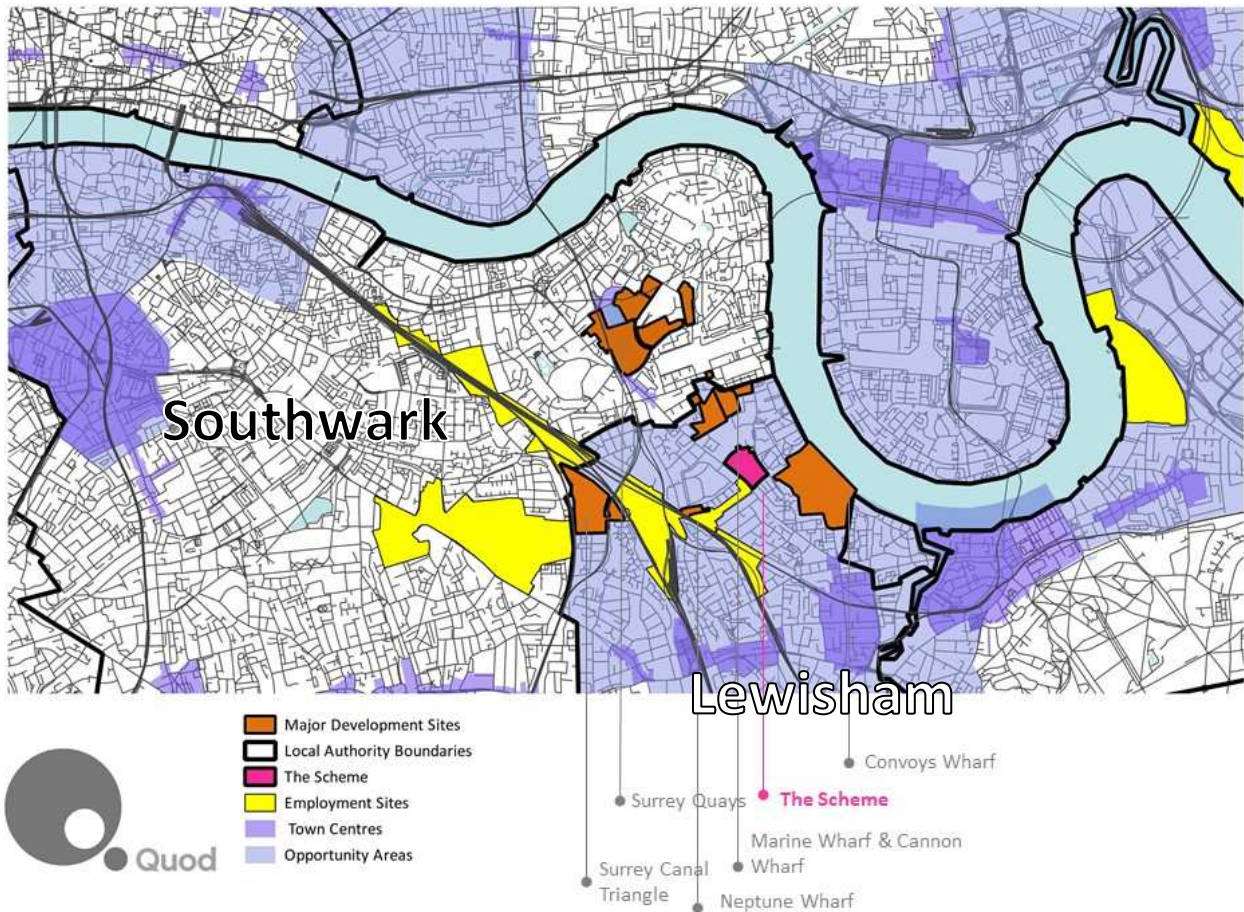
<sup>2</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document, Section 6.2.1

<sup>3</sup> GLA, 2016, The London Plan, p. 359

<sup>4</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document, Para 6.35

<sup>5</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document, Section 8.1

**Figure 2: The Scheme in Context**



### Strategic Site for Regeneration and Growth

2.7 The Site is located within a Regeneration and Growth Area. This means that it has the potential to deliver wider physical and socio-economic benefits for Lewisham, including reducing deprivation, through its redevelopment.

2.8 Within the Regeneration and Growth Areas, specific sites are allocated as Strategic Sites. These sites, including the Site, are “central to the achievement of the Core Strategy<sup>6</sup>.” They will play a crucial role

<sup>6</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document Paragraph 8.1

in place making by creating new places and enabling a transformation of the wider area<sup>7</sup>. This Strategic Site is one of four in the north of the borough that will, together, deliver 60% of Lewisham's London Plan housing target to 2025. Without the successful delivery of all of these sites, Lewisham would not be able to deliver its housing needs or play its part in meeting London's wider needs.

- 2.9 The Site *as a whole* is allocated, in recognition of its potential to substantially change the way the neighbourhood looks and works, the quality of life for its residential neighbours and its economic contribution to the borough. The allocation also includes the Diploma Works site (Scott House) which adjoins the Site at the north-east corner. This site has been converted to live/work units but does not form part of the Scheme.
- 2.10 The Core Strategy states that the Site is, "A large cohesive site, [where] redevelopment presents a major regeneration opportunity, with good access and critical mass potential." The Site has sufficient scale to allow a distinct 'business quarter' and a good opportunity for new employment space within a mix of uses that should be less focused on its current un-neighbourly uses<sup>8</sup>.
- 2.11 Throughout these policies Lewisham emphasises that the Site's size, its cohesiveness and its potential for critical mass is a key part of its value for delivering their regeneration objectives.

#### Mixed Use Employment Location

- 2.12 The Site is further designated as part of a Mixed Use Employment Location where new employment floorspace should be delivered alongside housing<sup>9</sup>. The Core Strategy sets out how the current industrial and business on-site uses do not reflect the importance of the Site. Large parts of it have not attracted investment for many years.

#### Opportunity Area

- 2.13 The Site is within an Opportunity Area, designated in The London Plan as an area which can and should deliver new homes and infrastructure and support wider regeneration<sup>10</sup>. For Deptford

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<sup>7</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document Paragraph 8.2

<sup>8</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document Section 8.4.2

<sup>9</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document Paragraph 8.3

<sup>10</sup> London Plan 2015, Policy 2.13



Creek/Greenwich Riverside and Lewisham/Catford/New Cross Opportunity Areas, the combined housing capacity is 13,000 new homes and 10,000 jobs<sup>11</sup>.

#### Policy Overview

- 2.14 These Site-specific policies sit within an overarching policy framework at a local, London and National Level that is supportive of housing delivery and economic growth.
- 2.15 Paragraph 14 of the National Planning Policy Framework sets out the “presumption in favour of sustainable development.” Significant weight should be placed on the need to support economic growth through the planning system (Paragraph 19) and housing applications should be considered in the context of the presumption in favour of sustainable development. (Paragraph 49)
- 2.16 The delivery of Strategic Sites is in line with Lewisham’s obligation under the NPPF to “*identify priority areas for economic regeneration*<sup>12</sup>.”
- 2.17 The local and London policy have already clearly demonstrated that this area is both in need of, and will benefit from, substantial housing and employment growth. Delivery of the comprehensive Scheme has a key role to play in the achievement of strategic regeneration objectives.

#### c) **Baseline social and economic context**

- 2.18 This section sets out the key social and economic characteristics of Lewisham, and Deptford in particular. There are some particular social and economic factors that create challenges in Lewisham and Deptford – as well as some strengths and opportunities. These are summarised below. The Site is located in Evelyn Ward; the “local area” referenced for data purposes covers this ward.

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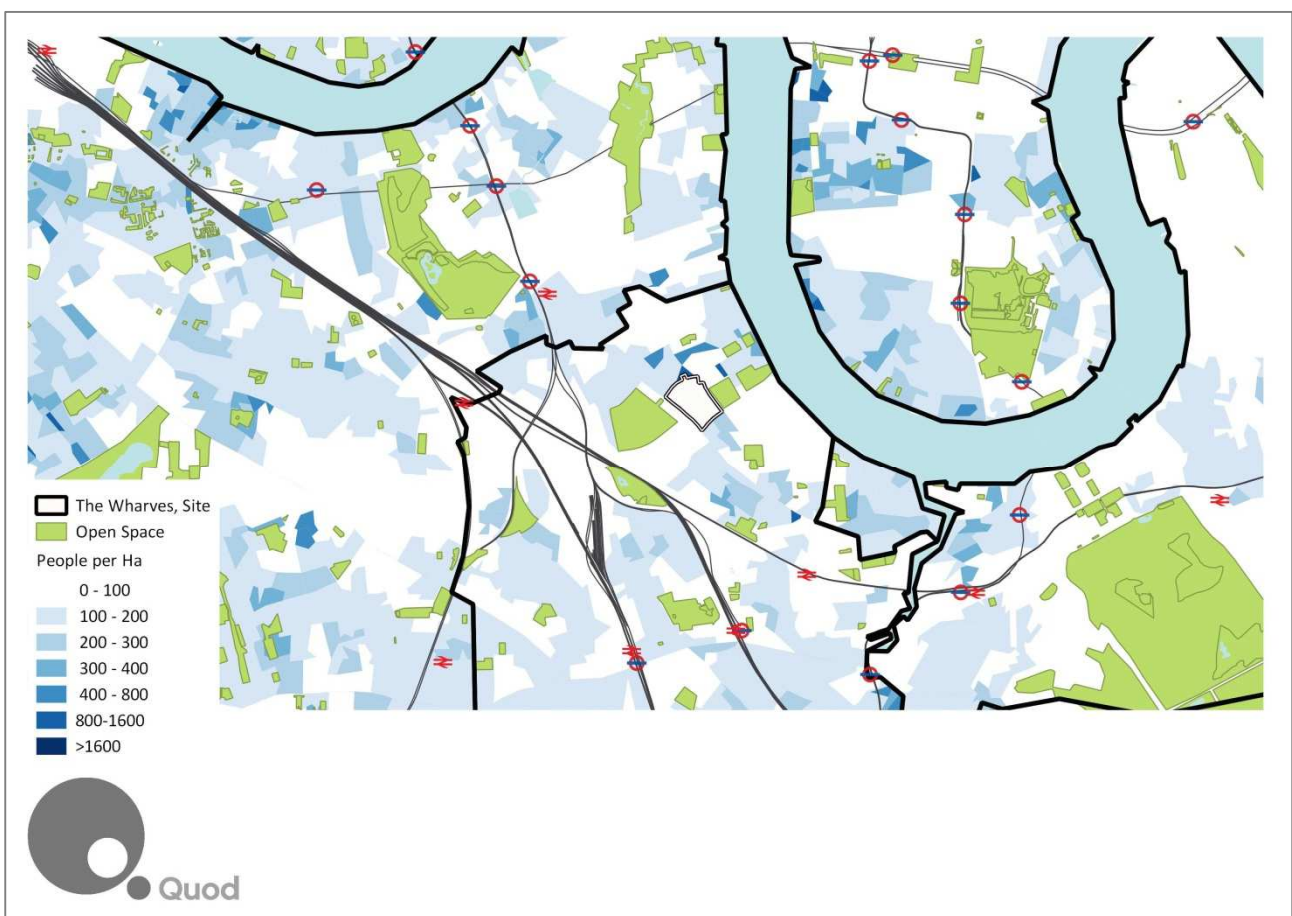
<sup>11</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document Page 1; London Plan , 2015, Policy 2.13 & Annex 1

<sup>12</sup> DCLG, 2012, National Planning Policy Framework, Paragraph 21

i) Residential and employment density

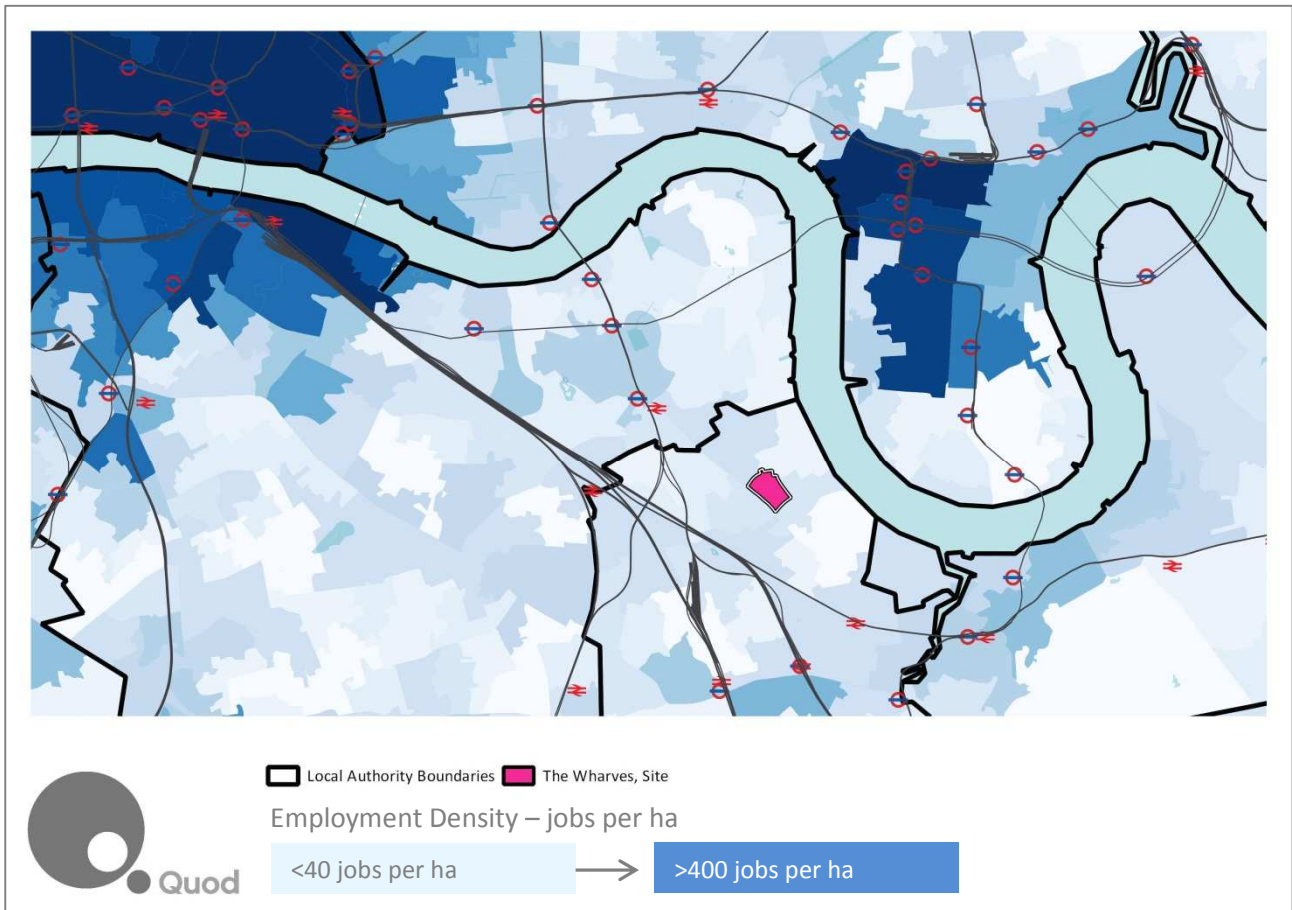
2.19 As Figures 3 and 4 below illustrate, Deptford has a relatively **low employment density** and **low residential density**. Many sites are underutilised. The area does not currently fulfil its full potential to support homes and jobs for London, especially for a location that is on the fringes of central London - with good access to public transport routes.

**Figure 3: Population Density** <sup>13</sup>



<sup>13</sup> Quod Analysis of Census 2011 Data

Figure 4: Employment Density<sup>14</sup>



ii) Unemployment and benefit claimants

2.20 **Youth unemployment** and lack of engagement in education or training is a key issue for London and Lewisham. Around 14% of people aged 16 to 24 in London (around 125,000 people) are ‘NEETs’ (Not in Employment, Education or Training). At the Census in 2011, 1 in 5 unemployed people in Evelyn Ward was under 24. In some areas of Lewisham this is 1 in 4. This is a particular policy concern for

<sup>14</sup> Quod Analysis of Business Register and Employment Survey data, 2015

Lewisham as set out in their Children and Young Peoples' Plan<sup>15</sup>. Extended periods of unemployment for a young person can have long term impacts on future career and well-being.

- 2.21 A higher proportion of local residents of Evelyn Ward claim **working age benefits** than the Lewisham or London averages. 14% of residents aged 16-64 are claiming benefits compared to 11% across Lewisham, and 9% across London.

*iii) Local environment*

- 2.22 The **local environment** and public realm is poor and this inaccessible site creates a barrier to movement. The vacant plots and light industrial uses are poor neighbours for Deptford Park, Pepys Park and the Pepys Estate residents.

*iv) Health*

- 2.23 5% of Evelyn Ward's population self-report having **poor or very poor health**. A larger proportion of White British and White Irish residents in Evelyn Ward report having poor health. Mental health problems and obesity are particular concerns in the borough as a whole and Lewisham residents are less physically active than the average Londoner.

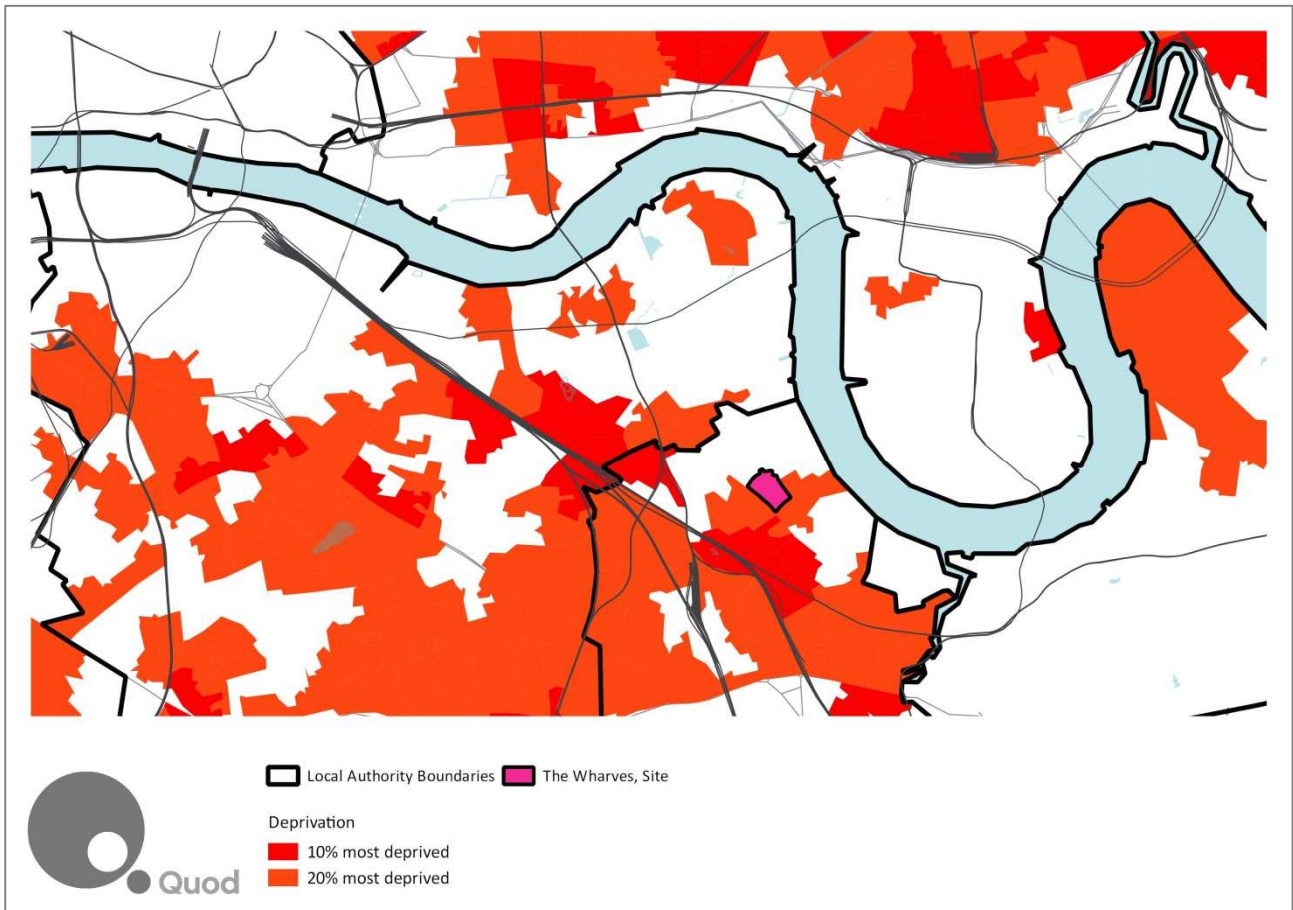
*v) Deprivation*

- 2.24 **Deprivation** in this area is high, which reflects many of the social and economic issues highlighted above. Deprivation is considered at a neighbourhood level – defined as a Lower Level Super Output Area – rather than at a ward level. Neighbourhoods at and around the Site are amongst the top 20% most deprived places in the country. The neighbourhood just to the south of the Site is in the top 10%. This is mapped on Figure 5. Neighbourhoods across Lewisham are particularly deprived in terms of the “barriers to housing and services” element of the index but crime, employment, health, income and living environment are also local challenges.

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<sup>15</sup> London Borough of Lewisham, 2012, Children & Young People's Plan 2012-15

**Figure 5: Index of Multiple Deprivation 2015**



vi) Local strengths and opportunities

2.25 The local economy has some clear strengths – the **population is young and dynamic**. Skills levels are in line with London average including around half of economically active working people holding a degree level qualification. However, older people in the borough (as in the country generally) are less well educated than younger residents. 37% of the over 50’s have no formal qualifications compared to 10% of the under 50’s.

2.26 There are substantial **areas of development and regeneration planned** for north Lewisham. These extensive regeneration proposals, including the Site and the other four Strategic Sites in North Lewisham have the potential to bring substantial benefits to the local area – but also to be greater

than the sum of their parts. Their combined social, economic and environmental benefits could be felt beyond the immediate neighbourhood and into the wider Lewisham community and economy.

2.27 The rate of **economic activity** in Lewisham<sup>16</sup> is in line with the London average at 78%. Lewisham's **unemployment** rate is slightly lower than the London average<sup>17</sup> but unemployment in Deptford is generally higher than the borough average.

2.28 Lewisham has a substantially higher than average proportion of people who are economically inactive but would like a job. This means they are not actively looking for work but would like a job if a suitable one was available. This includes people who are discouraged from the workforce - they would like to work but for whom a job at the right salary, suitable to their skills and/or level of flexibility to their needs is not available to them. 41% of economically inactive residents in Lewisham state that they want a job, compared to only 25% of economically inactive residents across London. This suggests that there is a significant available and willing local labour force that is currently under-employed and ready to work.

vii) *Business and industry profile*

2.29 Lewisham has a **greater reliance on employment in the public sector** than other boroughs. There are lower proportions of jobs in the finance, insurance, technology, professional and scientific sectors than in London as a whole. These sectors in which Lewisham is underperforming are key growth sectors for London. Figure 6 shows the differences in the London and Lewisham business profiles. In terms of absolute numbers of jobs, Lewisham is also underperforming – the borough supports only 1.4% of London's jobs (LB Greenwich has 1.6%, Lambeth has 3.1% and Southwark has 4.6%.)

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<sup>16</sup> July 2014 – June 2015 Annual Population Survey

<sup>17</sup> The International Labour Organisation definition of unemployment includes people who are willing and able to work but are not claiming unemployment benefits.

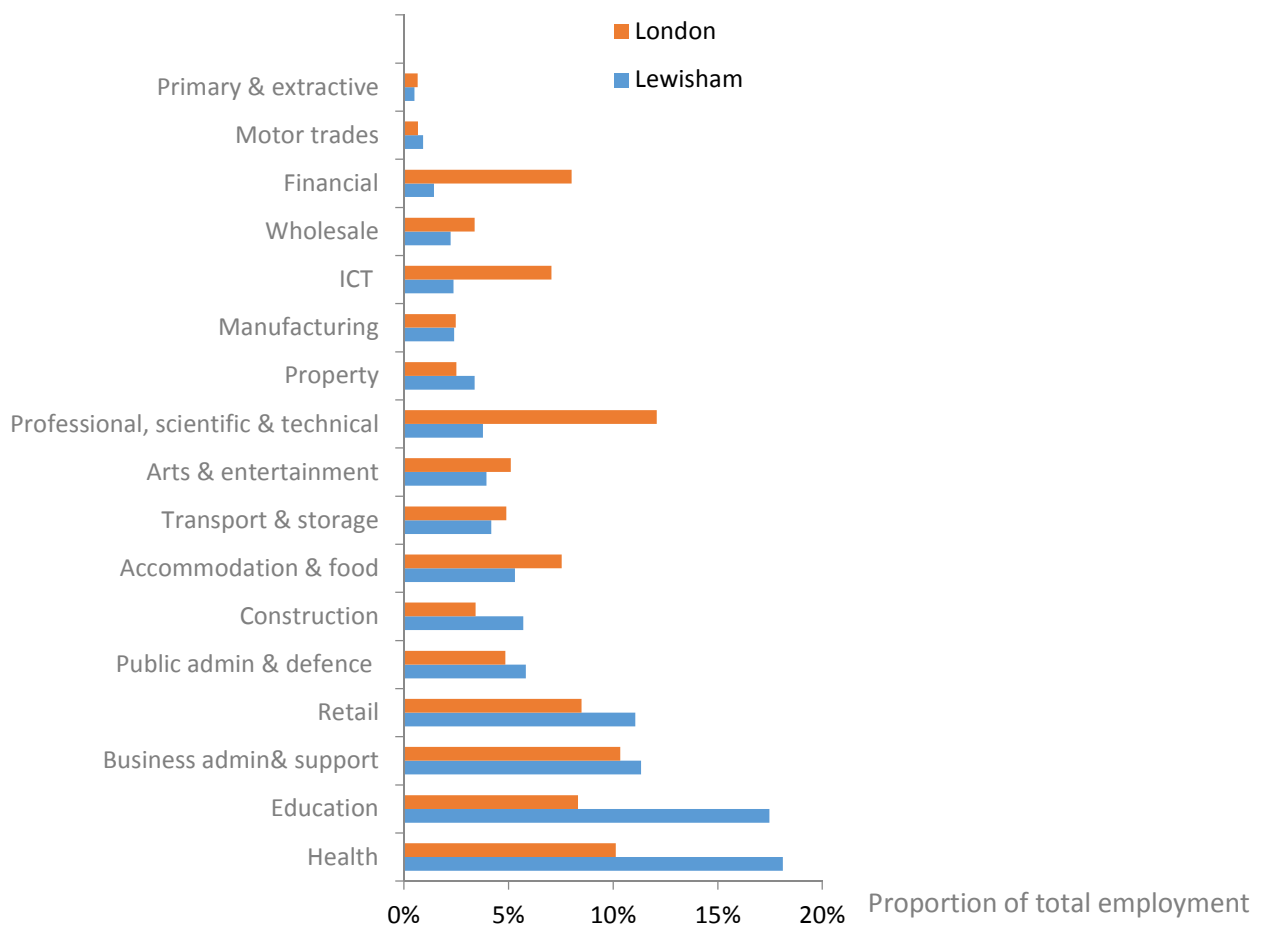
- 2.30 However, there is **business growth potential**: between 2008 and 2012, there were 4,800 business start-ups in Lewisham, which represented 34% of the total business stock. These new businesses employed 6,700 of Lewisham's workforce in 2012, which represented 12% of total employment in the borough<sup>18</sup>.
- 2.31 The number of small enterprises with fewer than 50 employees has grown substantially over the last decade. There are 70% more small firms now compared to 2003 - an additional 600 firms. This is faster growth in small firms than Inner London or the London as a whole, which have grown by 50%.
- 2.32 There are around 2,000 Cultural and Creative Enterprises in Lewisham; almost all of these enterprises have fewer than 10 employees.
- 2.33 Around 40% of London and Lewisham's new businesses survive 5 years<sup>19</sup>. The greater support provided by flexible co-working space could help to build resilient firms and aid survival.

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<sup>18</sup> Lewisham, 2013, Lewisham Business and Growth Strategy 2013-2023

<sup>19</sup> London Borough of Lewisham, Lewisham Business Growth Strategy 2012-2023 page 40

**Figure 6: Sector Breakdown, London & Lewisham (Business Register and Employment Survey, 2014)**



**d) Summary of baseline context**

2.34 Lewisham’s residents face some social and economic challenges. Many neighbourhoods in the borough have high levels of deprivation associated with a range of factors including poor housing. The borough’s economy is largely dependent on the public sector for employment. Those sectors with most growth potential in London are under-represented in the local economy. However, the borough also has strengths, including a skilled, young population.

2.35 In order to ensure that Lewisham and its residents share in – and contribute to - London’s growth and prosperity the borough needs to deliver on its growth policies. This includes delivering new



homes, including affordable homes and delivering modern workspace that will help to encourage the sector shift the local economy needs to make the most of its location on the fringes of central London.

**e) Proposals**

2.36 The Scheme will be a mixed use redevelopment of the whole 4.7ha of the Site. The Masterplanning process for the Scheme responded to Local, London and national policy objectives, including those set out above.

2.37 Lendlease and their lead architects Hawkins Brown laid down six themes that would guide and inform the design of the Scheme. These are:

- Connections and accessibility
- Responsibility and sustainability
- Open space
- The Grand Surrey Canal Route
- Living environments
- Character.

2.38 These six objectives are integral to the vision for the Site. They will maximise the Site's regeneration potential, public benefit and the quality of life for new and existing residents.

2.39 All current buildings on-site will be demolished except the former Victoria Pub.

2.40 The development will then provide:

- Up to 1,132 homes, including 189 affordable homes
- Up to 3,571m<sup>2</sup> GIA of flexible floorspace that could deliver a mix of retail, food and drink, office, community, cultural and leisure uses
- Up to 6,059m<sup>2</sup> GIA of B class business space.

2.41 The following Section of this report sets out how these proposals will work in the local context to bring about regeneration and substantial public benefits.

### 3 REGENERATION STATEMENT

3.1 The Scheme will make a significant contribution to Lewisham’s and the Mayor of London’s regeneration and growth targets. The Masterplan design, layout and mix of uses – including affordable housing, community and employment uses - would transform the Site and the neighbourhood around it. The diagram below – and the sections that follow – summarise the key ways in which the Scheme responds to its context to deliver on local and London ambitions.



**f) Delivering employment growth**

3.2 Lendlease wants to support local people and to position businesses in Lewisham to reap maximum benefit from the opportunities created by the Scheme during both construction and in the long-term. Through the Section 106 requirements for the Scheme and in accordance with Lewisham policy, Lendlease will provide a 'Local Labour and Business Strategy' which sets out how they and their contractors will work to maximise the number of local residents and businesses who can access opportunities created by the Scheme.

*i) Construction Employment*

3.3 The Scheme will support demolition and construction employment. Lendlease's investment will create an estimated 370 permanent Full Time Equivalent (FTE) construction jobs in the construction sector as a whole.

3.4 The number of people who could be employed over the course of the seven years of construction is likely to be higher. Using the Construction Industry Training Board Labour Forecasting Tool, for example, the Scheme would support an average of 650 construction jobs per month over the seven year period. At peak, up to 1,450 jobs could be supported.

Depending upon construction methods, a proportion of this employment will be on-site, with some potentially being elsewhere in the construction supply chain.

**Local employment during construction**

3.5 The Local Labour and Business Strategy put in place as part of the S106 agreement with Lewisham secures Lendlease's commitments to:

- pay financial contributions towards Lewisham's initiatives, plans, programmes that will help to get local people into jobs at the Development (whether construction or end-use)
- advertise job vacancies and supply chain opportunities locally
- monitor the number of local construction employees on-site

- share monitoring information with the Council
- work with Lewisham and their partners such as Job Centre Plus to promote opportunities for local businesses and residents.

3.6 Lendlease will also use Reasonable Endeavours to achieve a target of at least 50% of all employees being from Lewisham and 50% of all businesses and suppliers engaged on the Scheme being local businesses.

3.7 By encouraging and supporting local employment, the positive impacts of construction on the local economy will be maximised.

*ii) Permanent job opportunities*

3.8 The Site is in a Mixed Used Employment Location but Lewisham considers that its current mix of employment uses blight the Site's overall quality. It is considered that the current industrial and business uses do not reflect the importance of the Site and large parts of it have not attracted investment over many years<sup>20</sup>. The previous commercial uses did not meet the Site's full employment potential, and several were bad neighbours for the wider neighbourhood.

3.9 The Site represents a longer-term opportunity for job creation and a change in the type of uses on Site. Meanwhile, the Blackhorse Road Defined Employment Area, to the west provides a large and viable concentration of employment land<sup>21</sup> which is more suitable for the industrial-type uses currently on the Site.

3.10 The existing floorspace has a relatively low employment density and supports approximately 250 jobs across the Site. These types of jobs could be relocated to other Sites either at Blackhorse Road or elsewhere. This will facilitate a net increase in employment on Site and shift towards the types of jobs and businesses Lewisham wants to grow.

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<sup>20</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document Page 1; London Plan , 2015, Para. 8.28

<sup>21</sup> London Borough of Lewisham/Roger Tym and Partners, 2008, Employment Land Study: Annex 1 Lewisham Employment Sites Assessment

- 3.11 The Scheme will provide new office space, temporary incubation space and a workspace hub. These have been designed to meet the needs of Lewisham's growing cultural and creative sectors. The Y Building on Plot 3 will be the central commercial area.
- 3.12 There will also be a mix of class A retail units with the following potential uses:
- coffee shops & cafes
  - a local convenience store
  - supporting retail units e.g. hairdressers / cycle shop / drycleaners
  - gallery / exhibition space supporting the commercial space
  - potential micro-brewery in the existing Victoria Pub
  - crèche or similar facility.
- 3.13 Employment space at the Site will have several roles - to provide services for the community; to animate the Site; to provide local employment for sustainable growth; and to help Lewisham achieve its business strategy ambitions.
- 3.14 Overall there will be up to 9,630m<sup>2</sup> (GIA) commercial space spread over 3 phases of development. Phases 1A and 1B will deliver approximately half of the overall total commercial space which will help to establish a business identity for the Site early on.
- 3.15 These new shops, offices, leisure and community uses would support between 460 and 630 jobs, depending upon the end uses. That equates to an uplift of 210 -380 jobs onsite. Many of these jobs would be suitable for local people, or support the growth of Deptford enterprises, as set out in more detail below (Paragraphs 3.16-3.21 look at local jobs whilst 3.36 looks at enterprises).

**Table 1: Estimated Employment in Proposed Development (Figures may not sum due to rounding)**

Use	Floorspace sqm GIA	Phase 1A (Plot 1 and 2)	Phase 1B (Plot 3)	Phase 2 & 3 (Plot 4, 5 & 6)	Total
B1	6,059	0	186	232	417
A/B/D	3,571	13-73	16-86	15-54	44-231
<b>Total</b>	9,630	13-73	<b>202-272</b>	<b>247-286</b>	<b>460-630</b>
<b>Existing Employment on-site</b>					<b>250</b>
<b>Net increase in employment</b>					<b>210-380</b>

#### Small enterprises and cultural and creative industries

- 3.16 In the north of Lewisham, around Deptford, there are extant planning permissions to deliver in excess of 23,680m<sup>2</sup> (GIA<sup>22</sup>) of commercial (B1) space. Much of this space will be affordable cultural and creative space.<sup>23</sup>
- 3.17 This will help to consolidate Lewisham’s reputation as a key location for these sectors, especially small and dynamic firms that have the potential to grow fast and create local employment. These types of firms chose areas where networking and co-working opportunities are available so clustering and critical mass are an advantage.

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<sup>22</sup> Calculated from the floorspace consented in the neighbouring schemes of Convoys Wharf, Marine Wharf West, Marine Wharf East, Cannon Wharf and Paynes and Borthwick.

<sup>23</sup> Indicative information from Planning Applications.

### Local and entry level jobs

- 3.18 In line with Lewisham's S106 commitments, Lendlease will provide a Local Labour and Business Strategy which will include a commitment to support local people into operational jobs.
- 3.19 Retail, restaurant and bar jobs will provide excellent opportunities for part time and flexible work. This means work can be balanced alongside other commitments - to education or childcare for example.
- 3.20 Depending upon the users of the new floorspace, there could be a high proportion of part-time employees working on-site – particularly in the retail, restaurant, community and leisure uses where 50% to 60% of positions are part time. The net increase in headcount of people employed on-site each week could therefore significantly exceed 380.
- 3.21 Flexible jobs can benefit the community when they are provided locally. An analysis of 2011 Census data shows that in London, approximately 30% of all employees live within 5km of their workplace. In the wholesale, retail, hotel and restaurant sectors more than 36% of people live this close to their place of employment. As such, a significant number (likely to be at least 30%) of employees would be likely to come from within 5km of the Site, including areas of Lewisham with high unemployment and deprivation that are within easy reach walking or using public transport.
- 3.22 There will also be new opportunities for people leaving school or people with few formal qualifications. Based on existing patterns in the retail and restaurant sectors, 40% of these new jobs would be suitable for people with GCSE level qualifications or no formal qualifications. In the retail space, 13% of jobs could be for people working towards or having achieved an apprenticeship. In restaurant or café uses, this would be up to 26% of staff.
- 3.23 The retail sector provides an important entry point to work from school or for young people who are NEET. Retail employs more young people straight from school than any other sector<sup>24</sup>. A quarter of employees within the retail sector are aged under 25 – significantly higher than other sectors in the

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<sup>24</sup> UKCES, 2014, UK Commission's Employer Skills Survey 2013



UK economy<sup>25</sup>. 42% of all working 16 to 17 year olds are employed by retailers. Youth unemployment has serious implications for the long term resilience of both these individuals and their communities so opportunities to create jobs suitable for young people should be maximised.

- 3.24 The new 'Yard' public square around the south east corner of the Site is a focal point for proposed retail provision. In this location it will activate the area around the commercial building, providing essential services such as cafés, coffee shops and potential gallery space to accompany and facilitate a successful co-working/co-making environment.
- 3.25 The B1 office space will support a wide range of skilled and semi-skilled professionals and start-ups, including local people. ,

**g) Delivering new homes**

- 3.26 The Scheme will be a mixed community, with new homes in market, intermediate and affordable rented tenures – ranging from one bedroom flats to family homes. In total, the Site will accommodate 1,132 new homes of which up to 189 will be affordable homes. The approved housing mix includes 66 family-sized affordable homes of 3 or 4 bedrooms and the mix is set out in the signed S106. A revised mix is under consideration as part of the Section 96A application. This mix, still to be approved, also includes 189 affordable homes, 60 of which will be family affordable homes.
- 3.27 These homes will contribute 8% of Lewisham's ten year housing target. 1,920 new residents will live there.
- 3.28 As set in the *Site Context* section above, housing affordability and overcrowding are key issues for households in Lewisham. Delivering new homes is essential to support sustainable growth and alleviate deprivation.
- 3.29 New residents will also bring spending, footfall, and new skills to a neighbourhood.

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<sup>25</sup> UKCES, 2012, Sector Skills Assessment 2012: Wholesale and Retail Evidence Report 73, p. 26

- 3.30 189 new affordable homes will reduce some pressure on housing waiting lists, in particular for those with priority needs. This includes those at risk of violence or serious ill-health; those in very overcrowded homes; older people; and families with children. This may include people who require wheelchair accessible homes to support their health and wellbeing. There are 8,400 currently waiting for homes in Lewisham.
- 3.31 Local Authority Housing Statistics<sup>26</sup> show that the vast majority of social rented (including affordable rented) housing in Lewisham is let to existing residents of the borough, so the benefits of social rented and intermediate tenures will be felt locally. This includes opportunities for people moving from other social rented homes in the borough whose housing needs have changed. In many cases this would free up their existing home for new tenants.
- 3.32 New homes would increase Council Tax revenue for Lewisham. At the Scheme, this would amount to between £1.36m and £1.53m annually. In addition, Councils currently receive an added income for new homes delivered within their boroughs for a period of six years after completion. This New Homes Bonus could amount to £7m over four years for Lewisham to spend on local regeneration priorities.
- 3.33 The range of sizes and tenures of homes that will be on offer within the Scheme will help to create a sustainable, mixed and balanced community. New homes will contribute more to the neighbourhood context than the current uses, improving the environment for the existing residents too. This is greatly helped by a masterplan design that is focussed on better links and public realm running through the Site, opening it up to pedestrians and cyclists.

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<sup>26</sup> Department for Communities and Local Government, LAHS 2014-15

**h) Regenerating Deptford**

*i) One of four key sites*

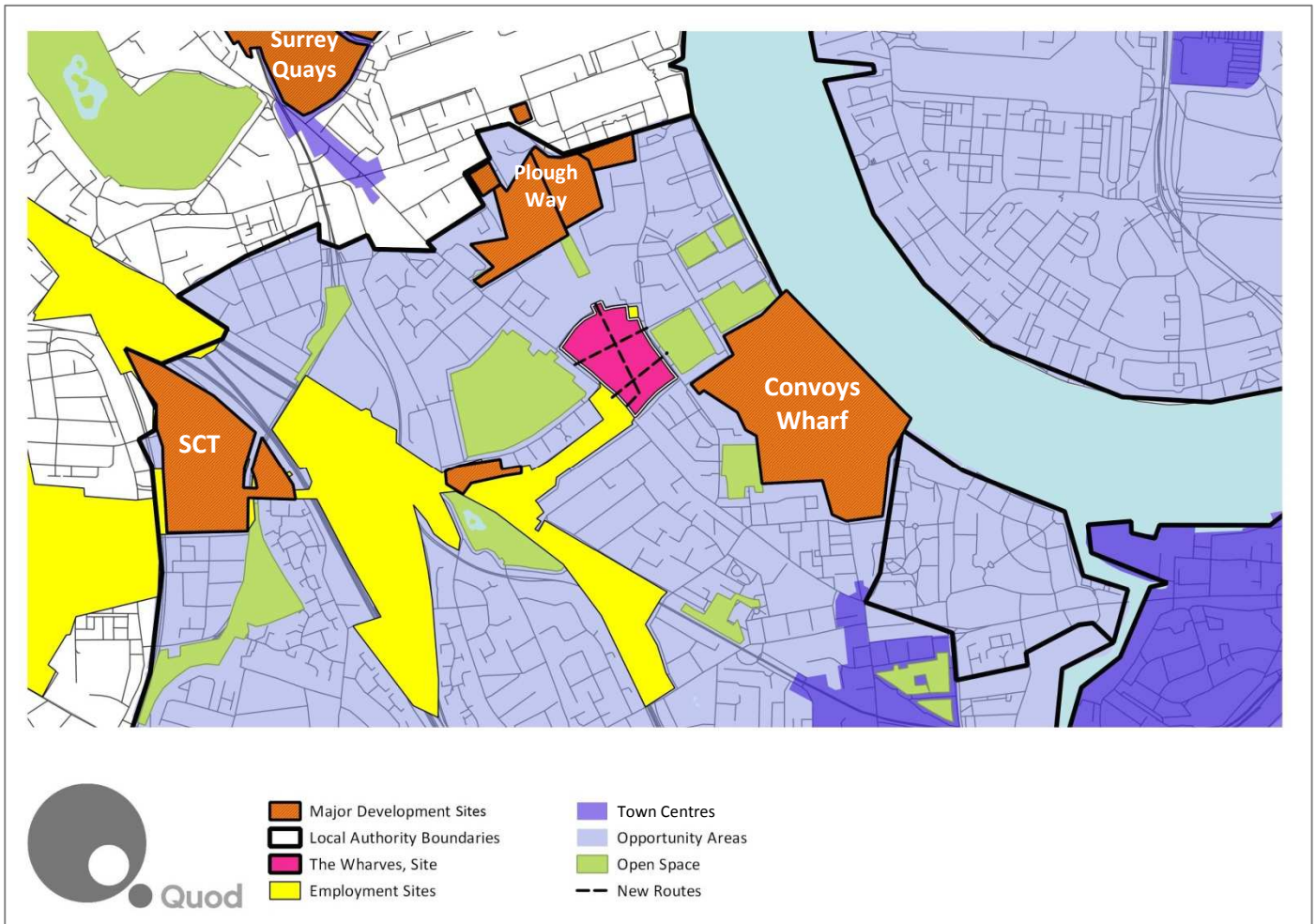
3.34 The Site is one of four Strategic Development Sites within the Opportunity Areas (as mapped on Figure 7, below)<sup>27</sup>. The Scheme has a critical part to play in delivering homes and jobs but also in building confidence, encouraging investment and driving regeneration in the Opportunity Areas as a whole.

3.35 The Site is located in a position where it could provide a critical link between other major regeneration sites in Lewisham and the neighbouring London Borough of Southwark. By changing the way people move around the Site, by opening up new routes with active frontages and open spaces and by creating a new animated thoroughfare, the character and geography of this space will change, to the benefit of all the new developments and to existing residents. A new route will be provided within the Site along the route of the former Surrey Canal, increasing permeability through the Site and also providing access to the Pepys Estate to the north of the Site. The quality of the environment along all the boundaries of the Site – Grove Street, Oxestalls Road, Evelyn Street and Dragoon Road – will be substantially improved.

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<sup>27</sup> Convoys Wharf, Surrey Canal Triangle, Oxestalls Road and Plough Way

**Figure 7: Strategic Sites**



3.36 It is envisaged by Lewisham and the Mayor of London that these areas will be *comprehensively redeveloped*. Developers have responded to this call and submitted planning applications for all four of these Strategic Sites in the north of Lewisham. These areas should be developed in such a way as to “maximise the physical, social and environmental regeneration opportunities new development will bring for the benefit of existing and future residents, to address deprivation issues, particularly

health inequalities, to improve well-being<sup>28</sup>.” 60% of Lewisham’s housing delivery to 2025 is planned to come forward on these Sites.

- 3.37 The root causes of deprivation and inequality are complex but good quality homes, including affordable homes; new jobs; provision of local services; and improved local environment can all contribute to improved health, well-being and reducing deprivation<sup>29</sup>.
- 3.38 In isolation, each site could have a positive effect on the well-being of those who live or work there. However, at the level of single site, it is challenging to affect enough change to make an impact on the deprivation and wellbeing of a whole community. In combination though, groups of linked Strategic Sites provide the critical mass to have a substantial long-term impact.
- 3.39 The new links and public realm is further explored in the *Exemplary design and public realm* Section.

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<sup>28</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document, p.6

<sup>29</sup> These factors feature in the DCLG’s Indices of Deprivation and/or the NHS HUDU Rapid Health Impact Assessment Tool

- 3.40 Employment projections produced by the GLA<sup>30</sup> show that it is likely that employment growth in London will continue to be driven by service sector employment. That includes professional and technical jobs, retail, hotels, health, education and business and other services. Apart from public sector services, these are not currently strengths of the Lewisham economy.
- 3.41 The borough is likely to capture little of this growth without a significant change in direction. This will need new floorspace, improved access to markets in London and investment to raise the profile of the borough as a working environment.
- 3.42 The Lewisham Business and Growth Strategy 2013-2023 sets out five key strengths of the local economy which it would like to develop and build on, as the drivers of their future economic growth:
1. Lewisham has become a growing centre for micro businesses, which benefit from the demand created from the London economy;
  2. Lewisham has a dynamic, diverse, creative and entrepreneurial population;
  3. Lewisham provides excellent value for London businesses;
  4. Lewisham is undergoing a period of significant regeneration, creating new high quality business space and environments; and
  5. Lewisham town centres are being revitalised, developing their unique and diverse offer.
- 3.43 Inner East London – which includes Deptford - will be the focus of a large proportion of London’s population and economic growth over the next 20 years. The definition of the core office market is widening due to central London cost and supply. Particularly for Creative Industries, East London can provide a more desirable location and type of business space offer than the traditional office locations. These businesses benefit from being in vibrant and diverse neighbourhoods near to their employees.

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<sup>30</sup> GLA, 2013, Employment projections to 2036

3.44 Start-ups and Creative Industries are particularly key in Lewisham’s growth ambitions. The borough established a Creative Industries Strategy in 2012 which set out how,

**“Creative industries are a key source of employment, innovation and productivity. They shape communities and create destinations. Developing the sector is an important element of the borough’s strategy for economic growth<sup>31</sup>.**

3.45 As set out in the *Site Context* section, Lewisham is showing signs of a strong and growing cultural and creative sector – but it will need support to fulfil its potential.

3.46 The workspace within the Scheme is designed to respond to these strengths and this opportunity and deliver the growth that Lewisham wants to see. Lewisham states that “demand for suitable space in Lewisham from start-ups and existing businesses wanting to expand is ever present<sup>32</sup>.”

3.47 Workspace proposals are concentrated around the delivery of The Y Building and temporary incubator space in the Victoria Pub. This space will foster demand from the creative and entrepreneurial sectors and provide a place for businesses to grow and collaborate [so] that they will be able to establish themselves on the permanent Site<sup>33</sup>.

3.48 The Y Building is intended to be able to be used by a range of tenants, and the floorplates are able to be provided flexibly either as larger open plan spaces or subdivided into smaller spaces with a central corridor.

3.49 The following diagram sets out the principles which facilitated the design, location and type of workspace that will be delivered.

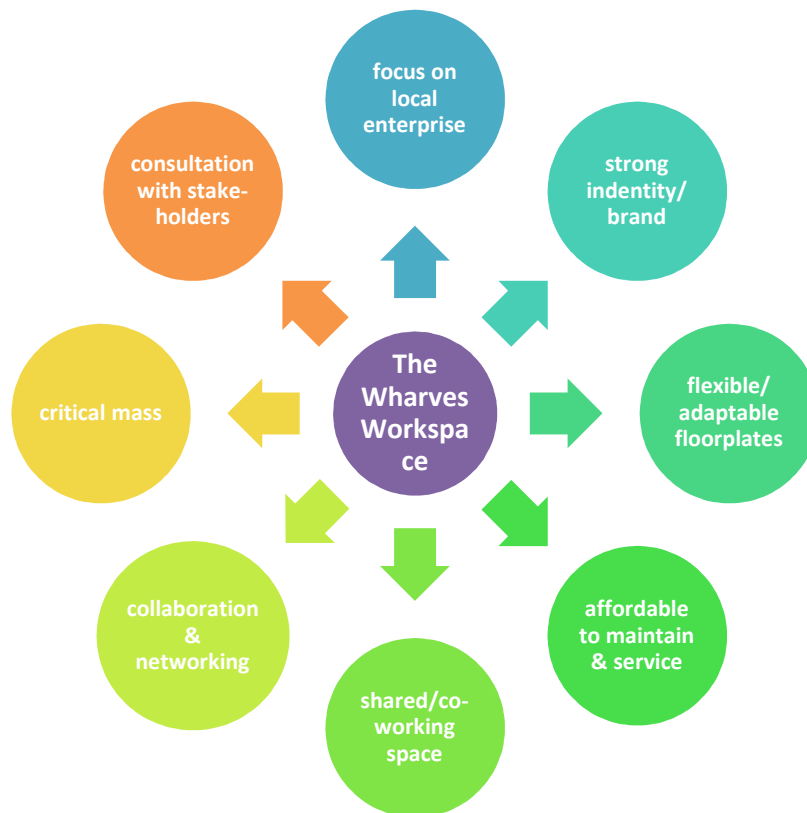
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<sup>31</sup> Lewisham, 2012, *The Business of Creativity: A Creative Industries Strategy for Lewisham 2012-2015* p.1

<sup>32</sup> Lewisham, 2012, *The Business of Creativity: A Creative Industries Strategy for Lewisham 2012-2015* p.3

<sup>33</sup> Lend Lease, 2015, *The Wharves, Deptford, Commercial Strategy* p.18

**Figure 8: The Scheme workspace design principles**



**Figure 9: The Y Building**





3.50 These principles have been established based on consultation, market analysis and Lewisham's aspirations. The amount, location and type of space across the Site will deliver critical mass in order for a sense of business and employment identity to flourish.

ii) *Benefits for the local economy*

3.51 Alongside direct employment and job brokerage, the Scheme will support businesses already in the area through supply chain activities in construction and operation (for example, local machine hire, business administration and support, catering etc.) and through the new residents' and workers spending on goods and services locally.

3.52 New employees working on-site would generate additional spending - on average workers spend £10.59 per day on food and drink in the area local to their work<sup>34</sup>. On this basis, the total additional spending generated at the Scheme would be £15.3m in household spending<sup>35</sup> and between £1.1m and £1.5m in employee spending annually. This would help to attract or sustain local shops and services and support local employment.

3.53 This spend will support existing businesses locally and create more opportunities for work in the area around the Site to support the Scheme and the retail and services in the other Strategic Sites.

3.54 Construction and operation will generate Gross Value Added (a local measure of Gross Domestic Product). Based on average rates of GVA per construction worker per year, total GVA generated by the demolition and construction at the Site will be c. £200m over 7 years. Based on rates for retail and commercial employees, the GVA generated by the retail and workspace uses would be around £33m every year.<sup>36</sup>

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<sup>34</sup> Visa Europe (2014) UK Working Day Spend Report

<sup>35</sup> The Office for National Statistics (ONS) Family Spending Survey estimates that the average weekly spending on local goods and services is £260 per week (based on London spending, adjusted to consider likely local goods and services specifically)

<sup>36</sup> Quod calculations based on Office for National Statistics benchmarks

- 3.55 The new business and retail space would substantially increase the rateable value of business on the Site. The total rateable value of the existing properties is estimated to be £530,000<sup>37</sup> - yielding annual business rates payments of approximately £260,000. Given the age and deteriorating condition of the existing buildings there is very limited potential for many of them to be continued to be used in the long term, so this is likely to be an overestimate of future revenue.
- 3.56 The new business space could increase this to £1.1m. This could generate in the region of £580,000 in Business Rates annually – an uplift of up to £320,000 in annual revenue over the current rates<sup>38</sup>. After 2020 all of the uplift generated within a local authority will be retained within the borough, to use for local investment priorities.
- 3.57 Small businesses, start-ups and charities may be able to claim small business rates relief from Lewisham. This would reduce the overall business rates revenue but would support the growth and sustainability of these businesses.
- 3.58 Increased local employment, during construction and in the long term, could increase income tax and National Insurance revenue as well as reducing benefit receipts where employees move from unemployment to new jobs. As set out above retail and food jobs can be particularly appropriate for people moving to work from unemployment.

i) **Exemplary design and public realm**

- 3.59 Lewisham states in its Core Strategy that,

**“A fundamental objective and requirement of the redevelopment of these sites is the need to deliver a radical improvement in the physical quality of the urban environment by improving their overall appearance and attracting further investment to a part of the borough where the environment is poor and unemployment and levels of deprivation are high<sup>39</sup>.”**

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<sup>37</sup> This is based on Valuation Office Data for The Wharves (existing uses) and comparable developments and locations (proposed uses)

<sup>38</sup> This is based on Valuation Office Data for The Wharves (existing uses) and comparable developments and locations (proposed uses)

<sup>39</sup> London Borough of Lewisham, 2011, Adopted Core Strategy Development Plan Document, Paragraph 6.24

3.60 Lendlease has established a Core Vision which centres on the ambition to “Create the Best Places.” This Vision underpins all of their developments including the Scheme. In relation to the Scheme, this is driven by the quality of the spaces between the buildings – those that are accessible to existing residents and workers, as well as new. These spaces will transform the layout and experience of the neighbourhood for everyone. Details of these interventions are set out below.

*i) Neighbourhood connections*

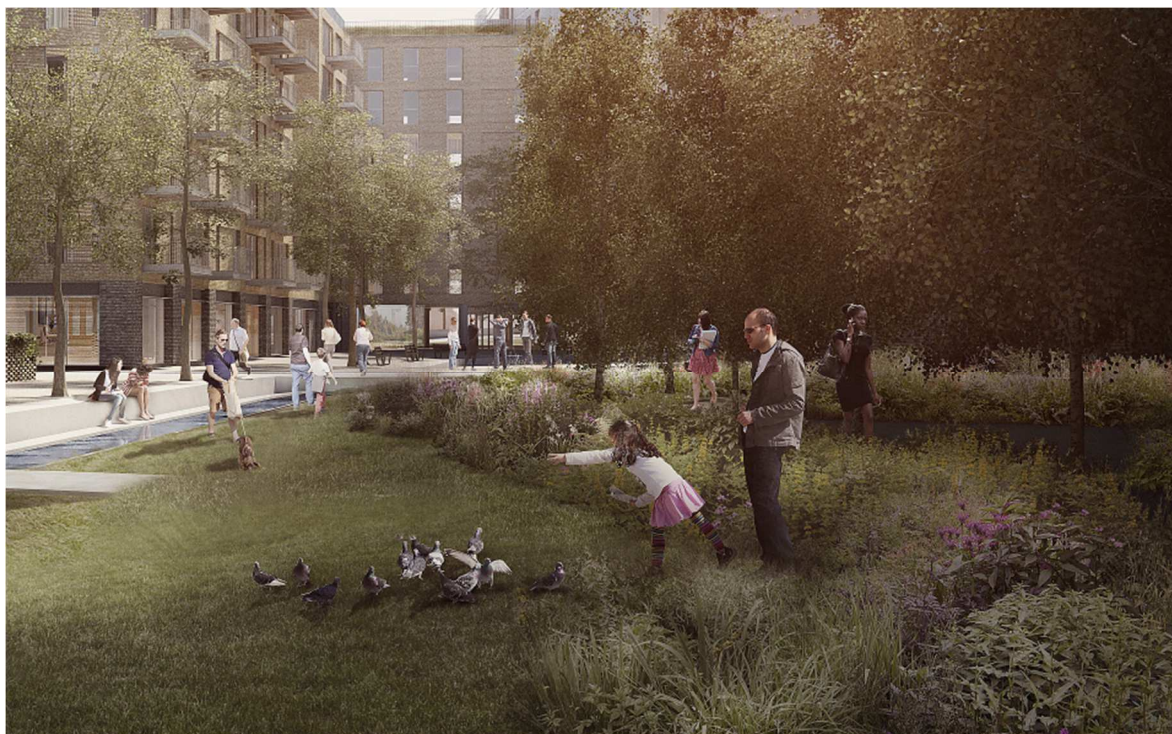
3.61 The Site is currently not accessible to the public and creates a significant barrier for pedestrians. The new masterplan proposes a series of pedestrian connections that will integrate the Site with wider networks and create much needed links using high quality public realm. The aim of these spaces will be to create a sense of place, permeability, accessibility and establishment of landmarks and new public open spaces.

3.62 Improvements are already being made to walking and pedestrian routes between the Site and transport nodes. New streets, green links and a linear park along the Surrey Canal route will cut across the Site creating new, attractive and animated public routes running both north to south and east to west. Public routes are secured via the Section 106. The proposed new routes are shown in the figure below.

**Figure 10: New public routes through the Site**



**Figure 11: New public spaces**



- 3.63 A linear park and water feature running across the Site (Surrey Canal Park) will be located on the line of the former canal creating a unique atmosphere where people can meet, rest and socialise. A neighbourhood square (The Yard) acts as a focal point encouraging leisure and recreation projects and allows space for outdoor cultural events and markets. The landscaping has specifically been designed to incorporate outdoor seating.
- 3.64 Across the Site, there will be public and private green spaces incorporating activities for children and young people.
- 3.65 These elements of the masterplan are all designed with the whole of the Scheme in mind. These routes, links and public spaces would be compromised if the vision for the Site in its entirety could not be delivered.
- ii) Heritage Influences
- 3.66 There is little of architectural or historical value at the Site, with the Wharf Infrastructure long gone. However, two elements of the Site's history will be retained, to ensure that the heritage of the location remains a part of the local community and identity.
- 3.67 The popular Victoria Public House building is to be restored and retained as a community asset, after public consultation which highlighted the importance of the building for local people.
- 3.68 The Victoria Pub will be used in the short term as incubator units for start-up businesses, with a training kitchen and small cafe at ground floor level. This is the subject of a separate planning application. In the long term, the pub will be refurbished to provide a flexible range of planning uses including a pub if a suitable operator comes forward.
- 3.69 The route of the canal will be reinstated via Surrey Canal Park and water feature.

**Figure 12: The retained Victoria Public House**



*iii) Accessibility and adaptability*

3.70 The Scheme has been designed in line with Lifetime Neighbourhood principles: these are a set guidelines that aim to create sustainable communities by designing places that are accessible, inclusive and safe<sup>40</sup>. Good design responds to current needs as well as allowing for potential demographic changes such as a future increase in older people.

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<sup>40</sup> DCLG, 2011, Lifetime Neighbourhoods

- 3.71 These principles are reflected in the design of the Scheme's new homes, in the outdoor spaces, in the services and facilities provided within walking distance and with the Site's good access to public transport. Lendlease is committed to policies that promote inclusive management of the public realm and residential blocks in the long run via consultation and collaboration.
- 3.72 Each new home will meet, and in many cases exceed, the minimum standards for the total floorspace area<sup>41</sup>. The Scheme has been designed to be as inclusive as possible in design, and to be used by everyone. Local and London policy set out the need for 10% of all homes to be wheelchair accessible or easily adapted for wheelchair use. Across the development this standard will be met.
- 3.73 In relation to the social rented units, up to 10% of these will be fitted out for wheelchair users according to need, with the remainder of the 10% being easily adaptable. The Shared Ownership and Market tenure wheelchair accessible units will only be sold in accordance with a Wheelchair Units Marketing Strategies which will be agreed between Lewisham and Lendlease and will secure a 6 month period of dedicated marketing to ensure that these units are prioritised for wheelchair users and fitted out or easily adaptable depending on the outcome of the marketing exercise (see Schedule Two: Affordable Housing of the signed Section 106 Agreement).

iv) Community, health and wellbeing

- 3.74 The Scheme is designed with the health and wellbeing of the new and existing community in mind. In addition to on-site facilities and spaces, the public and private spaces will be accessible and adaptable and designed to promote physical activity and wellbeing. The design of the new homes and spaces will ensure that this is a Lifetime Neighbourhood, able to be adapted in the future for use by residents or visitors who may have reduced mobility due to age or disability.
- 3.75 The Scheme has a number of design features to help ensure the buildings have good environmental performance. Features include high performance glazing, insulation to minimise heat loss, energy-efficient lighting and utilising solar gain and thermal mass as part of the design.

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<sup>41</sup> The level of detail is only set out for the Detailed Element: Phase 1. See DAS Volume 1 and in Table 7.2 in the Planning Statement

- 3.76 The Scheme will include flexible community floorspace which could be used for new public or community services, depending upon local needs. Existing and new local residents will also benefit from the early provision of the local convenience store.
- 3.77 New jobs and access to work can increase health and wellbeing. Income is one of the strongest positive influences on health and disease in public health research. Unemployment, conversely, is often related to an increased risk of poor physical and mental health and premature death. By creating a range of jobs and actively linking local people to opportunities through committed brokerage schemes, the Scheme will help to redress employment deprivation locally.
- 3.78 The Site will provide a series of courtyards and a large public square to be enjoyed by pedestrians and residents promoting walking and cycling. These spaces are designed to feel safe and will be managed and maintained to a high standard in perpetuity by a maintenance company. Lendlease will make an additional £13.5 million in Community Infrastructure Levy contributions and £1.1 million in S106 for community infrastructure priorities. Additional S106 obligations include off-site landscaping works, highway works and a car club.
- v) Community Consultation
- 3.79 One of the determinants of positive mental health is a sense of agency i.e. a sense of being in control of one's life and environment gained by being able to act independently and make choices. This includes being able to have a say in and influence decisions in your neighbourhood. Social participation and social support are associated with reduced risk of common mental health problems and better self-reported health<sup>42</sup>. Effective community consultation is therefore an integral part of building sustainable and healthy communities.

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<sup>42</sup> Mental Health Impact Assessment Toolkit Chapter 2



3.80 Between August 2014 and March 2015, Soundings carried out a process of community consultation to gather local knowledge and ideas. This looked at how the area is changing and the key issues facing the future of the Site and the neighbourhood. Key issues for the community are set out in Section 3 of the *Design and Access Statement* and in the *Statement of Community Involvement* that accompanied the planning application. These included:

- local employment opportunities
- provision of workspace including affordable workspace
- small-scale retail provision
- protection of the Victoria Public House
- traffic, transport and parking management
- Surrey Canal Park and other green infrastructure
- air pollution and environmental sustainability.

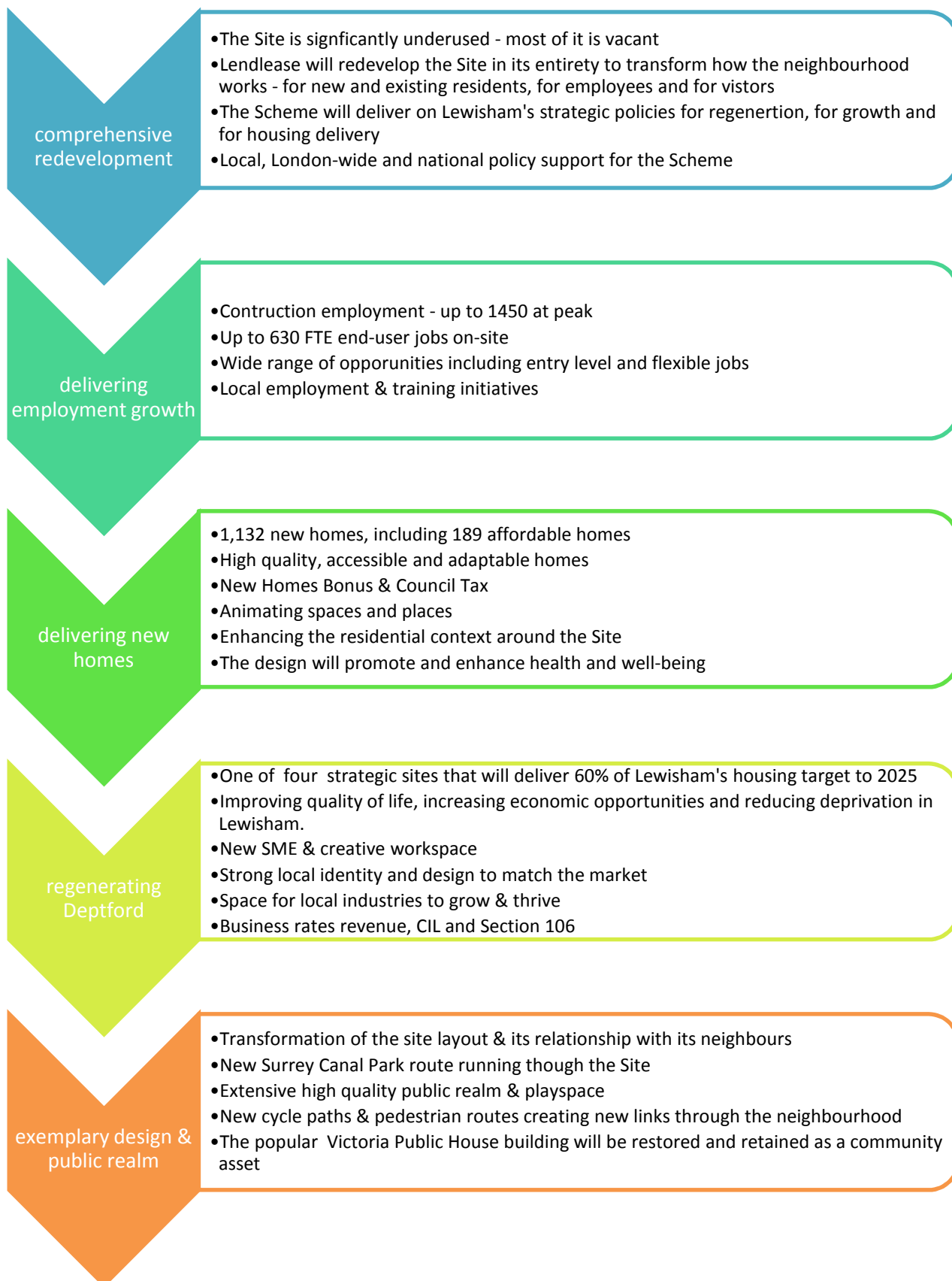
3.81 Lendlease and their Masterplanning team have listened to and responded to the views of local residents and organisations alongside those of statutory consultees such as the Greater London Authority, Lewisham Council and Transport for London. Some of the key initiatives respond to local concerns and will help the Scheme to be a sustainable and healthy community. Full details are provided in the *Design and Access Statement* that accompanied the planning application.

j) **Conclusion**

- 3.82 The Scheme will make a significant and lasting contribution to the regeneration and growth ambitions of both Lewisham and the Mayor of London for the Site.
- 3.83 As one of four Strategic Development Sites, a Mixed Used Employment Area, a Regeneration and Growth Area and part of the Mayor's Opportunity Areas, the Site has been identified multiple times as an important opportunity to deliver new homes, promote growth, create new jobs, and to address deprivation and social exclusion.
- 3.84 Through its design, layout and its mix of uses - including affordable housing, community and employment uses – the Proposed Development would transform the Site and the neighbourhood around it.
- 3.85 The Scheme will create homes for around 1,920 people, construction jobs for up 1,450 people at the construction peak and up to 630 FTE permanent jobs (a net increase of up to 380 FTE on-site). In reality, with part-time and flexible working, the number of people working within the Scheme could be substantially higher. The Scheme would also generate financial benefits for the local area and local government in the form of spending on goods and services, Council Tax, New Homes Bonus and business rates.
- 3.86 Any part of this development coming forward would bring beneficial effects of investment, new homes and new jobs. However, as Lewisham itself has indicated throughout its relevant policies, it is the Site's size and shape as a whole that give it the true potential for regeneration effects. The critical mass that can be achieved through delivery of the Scheme is required to sustain a thriving business hub and the local shops and facilities to support the new community of residents and workers. The new link routes and open spaces work to change the layout and functionality of this neighbourhood, creating a better public realm for all residents and visitors. These benefits will not be achieved without comprehensive redevelopment.
- 3.87 The Site is located in a position where it could provide a critical link between other major regeneration sites in the borough and the neighbouring London Borough of Southwark. By changing the way people move around the Site, by opening up new routes with active frontages and open



spaces and by creating a new animated thoroughfare, the character and geography of this space will change, to the benefit of all the new developments and to existing residents.



## 4 EQUALITIES IMPACT ASSESSMENT

### k) Introduction

#### Policy context and objectives

- 4.1 This Section considers the impacts of the Scheme in the context of the Equalities Groups and Protected Characteristics as defined by the Equality Act 2010.
- 4.2 The Equality Act 2010 forms the basis of anti-discrimination law within Great Britain. The Act replaces the Equal Pay act 1970, Sex Discrimination Act 1995, Race Relations Act 1976, Disabilities Discrimination Act 1995, Employment Equality (Religion or Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003 and Employment Equality (Age) Regulations 2006 in the aim of simplifying and codifying these Acts and Regulations. Section 149 of the Act requires public authorities to have due regard to equality considerations when exercising their functions.
- 4.3 The Protected Characteristics, as defined by the 2010 Act are:
- Age
  - Disability
  - Gender reassignment
  - Marriage and civil partnership
  - Pregnancy and maternity
  - Race
  - Religion and belief
  - Sex
  - Sexual orientation

4.4 The main objective of EqlA has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the target groups identified above. This EqlA sets out information to assist Lewisham and the Secretary of State and Planning Inspector appointed by the Secretary of State in considering their public sector equality duty as set out in the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to a number of equality considerations when exercising their functions. The aim of this assessment is to assist the decision-maker in this duty by presenting the relevant information relating to the project.

#### Identifying impacts

4.5 In the context of a planning application many of the impacts are inherently challenging to define or quantify.

4.6 The physical characteristics of the buildings may impact certain protected characteristics through the design of the built environment. Other equalities impacts would depend on the future use of these building and the actions of the occupiers.

4.7 Nonetheless, there are certain aspects of the Proposed Development that may have impacts on particular equalities target groups e.g.:

- impacts of design on accessibility for those with impaired sensory functions or mobility; and,
- creation of employment opportunities which could benefit target groups.

4.8 While the scale and significance of these impacts cannot be specifically quantified, the direction of the impacts can be considered (whether they are positive, negative or neutral).

#### Supporting information

4.9 The planning application that was submitted for the Scheme in 2015 was accompanied by a suite of documents including an *Environmental Impact Assessment*, a *Health Impact Assessment* and a *Draft Construction Environmental Management Plan*. The potential impacts of the Scheme on local communities, human health and the local economy and business have been considered in full within this assessment.

4.10 The submitted *Design and Access Statement* sets out the design features which have been considered as part of the applications to ensure the built environment and public realm created by the project adheres to current legislation and design codes. Therefore, these documents should be read alongside this EqIA.

**l) Assessment of potential impacts**

*i) Construction*

4.11 The seven year construction period has the potential to lead to effects on amenity for local residents, employees or visitors e.g. noise, dust, poor air quality and disruptions to access routes. Some of these effects could disproportionately affect Protected Groups in the absence of appropriate mitigation, particularly older people and disabled people (including those with life-limiting illnesses).

4.12 The effects of construction will be managed and mitigated through mechanisms set out in the *Draft Construction Environmental Management Plan* (September 2015) and through condition of the Planning Permission (DC/15/92295 Condition 41).

4.13 Stage One Enabling Works will be carried out in accordance with this CEMP (2015). All further works will be subject to a full *Construction, Environmental and Transport Management Plan* which will need to be submitted and approved by Local Planning Authority.

4.14 These Management Plans cover the following issues:

- details of hours of works;
- dust mitigation measures including details of the specification, methodology and location for noise and dust monitoring and how data will be used to manage work on site to minimise impacts on surrounding neighbours;
- the location and operation of plant and wheel washing facilities;
- details of best practical measures to be employed to mitigate noise (including noise mitigation relating to on-site crushing) and vibration arising out of the construction process;

- Details of construction traffic movements including cumulative impacts which shall demonstrate the rationalisation of travel and traffic routes to and from the Site; full details of the number and time of construction vehicle trips to the Site with the intention and aim of reducing the impact of construction related activity; measures to deal with safe pedestrian movement;
- construction logistics and appropriate measures to control the potential effects of the construction process on the wider road network and environment;
- Security Management (to minimise risks to unauthorised personnel);
- an Emergency Evacuation Plan for construction workers at the site, in the event of on-site flooding;
- Details of the training of site operatives to follow the Construction Management Plan requirements;
- Details of site hoarding of approximately 2.5m in height (with reinforcement along Oxestalls Road) to be erected around the perimeter
- Save for works that have first been agreed by the local planning authority in writing, no demolition or construction works shall be undertaken outside the following hours:
- Monday to Friday - 08:00 to 18:00
- Saturday - 08:00 to 13:00
- Sundays and Bank Holiday - No Work

4.15 The Site will be registered with Considerate Constructor's Scheme (CCS). Lend Lease Construction will register the project and adopt an independently assessed voluntary code of practice covering issues such as environmental awareness, relations with the public, site welfare and safety of those on and off site.



4.16 Any effects on amenity will be temporary. These effects will be monitored and minimised or mitigated throughout the construction period, including those issues which may disproportionately affect Protected Groups. A summary of this assessment is presented below.

<p><b>Potential effects on Protected Groups or Protected Characteristics</b></p>	<p>Temporary effects of construction in particular - amenity, noise, access routes – that may affect older people and disabled people (including those with life-limiting illnesses) if not managed or mitigated adequately.</p>
<p><b>Scheme Assessment</b></p>	<p>Potential effects will be monitored and minimised or mitigated throughout the construction period.</p> <p>Stringent monitoring and management is secured as a Planning Condition and through the CETMP including:</p> <ul style="list-style-type: none"> <li>• Dust &amp; air quality</li> <li>• Noise</li> <li>• Hours of operation</li> <li>• Traffic and transport</li> <li>• Hoarding</li> <li>• Site Safety</li> </ul>

ii) Delivery of new housing

4.17 Access to affordable, good quality housing is essential for building sustainable communities, reducing pressure on housing waiting lists and 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.

4.18 The Marmot Review into Health Inequalities (2010) identified that bad housing conditions – which also includes factors such as homelessness, temporary accommodation, overcrowding, tenure 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. Delivering affordable, well-designed housing is a key element in reducing health inequalities, particularly for vulnerable groups.

4.19 In order to deliver homes that are appropriate for the needs of these groups, the *Design and Access Statement* sets out how Lendlease and their design team considered the requirements of all users, including:

- People with mobility impairments
- People with visual impairments
- Deaf people
- Older people
- Small children.

4.20 The proposals are reviewed against the relevant regulations and standards that apply, as identified in *Appendix 1 of the Design and Access Statement*.

4.21 The proposals demonstrate that a good level of inclusive design will be achieved in the Scheme by compliance with the requirements of:

- SELHP Wheelchair Housing Design Guidelines/ Lifetimes Homes/ Building Regulations Part M
- British Standards where applicable
- Local, London and national planning policies as applicable.

4.22 At least 10% of all units provided across all tenures will be Wheelchair Housing Units meeting the requirements set out in Schedule 2 of the Section 106 Agreement (23 March 2016).

4.23 The Shared Ownership and Market tenure wheelchair accessible units will only be sold in accordance with a Wheelchair Units Marketing Strategy which will be agreed between Lewisham and Lendlease. This will secure a minimum 6-month period of dedicated marketing to ensure that these units are

prioritised for wheelchair users (see Schedule Two: Affordable Housing of the signed Section 106 Agreement).

- 4.24 Overall, the design standards will anticipate the needs of current and future residents and visitors. This will have an overall positive effect on the lives of these people and households, including those with Protected Characteristics.
- 4.25 Affordable rented units will be allocated subject to the legal protections in equalities applied by the Local Authority or commissioned housing management company under the Housing Act and Lewisham’s Housing Allocation Scheme Policy. In accordance with Lewisham’s Housing Allocations Policy, new affordable housing can be prioritised for people and families with priority needs such as those at risk of violence or serious ill-health, those in very overcrowded homes older people and single parents and families with children. 189 new affordable homes will reduce some pressure on housing waiting lists alleviating problems faced by residents with protected characteristics.
- 4.26 Whilst not discriminating in favour of any particular group, the allocation of affordable rented housing to reflect need would be expected to offer significant benefits to those who suffer disproportionately from housing need and would be expected to have a beneficial effect on alleviating the housing problems faced by some residents in Protected Groups.

<p><b>Potential effects on Protected Groups or Protected Characteristics</b></p>	<p>Delivery of new homes can help to improve access to good quality housing for local residents overall and in particular some vulnerable groups with Protected Characteristics. This effect would be long-term.</p>
<p><b>Scheme Assessment</b></p>	<p>The Scheme would deliver 1,132 new homes including 189 affordable homes. Homes and neighbourhoods have been designed to be Lifetime Neighbourhoods that are accessible and/or adaptable. Social homes will be subject to legal protections on lettings so as not to discriminate against any groups</p> <p>The allocation of affordable rented housing to reflect need would be expected to offer significant benefits those who suffer disproportionately from housing need including those in Protected Groups.</p>

iii) Local Businesses

**Loss of employment opportunities**

- 4.27 Access to employment and services is essential for the maintenance of a sustainable communities. Loss of local employment opportunities or services may disproportionately affect vulnerable groups who may find it harder to secure jobs or to travel to work.
- 4.28 The Site did support commercial and industrial buildings of c. 19,633m<sup>2</sup> (GEA) across A1, A3, B1, B2, B8, C3, and Sui Generis Use Classes. Historically, the Site was made up of five wharves – Crown Wharf, New Baltic Wharf, Victoria Wharf, Park Wharf and Bridge Wharf, along with a petrol filling station, a vacant public house ('The Victoria'), a car wash, a single residential dwelling and some small scale retail buildings. Much of the disused space has already been demolished under the Planning Permission of March 2016.
- 4.29 Displacement of current occupiers of industrial units and commercial activity on the Site through CPO and other purchase may lead to equalities impacts where/if business owners include those with Protected Characteristics and are required to move off-site and lose local ties.
- 4.30 A significant proportion of the site is now vacant. Quod understands that the remaining leases/tenants whose interests are the subject of the CPO are:
- Spaces Personal Storage Limited;
  - Safestore Personal Storage Limited;
  - Shell U.K. Limited; and,
  - Veolia ES (UK) Limited.
- 4.31 Based on the nature of the businesses on-site, there is no reason to believe that there will be a differential or disproportionate effect on people with Protected Characteristics with respect to owners, employees. Service users (customers or clientele) of existing businesses are dealt with in the following section, Community, health and wellbeing.

4.32 Lendlease has informed all of the existing tenants of the planning application process, and the likely timescales for the relevant phase that their units fall within to ensure that they can manage their business and property matters.

4.33 Lendlease has - and will continue to - engage with both tenants and land owners to inform them of the proposed time frame of development. All details of discussions with owners and tenants relating to relocation have been set out in the Acquisition Report.

#### Creation of employment opportunities

4.34 The new floorspace will generate employment on-site – between 460 and 630 Full Time Equivalent Jobs (a net increase of up to 380 on-site).

4.35 Delivery of this new floorspace would support demolition and construction employment. At peak, up to 1,450 jobs could be supported – although not all of these jobs would be on-site. Typically, on-site employment is considered to be around half of the total employment but this depends on construction methods and materials.

4.36 As set out in the Regeneration Section of this Report, jobs at the Scheme could provide specific opportunities for:

- Young people under 25
- People who want part time jobs to work around family care or study, particularly women
- People with entry level skills and experience and those coming back to work from unemployment.

4.37 Some protected groups may be unevenly represented in terms of barriers to accessing work, skills and qualifications. These barriers include language, cultural factors, family requirements and the need for flexible and/or part-time work. Young people, older people, family carers and ethnic minorities have disproportionate challenges accessing employment.

4.38 Black and Minority Ethnic (BAME) groups account for a disproportionately high proportion of London's job seekers - two thirds of all job seekers are from ethnic minorities (London's population is 40%

BAME). In Lewisham, Black African, Caribbean and Black British residents are particularly over represented amongst the unemployed.

- 4.39 There are also inequalities in terms of gross earnings between Lewisham and London and between men and women – with earnings lower in Lewisham than the London average and women earning on average less than men.
- 4.40 Therefore, the opportunities that will be created by the Scheme could align with the employment needs of local residents including those in Protected Groups.
- 4.41 In addition, Lendlease has committed, via a Section 106 agreement and a 'Local Labour and Business Strategy' to support local people and enterprises into work at the Scheme.
- 4.42 The recruitment for new jobs created during either construction or in the completed development would be required to be based on a non-discriminatory basis in accordance with legal requirements of Part 2 and Part 5 of the Equality Act 2010. This includes the legal obligation not to discriminate on the basis of age, disability, gender reassignment, pregnancy and maternity, race, religious belief, sex or sexual orientation.
- 4.43 As such, the proposals offer the opportunity to provide significant benefits to Protected Groups through the creation of jobs that meet a range of skill profiles and flexibility needs. These benefits will be enhanced through committed brokerage schemes tailored to support local people into employment.

<p><b>Potential effects on Protected Groups or Protected Characteristics</b></p>	<p>Creating new jobs provides social and economic benefits to current and future residents and can be enhanced to improve employment and skills opportunities of all Protected Groups.</p>
<p><b>Scheme Assessment</b></p>	<p>The Wharves is a long term project that will:</p> <ul style="list-style-type: none"> <li>• Support construction jobs</li> <li>• Support up to 630 operational (long term) jobs (a net increase of up to 380 on-site)</li> <li>• Support long-term employment opportunities that are part-time, flexible and/or suitable for people with few formal qualifications and those returning to work after a period of unemployment</li> <li>• Work with Lewisham to support local people and businesses to access new opportunities at the Scheme</li> </ul> <p>All employment on-site will be required to adhere to anti-discrimination laws set out in the Equality Act 2010.</p> <p>Loss of business on-site is not expected to disproportionately or differentially affect Protected Groups.</p>

iv) Community, health and wellbeing

4.44 One priority for planning community facilities is to ensure essential neighbourhood services can be accessed by all new residents. This may be especially important for hard to reach groups and those who may be less able to engage with local services. This may include groups with Protected Characteristics especially children, older people and disabled or people with life-limiting illnesses.

- 4.45 Provision of and access to good quality public services, including recreation facilities and neighbourhood retail can help to support the health and well-being of the local residents. It can also promote an active street life and foster a sense of community. This can help to tackle existing inequalities and make it easier to live a healthy lifestyle, especially for those for whom accessing these facilities can be challenging.
- 4.46 New residents on-site will need good access to new neighbourhood facilities as well as to wider strategic infrastructure. The creation of additional homes and therefore occupation of the Site by families with young children will create an impact on education and childcare capacity locally.
- 4.47 Based on the nature of the businesses on-site, there is no reason to believe that there will be a differential or disproportionate effect on people with Protected Characteristics with respect to service users (customers or clientele) of these businesses.
- 4.48 The Scheme will include 3,571m<sup>2</sup> GIA of flexible floorspace that could provide community floorspace or neighbourhood retail including, for example:
- coffee shops & cafes
  - a local convenience store
  - supporting retail units e.g. hairdressers / cycle shop / drycleaners
  - gallery / exhibition space supporting the commercial space
  - potential micro-brewery in the existing Victoria Pub
  - crèche or similar facility.
- 4.49 Lendlease is aware of the planned closure of the Sure Start facility in close proximity to the Site, an example of how change has occurred since the 2012 scheme obtained consent. As such Lendlease will investigate whether a crèche or similar facility can be incorporated into the development should



sufficient demand be created through the closure of this facility and the delivery of the Proposed Development<sup>43</sup>.

- 4.50 In addition, Lendlease will contribute £13.5 million in Community Infrastructure Levy contributions. Within Lewisham, this will provide for education, health and other local community facilities, wider transport initiatives, open space and allotments, flood management or emergency services according to Lewisham’s priorities. Approximately £4 million of this CIL will go to the Mayor of London to support Crossrail.
- 4.51 Through agreed on-site provision and through financial contributions, any potential negative effects with respect to access to community facilities would be mitigated. Additionally, by creating affordable housing, on-site neighbourhood facilities and significant open space and playable space in a safe, accessible environment, the Scheme could help to support the needs of new residents including those with Protected Characteristics.

<p><b>Potential effects on Protected Groups or Protected Characteristics</b></p>	<p>Access to community facilities must be taken into account when planning new housing developments to ensure that new residents can access the services they need for their health and wellbeing. This may be especially important for hard to reach groups and those members of the community who may be less able to engage with local services.</p>
<p><b>Scheme Assessment</b></p>	<p>By creating affordable housing, on-site neighbourhood facilities and significant open space and playable space in a safe, accessible environment, The Scheme could help to support the needs of new residents including those with Protected Characteristics.</p> <p>Based on the nature of the businesses on-site, there is no reason to believe that there will be a differential or disproportionate effect on people with Protected Characteristics with respect to service users (customers or clientele) of the businesses on-site.</p>

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<sup>43</sup> Lendlease, 2015, The Wharves, Deptford, Commercial Strategy p.19

v) Design and public space

4.52 The Scheme has been designed in line with Lifetime Neighbourhood principles. These aim to create sustainable communities by designing places that are accessible, inclusive and safe. Good design responds to current needs as well as allowing for potential demographic changes such as a future increase in older people. Further detail about the design and accessibility of the Scheme is set out in the *Design and Access Statement*.

4.53 The Scheme will increase the amount of accessible space in the local area, including accessible employment space, shops, open spaces and public realm. This will help all residents, employees and visitors to feel safe and to travel independently. This will be especially helpful for those with Protected Characteristics such as disability and for older people.

vi) Transparency and public engagement

4.54 The Statement of Community Involvement sets out the full details of the consultation and engagement process that was undertaken between August 2014 and March 2015.

4.55 Forms of consultation included newsletters, posters, flyers, a website, one-to-one sessions with local Stakeholders, group sessions with the community and local public events. This consultation took account of views from a wide range of community groups and interested parties including youth groups and advocates; the Lewisham Indochinese Community Centre and FORVIL (Federation of Refugees from Vietnam in Lewisham). A full list of consultees is set out in Appendix C of Lewisham's the Statement of Community Involvement.

4.56 Over the course of the consultation process, Lendlease and the Masterplanning team have listened to and responded to the views of local residents and organisations alongside those of statutory consultees such as the Greater London Authority, Lewisham and Transport for London.

vii) Conclusion

4.57 The Scheme has been planned and designed to provide an inclusive environment. Overall it has been assessed that the Scheme would not have a negative impact on protected groups or characteristics. The delivery of homes, employment space, public realm and neighbourhood facilities will have

beneficial effects on the local community of existing and new residents, employees and visitors, including those with Protected Characteristics.

4.58 The Table below summarises the potential impacts affecting each protected characteristic as defined by the Equality Act 2010.

**Table 2: Summary of Equalities Impact**

Characteristic	Impact	Reason
Age	Positive	Inclusive and accessible design principles have been built in to ensure people of all ages with mobility restrictions can use the new facilities with ease.  Employment on-site could provide opportunities including those that are suitable for young people who may be NEET.
	Neutral	Employment supported at the Scheme will be required to adhere to anti-discrimination laws with respect to age as set out in the Equality Act 2010.  Loss of businesses on-site will not disproportionately or differentially impact on Protected Groups,
Disability	Positive	Inclusive and accessible design principles have been built in to ensure people with mobility restrictions can use the new facilities with ease.
	Neutral	Employment created by the Scheme will be required to adhere to anti-discrimination laws with respect to disabilities as set out in the Equality Act 2010.  Loss of businesses on-site will not disproportionately or differentially impact on Protected Groups.
Gender reassignment	Neutral	Employment created by the Scheme will be required to adhere to anti-discrimination laws with respect to gender reassignment as set out in the Equality Act 2010. Loss of businesses on-site will not disproportionately or differentially impact on Protected Groups.
Marriage & civil partnership	No impact	Not applicable
Pregnancy & maternity	Positive	Inclusive and accessible design principles have been built in to ensure people with mobility restrictions can use the new facilities with ease. This could include pregnant women and women with young children.  The playspace and public realm has been designed to provide safe, fun and accessible space for children and their parents.
	Neutral	Employment on-site could provide opportunities that are particularly suitable for parents balancing work and childcare.  Employment created by the Scheme will be required to adhere to anti-discrimination laws with respect to pregnancy and maternity as set out in the Equality Act 2010.

Characteristic	Impact	Reason
		Loss of businesses on-site will not disproportionately or differentially impact on Protected Groups.
Race	Neutral	Employment created by the Scheme will be required to adhere to anti-discrimination laws with respect to race as set out in the Equality Act 2010. Loss of businesses on-site will not disproportionately or differentially impact on Protected Groups.
Religion or belief	Neutral	Employment created by the Scheme will be required to adhere to anti-discrimination laws with respect to religion or beliefs as set out in the Equality Act 2010. Loss of businesses on-site will not disproportionately or differentially impact on Protected Groups.
Sex	Neutral	Employment created by the Scheme will be required to adhere to anti-discrimination laws with respect to sex as set out in the Equality Act 2010. Loss of businesses on-site will not disproportionately or differentially impact on Protected Groups.
Sexual orientation	Neutral	Employment created by the Scheme will be required to adhere to anti-discrimination laws with respect to sexual orientation as set out in the Equality Act 2010. Loss of businesses on-site will not disproportionately or differentially impact on Protected Groups.