



**EQUALITIES STATEMENT
ADDENDUM**

**ELEPHANT AND CASTLE SHOPPING
CENTRE**

**ELEPHANT AND CASTLE PROPERTIES
CO. LTD**

July 2017

Our Ref: Q70331

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FOREWORD

This Equalities Statement has been prepared by Quod to accompany the application for planning permission submitted on behalf of Elephant and Castle Properties Co. Limited (hereafter referred to as the ‘Applicant’) for the proposed Elephant & Castle Town Centre development (hereafter referred to as the ‘Proposed Development’).

Full planning permission (ref. 16/AP/4458) is sought for the phased mixed use redevelopment of Elephant and Castle Shopping Centre site (hereafter referred to as the ‘East Site’) and the London College of Communication (LCC) site (hereafter referred to as the ‘West Site’). The East and West Sites comprise the overall ‘Application Site’. The Application Site is 3.56 hectares (ha) and is located within the London Borough of Southwark (LBS).

The proposed Description of Development is as follows (hereafter referred to as the ‘Planning Application’):

“Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (Use Class C3), retail (Use Class A1-A4), office (Use Class B1), education (Use Class D1), assembly and leisure (Use Class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.”

Alongside the Planning Application, an associated listed building consent application is submitted in relation to minor works proposed to the Grade II listed Metropolitan Tabernacle, associated with the redevelopment of the West Site.

1 INTRODUCTION

- 1.1 This Addendum to the Equalities Statement (EqS) has been prepared and submitted by Quod, on behalf of Elephant and Castle Properties Co. Limited ('The Applicant').
- 1.2 The purpose of this Addendum is to provide additional information in relation to the EqS submitted alongside the Planning Application (ref. 16/AP/4458) in order to assist Southwark Council to carry out their duty under Section 149 of the Equality Act 2010 in determining the Planning Application.
- 1.3 The EqS submitted alongside the Planning Application considered the potential loss of the existing uses on site as well as the potential effects of the Proposed Development on equalities.
- 1.4 This Addendum focuses on the potential effect of the displacement of The London Palace Bingo Hall (hereafter referred to as the "Bingo Hall"), and is based on information gathered from a survey AECOM undertook in 2017 on behalf of Southwark Council. The Bingo Hall was selected for an additional survey as this use was identified as having a customer base with protected characteristics as defined by the Equality Act. Other existing leisure uses on site such as the Coronet and the London Palace Superbowl were not identified as having any particular sensitive characteristics over and above those considered in the EqS in relation to the overall loss of existing uses.
- 1.5 In addition this Addendum provides additional information on the proposed Local Business Support & Relocation Strategy (hereafter referred to as the 'Strategy') which sets out the mitigation measures which will be put in place to support existing occupiers, including any with specific protected characteristics such as the Latin American Business cluster on the site.
- 1.6 This work should be read alongside the EqS as submitted with the planning application in 2016.

2 EQUALITIES POLICY AND DUTY

a) Equality Act

2.1 The Equality Act 2010 forms the basis of anti-discrimination law within Great Britain. Section 149 of the Act requires public authorities to have due regard to a number of equality considerations when exercising their functions including decision making on planning applications. These include the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

2.2 The Equality Act 2010 sets out a list of protected characteristics which prioritise particular characteristics aimed to reduce socioeconomic inequalities, which are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

2.3 The main objective of the duty has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the protected characteristics identified above.

2.4 There are no statutory or regulatory requirements for the form or content of an Equalities Assessment. A growing body of recent practice in EqS has been to categorise equalities impacts into Disproportionate and Differential. Some effects of development will affect many users – residents, customers, visitors, employees – including many with protected characteristics. This is not necessarily an equalities issue, but it may become one when any adverse effect on those with protected characteristics is Disproportionate or Differential, as explained below:

- Disproportionate: there may be a disproportionate equalities effect where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population.
- Differential: there may be a differential equalities effect where people with a protected characteristic are affected differently to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.

2.5 The scale and significance of such impacts cannot always be quantified, and it is common for EqS to address this through descriptive analysis of impacts, and identifying whether such impacts are adverse or beneficial.

2.6 In the context of a planning application, certain impacts are inherently more difficult to define or quantify. The physical characteristics of the buildings that are subject to the Planning Application may impact certain protected characteristics. Other equalities impacts would depend on the future use of the buildings and the actions of the occupiers and the users, not all of which can be determined or controlled through the planning process.

2.7 Nonetheless, there are certain aspects of the Proposed Development that may have impacts on particular equalities protected characteristics, in particular:

- Disabilities, Age and Pregnancy and Maternity – impacts of design on accessibility for those with impaired sensory functions or mobility; and
- Disabilities, Age, Gender reassignment, Sexual Orientation, Pregnancy and Maternity, Sex Religion and Belief and Race – creation of employment



opportunities or provision of services which could benefit individuals or groups of protected characteristics.

- 2.8 Marriage and civil partnership are not considered relevant to this type of project as the potential effects arising from the Proposed Development are not relevant to an individual's marital status.
- 2.9 While the scale and significance of these effects cannot be meaningfully quantified, the direction of the effects can be qualitatively considered (whether they are positive, negative or neutral). This EqS will aid the council in making this assessment of impact by setting out the potential equalities effects arising from the Proposed Development.

3 SURVEY RESULTS & BASELINE

- 3.1 AECOM undertook an additional customer survey of the Bingo Hall in February 2017. This survey was to provide further information to supplement the equalities analysis survey of the Elephant and Castle Shopping Centre which was undertaken between March and June 2016.
- 3.2 The original equalities analysis survey (March – June 2016) considers the potential effects of the redevelopment of the Shopping Centre upon customers and businesses. The findings of the survey informed the Equalities Statement which was submitted as part of the Planning Application in 2016.
- 3.3 This additional survey and Addendum consider the potential effects of the displacement of the Bingo Hall on the local community.

a) **The Bingo Hall**

- 3.4 The Bingo Hall occupies the first floor of the Shopping Centre. This is one of the UK's largest bingo venues, the hall has capacity to accommodate 2,000 bingo players. The hall is open seven days a week.

b) **The Survey Results**

- 3.5 The survey was undertaken in February 2017 and 138 customers were interviewed. As with the original equalities analysis survey, a series of questions were asked to ascertain attitudes towards the proposed redevelopment of the site along with some supplementary demographic questions.

i) **Profile of Customers**

- 3.6 Of those interviewed, 63% were residents of Southwark, 11% from elsewhere in South London, 22% elsewhere in Greater London and 4% living outside London. The survey results show that of those interviewed many are regular customers. 82% of participants visit the hall twice a week, with 36% visiting five days of the week or more.
- 3.7 A question regarding reasons for visiting the hall illustrates how this leisure use may have a social benefit for the community. Whilst 58% of respondents said their reason for visiting the hall was

to win money or play bingo, 37% recorded their reason for visiting the hall as being to get out of the house or socialise.

3.8 The gender breakdown of the respondents suggests that there is a larger proportion of women using the Bingo Hall. 59% of those interviewed were woman and 41% were men. This difference is slightly larger than would be accounted for by the age profiles alone.

3.9 The age of those interviewed shows that the Bingo Hall has an older demographic of users.

- Over 75 years – 22%
- 65 – 74 years – 26%
- 55 – 64 years – 28%
- 45 – 54 years – 15%
- 25 – 44 years – 10%.

3.10 Almost half of respondents are retired (49%), with 7% unemployed, 22% in part time employment and 19% full time employment (with an additional 3% reported as either medically retired or working as volunteers).

3.11 The ethnicity of the sample of bingo users shows that there is a large Black Asian Minority Ethnic (BAME) community that are customers of the Bingo Hall. The ethnic breakdown of those interviewed is as follows:

- Black Caribbean – 62%
- Black African – 6%
- Other Black ethnicity – 2%
- White – 24%
- Asian – 2%

- Latin American/ Hispanic – 1%
- Mixed/ multiple ethnic group – 3%

3.12 In terms of religious beliefs, the majority of respondents (91%) were Christians. A further 7% stated they had no religion, whilst 1% stated Hinduism, 1% Islam and 1% preferred not to say¹.

ii) Attitudes Towards Redevelopment Proposals

3.13 Over two thirds (69%) of those interviewed were aware of the planned redevelopment of the Elephant and Castle shopping centre. 30% of respondents supported the redevelopment plans

3.14 Of those who said they supported the redevelopment plans, 46% said they didn't want to lose the Bingo Hall and that it should be retained or relocated. 22% of those who supported the redevelopment said that regeneration would be beneficial for local people by improving housing and bringing more jobs.

3.15 A third of respondents were opposed to the redevelopment proposals, as well as another quarter who had reservations. The most common reason given for opposing the proposals was that they didn't want to see the Bingo Hall lost and felt it should be retained or relocated (NB. 83.4% of all respondents who completed questionnaires at the 2nd public exhibition, prior to submission of the Planning Application, either strongly supported or supported the redevelopment plans).

3.16 Those interviewed were asked what the potential impacts of the redevelopment would be on bingo users. A significant proportion of respondents expressed concern over the potential loss of the Bingo Hall. Responses included the following:

- Will be very upset/ don't want the bingo to close – 41%
- Leaves us with nowhere to go/ place for old people – 21%
- Will they keep the bingo/ will it be closed – 17%

¹ Figures do not sum to 100% due to rounding.

- People can use other bingo places/ I will go elsewhere – 9%
- Will the Palace Bingo relocate to somewhere else/ accessible venue – 4%
- Need to develop a new bingo place – 2%

3.17 Respondents were asked what retail or leisure facilities they would like to be included within the redevelopment. A large proportion suggested a bingo facility, 79%.

iii) Summary of survey results

3.18 It is clear from the survey that there is concern over the loss of the Bingo Hall. The sample of Bingo Hall customers surveyed showed that there are a number of protected characteristics as defined by the Equality Act which are disproportionately represented.

3.19 In particular potentially sensitive groups could include elderly people and ethnic minorities. The Bingo Hall is well used by older residents as place to socialise and engage with the wider community.

4 EQUALITIES STATEMENT

a) The Scheme

- 4.1 The Proposed Development will include the demolition of all existing buildings and construction of a range of uses including residential units, retail, office, education, assembly and leisure. The Proposed Development will also include a new Northern Line Station Entrance and Station Box for the London Underground operational railway station.
- 4.2 The Proposed Development will form an integral part of Southwark's regeneration and support the development of a new town centre at Elephant and Castle. The vision and ambition of the development is to become a new zone 1 destination and focal point for the local community. The benefits of the Proposed Development and an explanation of how it complies with relevant planning policies is set out elsewhere in the Planning Application.

b) Loss of Existing Uses

- 4.3 The Bingo Hall will be displaced as part of the redevelopment proposals.
- 4.4 The Proposed Development includes the provision of replacement leisure floorspace, however, this will have another leisure use and will not replace the existing Bingo Hall. It is anticipated that the proposed leisure floorspace would accommodate a cinema and a music venue.

c) Potential Equalities Impact

- 4.5 As previously set out, the Bingo Hall provides leisure facilities for a number of protected characteristics including elderly people and ethnic minorities.
- 4.6 The Bingo Hall provides this demographic with a means of socialising and is regularly attended by users throughout the week.
- 4.7 The displacement of this facility could have an adverse effect on these people. It is considered that this would have a differential effect on elderly people due to the age profile of the customer base for the Bingo Hall. It would have a disproportionate effect on ethnic minorities because of the particular mix of customers of this bingo hall.

d) **Recommendations**

- 4.8 It is recommended that, when considering the Planning Application, Southwark Council considers the potential effects of the Proposed Development on those with protected characteristics as defined under the Equality Act 2010.
- 4.9 When doing this, the Council should give due regard to equality considerations (see paragraph 2.1) and attribute appropriate weight to such considerations. Equalities impacts should be a consideration in the balance when determining the Planning Application, alongside the benefits arising from the Proposed Development.
- 4.10 The Council should also consider appropriate mitigation to minimise the potential effects of the Proposed Development on those with protected characteristics.
- 4.11 The Applicant is committed to agreeing the terms of a Local Business Support & Relocation Strategy (the 'Strategy') to assist existing occupants, secured via a Section 106 legal agreement. The Strategy is comprised of the following commitments which will be delivered/ funded by the Applicant, of which the following elements could be relevant to the operator of the Bingo Hall:
- **Business support and relocation advisor** – this will be an independent advisor who will support existing occupiers in their search for alternative premises. This will include facilitating access to surveyors, solicitors, accountants and other specialist;
 - **Database of relocation opportunities** – the applicant will maintain a database of vacant units within Elephant and Castle and the Walworth Area
 - **Commitment to inclusive operation of the development post completion to provide opportunities for people with protected characteristics to use and enjoy the Elephant and Castle Town Centre.**
- 4.12 In relation to the final point, the Applicant and the Council could engage with future occupiers of the leisure uses to encourage them to develop a programme of events which would cater for elderly residents and ethnic minorities. This principle could be firmly established in the Section 106 Agreement.

- 4.13 This communication strategy should also include sufficient prior notice as to when the Bingo Hall may close. Information should be included about other similar facilities within the area, for example the Gala Bingo hall at Surrey Canal, and the Gala Bingo hall at Tooting Broadway which is accessible from Elephant and Castle via the Northern Line.
- 4.14 The Strategy also sets out the wider mitigation proposed to support the existing occupiers on the site. In addition to those outlined above the Strategy includes the following elements:
- Identification and support in accessing offsite affordable retail units – the Applicant and the Business Support and Relocation Advisor will work to facilitate the transition of qualifying tenants into the affordable retail units where possible.
 - Feasibility support for additional sites available for relocation and retailing – the Applicant will support the Council throughout their feasibility studies for Arch Street garage and the Peronet House sites as potential sites for alternative accommodation for existing Shopping Centre traders and tenants.
 - The opportunity to apply via the Advisor for a proportionate relocation contribution to assist with moving costs, legal and professional bills.
- 4.15 These measures will support the existing occupants of the Shopping Centre to help mitigate the effects of being displaced. This support will be available to all qualifying businesses including those with protected characteristics, including the Latin American Businesses and others identified within the EqS submitted alongside the 2016 Planning Application.

5 SUMMARY & CONCLUSION

- 5.1 The redevelopment of the Site will affect existing businesses and their customers who will be displaced from the Site.
- 5.2 The majority of the Bingo Hall customers are elderly and/or from BAME backgrounds. The Applicant is committed to working with the existing businesses across the Shopping Centre to ensure, where possible, they are provided with appropriate levels of assistance in order to mitigate the effect of their displacement from the Site. The Strategy is targeted towards mitigating such effects where possible.
- 5.3 A combination of differential and disproportionate effects on people with protected characteristics could occur as a result of the Proposed Development, depending on how the potential negative effects can be mitigated. Table 5.1 below summarises the potential effects of the loss of the Bingo Hall relating to each protected characteristic as defined by the Equality Act 2010. Table 5.2 sets out a full summary of the equalities effects as reports in the original EqS updated to reflect the findings of this Addendum.

Table 5.1 – Equalities Potential Effects of Loss of Bingo Hall

Characteristic	Effect	Reason
Age	Negative	Large elderly community use the Bingo Hall regularly.
Disability	Neutral	No specific effects identified
Gender reassignment	Neutral	No specific effects identified
Marriage and civil partnership	Neutral	No specific effects identified
Pregnancy and maternity	Neutral	No specific effects identified
Race	Negative	There is a high proportion of Bingo Hall customers from BAME backgrounds.
Religion or belief	Neutral	No specific effects identified
Sex	Neutral	No specific effects identified
Sexual orientation	Neutral	No specific effects identified

Table 5.2 - Equalities Potential Effects of Proposed Development

Characteristic	Effect	Reason
Age	Negative	Displacement of older business owners. Older business owners may find relocation difficult.
	Negative	Large elderly community use the Bingo Hall regularly.
	Positive	Increased access to open space and pedestrian routes will benefit older people and children.
	Positive	Upgrade to Northern Line Ticket Hall will provide a more accessible station for people of all ages
	Positive	Young people may benefit from the provision of affordable homes.
Disability	Positive	Inclusive and accessible design principles have been considered in order to ensure residents and users with mobility restrictions can use the new facilities with ease.
	Positive	10% of housing meets the M4(3) wheelchair standards
Gender reassignment	Neutral	No effects identified
Marriage and civil partnership	Neutral	No effects identified
Pregnancy and maternity	Positive	Inclusive and accessible design principles have been considered in order to ensure residents and users with mobility restrictions can use the new facilities with ease.
Race	Negative	There is a high proportion of business owners (and their employees and customers) from BAME backgrounds who will be displaced from the existing uses on-site. The effects will depend in part on mitigation and the relocation strategy.

Characteristic	Effect	Reason
	Negative Positive	There is a high proportion of Bingo Hall customers from BAME backgrounds. Increased retail employment is, on average, expected to provide a disproportionate number of jobs to local ethnic minority residents, some of whom may otherwise face barriers to employment.
Religion or belief	Neutral	There are a number of business owners from minority religious beliefs who will be displaced from the existing uses on-site. The effects will depend in part on mitigation and the relocation strategy. Effects are not expected to differ depending on religion or beliefs.
Sex	Neutral	There are no effects which have been identified.
Sexual orientation	Neutral	No effects identified