

# **CAMBERWELL UNION**

**BURGESS BUSINESS PARK  
SE5**

**EQUALITIES STATEMENT  
AUGUST 2018**



# Equalities Statement

Camberwell Union - Dunnett Investments Limited

A report by Volterra Partners, August 2018

## 1 Introduction

- 1.1 This Equalities Statement has been prepared on behalf of Peachtree Services Limited “the Applicant” to accompany a detailed application for Camberwell Union, a mixed-use development in Camberwell, London Borough of Southwark (LBS). The site includes 499 residential units, of which 173 will be affordable, and up to 4,290 sqm (NIA) of commercial space.
- 1.2 The current site is a relatively underused business park with less than 50% of the commercial space being permanently occupied. The vision for the commercial space in the Proposed Development is to create a multi sector mixed workplace environment which is open, dynamic, flexible and modern, and builds on Camberwell’s manufacturing heritage.
- 1.3 This Equalities Statement has been produced in order to assist the LBS in considering their public sector equality duty as set out in the Equality Act 2010. Section 149 of that Act requires public authorities to have due regard to a number of equality considerations when exercising their functions - including eliminating discrimination and advancing equality of opportunity between persons with a protected characteristic and persons without.
- 1.4 For the purposes of this statement, the following equality groups have been considered (according to the Equality Act 2010):
- (1) Age
  - (2) Disability
  - (3) Gender and gender reassignment
  - (4) Marriage and civil partnership
  - (5) Pregnancy and maternity
  - (6) Race
  - (7) Religion or belief
  - (8) Sexual orientation
- 1.5 The remainder of this statement is set out as follows:
- Section 2: describes the site and the Proposed Development
  - Section 3: details the policy context with regards equality groups
  - Section 4: considers equality groups in the context of the Proposed Development

## 2 Site description and Proposed Development

### The site

- 2.1 The site is located within the LBS – it is bound to the east by Wells Way, to the south by Cottage Green, to the west by Southampton Way and to the north predominantly by Parkhouse Street.

Figure 1: The site location



Source: HTA

- 2.2 The site is within a 25 minute walk from Denmark Hill Station - which offers London Overground services and trains to Victoria and Blackfriars – as well as Oval and Kennington underground stations which both have a northern line service. The area is well served by the 136 and 343 buses going both to Central London and to Elephant and Castle tube/train station (served by the Northern and Bakerloo underground lines as well as Thameslink trains).
- 2.3 The site is adjacent to Burgess Park, which is the LBS's largest park at 56 hectares. Burgess Park was built between 1950 and 1980, and recently underwent transformation in 2012. Further work is currently underway to improve the park and associated facilities.

## Changes to the area surrounding site

- 2.4 There are a number of developments being planned within the surrounding area. The most significant is the redevelopment of the Aylesbury Estate<sup>1</sup> which is a twenty year regeneration project being carried out by the LBS council. The first new homes were completed in 2012 and the council has now appointed Notting Hill Housing Trust as its Development Partner to take forward the continued regeneration of the area over the next 20 years across four phases. This will include nearly 4,000 new high quality homes (of which 50% will be affordable), new streets and squares, as well as new community and retail facilities.

## Proposed Development

- 2.5 The Proposed Development is a mixed-use scheme which will provide 499 residential units and up to 4,290 sqm (NIA) of commercial space. The description of development is as follows:

*Demolition of the existing buildings and redevelopment of the site to provide 499 residential units, up to 3,379sqm (NIA) of Class B1 commercial floorspace, up to 122sqm (NIA) of Class D2 leisure floorspace and up to 789sqm (NIA) of Class A1-A3 floorspace within 13 blocks of between 3-14 storeys, with basement, car and cycle parking and associated hard and soft landscaping*

- 2.6 The 499 residential units will range from studio flats to three-bedroom units, with 60% of units being two bedrooms or more. The scheme includes 173 affordable units (35%) of which 119 will be socially rented and 54 will be intermediate.

Table 1: Dwellings split by Tenure and Number of Bedrooms

	Studio	1	2	3	Total	
Private	23	113	121	69	326	65%
Intermediate	0	24	30	0	54	11%
Socially rented	0	41	44	34	119	24%
Total	23	178	195	103	499	100%
	5%	36%	39%	21%	100%	

- 2.7 The commercial space proposed will consist of office, retail and maker spaces. The Proposed Development will provide office space suitable for SMEs, as well as incubator and start-up space. It will also comprise suitable units for artistic and manufacturing uses. The retail space will include cafes (including a bike café) and a grocery shop. There will also be a gym/juice bar and a microbrewery onsite. It is estimated that the Proposed Development would support 290 jobs onsite in a variety

<sup>1</sup> Aylesbury Estate, Southwark, August 2017

of employment types, this is a significant increase compared to the existing employment permanently supported on site (c.135).

Table 2: Proposed Employment Generating Commercial Space by use class

Use class		NIA		Density assumed (NIA)	FTEs		Jobs
B1	Small making space	748	3,634	20m <sup>2</sup>	35	215	240
	Large making space	1,234		20m <sup>2</sup>	60		
	Office	632		12m <sup>2</sup>	55		
	Creative office	765		15m <sup>2</sup>	50		
	Microbrewery	255		20m <sup>2</sup>	15		
A1-A3	Café	135	534	20m <sup>2</sup>	5	30	35
	Retail	142		17.5m <sup>2</sup>	10		
	Bike shop/café	257		20m <sup>2</sup>	15		
D2	Gym/juice bar	122	122	30m <sup>2</sup>	10	10	15
<b>TOTAL (excluding bike &amp; bin store)</b>		<b>4,290</b>		N/A	<b>255</b>		<b>290</b>

- 2.8 The scheme intends to establish a new creative hub in Camberwell similar to those already existing in Elephant and Castle, Bermondsey and Peckham. The Proposed Development aims to create an open and dynamic workplace environment whilst preserving the area's manufacturing heritage – for example, the historic chimney will be preserved in the middle of the site.
- 2.9 There will be significant public realm investment onsite, including new routes to increase the permeability through the site and a green link between Burgess Park and neighbouring streets, thus contributing towards the wider regeneration of the area which will contribute positively to the vibrancy and perception of the place for neighbouring tenants and property owners.

### 3 Policy Context

#### Equality Act 2010

- 3.1 The Equality Act 2010 was prepared in order to protect individuals from unfair discrimination and ensure equal accessibility in terms of employment, services, education, buildings etc. The Act replaces the Equal Pay Act 1970, Sex Discrimination Act 1995, Race Relations Act 1976, Disabilities Discrimination Act 1995, Equality Act 2006 part 2, Employment Equality (Religion or Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003 and the Employment Equality (Age) Regulations 2006 and the Employment Equality (Sexual Orientation) Regulations 2007 into one overarching Act – making the law easier to understand.
- 3.2 The Act sets out a list of protected characteristics that should be considered when assessing equality issues, including:
- Age;
  - Disability;
  - Gender and gender reassignment;
  - Marriage and civil partnership;
  - Pregnancy and maternity;
  - Race;
  - Religion or belief;
  - Sex; and
  - Sexual orientation.
- 3.3 Overall, the Act mandates that public authorities shall
- Eliminate unlawful discrimination, harassment and victimisation;
  - Advance equality of opportunity between those who share a protected characteristic and those who do not; and
  - Foster good relations between communities.
- 3.4 Consideration should be given to how community and equality groups can benefit from the Proposed Development and how participation can be encouraged.

#### GLA Equal Life Chances for All (2014)

- 3.5 The GLA's Equal Life Chance for All (2014) is the equality framework for London and demonstrates a commitment to tackling inequality, improving life chances and removing barriers that prevent people from reaching their potential. For information, it should be noted that this was published under the previous Mayor (Boris Johnson) in 2014.
- 3.6 This framework is based upon the process of mainstreaming – equality must be integrated into everything the organisation does. It includes multiple equality objectives relevant to the Proposed Development:
- **Employment, pay & skills, Objective 1** - The GLA will work to ensure all Londoners have the opportunity to take part in London's economic success, access employment and progress in their careers.
  - **Regeneration, Objective 1** - Deliver regeneration projects which maximise economic and social benefits for all Londoners.

- **Housing, Objective 1** - Increase the supply of affordable housing, particularly family-sized homes.
- **Housing, Objective 2** - Raise the standard of homes and neighbourhoods. Ensure that all new homes are built to the Mayor's housing design standards, including all meeting Lifetime Homes standards and 10% being wheelchair accessible
- **Housing, Objective 3** - Enhance choice and mobility.
- **Housing, Objective 4** - Tackle housing need.

### London Plan (2016)

- 3.7 The London Plan (2016) sets out the economic, environmental, social and transport framework for development in London. It provides guidance on the future development of London, taking into consideration all the city's stakeholders.
- 3.8 Policies relevant to the Proposed Development include:
- **Policy 3.1: Ensuring equal life chances for all** - recognises the requirement to meet the needs of, and expand opportunities for, all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities. Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities.
  - **Policy 3.5: Quality and design of housing developments** - Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live.
  - **Policy 3.6: Children and young people's play and informal recreation facilities** - recognises the need to ensure that all children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision.
  - **Policy 3.8 Housing choice** - Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.
  - **Policy 4.12: Improving opportunities for all** - Strategic development proposals should support local employment, skills development and training opportunities.
  - **Policy 7.2: An inclusive environment** - requires all new development in London to achieve the highest standards of accessible and inclusive design, and supports the principles of inclusive design which seek to ensure that developments:
    - can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances;
    - are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;
    - are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways; and
    - are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.
- 3.9 A review of the London Plan is currently underway and a new (final) version is expected to be published in Autumn 2019. The draft New London Plan was published

in December 2017 and consulted upon in early 2018. Whilst it is not yet adopted, it is a material consideration. With regards equality, like the 2016 London Plan, it strongly promotes “the principle that there should be equality of opportunity for all people” and continues to have regard to the statutory obligations set out in this document.

### Planning for Equality and Diversity in London SPG (2007)

3.10 This SPG sets out some of the overarching principles that should guide planning for equality in the London context. The guidance includes several policies and objectives relevant to the scheme, namely:

- **Implementation Point 3c: Promoting equality of opportunity** - Boroughs are asked to consider how planning can be used to promote equality of opportunity, especially in areas where there are concentrations of deprivation.
- **Implementation Point 3d: Promoting community cohesion** - Boroughs should give special consideration to planning measures that improve community cohesion.
- **Implementation Point 3g: Principles of inclusive design** - Developments should be accessible and inclusive taking account of the Mayor’s Accessible London SPG and CABE’s Principles of Inclusive Design.
- **Implementation Point 3h: Creating safe and inclusive urban environments** - Ensure that urban environments have direct routes, safe street scraping and good lighting so that they help all people but especially the most vulnerable to feel more confident.
- **Implementation Point 3j: Lifetime Home Standards** - All new housing should be built to allow the design of individual homes to be more flexible, enabling residents, for example older and disabled people, to remain in their property for longer.
- **Implementation Point 3l: Creating local employment in new developments** - Boroughs are encouraged to investigate with developers the possibility of providing local businesses and residents the opportunity to apply for employment during the construction process and in the resultant end use.
- **Implementation Point 3p: Employment and training access for all** - in order to help disabled people gain access to employment it is important that new employment is located in fully accessible places. In addition, people from all communities including lone parents, young people, men over 50, BAME people, disabled people, offenders and ex-offenders, refugees and asylum seekers, and homeless people should be able to access facilities provided, especially to help secure employment.
- **Implementation Point 3t: Equitable access to services** - recognises the importance of ensuring all communities, especially vulnerable groups, can access health and social facilities in an equitable manner.
- **Implementation Point 3u: Maximising the benefits of open space** - states that the benefits of open spaces to communities must be considered. Children should be able to play within their local neighbourhoods and have safe and attractive play spaces within easy walking distance of their homes. They should have access to large open spaces with sporting facilities.
- **Implementation Point 4.3c: New developments** - stresses the need to address accessibility and safety issues in the public realm – promoting independence

among older people. Public realm shall include seating (preferably in shaded spots for the summer).

- **Implementation Point 4.4a: Blue Badge Parking** - advises boroughs that new developments should incorporate adequate blue badge parking to enable disabled people to use the development.
- **Implementation Point 4b: Managing accessible and inclusive open spaces** - states the importance of making sure open spaces are designed to allow access for disabled people, including walkways and paths that are level and clear of obstructions.
- **Implementation Point 4.5a: Access to housing** - recognises that faith groups have different needs and developments should consider these by providing an appropriate range of housing sizes given the requirement of local communities.

### Southwark Council – New Southwark Plan (November 2017)

3.11 The New Southwark Plan (November 2017) is currently under consultation<sup>2</sup> and therefore it has not been fully adopted as yet; however, there are a number of policies that are of particular relevance that should be noted.

- **Strategic Policy 1: Quality affordable homes** - Aim to build 11,000 new council homes by 2043, improve housing standards and build more homes for households with children as well as childless households
- **Development Management Policy P1: Affordable homes** - states that a minimum of 35% affordable homes should be provided for any development (above 11 dwellings.)
- **Development Management Policy P2: New family homes** - requires a minimum of 60% units to have two or more bedrooms and a maximum of 5% of dwellings being studio flats.
- **Development Management Policy P6: Homes for households with specialist needs** - requires at least 10% of homes to be wheelchair accessible.
- **Strategic Policy 2: Social regeneration to revitalise neighbourhoods** – Work towards ensuring that all neighbourhoods and all residents have access to a healthy environment where they can live and work.
- **Development Management Policy P11: Design of places** - recognises the need for high quality public realm that is attractive, eases the movement of users and avoids clutter. The policy states that public realm should be accessible and have an inclusive design for all ages and people with disabilities – providing opportunities for play and adequate seating for visitors and residents.
- **Strategic Policy 5: Healthy, active lives** - maintain and improve the health and wellbeing of our residents, encouraging healthy lives by tackling the causes of ill health and inequalities.
- **Development Management Policy P53: Parking standards for disabled people** - Developments must provide accessible car parking spaces up to a maximum of one car parking space per wheelchair accessible unit and ensures that these are located within the development in close proximity to the nearest entrance or lift.
- **Strategic Policy 6: Cleaner, greener, safer** - states that neighbourhoods will be made safer through well-designed buildings and spaces that discourage crime.

<sup>2</sup> New Southwark Plan, Proposed Submission Version, November 2017. This local plan is yet to be finalised and released but is undergoing a consultation period.

- **Development Management Policy P55: Designing out crime** - requires developments are designed so that windows overlook streets to provide natural surveillance; streets and open spaces are easy to navigate avoiding blind corners and sharp turns; and there is an appropriate level of street lighting.

## 4 Consideration of Equality Groups at the Proposed Development

4.1 This section of the Equalities Statement provides an assessment of the Proposed Development with respect to The Equality Act (2010) and other relevant policies and procedures. The Proposed Development has been assessed with regards to the following equality groups:

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

### Construction process

4.2 The Applicant commits to ensuring that during the construction process the workplace will be free from unlawful or unfair discrimination on the grounds of colour, race, age, nationality, ethnic or national origin, sex, pregnancy, gender reassignment, marital status, sexual orientation, religion or belief, mental or physical disability.

4.3 Being considerate to the needs of all those who are affected by the construction process and of its impact to the environment will be a requirement of contractors. Special attention will be given to the needs of those with sight, hearing or mobility difficulties.

4.4 The Applicant will only subcontract work to suitable contractors with appropriate experience, skills and capabilities needed to complete the work. Subcontractors will be required to abide by the above equality commitments.

4.5 The Construction Logics Plan and the Environmental Management Plan will include mitigation measures to reduce the impact of the construction phase on the local neighbourhood amenity. This will include, but will not be limited to: prohibited or restricted operations (locations, hours, etc.); a procedure to ensure communication is maintained with the LBS and the local community to provide information on any operations likely to cause disturbance (through, for example, meetings and newsletters); and a provision for affected parties to register complaints and the procedures for responding to complaints.

4.6 The site will be registered with the UK's Considerate Contractors Scheme - a voluntary code of practice that ensures contractors and trade contractors carry out their operations in a safe and considerate manner; with due regard to passing pedestrians, road users and neighbouring properties. This code of practice seeks to:

- Minimise any disturbance or adverse effect (in terms of noise, dirt and inconvenience) sometimes caused by construction sites to the immediate neighbourhood;
- Eradicate offensive behaviour and language from construction sites; and
- Recognise and reward the contractor's commitment to raise standards of site management, safety and environmental awareness beyond statutory duties.

## Operational phase

### Commercial space

- 4.7 The Applicant will use best endeavours to ensure that all employment created by the Proposed Development will be required to adhere to anti-discrimination laws with respect to age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation as set out in the Equalities Act 2010.
- 4.8 The Applicant will ensure that any form of discrimination, harassment, bullying or victimisation is not tolerated. It will ensure this is an overarching equality commitment for all employers on site upon completion of the Proposed Development. This will include:
- Providing equal opportunities in all aspects of employment - including selection of candidates, recruitment, promotion and terms of employment;
  - Making sure that all employment decisions are taken in an objective manner without being subject to any discriminatory criteria;
  - Ensuring that all employees will be aware that discriminatory practices are unlawful and that they are responsible for avoiding offensive behaviour; and
  - Protecting those employees that report any incidents of discrimination or harassment they have been subjected to or they have witnessed by respecting their will to remain anonymous should they request to do so.
- 4.9 The Proposed Development is expected to result in an increase of c.155 direct jobs onsite. Where possible, occupiers will be encouraged to ensure that job opportunities are well published in the local area and in local job centres; this will help to address issues of local unemployment and help reduce social inequality and deprivation. This increase in employment would also be accompanied by an increase in worker spending which would further boost the economic activity in the local area.

### Residential space and accessibility

- 4.10 Camberwell Union will offer a wide range of new homes for sale and rent, designed to meet the needs of people of all ages. Dwelling layouts are designed to cater for the needs of all, whether single, in a couple, married with children, young, older, able bodied or in a wheelchair. The scheme has been designed to ensure that the layout creates an inclusive environment for all residents, from the approach to the home.
- 4.11 The scheme includes 499 units of which:
- 173 units (35%) will be affordable – 119 will be socially rented and 54 will be intermediate – providing more housing options for low income families.

- 60% of the proposed dwellings have two or more bedrooms, providing family homes.
- 4.12 All dwellings have been designed to meet the requirements of London's Housing SPG (2016) and the LBS's Supplementary Planning Document in relation to residential design standards (2015 Technical Update to the 2011 Residential Design Standards). Design standards include:
- All 3+bed units must have at least 10sqm of private amenity space;
  - Integral bulk storage facilities;
  - A mix of open of plan living-kitchen-diners and units with separate kitchen diners to offer choice to potential occupiers;
  - All three bed affordable dwellings should be designed to have self-contained kitchens.
- 4.13 The main residential entrances have been located at the most prominent location on each block and the internal level is set at the same level as the immediate external context. This means that the front entrance has a level approach into the building and through to the circulation, ensuring that there is no segregation between those abled bodied residents and those with disabilities.
- 4.14 All internal routes are level and direct to the lift cores of which two are provided for blocks above six storeys and all designed to be fully wheelchair accessible. All stairs are designed for ambulant disabled.
- 4.15 At the residential floors the corridor is generally 1.6m wide and increases to 2.0m at the lifts. Circulation has been designed to remove acute angles, unnecessary internal partitions and with clear legibility.
- 4.16 There are 51 (10%) wheelchair adaptable homes which have been designed to comply with the Building Regulations Part M4 and LBS's 2015 Technical Update to the Residential Design Standards SPD. Key design criteria that have defined the brief for the internal layouts include:
- Transfer zones in hallways
  - Larger bathrooms
  - Wheelchair turning space in rooms
  - Larger bedrooms
  - The facility for hoists from bedrooms to bathrooms.
- 4.17 For further information on the design of the residential units and the approach to inclusive design please refer to the Design and Access Statement.

#### Site accessibility

- 4.18 The proposal is a mixed-use development, meaning it will serve a range of users. A vibrant open space will be created at the heart of the scheme, with independent shops and cafes/restaurants giving the area a unique feel. The series of open public spaces will attract a constant stream of visitors to the area and help to deter criminal activity. 24-hour onsite security will be provided within the public spaces to help reinforce the safety of the area. An ongoing management led maintenance plan will be put in place to avoid the area becoming run down and attracting anti-social behaviour.

- 4.19 Each of the blocks will be entered via remote access control to main entrances ground floor stairs. For every floor there will be remote access to the lobby and corridor doors and access doors to the podium. All ground floor doors and windows are designed to be Secure by Design accredited. The use of external lighting to ensure that pedestrians and cyclists feel safe in the public realm and communal areas.
- 4.20 The scheme will create multiple links across the site, including a new access to Burgess Park (Figure 2). These will provide well lit, direct routes in and out of the area and increase its permeability, contributing to higher levels of safety and reducing the opportunity for criminal behaviour.

Figure 2: New pedestrian routes onsite



Source: HTA

- 4.21 With regards to accessibility for the disabled, elderly, pregnant women or individuals with buggies, inclusive and accessible design principles, have been incorporated to ensure those with mobility restrictions can access and utilise the Proposed Development with ease. Features include wide pathways (level and clear of obstructions), sufficient seating, dropped kerbs and dedicated parking spaces for disabled people, with 15 Blue Badge parking spaces provided. The green corridor and new public realm will also provide open space and an informal play area for children under five – enclosed within a safe environment.

## Conclusion

- 4.22 Overall, it has been assessed that the Proposed Development would not have a negative impact on equalities groups and therefore adheres to the relevant policies identified earlier in this report.
- 4.23 The Proposed Development will help stimulate economic activity the local area through high quality design and the mix of residential and commercial uses. The public realm provision and the green links have been designed to minimise crime and ensure that the site is accessible for all, which will encourage community cohesion. The provision of both affordable and market housing will contribute to the LBS's housing targets, while the mix of commercial uses will create a vibrant urban centre where people want to live and work.

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