

Equality Impact Assessment

Redevelopment Proposals for Dog Kennel Hill Adventure Playground

May 2022



Document versions

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1. Introduction

1.1 The project background and brief

The Dog Kennel Hill Adventure Playground is a 4000sqm site located on the A2216 Dog Kennel Hill road. The site comprises a timber framed single storey adventure play centre built in the 1970s. The building has a main hall, craft room, kitchen, office and two toilets. The playground features a stretch of old wooden platforms, walkways and bridges at varying levels together with three pieces of recently installed outdoor gym equipment.

The existing play buildings on site are in a poor condition. The current Playground operator has obtained planning permission for a single new building which replaces all of the existing smaller buildings across site. A new commissioned masterplan delivered by Landscape Architects will create a coherent design for the whole site which includes the footprint of the new building and the removal of all existing buildings.

The scope of the EQIA includes the proposed new building and landscape proposals.

The project needs to enhance Equal Opportunities including:

- This scheme must seek to enable easy access for children and people with disabilities or limited mobility, to ensure obligations under the Equality Act 2010 are met.
- Advise on appropriate measures for the scheme to aid equality of access and enjoyment.

The project needs to enhance Equal Opportunities including:

- This scheme must seek to enable easy access for people with disabilities or limited mobility, and fully comply with the Equality Act 2010 (previously the Disability Discrimination Act). Particular user groups that will need to be catered for include older people and parents with young children. Provision should also be made for wheelchair use and for people with limited or partial sight.
- Measures may include appropriate surface treatments, sensitive placement of furniture and initiatives to aid interpretation of park elements. The consultant will be required to advise on appropriate measures for the scheme to aid equality of access and enjoyment.

1.2 Aims and scope of the Equality Impact Assessment

The Equality Impact Assessment (EQIA) helps public authorities ensure their policies and the ways they carry out their functions do what they are intended to do, and for everyone.

The EQIA can assist public authorities meet their duties under the Equality Act 2010 and identify opportunities and further steps they can take to promote equality, improve access and participation in public life and good relations between all groups.

This EQIA assesses the impact of the proposed scheme in Cossall Park on relevant groups with protected characteristics in relation to the Equality Act. It focuses on the impact on older and disabled people, people of different races, and also how the design may affect pregnant women and parents with small children.

The Equality Impact Assessment (EQIA) focuses on

- identifying the key aims of the guidance and the scheme,
- systematically assessing and recording the likely equality impact of an activity or policy.
- identifying any direct or indirect discrimination,
- identifying whether certain groups are excluded from any of the services,
- assessing the impact on people with protected characteristics,
- making sure that, as far as possible, any negative consequences are eliminated or minimised.
- opportunities for promoting equality and improving services are maximised.

1.3 Legal context: Southwark Council Public Sector Equality Duty

The Equality Act 2010 sets out duties and responsibilities of service providers in relation to disabled people as defined by the Act. The Act defines a disabled person as 'someone who has a physical or mental impairment, which has a substantial and long-term adverse effect on his or her ability to carry out normal day to day activities.'

Councils have general legal responsibilities to demonstrate that they are taking action to promote equality in relation to policy making, the delivery of services and employment

More specifically, Public Authorities have a legal responsibility to assess their activities, and to set out how they will protect people from discrimination on the basis of the nine 'protected characteristics: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, Sexual orientation.'

EQIAs are one of the key ways in which public authorities can meet their general duties on equality. These require that due regard is given to achieving the goals set out in the general duties, all with the aim of achieving greater equality for affected groups.

The weight that public authorities give to equality should be proportionate to its relevance to a particular function. EQIAs can help identify the most proportionate and effective responses.

1.4 Inclusive Design Approach

The approach is based on the principles of inclusive design, promoting integration rather than separation, and seeking to provide environments that are safe, convenient and enjoyable for use by everyone, regardless of age, ability, gender or other protected characteristic.

The recommendations take due account of the considerations of effectiveness, resources, practicability of making changes.

The context within which the appraisal is undertaken is to ensure that Southwark Council is meeting its Public Sector Equality Duty under the Equality Act 2010

1.5 Methodology

The following methodology was followed:

1	REVIEW MASTERPLAN SCHEME <ul style="list-style-type: none">identifying existing best practice standards involving range of stakeholdersReview of proposals against identified best practice
2	SITE VISIT AND AUDIT carried out on Friday 8 April 2022 (client representative, site/operations manager Patrick)
3	EQUALITY IMPACT REVIEW <ul style="list-style-type: none">Assess different features on design in relation to impact on groups with protected characteristicsMitigate potential adverse impact: measures to eliminate or reduce impact on any specific groups

1.6 Standards for assessment

Standards and criteria for accessibility include:

- Need to maximise access to and use of Dog Kennel Hill Adventure Playground for all users
- Requirements of the Equality Act 2010
- Currently published best practice standards and guidance to meet the needs of disabled people as set out in:

- A Guide to Creating Accessible Play Spaces, Rick Hansen Foundation, 2020
- Inclusive Play Design Guide, Playworld Systems, May 2012
- Shaping Neighbourhoods: Play and Informal Recreation, London Plan Mayor London SGP 2012
- Design for Play: A guide to creating successful play spaces, Play England, 2008
- Developing Accessible Play: A good practice guide, OPDM, 2003
- Mainstreaming Inclusive Play, Good Practice Briefings, Play England, Dept for Children, Schools and Families, KIDS NDD, 2009
- Managing Risk in Play Provision: Implementation Guide, Play England, David Ball, Tim Gill and Bernard Spiegel, Dept for Children, Schools and Families, 2008
- Can Play Will Play, Disabled Children and Access to Outdoor Playgrounds, National Playing Fields Association, A John & R Wheway, 2004
- BS 8300:2018 *Design of an accessible and inclusive built environment, Part 1 External environments - Code of practice*

Other documents reviewed

1. Protected Characteristics in Southwark: JSNA Factsheet (Southwark's Joint Strategic Needs Assessment), November 2017
2. Multi-Ward Profiles 2019 South Southwark JSNA Factsheet, 2019
3. Southwark's Open Space Strategy, 2013 sets out standards for different types of open spaces and provides an action plan.

1.7 Disclaimer

The Equality Act 2010 is civil legislation requiring individuals and organisations not to discriminate against disabled people. Public sector organisations have to comply with their Public Sector Equality Duty.

It is the authority or service provider who must meet the requirements of the Act, and buildings or physical environments cannot 'comply' with the Equality Act.

This report makes reference to current regulations and best practice, which are subject to change.

This report does not constitute a health and safety assessment.

Following the advice contained in this report cannot ensure that the service provider will meet the requirements of the Act or render them immune from the award of damages under the Act.

1.8 Dog Kennel Hill Adventure Playground neighbourhood community profile

The Dog Kennel Hill Adventure Playground (DKHAP) has been established for 50 years and is supported and managed by voluntary sector partners, Southwark Council, with extensive involvement of the local community.

Southwark is a diverse borough with people with a wide range of ethnicities and backgrounds. South Southwark area is less deprived than rest of Southwark according to JSNA data.

The Adventure Playground is located in Champion Hill ward in the South Southwark, where 44% of residents are from black and minority ethnic communities;

It is situated between three large housing estates where many residents are on low incomes and few have gardens or access to outdoor space.

It is close to Bessemer Grange, Dog Kennel Hill and Goose Green primary schools and is much used by children from these, other local primaries and 4 local secondary schools.

The JSNA profile for the Champion Hill ward indicates

- Champion Hill has a higher level of deprivation than the London average, though one of the least deprived wards in Southwark;
- Nearly half of residents (47.4%) in Champion Hill ward are non-white, compared to 45.8% of residents in Southwark.
- 31.2% of resident homes are social housing managed by the Council or TMOs compared to the borough average of 24.6%;
- Southwark has particularly high prevalence of child obesity. In addition, there are significant health inequalities whereby prevalence of obesity, smoking and sedentary lifestyle is higher in residents from more deprived backgrounds. Champion Hill ward has high levels of child obesity of 22% at reception and 36.4% at Year 6.
- Local population younger than London average with this ward having higher proportion of children and young people than rest of Southwark

The profile indicates priorities for improving the local park that include attracting local people into the park for the purpose of play and exercising, walking and running, particularly for children and younger people, and less active people, would be beneficial to the local community.

1.9 Inclusive design brief

The brief provided by the client for the creation of the playground includes many inclusive design requirements:

- Caters for a range of ages, abilities and disabilities
- Is accessible and well connected
- Meets the needs of the local community
- Promotes physical activity
- Encourages positive social behaviour
- Provides learning opportunities
- Gives freedom to play outdoors
- Is safe
- Brings in additional income through lettings such as birthday parties
- Has low maintenance cost
- Enhances biodiversity and contributes to council's environmental aspirations and policies
- Is fenced and secure, yet welcoming
- Provides some MUGA or sports surface for ball games (ideally in same location, can be moved if proven beneficial)
- Offers different types of play
- Does not include bespoke equipment
- Largely complies with recognised standards inc BS 1176 & 1177, low risk structures of the current playground may be adapted, if repaired and well integrated.
- Includes a fence audit and proposals for visually improved boundaries in areas

The approach taken by the playground operator is to retain the attraction of the natural appeal and wilder elements of the site. This can be achieved while ensuring that some elements of each play equipment is accessible to disabled children, with a balance being sought.

2. Equality Impact Assessment of redevelopment proposals for Dog Kennel Hill Adventure Playground

2.1 Equality Impact Assessment Summary

Protected Characteristic	Impact of proposals	Comment
Age		The proposals provide suitable, accessible and inclusive facilities for a range of ages, including adults, young children of all ages, as well as for older and disabled people.
Disability		The proposals are well considered and inclusive and accessible for a wide range of disabled people, including wheelchair users, people with mobility impairments, visual impairments, sensory impairments and cognitive impairments.
Marriage and civil partnership,		Not applicable
Pregnancy and maternity		Pregnant women who need a rest and parents with babies and small children are well catered for in relation to play areas, resting places and seating provided.
Race, Religion or belief		The design and facilities of the park do not specifically cater for people of different races, religions or belief.
Sex, Gender reassignment, Sexual orientation		Not applicable

2.2 Inclusive Play principles and good practice

The right to play is recognised as a human right in UN Convention on the Rights of the Child.

The London Plan's Play and Informal Recreation SPG says:

"All children should be able to access equipment and play opportunities that are exciting and fun and offer various levels of challenges. Sensory experiences as well as the use of equipment that can be used in different ways by children at different stages of development and with differing levels of ability should be encouraged."

We already know that lots of children with impairments make good use of their playgrounds with their friends, and benefit enormously from the experience.

Successful play spaces offer enjoyable play experiences to disabled children and young people, and to those who are non-disabled, whilst accepting that not all elements of the play space can be accessible to everyone. Children with different abilities can play together in well designed play spaces, and parents and carers who are themselves disabled should be able to gain access to play spaces if they are to accompany their children.

Enabling all children to play, and to play together, is about a benefit to the whole community. It is not about overcoming legal hurdles or making expensive provision for a small section of the community. If any child is prevented from playing then it diminishes the play experience of all.

Benefits of accessible play spaces include:

- Children with disabilities can enjoy the benefits of active play, enhancing social skills and overall health
- All children learn valuable lessons about the world, including that everyone has similarities and differences
- All children develop concepts related to tolerance, diversity, and acceptance
- Everyone can access, interact, and have fun in the play spaces, including parents, grandparents, and members of the community with disabilities

A play space may include the following elements:

- A selection of approaches into the play space
- Adequate space for wheelchair users to access and manoeuvre around equipment

- A smooth, even, shock-absorbent surface that allows access to play equipment with minimal effort
- Opportunities for physical challenge with minimal hazards
- Good use of visual contrast to define edges of paths and edges and outlines of play equipment and features
- Accessible features and amenities, such as planter boxes and benches of different heights and sizes to accommodate all abilities
- Opportunities to enjoy some features of the play space in separate 'quieter' areas adjacent to the main play equipment that allows for low stress play experience
- Shiny surfaces should be avoided, as they can produce a disturbing glare that can inhibit the ability of people with vision loss to orient themselves.
- Sensory elements also offer clues to help children orient themselves to the different areas and elements within the play space. This equipment typically includes the use of:
 - Sound and musical elements, such as talk tubes or falling water
 - Textured paths, textured designs, and shapes
 - Aromatic plants and gardens
 - Elements that can be manoeuvred and that move and respond to touch
 - Colour, patterns, and light
 - Moving components like tic-tac-toe
- Equipment that promotes sensory development, with features incorporating texture, manipulative devices, contrasting colours, and sound to enhance auditory, tactile, and sensory awareness and to encourage artistic and aesthetic development

For assistance animals provide:

- Spending area
- Available drinking water

Suggestions for inclusive play equipment

- Larger rocking equipment: These often have the benefits of a backrest, footrest, handrail and a side, so that a child can be reasonably supported in it and have an accompanying friend or adult sitting alongside.
- Wider slides, or double slides, that allows an adult to support a child
- Rigid harness swings (need to be installed at a higher level)
- Horizontal monkey bars permitting children in wheelchairs to pull themselves along
- Low level balancing bars are helpful to children with Downs Syndrome, or who are deaf, because these children can benefit from activities that help improve their balance.

Other features that would improve inclusive access:

- Accessible toilets
- Use visual and/or tactile boundary indicators that help to identify boundaries around certain play zones or play components, such as swings, slide drop-off areas, and play zones of different skill levels
- Sensory elements are an important play component for all children and particularly so for children who are not able to enjoy the more physically challenging components of a play space.
- Consider providing a water fountain at an accessible height (with dog bowl at the bottom)
- Provide shelter and comfortable seating with backrests and armrests for disabled carers at viewing points.
- Outdoor play, especially play in natural settings, has been shown to have a soothing effect on children with autism spectrum disorder. Activities that involve natural settings, motion, visual interest, and water play can be good choices.

2.3 Comments from site visit 8 April 2022

Site visit contact: Patrick (Playground Manager)

1. Entrance and approach

It is important that the entrance and approaches are accessible so that a wide range of people and children can easily reach the Playground.



Unfriendly street and poor crossing environment

- There was no Blue Badge parking seen in the vicinity. Liaise with Highways Authorities to designate some Blue Badge parking near the entrance to the Playground.
- There is a bus stop immediately outside the Playground, but no pedestrian crossing from the corresponding stop across Dog Kennell Hill or from the residential areas across the busy main road. Some investment in improving

the access route and approach should be sought from the Highways authorities.



Poor pedestrian access into Playground

- The pedestrian approach is very poor, with two steep dropped kerbs at the entrance driveway and no continuous footway. There is also no suitable pedestrian path to the side of the vehicular gate that goes across the entrance and is kept closed. There is only a rough hewn earth section with a sign post in the middle of it.
- It is recommended to create a path to the side of the vehicular gate that is a minimum of 1200mm wide at the gate, with a firm, smooth, level paved surface.
- Beyond the vehicular gate, the shared road is suitable, with a smooth, level and firm surface.
- The gateway to the Playground is clearly visible but could benefit from some visually distinguishing bright colour and signage to indicate the playground.

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Approach and gateway to the Playground

- Cycle parking: Suitable single stack Sheffield stands are provided to the side of the Centre building, which should be replicated in the new proposals. Ensure the ends of the rows are kept clear to accommodate wider and adapted cycles used by some disabled people.

2. Playground structures

The existing adventure playground provides a large play structure of wooden platforms, walkways and bridges at varying levels. This weaves through the site under large trees. It includes several towers including the Shard, a play-house, a climbing wall, two slides, fireman's poles and ladders.



A trail of low level boardwalks adds additional connections and routes. These will be the focus of attempts to make the structure more accessible for disabled children.

Sections of the boardwalks through the trees are proposed to be made more accessible with ramped access from ground level. Ensure these sections also have suitable handrails for mobility impaired children to grab on in order to balance themselves while walking.

The Playground is well used by children and carers including disabled children, as was observed at the time of the site visit. Ramped paths to the top of the main swing platform were provided, along with steps, which were used by carers for sitting.



Well used ramps to existing equipment

3 Handrails need improvement, and to be provided to as many steps as possible

Some handrails were not suitably profiled, not easy to grip and did not extend beyond the top and bottom step so as to be easily reached. It is recommended that the handrails for all new and existing play equipment are suitably designed to be easily grippable and reachable, extending beyond bottom steps and turning in at their ends. Preferably all steps should be provided with handrails.



The steps to the Slide and the Zip Wire could potentially benefit from a handrail.

3 Zip wire path

Ensure the path under the Zip Wire is reasonably smooth and forgiving for a fall, without muddy puddles (as existing), with smooth grass or suitable artificial material.

A Zip Wire that allows a disabled child to be securely harnessed would be a suitable addition if possible.

4 Can the log bridge be made easier to use for more children?



Consider providing an alternative log bridge at a lower level with an upper level handrail to allow mobility impaired children to hold on to.

5 Fire pit: This needs to have an accessible path to get to it, and an accessible level area with a 1500mm turning circle as a viewing/resting point to allow wheelchair users to sit alongside companions.

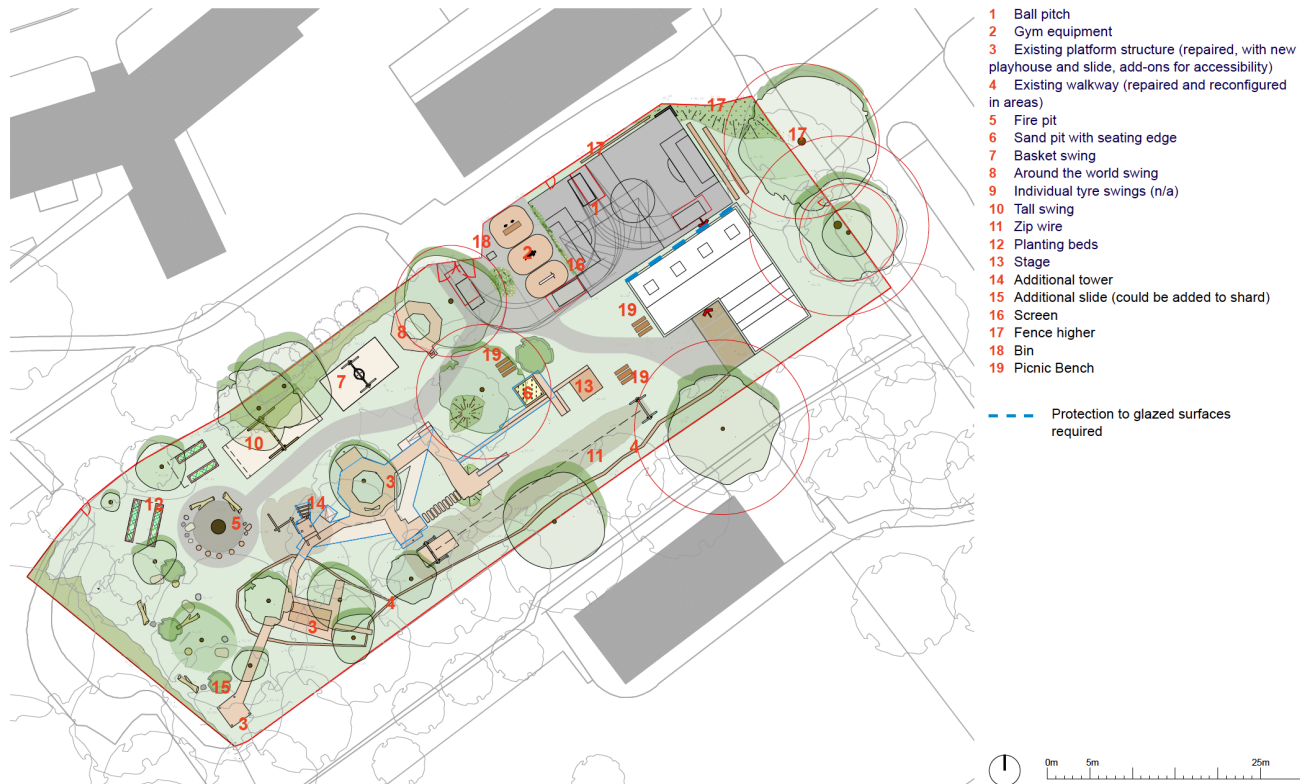


2.4 Inclusive access review of proposals

Preferred Option B1 Dog Kennel Hill Adventure Playground proposals

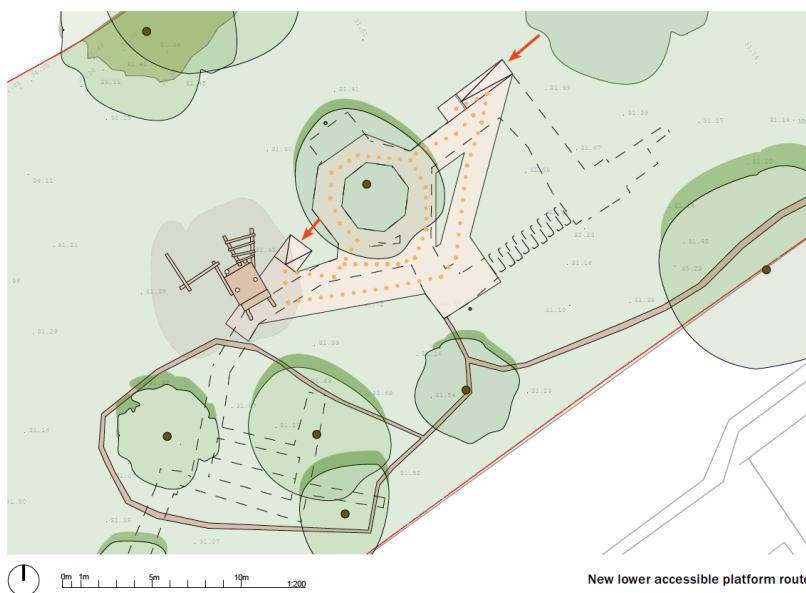
Erect Architecture, March 2022

APG Initial Design Options - B1



A balanced approach needs to be taken to ensure a reasonable proportion of the playground is accessible to disabled children and to those children who may have lower risk levels.

- Existing lower-level walkways of the adventure playground structure are not wheelchair accessible. The proposals are to replace like for like with improvements to accessibility including step-free access, wider and more gently sloping walkways.



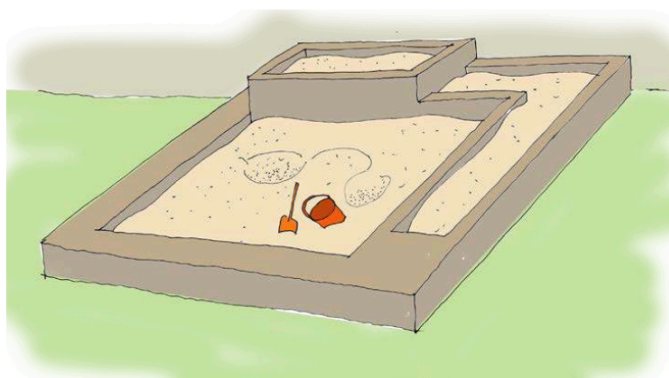
Inclusive play equipment and features

- The proposed tarmac paved ball area will be accessible to wide range of users including wheelchair users.
- **Swings:** A basket swing will be provided alongside tall swings. The Basket swing area needs to have an accessible, smooth, firm and level or gently sloping path to get to it. The ground surface also needs to smooth and firm to allow a wheelchair user access.



Existing basket swing with poor access.

- **Sand pit:** An accessible sand pit will be provided. This needs to have an accessible path to get to the raised section.



Principle of partly accessible sand pit at edge of terrace

Other higher risk play equipment, that will be retained, include:

- The 'around the world' swing, where the players chase each other on swings.

- A platform swing where a platform is provided for users to push against to swing themselves up will also be provided. The platform edge should be visually highlighted.

These could be safely used by some disabled children with supervision and all users will naturally assist and take care of each other.

Pathways

- A network of accessible pathways that are a minimum of 1200mm wide and have wider turning circles of 1500mm at regular intervals (10m recommended) will allow wheelchair users to reach play equipment. These do not have to extend to the full extent of the adventure playground, but to sections of it that is more accessible, such as the low level broadwalks.
- The paths should be level or gently sloping (not exceeding 1:20 gradient) with level areas 1500mm x 1500mm at every 500mm rise.
- The path surface should be smooth and firm with no loose materials, and a bonded surface such as resin bound gravel or TigerMulch to allow easy access for wheelchair users.

Seating

- Family picnic benches that allow wheelchair users to sit within a group, and also provide some backrests (300mm high at least) for older and mobility impaired people would be very useful. The underside of the bench needs to provide 700mm clearance for wheelchair users to get knees underneath.
- There needs to be a smooth, firm path to reach these benches and an extended area of hardstanding next to the benches (900 x 1400mm) would allow a wheelchair user to sit alongside a companion.



Water fountain: Consider providing a water fountain which is accessible to both standing and wheelchair users at height of 750-850mm with lower level built in bowl for dog drinking.

Growing beds:

- some of the planters/beds should be raised so as to allow mobility impaired people to stand when gardening
- Some should be raised to 760mm with a knee recess at the edge, so as to be accessible to wheelchair users.

Lighting:

- Good external lighting is crucial in ensuring social amenity and enabling people who are partially sighted and those who have sensory/neurological processing difficulties to be able to use external environments conveniently and safely. Also critical for vulnerable groups for whom security is a key issue.
- A general illuminance level of 50 Lux for pathways is recommended by BS 8300:2018 -1: External Environments

Maintenance:

- Maintenance of park infrastructure to ensure a level of amenity is also essential for comfort and enjoyment of users.

Maintenance of path surfaces is critical to ensure comfort and continued use, including cutting back vegetation that extends onto or over a pathway.

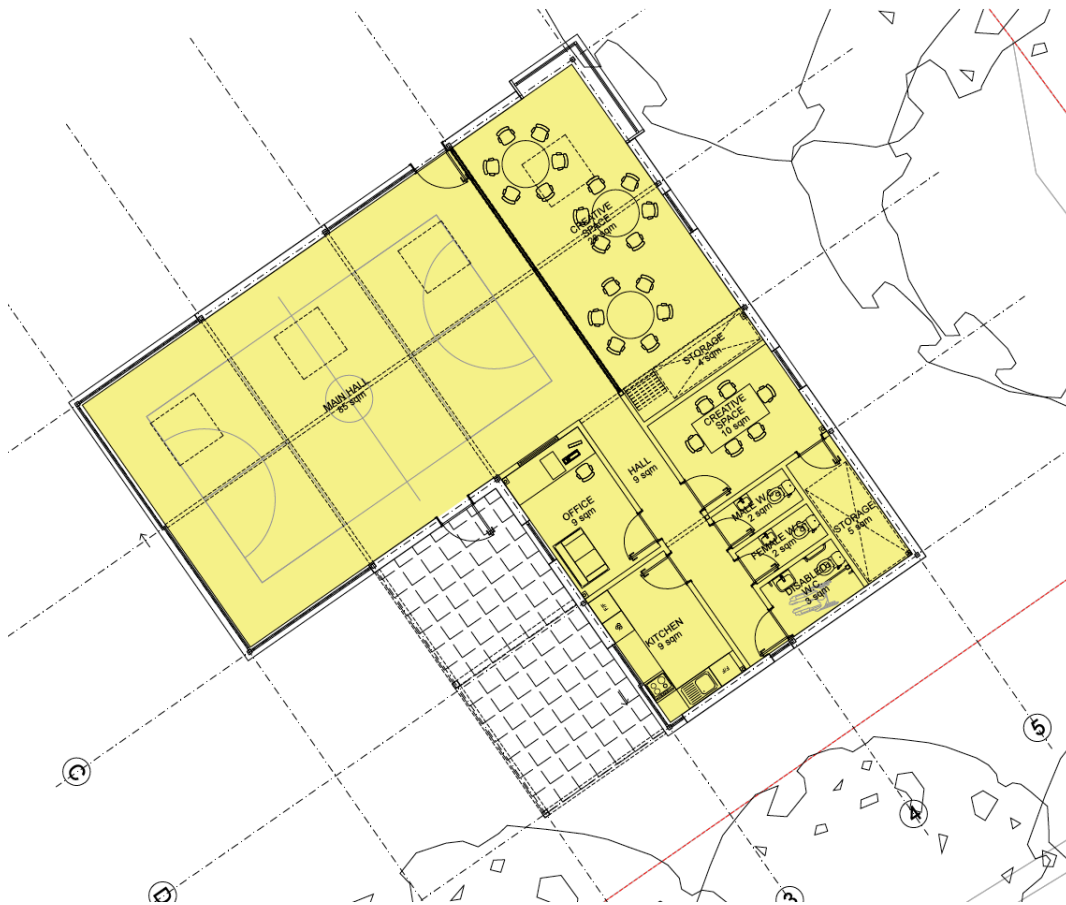
Regular cleaning, maintenance and updating of signage and information panels, including cutting back any surrounding planting is necessary to ensure they remain legible and up to date.

Crucial for disabled people, wheelchair users and those wheeling baby buggies is:

- Ensuring surfaces are maintained as smooth, firm and level, with no potholes or uneven areas
- Visual contrast of edges and at junctions is maintained
- Adequate lighting levels are maintained
- Ponding is immediately attended to.

DKHAP Indoor Centre- Proposed Ground Floor Plan

Create Architecture, dated 26.02.15



Comments on inclusive access to the building:

- Ensure entrance doorway provides a width of min 1000mm clear opening width.
- If kitchen is used by staff and community it needs to provide wheelchair access with a section of counter at 850mm high and knee space for wheelchair users under.
- Passage to the amenities and accessible toilet is only 1200mm wide, which would be slightly difficult to turn into for a wheelchair user. A turning circle of 1500mm at the doorway is recommended.
- The size of the WC of 1500 x 2200mm does meet Building Regulations Part M. If possible, it is recommended to be the wider 2200 x 1700mm size as in current best practice in the British Standards, BS 8300: 2018 for an accessible and inclusive built environment.