

Equality Impact Assessment Report	Please enter responses below in the right hand columns
Date to EIA panel, department, DLT or DMT	Corporate EIA Panel date: 1 November 2016
Sign-off path for EIA	Corporate EIA Panel
Title of Project, business area, policy/strategy	Draft Lambeth Development Viability Supplementary Planning Document
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London Borough of Lambeth Full Equality Impact Assessment Report

Please enter responses below in the right hand columns.

1.0 Introduction

1.1 Business activity aims and intentions

In brief explain the aims of your proposal/project/service, why is it needed? Who is it aimed at? What is the intended outcome? What are the links to the cooperative council vision, corporate outcomes and priorities?

The aims of the proposal/project/service, why is it needed?

Since the publication of the NPPF in 2012 viability has become a central part of the planning system, both in terms of plan making and in determining planning applications. However, there has been considerable variation in how viability matters are dealt with in the planning process. There are a range of methodologies and guidance relating to viability nationally, which has led to diversity in approach and no clear view on what constitutes best practice. There is potential for significant variation in the outcome of viability assessments depending on the inputs assumed. There is also concern that viability assessments may be put forward to local planning authorities showing an artificially low surplus from a development proposal (for example through undervaluation of sales values and/or inflated construction or finance costs), leading to a reduced amount of affordable housing or other planning obligations being proposed. This has resulted in growing recognition of the need for greater consistency in the approach to viability, a need to ensure that viability appraisals are formed of inputs that are supported by robust evidence, and greater transparency in the viability process.

Where the public do not have access to viability evidence they are unable to reach their own view of whether the information is reasonable and robust. This has the potential to undermine confidence in the planning system. The Environmental Information Regulations 2004 (EIR) apply a presumption in favour of information disclosure; the exceptions are limited and even then, in most cases, it is necessary to decide whether the public interest is best served by the information being disclosed. The importance of the

principle of disclosure of viability information in planning cases has also been emphasised in various recent decisions of the Information Tribunal.

In July 2016 the council adopted its revised Local Application Requirements (LARs), a document which specifies the council's local information requirements for applications for planning permission and other consents. The LARs make clear that financial viability assessments in relation to affordable housing should be submitted without redaction unless there are justifiable grounds not to do so, and that in submitting financial appraisals applicants will do so in the knowledge that the information may be made publicly available alongside other application documents.

The draft Lambeth Development Viability Supplementary Planning Document (SPD) has been developed in the light of the above issues. Its purpose is to support relevant policies in the Lambeth Local Plan 2015, particularly affordable housing policy but also in respect of any other development plan policies (comprising the London Plan and the Local Plan) where viability is a consideration. It also reflects the approach set out Lambeth's adopted LARs.

Who is it aimed at?

Planning is a statutory function carried out by local authorities. The development of planning policies and the impacts of planning decisions can affect everyone with an interest in land in the borough. The document will be of most relevance to the following stakeholders:

- Developers (and their clients), landowners and those acting on their behalf (e.g. architects and planning agents) and members of the public who may be submitting or considering/commenting on submitted planning applications.
- Current and future residents who will benefit from the provision of affordable housing that is funded by developer contributions or provided directly by developers.
- The council.

What is the intended outcome?

The Development Viability SPD will provide clear guidance on when a viability appraisal is required, what methodology should be followed and the basis on which viability appraisals will be assessed by the council and made public. This will be to the benefit of developers and other stakeholders, including the wider public, in helping to ensure that planning applications are dealt with efficiently, consistently and transparently.

The draft SPD makes clear that the council's starting point is that information submitted as part of, and in support of, viability appraisals should be treated transparently and be available for wider scrutiny. It states that appraisals should be submitted without redaction and will be published in their entirety alongside other planning application documents in all but exceptional cases. The availability of information submitted as part of the planning process is important to ensure public participation and confidence in the planning system.

The draft SPD also requires the submission of an executive summary setting out clearly the key findings and conclusions of the financial viability appraisal. This will ensure that the information submitted is more accessible and easily understood by members of the public and other stakeholders.

In the assessment of individual planning applications, financial viability appraisals are mostly associated with major developments which trigger affordable housing requirements. It is hoped that, by clarifying the approach to viability assessment, the SPD may also result in the delivery of additional affordable housing through Section 106 agreements associated with new residential developments.

What are the links to the cooperative council vision, corporate outcomes and priorities?

The draft Development Viability SPD links to many of the strategic priorities and outcomes set out in Future Lambeth: Our Borough Plan 2016-2021, and in particular:

	<ul style="list-style-type: none"> • Inclusive growth: Increase investment and regeneration in the borough, ensuring that this creates benefits for all. In particular, to increase new homes for sale and rent to cross subsidise affordable housing in the borough by 2021. • Working together to reduce inequality: Maintain socially mixed communities in Lambeth by building homes of all tenures. • Strong and sustainable neighbourhoods: Make our communities places where people can enjoy a good quality of life and everyone is able to make a contribution and feel valued.
2.0 Analysing your equalities evidence	
2.1 Evidence Information has been drawn from: <ul style="list-style-type: none"> • State of the Borough Report 2016 • (Draft) Inequality in Lambeth Understanding the impact of national and local changes on Lambeth residents: A Cumulative Equalities Impact Assessment August 2016 • Census 2011 • Lambeth Tenancies and Diversity Digest April 2016 • Lambeth’s Housing Register (as at July 2016) 	
Protected characteristics and local equality characteristics	Impact analysis
Race	Positive impact Data: Evidence from the 2011 Census indicates that approximately 62% of Lambeth’s population are from a White background. Black people make up a quarter of the population, and 6% of the population are from Asian backgrounds.

A higher proportion of Black, Asian and Minority Ethnic (BAME) residents live in social rented accommodation (affordable housing) (60%, compared with 40% of White residents):

Tenure by ethnic group	% Population living in Lambeth	% Living in social rented accommodation
White	61.8	40.3
Mixed/multiple ethnic group	5.5	7.2
Asian/Asian British	6	4.4
Black/African/Caribbean/Black British	24.8	45.6
Other ethnic group	2	2.6
All categories	100	100

(Source: Census 2011)

This is also reflected by the ethnic profile of Lambeth Council tenants, which in 2015/16 was:

	Current tenancies	New tenancies
Black tenants	10,850 (46.3%)	502 (53.7%)
Asian tenants	609 (2.6%)	33 (3.5%)
Mixed race tenants	514 (2.2%)	46 (4.9%)
White tenants	7,646 (32.6%)	262 (28.1%)
Other race tenants	1,602 (6.8%)	52 (5.6%)
Race not known	2,201 (9.4%)	39 (4.2%)
TOTAL	23,422	934
Total BAME	13,575 (58%)	633 (67.8%)

(Source: Tenancies and Diversity Digest April 2016)

	<p>The table shows that approximately 60% of current tenancies, and 70% of new lettings are to BAME households.</p> <p>The ethnicity profile of applicants on the housing register is similar: 29% White; 71% BAME. Of those in the highest priority categories (Bands A and B) 30% are White and 70% BAME. (Source: Housing Register data July 2016)</p> <p>Justification: By providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system. In this regard, the SPD is predicted to have a positive impact for BAME communities, which the evidence shows have a disproportionately high level of need for affordable housing.</p> <p>No unintended consequences were identified.</p>									
<p>Gender</p>	<p>Positive impact</p> <p>Data: Approximately half of the borough’s population are female (50.3%). The Census 2011 showed that a higher proportion of females than males were living in social rented accommodation:</p> <table border="1" data-bbox="722 1214 1436 1430"> <thead> <tr> <th></th> <th>% Population living in Lambeth</th> <th>% Living in social rented accommodation</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>49.7</td> <td>46.5</td> </tr> <tr> <td>Female</td> <td>50.3</td> <td>53.5</td> </tr> </tbody> </table>		% Population living in Lambeth	% Living in social rented accommodation	Male	49.7	46.5	Female	50.3	53.5
	% Population living in Lambeth	% Living in social rented accommodation								
Male	49.7	46.5								
Female	50.3	53.5								

	Total	100	100
	<p>Source: Census 2011</p> <p>Data also shows a higher proportion of female to male tenants in Lambeth council properties, with 63% of all current tenancies being female tenants and 37% male. The proportion of new tenancies in 2015/16 was comparable – 63% of new tenancies went to female tenants and 36% to male tenants. (Source: Lambeth Tenancies and Diversity Digest April 2016)</p> <p>This mirrors the gender profile of Lambeth’s housing register, which has a higher proportion of females (60%) than males. 70% of those in the highest priority housing need categories (Bands A and B) were female. (Source: Housing Register data July 2016)</p> <p>Justification:</p> <p>By providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system. In this regard, the SPD is predicted to have a positive impact for both men and women in need of affordable housing, particularly those in priority housing need. As the data indicates a higher proportion of women than men in priority need categories for affordable housing, this gender group is likely to benefit the most from the supply of more affordable homes.</p> <p>No unintended consequences were identified.</p>		
Gender re-assignment	<p>No disproportionate impact identified.</p> <p>Data:</p> <p>The State of the Borough 2016 reports that it has been estimated that there are 20 transgender people per 100,000 people in UK, which suggests roughly 50-60 people in</p>		

	<p>Lambeth (Gender Variance in the UK: Prevalence, Incidence, Growth and Geographic Distribution, Gender Identity Research and Education Society, 2009). There is limited local data. The Lambeth Living Tenancies and Diversity Digest April 2016 records 22 transgender tenants, of a total 23,422 Lambeth tenancies. However, it should be noted that this data was not recorded for 21,872 tenants and therefore is not considered to be representative.</p> <p>Justification: Nevertheless, by providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system. In this regard, the SPD is predicted to have a positive impact for all people in need of affordable housing.</p> <p>No unintended consequences were identified.</p>									
<p>Disability</p>	<p>Positive impact</p> <p>Data: The Census 2011 provides some insight into the number of people affected by disability. The table below shows the percentage of people living in Lambeth who have identified themselves as being affected by a long-term health problem or disability which limits their day-to-day activity. 13% of Lambeth residents are affected by a long-term health problem or disability, which is in line with the London average (14%).</p> <table border="1" data-bbox="722 1224 1770 1385"> <thead> <tr> <th></th> <th>Lambeth</th> <th>London</th> </tr> </thead> <tbody> <tr> <td>All usual residents</td> <td>303,086</td> <td>8,173,941</td> </tr> <tr> <td>Day-to-day activities limited a lot by a long-term health problem or disability</td> <td>18,618 (6.1%)</td> <td>551,664 (6.7%)</td> </tr> </tbody> </table>		Lambeth	London	All usual residents	303,086	8,173,941	Day-to-day activities limited a lot by a long-term health problem or disability	18,618 (6.1%)	551,664 (6.7%)
	Lambeth	London								
All usual residents	303,086	8,173,941								
Day-to-day activities limited a lot by a long-term health problem or disability	18,618 (6.1%)	551,664 (6.7%)								

Day-to-day activities limited a little by a long-term health problem or disability	20,053 (6.6%)	605,501 (7.4%)
Day-to-day activities not limited	264,415 (87.2%)	7,016,776 (85.8%)

(Source: Census 2011)

59% of people who are affected by a long-term health problem or disability live in social rented housing in Lambeth. This is a notably higher proportion than across London.

	Lambeth	London
Owned or shared ownership: Total	10,117 (27%)	526,965 (47%)
Rented: Social rented	21,720 (59%)	429,591 (39%)
Rented: Private rented or living rent free	5,125 (14%)	158,746 (14%)

(Source: Census 2011)

In April 2016, 1,809 Lambeth Council tenants were identified as having a disability or vulnerability. This equates to 8% of tenants. (Lambeth Tenancies and Diversity Digest April 2016)

There are estimated to be around 400 households in market housing in Lambeth who need to move to social rented housing due to a household member's disability or medical issue. However this figure excludes those households who are already in social housing or who are not on a waiting list. (Source: Lambeth Housing)

Justification:

By providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional

	<p>affordable homes through the planning system. By enabling the delivery of more affordable housing, and in combination with existing development plan policies to secure accessible homes, the proposed guidance is likely to have a positive impact on those living with disability.</p> <p>It is also hoped that by setting out clear guidance within the SPD relating to the process of assessing viability in the planning process, and requiring applicants to submit an executive summary, the information will be more accessible and easily understood. This will benefit everyone with an interest in planning, including residents and other stakeholders who may have difficulty communicating due to disability.</p> <p>No unintended consequences were identified.</p>
<p>Age</p>	<p>Positive impact</p> <p>Data:</p> <p>Over half of Lambeth’s population is younger working aged (20-44 years), and there relatively few children and young people under 20. Lambeth has the highest number of people aged 25-29 of any London borough. The borough has a small proportion of people aged 60+. (Source: State of the Borough 2016)</p> <p>Data from the 2011 Census shows that Lambeth has a relatively low rate of home ownership amongst the over 65’s, and a correspondingly high proportion of older people in socially rented housing. 41% of over 65 households in Lambeth are owner-occupiers, 51% rent from the council or a registered housing provider and 8% rent privately. This compares with 65% owner-occupier, 27% social / affordable renters and 8% private renters in London. Across all ages home ownership in Lambeth is low compared to London, at 33% and 48% respectively, and the number of owner-occupiers over 65 is therefore not disproportionate. The analysis does illustrate however that Lambeth has a</p>

significantly higher proportion of older people living in social rented accommodation than both London and England.

All households where the Household Reference Person is aged 65 and over (households)	Lambeth	London	England
All categories: Tenure	16,305	607,066	5,721,724
Owned	6,615 (40.6%)	391,338 (64.5%)	4,239,177 (74.1%)
Shared ownership (part owned and part rented)	71 (0.4%)	2,864 (0.5%)	27,489 (0.5%)
Rented from council (Local Authority)	5,016 (30.8%)	100,747 (16.6%)	585,397 (10.2%)
Other social rented	3,213 (19.7%)	65,590 (10.8%)	499,063 (8.7%)
Private rented	1,187 (7.3%)	36,604 (6.0%)	252,553 (4.4%)
Living rent free	203 (1.2%)	9,923 (1.6%)	118,045 (2.1%)

(Source: Census 2011)

The age profile for current Lambeth Council tenants and new tenants is as follows:

	Current tenants (2015/16)	New tenancies (2015/16)
0 – 24 years	462 (2%)	90 (9.6%)
25 – 44 years	7,386 (31.5%)	505 (54%)
45 – 64 years	10,441 (44.6%)	264 (28.2%)
65 and over	5,057 (21.6%)	77 (8.2%)

(Source: Tenancies and Diversity Digest April 2016)

	<p>This shows that people aged between 25 and 44 years are allocated the highest proportion of new lettings in the borough.</p> <p>Housing register data shows that, of 23,399 applicants on the housing waiting list as at July 2016, the highest proportions were aged 30-39 (28%), 20-29 (24%) and 40-49 (22%). Of those in the highest priority categories of need (Bands A and B), 22% are aged 30-39, 21% 40-49, 19% 20-29, 17% 50-59 and 19% aged 60+.</p> <p>Justification:</p> <p>By providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system. By enabling the delivery of more affordable housing the proposed guidance is likely to have a positive impact on all age groups, but particularly people in priority need.</p> <p>No unintended consequences were identified.</p>
<p>Sexual orientation</p>	<p>No disproportionate impact identified.</p> <p>Data:</p> <p>According to the State of the Borough 2016, estimates suggest that Lambeth has one of the largest Lesbian Gay Bisexual and Transgender (LGBT) populations in London. It reports that regional data suggests that around 3.5% of people in London are Lesbian, Gay, Bisexual and Transgender (LGBT) (Annual Population Survey). Recent health estimates suggest that Lambeth has one of the largest populations of gay men in the UK (Men who have sex with men: estimating the size of at-risk populations in London primary care trusts, Health Protection Agency (HPA), 2010). 4% of respondents to the Lambeth Residents' Survey identified themselves as lesbian, gay or bisexual. The report notes that</p>

	<p>this level has remained constant since first being asked in 2007, although this is likely to be an under representation.</p> <p>There is currently no data published on sexual orientation and housing need. In the absence of data or other specific evidence it is not possible to judge the specific impact on this protected characteristic. The Tenancies and Diversity Digest April 2016 recorded 11 current tenants who identified themselves as Lesbian, 53 who identified themselves as Gay, and 24 Bisexual. However this data is not considered to be representative as it was not recorded for a significant majority of tenants (87%).</p> <p>Justification:</p> <p>The SPD does not directly address sexual orientation as the objective is to ensure that sufficient affordable housing can be delivered for all of the borough’s future and existing residents. Nevertheless, by providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system. In this regard, the SPD is predicted to have a positive impact for all people in need of affordable housing.</p> <p>No unintended consequences were identified.</p>
<p>Religion and belief</p>	<p>No disproportionate impact identified.</p> <p>Data:</p> <p>Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest groups of residents with a religion. (State of the Borough 2016)</p> <p>The Tenancies and Diversity Digest April 2016 records that, of those for whom the data was collected, the highest proportion of tenants were Christian (11%), followed by</p>

	<p>Muslim (2%), then Hindu (0.1%). 2.4% of tenants stated they had no religion. However, this data was only recorded for 17% of tenants.</p> <p>In the absence of further data or other specific evidence it is not possible to judge the specific impact on this protected characteristic.</p> <p>Justification:</p> <p>The SPD does not directly address religious belief, however, it is likely that people of all faiths, or no faith, will benefit from the council's improved ability to secure affordable housing.</p> <p>No unintended consequences were identified.</p>
<p>Pregnancy and maternity</p>	<p>No disproportionate impact identified.</p> <p>Data:</p> <p>In 2011 there were 34,847 households with dependent children in Lambeth, accounting for 27% of households (ONS Census 2011). This is a slightly lower proportion than across London as a whole (31%). When compared with London, the proportion of married couples with children in Lambeth is notably lower: 10% compared to 15% across London. Other household type categories do not show any particular deviations from the regional average.</p> <p>Demographic projections (GLA 2014 round trend-based household projections, central variant) suggest that the number of households with dependent children is expected to increase by 10% from 2015 to 2035 (an increase of around 175 households per annum). Total households are projected to increase by 23% over the same period. As a proportion of total households, the number of households with children is projected to reduce over this period - from 26% in 2015 to 23% in 2035. In London, the growth rate to 2035 is</p>

almost exactly the same as the overall household growth rate, meaning that the family share of the total is projected to remain almost unaltered (30%).

Lambeth has a notably higher proportion of dependent children living in social rented housing (51%) than in London (31%) and a correspondingly lower proportion of children in owner-occupied housing – 29% (45% in London). 20% of children in Lambeth are housed in the private rented sector, compared with 24% across London. Nearly a third of social rented households are lone parent households. (Source: Census 2011)

Families with children by tenure	Lambeth
Owner occupier (including shared ownership)	17,954 (29%)
Social rented	31,255 (51%)
Private rented or living rent free	12,335 (20%)
All categories	61,544

(Source: Census 2011)

Analysis also indicates that young families are more likely to be found homeless than other categories. (Source: Households accepted for assistance under homelessness legislation between April 2014 and March 2015, P1E statistics, April 2014-March 2015)

Justification:

By providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system. As the data indicates a higher proportion of households with children in need of affordable housing, this group is likely to benefit from the supply of more affordable homes.

No unintended consequences were identified.

<p>Marriage and civil partnership</p>	<p>No disproportionate impact identified.</p> <p>Data: There is currently no data or research published on the links between marriage and civil partnership and housing need. No anecdotal evidence has been presented that there would be any impacts as a result of the implementation of the draft SPD. In the absence of data or other specific evidence it is not possible to judge the specific impact on this protected characteristic.</p> <p>Justification: Nevertheless, by providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system. By enabling the delivery of more affordable housing the proposed guidance is likely to have a positive impact for all people in need of affordable housing.</p> <p>No unintended consequences were identified.</p>
<p>Socio-economic factors</p>	<p>Positive impact</p> <p>Data: The State of the Borough 2016 reports that, like many London boroughs, Lambeth has areas of affluence and areas of poverty, although it is not amongst the poorest boroughs in London. None of Lambeth’s twenty-one wards is in the 10% poorest in London and Clapham Common ward is in the 10% most affluent. Although the borough as a whole is becoming less deprived, there is a persistent pool of economically inactive people with little mobility and this group tends to experience high levels of social exclusion and poor education, employment and health outcomes.</p>

	<p>Measuring poverty as having a household income below 60% of the median income, there are an estimated 49,000 people in poverty in Lambeth before housing costs, and 87,000 people in poverty after housing costs. A third of working age people and a quarter of people of retirement age in Lambeth are living in poverty. Around a fifth of employed residents are paid below the London Living Wage. The 2015 London Poverty Profile, produced by Trust for London and New Policy Institute, estimates poverty at borough by aggregating 14 scores. Lambeth, overall, is in the 16 least impoverished boroughs.</p> <p>The Index of Multiple Deprivation 2015 places Lambeth as the 8th most deprived borough in London and 22nd most deprived in England. This is an improved relative position since 2010 when Lambeth was ranked as the 14th most deprived authority in England. Lambeth is among the 10% most deprived authorities in England (out of 326 districts) on three deprivation scores: the headline figure rank of average rank, scale of income, and exclusion from the labour market.</p> <p>Justification:</p> <p>By providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system. By enabling the delivery of more affordable housing the proposed guidance is likely to have a positive impact on all people in need of affordable housing.</p> <p>No unintended consequences were identified.</p>
<p>Language</p>	<p>Positive impact</p> <p>Data:</p>

	<p>Around 150 different languages are spoken in the borough. Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages. (State of the Borough 2016)</p> <p>Justification: It is hoped that by setting out clear guidance within the SPD relating to the process of assessing viability in the planning process, and requiring applicants to submit an executive summary, the information will be more accessible and easily understood. This will benefit everyone with an interest in planning, including residents and other stakeholders who may have difficulty communicating in English.</p> <p>No unintended consequences were identified.</p>
Health	<p>No disproportionate impact identified.</p> <p>Data: The State of the Borough 2016 reports that over 85% of people in Lambeth say they are in good or very good health, almost half (53%) in very good health. There are around 14,000 people who are in bad or very bad health, just under 5% of the population. This pattern is typical of London boroughs. Approximately one in four Lambeth households (around 30,000 households) has someone with a long-term health problem or disability, which is similar to London. About 6% of Lambeth residents have their day-to-day activities limited a lot by a long-term health problem or disability (18,600 people), and another 6.6% (20,000 people) are limited a little. Around 20,500 people provide unpaid care to someone else, just under 7%. This is one of the lowest rates of provision of unpaid care in London. (State of the Borough 2016)</p> <p>Justification: The SPD does not directly address health. However, by providing clear guidance the SPD will promote a more consistent and transparent approach to the assessment of viability</p>

	<p>appraisals that are submitted with planning applications. It is hoped that this will ultimately lead to the delivery of additional affordable homes through the planning system, which will benefit all people in need of affordable housing.</p> <p>No unintended consequences were identified.</p>
<p>2.2 Gaps in evidence base <i>What gaps in information have you identified from your analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are unable to fill in the gaps please state this clearly with justification.</i></p>	<p>There is currently no published data or research or anecdotal evidence, that we are aware of, which explores the links between sexual orientation or marriage and civil partnership and housing need. In the absence of data or other specific evidence it is not possible to judge the specific impact on these protected characteristics. However, the initial conclusions of the EIA will be reviewed in the light of any further evidence that emerges through public consultation on the draft SPD.</p>
<p>3.0 Consultation, Involvement and Coproduction</p>	
<p>3.1 Coproduction, involvement and consultation <i>Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?</i></p>	<p>A report seeking Cabinet approval to publicly consult on the draft SPD will be presented to Cabinet on 28 November 2016.</p> <p>The statutory Regulations governing the preparation of SPDs require a two stage process of consultation. The first stage of consultation is the most important in practical terms. This provides an opportunity for the community and stakeholders to influence the content of the draft SPD and for the council to take account of comments received in the final iteration of the SPD.</p> <p>A Consultation and Engagement Plan has been developed. A two-month public consultation on the draft SPD is proposed to take place from December 2016 to February 2017. This goes beyond the minimum requirements set out in the Lambeth Statement of Community Involvement 2015 (SCI), in order to encourage wide participation and to allow as many people as possible to respond to the consultation.</p>

The consultation methods used will reflect those outlined in the SCI. Electronic notification of the consultation with links to the draft SPD and response form will be emailed to contacts on the planning policy consultation database (this includes faith groups, amenity societies and other community groups, businesses, developers and landowners, individuals who have asked to be kept informed etc.), neighbouring boroughs and the Greater London Authority. In addition, the consultation will be publicised on the Planning Policy pages of the Lambeth Council website and copies of the draft SPD and response form will be made available online and in hard copy at Phoenix House and all Lambeth libraries.

The second stage of consultation will take place after responses to the first stage of consultation have been considered and any amendments made to the SPD. In accordance with the 2012 Regulations a consultation statement (setting out who was consulted, what issues were raised and how those issues have been addressed) will be prepared. This, together with the revised draft SPD, will be made available at Phoenix House and all Lambeth libraries and published on the council's website. Contacts on the planning policy consultation database, neighbouring boroughs and the GLA will also be notified electronically. Representations will be invited over a (minimum) four-week period.

Both stages of consultation will be open to responses from any interested parties, including local residents, developers and community groups and other stakeholders. We will try to specifically target as many equality groups as possible, particularly through the mail out. As part of the wider planning policy consultation database we intend to make use of the council's GIFTS database. We also propose to put a small poster in the libraries to generate more general awareness of the consultation. While it can be quite difficult to engage people in planning policy development, which people may find hard to relate to, by employing these methods we will try to be as inclusive as possible.

<p>3.2 Gaps in coproduction, consultation and involvement</p> <p><i>What gaps in consultation and involvement and coproduction have you identified (set out any gaps as they relate to specific equality groups)? Please describe where more consultation, involvement and/or coproduction is required and set out how you intend to undertake it. If you do not intend to undertake it, please set out your justification.</i></p>	<p>We intend to undertake a comprehensive approach to consultation, as required by statutory Regulations and in accordance with the council’s Statement of Community Involvement. As set out above, we will try to specifically target as many equality groups as possible, particularly through the use of the council’s GIFTS database and placement of small posters in the libraries to generate more general awareness of the consultation. While it can be quite difficult to engage people in planning policy development, which people may find hard to relate to, by employing these methods we will try to be as inclusive as possible.</p>
<p>4.0 Conclusions, justification and action</p>	
<p>4.1 Conclusions and justification</p> <p><i>What are the main conclusions of this EIA? What, if any, disproportionate negative or positive equality impacts did you identify at 2.1? On what grounds do you justify them and how will they be mitigated?</i></p>	<p>By providing clear guidance the SPD will promote a more consistent and transparent approach to the viability appraisal process. It is hoped that in doing so the SPD will ultimately lead to the delivery of additional affordable homes through the planning system.</p> <p>By enabling the delivery of more affordable housing the proposed guidance is likely to have a positive impact on all groups in need of affordable housing. The data set out in this EIA indicates that some equalities groups are over-represented in terms of affordable housing need. In this regard, the SPD is likely to have a positive impact on BAME communities, females, people with disabilities, people aged 25 to 64, and families with children in particular. It is therefore hoped that the SPD will help to deliver the council’s equalities (and affordable housing) objectives.</p> <p>In addition, the SPD will give additional support to the council’s requirement that appraisals should be treated transparently and be available for wider scrutiny. The</p>

	<p>availability of information submitted as part of the planning process is important to ensure public participation and confidence in the planning system. Requiring applicants to submit an executive summary will also ensure that viability information is more accessible and easily understood. This will help to improve local involvement in planning decision making and ultimately benefit everyone with an interest in planning and in particular those who may experience language barriers or greater difficulty in communicating due to disability.</p> <p>The SPD will also assist applicants with making successful planning applications that are in line with the adopted Development Plan and reduce the need for lengthy negotiations relating to viability.</p> <p>The EIA has not identified any direct negative impacts on any groups with protected characteristics. For this reason it is not considered that any mitigation measures are necessary. However, as set out below, the conclusions of the EIA will be reviewed following public consultation on the draft SPD and annual monitoring of affordable housing will allow us to assess what impact the SPD has had following adoption (if adopted).</p>
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4.2 Equality Action plan
Please list the equality issue/s identified through the evidence and the mitigating action to be taken. Please also detail the date when the action will be taken and the name and job title of the responsible officer.

Equality Issue	Mitigating actions
That the equality analysis may not have accurately covered all the equality impacts.	Review the conclusions of the EIA following public consultation on the draft SPD.
That the SPD may not result in the intended outcomes or may have other unintended consequences.	The Planning department monitors affordable housing approvals and completions and reports on this annually. Through this monitoring we will be able to assess what impact

