

<b>Equality Impact Assessment</b>	<b>Please enter responses below in the right hand columns</b>
<b>Date</b>	13 March 2017
<b>Sign-off path for EIA</b>	Head of Equalities
<b>Title of Project, business area, policy/strategy</b>	Confirmation of a Non-Immediate Article 4 Direction for change of use from office to residential
<b>Author</b>	Dominique Barnett
<b>Job title, directorate</b>	Senior Planner Policy, Neighbourhoods and Growth
<b>Contact email and telephone</b>	<a href="mailto:DBarnett@lambeth.gov.uk">DBarnett@lambeth.gov.uk</a> 0207 926 6991
<b>Strategic Director Sponsor</b>	Sue Foster

# London Borough of Lambeth Equality Impact Assessment

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 political vision, and outcomes?*

To confirm an Article 4 Direction made by the Council on the 25 July 2016 relating to a permitted development right for the change of use from office (B1a) to residential (C3). Once confirmed, the Article 4 Direction removes this permitted development right in targeted areas of the borough and any proposal involving the change of use from office to residential will require planning permission from 15 September 2017. This will enable the Council to manage the loss of office space by assessing any proposal against the adopted Local Plan policies.

## 2.0 Analysing your equalities evidence

### 2.1 Evidence

- State of the Borough Report 2016

### Protected characteristics and local equality characteristics

### Impact analysis

#### Race

#### Positive

The State of the Borough Report 2016 identifies that employment rates are lower for BME groups (66% compared to 85% for white working age residents). The removal of permitted development rights is likely to have a positive effect on the BME population by protecting office floor space which provides employment and business opportunities for all residents but particularly those currently unemployed. Removing permitted development rights and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents.

#### Gender

#### Unknown

No data is available on the businesses currently occupying the units to be protected by the Article 4 Direction and who they employ therefore it is not possible to assess the

	<p>impact of protecting the office floor space on gender. However, removing permitted development rights and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents.</p>
<b>Gender re-assignment</b>	<p><b>Unknown</b>  No data is available on the businesses currently occupying the units to be protected by the Article 4 Direction and who they employ therefore it is not possible to assess the impact of protecting the office floor space on those undergoing gender re-assignment. However, removing permitted development rights and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents.</p>
<b>Disability</b>	<p><b>Unknown</b>  No data is available on the businesses currently occupying the units to be protected by the Article 4 Direction and who they employ therefore it is not possible to assess the impact of protecting the office floor space on those with disabilities. However, removing permitted development rights and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents and are accessible to those with a disability.</p>
<b>Age</b>	<p><b>Positive</b>  The State of the Borough Report identifies that Lambeth has a relatively young age profile and is a destination for young working age people. 51% of the borough is aged 20-44 and 28% are 25-34. The removal of permitted development rights is likely to have a positive effect on young people and the working age population by ensuring the Council can control the loss of office floor space to ensure that businesses have access to floor space and can continue to provide jobs and employment opportunities to young people and those of a working age. Removing permitted development rights and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents.</p>
<b>Sexual orientation</b>	<p><b>Unknown</b>  No data is available on the businesses currently occupying the units to be protected by the Article 4 Direction and who they employ therefore it is not possible to assess the</p>

	<p>impact of protecting the office floor space on sexual orientation. However, removing permitted development rights and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents.</p>
<b>Religion and belief</b>	<p><b>Unknown</b> No data is available on the businesses currently occupying the units to be protected by the Article 4 Direction and who they employ therefore it is not possible to assess the impact of protecting the office floor space on religion and belief. However, removing permitted development rights and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents.</p>
<b>Pregnancy and maternity</b>	<p><b>Positive</b> Removing permitted development rights and assessing proposals for the suitability of office floor space to be converted to residential will have a positive impact on those with the pregnancy and maternity characteristics. B1a floor space could be located in employment or industrial areas where it is not appropriate to locate residential development due to noise, dust and smells which could have negative impact on those who are pregnant or new-born children. Requiring the change of use from office to residential can prevent them being located in inappropriate locations.</p>
<b>Marriage and civil partnership</b>	<p><b>Unknown</b> No data is available on the businesses currently occupying the units to be protected by the Article 4 Direction and who they employ therefore it is not possible to assess the impact of protecting the office floor space on marriage and civil partnership. However, removing permitted development rights and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents.</p>
<b>Socio-economic factors</b>	<p><b>Positive</b> The Article 4 Direction will have a positive impact on economic growth in the borough by ensuring that office and employment floor space is protected and requiring any proposed loss to be assessed against adopted Local Plan planning policies. This will protect the borough's potential for economic growth and development, opportunities for business</p>

	start-up and expansion, job retention and creation and future opportunities for local people which will benefit all residents and those with a protected characteristic.
<b>Language</b>	<b>Unknown</b> No data is available on the businesses currently occupying the units to be protected by the Article 4 Direction and who they employ therefore it is not possible to assess the impact of protecting the office floor space on language.
<b>Health</b>	<b>Positive</b> The State of the Borough 2016 reports that over 85% of people in Lambeth say they are in good or very good health. Just under 5% of the population have bad or very bad health and approximately one in four Lambeth households has someone with a long-term health problem or disability. Removing permitted development rights and requiring changes of use from office to residential to be submitted as a planning application and assessed against Local Plan policies will have positive impacts on the health of the borough. Any planning application will be assessed against factors such as impact on amenity, whether adequate daylight and sunlight are provided, air quality and noise are mitigated and units meet adopted space standards. It also will prevent residential accommodation being located in inappropriate locations whereby residents are subject to noise, dust and smells from other employment uses. All of these factors can have a negative impact on health and will ensure that residents continue to report to be in good or very good health as their living conditions will not be having a negative impact on their health and wellbeing.
<b>2.2 Gaps in evidence base</b>	The Council does not hold data on the businesses currently occupying the units and data on who they employ. This means it is not possible to assess the impact of the loss of these businesses or employers on those with protected characteristics if the B1a floor space they occupy was to be converted through residential under permitted development rights. No representations were received from the owners/occupiers of the affected buildings during the consultation on the making of the Article 4 Direction which meant that no further data could be gathered.
<b>3.0 Consultation, Involvement and Coproduction</b>	
<b>3.1 Coproduction, involvement and consultation</b>	After making the Article 4 Direction the LPA was required to notify affected owners/occupiers and the Secretary of State. 49 site notices were put up in the affected areas, 767 letters were sent to affected owners/occupiers, a public notice was placed in

	the Lambeth weekender and details of the Article 4 Direction were available on the Council's webpages. Representations on the making of the Article 4 Direction were sought between 29 July and 23 September. One representation was received and no representations were received from the affected landowners/occupiers and so no data could be gathered on who is occupying the businesses and who they employ.
<b>3.2 Gaps in coproduction, consultation and involvement</b>	The notification and consultation on the making of the Article 4 Direction were in accordance with the requirements of the General Permitted Development Order 2015. No further consultation on the Article 4 Direction is required but the same methods will be used to notify the necessary stakeholders that the Article 4 Direction has been confirmed.
<b>4.0 Conclusions, justification and action</b>	
<b>4.1 Conclusions and justification</b>	<p>The EIA has not identified any direct negative impacts on any groups with protected characteristics. It has identified there are likely to be positive impacts on BME groups, young people, those of working age and the pregnancy and maternity protected characteristic. It will also have a positive impact on the health of residents in the borough. Due to the lack of data available there is an unknown impact gender, gender re-assignment, disability, sexual orientation, religion &amp; belief and marriage &amp; civil partnership. However, removing the permitted development right and requiring conversions to residential to be assessed against adopted planning policies will result in quality accommodation that benefits all of the borough's residents.</p> <p>As no identified any direct negative impacts have been identified on any groups with protected characteristics, it is considered that no mitigation measures are necessary.</p>
<b>4.2 Equality Action plan</b>	
<i>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.</i>	
<b>Equality Issue</b>	<b>Mitigating actions</b>
<b>Example:</b>	<b>Example:</b>

