

Equality Impact Assessment Report	Please enter responses below in the right hand columns
Date to EIA panel, department, DLT or DMT	
Sign-off path for EIA	
Title of Project, business area, policy/strategy	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?

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. 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.

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 purpose of the Lambeth Development Viability Supplementary Planning Document (SPD) 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.

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.

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 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 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:

- 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:

- 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

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)

The table shows that approximately 60% of current tenancies, and 70% of new lettings are to BAME households. 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).

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.													
Gender	<p><u>Positive impact</u></p> <p>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="722 521 1879 781"> <thead> <tr> <th data-bbox="722 521 961 657"></th> <th data-bbox="961 521 1413 657">% Population living in Lambeth</th> <th data-bbox="1413 521 1879 657">% Living in social rented accommodation</th> </tr> </thead> <tbody> <tr> <td data-bbox="722 657 961 699">Male</td> <td data-bbox="961 657 1413 699">49.7</td> <td data-bbox="1413 657 1879 699">46.5</td> </tr> <tr> <td data-bbox="722 699 961 742">Female</td> <td data-bbox="961 699 1413 742">50.3</td> <td data-bbox="1413 699 1879 742">53.5</td> </tr> <tr> <td data-bbox="722 742 961 781">Total</td> <td data-bbox="961 742 1413 781">100</td> <td data-bbox="1413 742 1879 781">100</td> </tr> </tbody> </table> <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). 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>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</p>			% Population living in Lambeth	% Living in social rented accommodation	Male	49.7	46.5	Female	50.3	53.5	Total	100	100
	% Population living in Lambeth	% Living in social rented accommodation												
Male	49.7	46.5												
Female	50.3	53.5												
Total	100	100												

	<p>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>Gender re-assignment</p>	<p><u>None</u></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 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. 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>Disability</p>	<p><u>Positive impact</u></p> <p>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 1382 1881 1422"> <tr> <td data-bbox="722 1382 1276 1422"></td> <td data-bbox="1276 1382 1520 1422">Lambeth</td> <td data-bbox="1520 1382 1881 1422">London</td> </tr> </table>			Lambeth	London
	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)

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

	<p>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. 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>Age</p>	<p><u>Positive impact</u></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 65s, 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 significantly higher proportion of older people living in social rented accommodation than both London and England.</p> <table border="1" data-bbox="722 1333 1875 1408"> <tr> <td data-bbox="722 1333 1148 1408">All households where the Household Reference Person</td> <td data-bbox="1148 1333 1379 1408">Lambeth</td> <td data-bbox="1379 1333 1610 1408">London</td> <td data-bbox="1610 1333 1875 1408">England</td> </tr> </table>				All households where the Household Reference Person	Lambeth	London	England
All households where the Household Reference Person	Lambeth	London	England					

is aged 65 and over (households)			
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)

This shows that people aged between 25 and 44 years are allocated the highest proportion of new lettings in the borough. 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>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>Sexual orientation</p>	<p><u>Unknown</u></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 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>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</p>

	<p>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>Religion and belief</p>	<p><u>Unknown</u></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). 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 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. In the absence of further data or other specific evidence it is not possible to judge the specific impact on this protected characteristic. 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>Pregnancy and maternity</p>	<p><u>Positive</u></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>

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 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)

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

	<p>of households with children in need of affordable housing, this group is likely to benefit from the supply of more affordable homes.</p>
Marriage and civil partnership	<p><u>Unknown</u></p> <p>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. 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>
Socio-economic factors	<p><u>Positive impact</u></p> <p>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</p>

	<p>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>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>Language</p>	<p><u>Positive impact</u></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>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</p>

	<p>everyone with an interest in planning, including residents and other stakeholders who may have difficulty communicating in English.</p>
<p>Health</p>	<p><u>Positive impact</u></p> <p>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>It is hoped that the SPD will ultimately lead to the delivery of additional affordable homes through the planning system, which will benefit all people in need of affordable housing. This will have a positive impact on health by enabling those in need to move out of unsuitable housing, which may be overcrowded or in poor quality which can have negative health impacts. It can also have a positive impact on mental health by reducing stress and depression caused by housing issues.</p>
<p>2.2 Gaps in evidence base</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. No further data or information was provided during the two rounds of consultation.</p>

3.0 Consultation, Involvement and Coproduction

3.1 Coproduction, involvement and consultation

The statutory Regulations governing the preparation of SPDs require a two stage process of consultation. Consultation on the draft SPD took place for two months from December 2016 to February 2017. The methods used during the consultation reflected those outlined in the SCI. Electronic notification of the consultation with links to the draft SPD and response form were 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 was publicised on the Planning Policy pages of the Lambeth Council website and copies of the draft SPD and response form were made available online and in hard copy at Phoenix House and all Lambeth libraries.

None of the 23 representations received during the consultation made reference to any impact on protected characteristics or on health, language or socio-economic factors. The majority of the responses were received from developers, planning consultants and housebuilders. Responses were also received from statutory consultees, a private individual and a neighbourhood planning forum.

Following the first round of consultation, a small number of changes were made to the draft SPD. The majority of the changes made were to align the Lambeth SPD with the Mayor's Affordable Housing and Viability SPG.

A revised draft SPD and consultation statement were published for a four week consultation period from 5 April to 5 May 2017. 17 responses were received during this consultation and none of these made reference to any impact of the SPD on protected characteristics or on health, language or socio-economic factors.

3.2 Gaps in coproduction, consultation and involvement	No gaps have been identified in the methods used during the two rounds of consultation.
4.0 Conclusions, justification and action	
4.1 Conclusions and justification	<p>The Equality Action Plan for the draft SPD required a review of the conclusions of the EIA following the public consultation on the draft SPD. Having reviewed the conclusions of the initial EIA and the consultation responses, it is considered that the original conclusions remain the same. 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. 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. It is also likely to have a positive impact on health by reducing some of the health impacts of living in unaffordable, unsuitable or overcrowded housing.</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 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</p>

	<p>particular those who may experience language barriers or greater difficulty in communicating due to disability.</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, annual monitoring of affordable housing will allow us to assess what impact the SPD has had following adoption.</p>
<p>4.2 Equality Action plan <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></p>	
Equality Issue	Mitigating actions
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 the SPD has following its adoption (if adopted). However, it must also be noted that there are many other factors that influence the delivery of affordable housing (including the economic climate, property market, availability of grant funding etc).
<p>5.0 Publishing your results</p>	
The results of your EIA must be published. Once the business activity has been implemented the EIA must be periodically reviewed to ensure your decision/change had the anticipated impact and the actions set out at 4.2 are still appropriate.	
EIA publishing date	
EIA review date	
Assessment sign off (name/job title):	

All completed and signed-off EIAs must be submitted for publication on Lambeth's website. Where possible, please anonymise your EIAs prior to submission (i.e. please remove any references to an officers' name, email and phone number).