



Equalities Analysis Assessment

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1. The activity or decision that this assessment is being undertaken for

The introduction of a non-immediate Article 4 Direction that removes permitted development rights for the change of use from commercial, business and service use (Use Class E) to residential use (Use Class C3) in major centres, district centres, local centres, selected parades strategic industrial locations, selected locally significant industrial sites and mixed-use employment locations, as allowed under Class MA, of Part 3, of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (the GPDO 2015).

A report on the Article 4 Direction - Use Class E (commercial, business and services) to Use Class C3 (residential) will be considered by Mayor and Cabinet on the 6th of December.

2. The protected characteristics or other equalities factors potentially impacted by this decision

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity/Race	<input checked="" type="checkbox"/> Religion or belief	<input type="checkbox"/> Language spoken	<input type="checkbox"/> Other, please define:
<input checked="" type="checkbox"/> Gender/Sex	<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Household type	
<input type="checkbox"/> Income	<input type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Socio Economic	
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy and Maternity	<input type="checkbox"/> Refugee/Migrant/Asylum seeker	<input type="checkbox"/> Health & Social Care	
<input type="checkbox"/> Nationality	<input type="checkbox"/> Employment	<input type="checkbox"/> Veterans or reservists		

Given the extent of the Article 4 Direction area all of the above characteristics have been selected as a large group of people who live in the area may be impacted by the decision.

3. The evidence to support the analysis

Age

According to the 2021 Census there are 300,553 people living in Lewisham. Of this 18% are below the age of 15, 72% are between the ages of 15 and 64 and 10% are over the age of 65.

Sex

According to the 2021 Census there are 157,820 (53%) females living in Lewisham and 142,733 (48%) living in Lewisham.

Disability

According to the 2021, Census one in 6 people are living with a disability in Lewisham.

Sexual Orientation

According to the 2021 Census, 18,332 (6.1%) people aged 16 and over identify as gay or lesbian, bisexual or other sexual orientation in Lewisham.

Ethnicity/race

Population by race in Lewisham, 2021 census:

- White - 154,749 people or 51.5%
- Black - 80,473 people or 26.8%
- Asian - 26,927 people or 9.0%
- Mixed - 24,253 people or 8.1%
- Other - 14,151 people or 4.7%

Religion

Religious groups in Lewisham, 2021 census:

- Christian - 131,706 people or 43.8%
- Buddhist - 3,270 people or 1.1%
- Hindu - 6,459 people or 2.1%
- Jewish - 826 people or 0.3%
- Muslim - 22,264 people or 7.4%
- Sikh - 720 people or 0.2%
- Other - 135,308 people or 45.0%

Socio-Economic

Lewisham is the 31st most deprived local authority in England from a total of 333 according to the UK Government English Indices of Deprivation 2019.

Given the extent of the Article 4 Direction area all the above characteristics have been selected as a large group of people who live in the borough that may be impacted by the decision.

4. The analysis

Age

This Article 4 Direction will positively impact all because it protects employment floorspace in strategic locations to support a strong local economy and deliver employment-generating uses. Protecting employment floorspace may primarily benefit economically active people, and this will have positive spill over impacts for all ages.

The Article 4 Direction will also protect against the creation of poor-quality housing through permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation. The health and social impacts of poor quality housing disproportionately impact older people and young people. For example, children do less well at school, have poorer physical health and have increased stress, anxiety and depression when living in poor housing conditions.

The Article 4 Direction will also protect against the loss of shops, commercial, business, and services locally in key locations across the borough. The permitted development right would reduce the active frontages in town centres and mixed-use employment locations. Significant stretches of inactive frontages will undermine their long-term sustainability, vitality, viability, and diversity. The reduction in active ground floor uses would negatively impact the public realm, footfall and economic renewal. Poor public realm and non-inclusive design will significantly impact young and older people.

Sex

This Article 4 Direction will positively impact all because it protects employment floorspace in strategic locations to support a strong local economy and deliver employment-generating uses. Protecting employment floorspace may primarily benefit economically active people, and this will have positive spill over impacts for all.

The Article 4 Direction has positive impacts on mental health and wellbeing by helping to prevent poor quality conversions to housing for all local residents.

The permitted development right would reduce the active frontages in town centres and mixed-use employment locations. Significant stretches of inactive frontages will undermine their long-term sustainability, vitality, viability, and diversity. The reduction in active ground floor uses would negatively impact the public realm, footfall and economic renewal. The creation of a poor-quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. A higher fear of crime is found in women.

Disability

This Article 4 Direction will positively impact all because it protects employment floorspace in strategic locations to support a strong local economy and deliver employment-generating uses. Protecting employment floorspace may primarily benefit economically active people, and this will have positive spill over impacts for all abilities.

The Article 4 Direction will also protect against the creation of poor-quality housing through permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation. The health and social impacts of poor-quality housing disproportionately impact those who have a disability. Those who have a disability are likely to experience distinct issues arising from the lack of availability of an accessible home, including the indignity of not being able to live independently, poorer mental health, mobility problems, and feelings of social isolation and anxiety.

The Article 4 Direction will positively impact on those with a disability by helping to protect the viability, vitality and diversity of designated town centres and selected parades, which provide shops close to people's homes and in other accessible locations.

Sexual Orientation

This Article 4 Direction will positively impact all because it protects employment floorspace in strategic locations to support a strong local economy and deliver employment-generating uses. Protecting employment floorspace may primarily benefit economically active people, and this will have positive spill over impacts for all sexualities.

The Article 4 Direction has positive impacts on mental health and wellbeing by helping to prevent poor quality conversions to housing for all local residents.

The permitted development right would reduce the active frontages in town centres and mixed-use employment locations. Significant stretches of inactive frontages will undermine their long-term sustainability, vitality, viability, and diversity. The reduction in active ground floor uses would negatively impact the public realm, footfall and economic renewal. The creation of a poor-quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. Disproportionate victimisation is experienced by LGBTQ+ people.

Ethnicity/race

This Article 4 Direction will positively impact all because it protects employment floorspace in strategic locations to support a strong local economy and deliver employment-generating uses. Protecting employment floorspace may primarily benefit economically active people, and this will have positive spill over impacts for all races and ethnicities.

The Article 4 Direction will also protect against the creation of poor-quality housing through

permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation. The effect of poor housing disproportionately impacts the most vulnerable communities, including Black, Asian and minority ethnic communities.

The Article 4 Direction will positively impact on those belonging to a racial or ethnic minority, by ensuring that retail floorspace within town centres is protected and can continue to support shops that meet the needs of the borough's diverse communities.

Religion

This Article 4 Direction will positively impact all because it protects employment floorspace in strategic locations to support a strong local economy and deliver employment-generating uses. Protecting employment floorspace may primarily benefit economically active people, and this will have positive spill over impacts for all.

The Article 4 Direction has positive impacts on mental health and wellbeing by helping to prevent poor quality conversions to housing for all residents.

The Article 4 Direction will also help protect against the loss of shops, commercial, business, and services use locally in key locations across the borough. The permitted development right would reduce the active frontages in town centres and mixed-use employment locations. Significant stretches of inactive frontages will undermine their long-term sustainability, vitality, viability, and diversity. The reduction in active ground floor uses would negatively impact the public realm, footfall and economic renewal.

Socio-economic

The Article 4 Direction will positively impact all because it protects employment floorspace in strategic locations to support a strong local economy and deliver employment-generating uses. Therefore, as the local economy develops, individuals from a socio-economic disadvantage background will have more employment choice.

The Article 4 Direction will also protect against the creation of poor-quality housing through permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation. The health and social impacts of poor-quality housing has significant impacts those from low socio-economic backgrounds.

The Article 4 Direction will also protect against the loss of shops, commercial, business and services locally in town centres across the borough. This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable. Lewisham's town centres are important places for local and accessible economic opportunities for a range of communities, including those with socio-economic disadvantage.

Sources of information:

- [Research into the quality standard of homes delivered through change of use permitted development rights \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/611117/research-into-the-quality-standard-of-homes-delivered-through-change-of-use-permitted-development-rights.pdf)
- [the-marmot-review-10-years-on-full-report.pdf \(instituteofhealthequity.org\)](https://www.instituteofhealthequity.org/publications/the-marmot-review-10-years-on-full-report.pdf)
- [Healthy High Streets Full Report v3 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/611117/healthy-high-streets-full-report-v3.pdf)
- [Housing and disabled people: Britain's hidden crisis | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/housing-and-disabled-people/britains-hidden-crisis)
- [Overcrowded households - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://ethnicity-facts-figures.service.gov.uk/)

5. Impact summary

Overall, the impact of implementing the Article 4 Direction is positive. It protects against the negative impacts of the change of uses in key employment, industrial and town centre locations.

These include Strategic Industrial Locations, selected Locally Significant Industrial Sites, Mixed Use Employment Locations, Major Centres, District Centres, Local Centres and selected parades.

The Article 4 Direction aims to protect employment-generating uses to support a strong and inclusive local economy across the borough in town centres and key employment and industrial areas. The proposed permitted development right undermines Lewisham's town and local centres' long-term sustainability, vitality, viability, and diversity. High streets are important social spaces for older people, young people, and particular minority ethnic communities. Loneliness and social isolation is particularly pronounced in certain groups, such as LGBTQ+ communities, those with a long-term illness or disability, particular minority ethnic groups, and older people.

Lewisham's town centres are also important places for local and accessible economic opportunities for a range of communities. The proposed permitted development right would reduce vital commercial, business and service floorspace, which has many economic, social, health and wellbeing benefits for people with protected characteristics. The protection of uses that provide active frontages in town centres and mixed-use employment locations will support their long-term sustainability, vitality, diversity, viability, and quality place-making. The reduction in active ground floor uses would negatively impact the public realm, footfall, and economic renewal. Disadvantaged communities are more likely to live near poor-quality local high streets. The associated impacts, including area degradation, non-inclusive design and fear of crime, will significantly impact many of the protected characteristics.

Preventing conversions to residential uses also ensures that the quality of residential accommodation, including internal and external amenities, is prioritised. Housing that comes forward through permitted development has been evidenced to produce poor quality accommodation through their poor design and lack of amenity requirements. Poor quality housing has significant implications for several protected characteristics, including young people, older people, those with disabilities, particular ethnic communities and those with socio-economic disadvantage. For example, the health impacts of poor-quality housing include respiratory conditions, cardiovascular disease and communicable disease transmission, increased mortality and increased stress, depression and anxiety. Although space standards have been applied to permitted development housing – there isn't evidence yet to suggest improved housing conditions in practice.

Sources of information:

- [Research into the quality standard of homes delivered through change of use permitted development rights \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/642222/research-into-the-quality-standard-of-homes-delivered-through-change-of-use-permitted-development-rights.pdf)
- [the-marmot-review-10-years-on-full-report.pdf \(instituteofhealthequity.org\)](https://www.instituteofhealthequity.org/publications/the-marmot-review-10-years-on-full-report.pdf)
- [Healthy High Streets Full Report v3 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/642222/healthy-high-streets-full-report-v3.pdf)
- [Housing and disabled people: Britain's hidden crisis | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com/reports/housing-and-disabled-people-britains-hidden-crisis/)
- [Overcrowded households - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://ethnicity-facts-figures.service.gov.uk/)

6. Mitigation

There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.

7. Service user journey that this decision or project impacts

The service user the Article 4 Direction impacts are landowners seeking to change of use from commercial, business and service use (Use Class E) to residential use (Use Class C3) of building under permitted development Class MA. If the Article 4 Direction is confirmed and comes into effect, then the landowner – 'the applicant' - will need to obtain planning permission

from the Planning Service before making such land use changes.

**Signature of
Director**

Nick Fenwick