

## EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<b>Name of 'proposal' and how has it been implemented</b> (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	<b>Article 4 Direction – Office (B1a) to Residential (C3)</b>
<b>Directorate / Service</b>	<b>Strategic Planning - Plan Making Directorate of Place</b>
<b>Lead Officer</b>	<b>Tom Clarke</b>
<b>Signed Off By (inc date)</b>	<b>Marissa Ryan-Hernandez (04/07/2017)</b>
<b>Summary – to be completed at the end of completing the QA (using Appendix A)</b>	<div style="display: flex; align-items: flex-start;"> <div style="width: 20px; height: 20px; background-color: green; margin-right: 10px;"></div> <div> <p><b>Proceed with implementation</b></p> <p>As a result of performing the QA checklist, the project does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p> </div> </div>

Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
<b>1</b>	<b>Overview of Proposal</b>		
a	Are the outcomes of the proposals clear?	Yes	The Article 4 direction will prevent the unmanaged loss of office space in the borough's most important areas for employment, thus helping to maintain jobs and opportunities available to local people of all needs and backgrounds. The Article 4 direction will also help prevent housing coming forward that may not meet standards normally required

			<p>through the Local Plan such as provision of amenity space. In particular, the permitted development from offices to residential does not oblige developers to provide affordable housing. Therefore the Article 4 direction can help make sure that where residential development is proposed it provides sufficient affordable housing to help meet identified needs including from the BME community and people with disabilities.</p> <p>In terms of statutory public consultation, this is guided by legislation. While Article 4 directions are not referenced within the Council's Statement of Community Involvement (SCI) (2012) the consultation will be carried out in the spirit of the SCI. This will include extending the consultation period from the minimum of four weeks to six weeks which maximise the opportunity for people of all needs and backgrounds to submit representations. It will also mean contacting a wide range of consultees including community groups and representative groups to ensure a diverse group of people are given the opportunity to comment.</p>
b	Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?	Yes	The SCI sets out how, when and where the council will consult with local and statutory stakeholders in the process of planning for the local authority area, both in producing development plan documents and in carrying out the development control function. The document take account of the wide ranging community involvement in planning to make sure all our communities can have a say in the Council's planning decision making processes, including language diversity issues, knowledge of planning issues, age, the business community, residential who are likely to be most affected by what is proposed through the planning system, consultation period and on and off-line services.
<b>2</b>	<b>Monitoring / Collecting Evidence / Data and Consultation</b>		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	There are adequate demographic data and other data sets that can be used to support claims about impacts arising from

			the Article 4 direction.
b	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	The Article 4 direction is underpinned by evidence base including the Employment Land Review (ELR) (2016) prepared for the Council and is supported by the Mayor of London as articulated through the London Plan, City Fringe Opportunity Area Planning Framework and their supporting documents. Those documents were themselves subject to public consultation.
c	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	The Article 4 direction has been prepared utilising officers from across the Council, and has been prepared in accordance with relevant legislation.
d	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	The purpose of the statutory consultation is to obtain representations from persons with an interest in the Article 4 direction. The SCI encourages public participation in planning decisions. By according with the SCI it can be ensured that any groups impacted by or with an interest in the Article 4 direction may have a say.
<b>3</b>	<b>Assessing Impact and Analysis</b>		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	N/A	The nature of Article 4 direction means that it seeks to protect strategically important employment land and prevent housing coming forward that may not contribute to the borough's need for affordable and family housing and may not provide elements beneficial to the wellbeing of future inhabitants such as minimum space standards and amenity space. As such It is considered the Article 4 direction would prevent negative impacts amongst the nine protected characteristics.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	N/A	As stated above.
<b>4</b>	<b>Mitigation and Improvement Action Plan</b>		
a	Is there an agreed action plan?	N/A	The SCI, with which the statutory consultation for the Article 4 direction is according, sets out how, when and where the Council will consult with local and statutory stakeholders.
b	Have alternative options been explored	Yes	The alternative option is not to introduce an Article 4 direction. This would have negative impacts on the

			borough's supply of offices and jobs and on housing standards and as such would have a detrimental impact on protected characteristics.
<b>5</b>	<b>Quality Assurance and Monitoring</b>		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	In terms of proposals for change of use, the number of planning applications submitted that would otherwise have been permitted development can be monitored.  For the statutory public consultation, an Equality Monitoring Form will be available during the consultation stage and the feedback received will be analysed by officers. This will inform the final quality assurance checklist.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	N/A	When the Article 4 direction is issued and takes effect, proposals for change of use to residential must be made using a full planning application and accord with the policy requirements within the Local Plan. This includes policies to ensure the quality and suitability of residential accommodation provided for future occupants. The Local Plan and the content within is subject to a full Equalities Impact Assessment. The full impact of the Article 4 direction will not be known as it is likely that several potential conversions from office to residential will simply not come forward upon introduction of the Article 4 direction. However, where applications do come forward an estimate can be made as to the likely quantum of affordable housing that will be provided that otherwise wouldn't have come forward, or indeed where proposals are refused the quantum of office floorspace that would otherwise have been lost.
<b>6</b>	<b>Reporting Outcomes and Action Plan</b>		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	While the Executive Summary does not explicitly refer to protected characteristics, it highlights the implications on housing standards and impact on office floorspace and jobs from this type of permitted development which themselves have an impact on protected characteristics.

## Appendix A

### (Sample) Equality Assessment Criteria

Decision	Action	Risk
<p>As a result of performing the QA checklist, it is evident that due regard is not evidenced in the proposal and / or a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. It is recommended that the proposal be suspended until further work or analysis is performed – via a the Full Equality Analysis template</p>	<p><b>Suspend – Further Work Required</b></p>	<p><b>Red</b></p> 
<p>As a result of performing the QA checklist, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p><b>Proceed with implementation</b></p>	<p><b>Green:</b></p> 