

Equality Impact Assessment Screening Tool

1	Lead officer contact details: Philip Crowther – Philip.crowther@haringey.gov.uk
2	Date: 17.1.2020
3	Summary of the proposal: To make a non-immediate Article 4 Direction removing permitted development rights which allow offices (B1a) to change use to residential (C3) by way of prior approval. This withdrawal of permitted development rights would apply in Growth Areas, Metropolitan and District Centres as designated on Haringey’s Local Plan adopted polices map. Future such proposals would need a full planning permission to change use.

Response to Screening Questions	Yes	No	Please explain your answer.
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a) Type of proposal

4.	Is this a new proposal or a significant change to a policy or service, including commissioned service?		X	The proposal will involve removal of certain permitted development rights in certain areas of the Borough. Prior to 2013 these permitted development rights did not exist.
5.	Does the proposal remove, reduce or alter a service or policy?	X		The proposal will remove certain permitted development rights in Growth Areas, Metropolitan and District Centres. In respect of the permitted development right which is removed, the effect will be that parties proposing such types of development will be required to submit a planning application to the Council (whereas this would not be necessary if the permitted development right had not been withdrawn). There will be a fee due to the Council in respect of the planning application versus a minor £96 fee if the permitted development right had not been removed.
6.	Will there be a restructure or significant changes in staffing arrangements? Please see the restructure pages for guidance for		X	No

	restructure EqlAs.			
7.	If the service or policy is not changing, have there been any known equality issues or concerns with current provision. For example, cases of discrimination or failure to tackle inequalities in outcomes in the past?		X	The Council has restricted many permitted development rights in conservation areas, and has also restricted permitted development rights for changes of use from warehousing (B8) to residential, and from residential (C3) to a HMO (C4). This is not known to have given rise to any negative equalities issues.
b) Known inequalities				
8.	Could the proposal disproportionately impact on any particular communities, disadvantaged or vulnerable residents?		X	The proposal has potential to impact equalities in two main ways. Firstly, the proposal will create a new cost burden. This will apply where parties have to fund a planning application and supporting work in respect of an application that would not have been necessary had this particular permitted development right not been removed. This could be argued to have potential to affect those on lower incomes who may be in some of the protected groups. However, this is extremely unlikely, as such a person would have to own an office premises and have the means to undertake conversion to residential to have benefitted from this permitted development, and so in effect this can be discounted. Secondly, the proposal may impact positively upon all groups that share the protected characteristics, by ensuring that within these defined areas any office conversion to residential is subject to proper scrutiny by way of a full planning application, ensuring affordable housing, space standards, and decent levels of amenity are provided, and that valuable employment floorspace is protected. This will particularly benefit disability groups, through ensuring standards on accessibility in the Local Plan are met.

				Nevertheless, public consultation is required on the proposals before they can be confirmed. This will provide the opportunity for any unforeseen equalities issues to be raised and the Council will have chance to consider these before deciding whether to confirm the proposals. The Council will take measures to ensure that the consultation process is inclusive in accordance with the Council's Statement of Community Involvement.
9.	<p>Is the service targeted towards particular disadvantaged or vulnerable residents?</p> <p><i>This can be a service specifically for a group, such as services for people with Learning Disabilities. It can also be a universal service but has specific measures to tackle inequalities, such as encouraging men to take up substance misuse services.</i></p>		X	No
10.	<p>Are there any known inequalities? For example, particular groups are not currently accessing services that they need or are more likely to suffer inequalities in outcomes, such as health outcomes.</p>	X		Yes, there is clear evidence that through these permitted development rights substandard residential accommodation is being created without sufficient amenity for residents. This can particularly impact disabled people and those on low incomes. It negatively impacts upon disabled groups as by way of permitted development, space and accessibility standards in the Local Plan can not be secured, and so often the developments will not be suitable or adaptable for those with disabilities. It will also negatively impact those on low incomes, as the standard of accommodation delivered is often well below Planning minimums in terms of amenity, space, access to daylight and amenity space, and the

				resulting accommodation will often only be taken up by those on the lowest income with no other alternative.
11	Full EqIA may be needed if Yes has been indicated in any answer			It is not considered a full EqIA is necessary given the information provided above, notably that the proposal is likely to have no/minimal negative impact on groups that share the protected characteristics or other disadvantaged groups. Indeed, the inverse is likely in that outcomes from this course of action will be inherently beneficial to all, including groups with protected characteristics.