

Article 4 Directions relating to demolition and change of use from commercial buildings to residential

No.	Title
Appendix A	Draft Article 4 Directions proposed
Appendix B	Map of the areas subject to proposed Article 4 Directions
Appendix C	Equalities Impact Assessment
Appendix D	GLA strategic evidence to support London borough Article 4 Directions

**Article 4 Directions
Equalities Impact Assessment
July 2021**

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- We have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- We review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- We take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- We consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the protected characteristics and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others who can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present within divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments. Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health and wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1

Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Article 4 Directions Report for Planning Committee			
Equality analysis author		Lauren Wilkinson/Michael Gozo			
Strategic Director		Stephen Platts			
Department		Planning	Division	Chief Executive's	
Date of analysis		July 2021			
Sign-off	Laura Hills Juliet Seymour Colin Wilson	Position	Planning Policy Team Leader, Planning Policy Manager, Head of Old Kent Road Regeneration	Date	July 2021

Section 2: Brief description of policy/decision/business plan

This equalities analysis report supports the report, which request confirmation on the introduction of the following Article 4 Directions:

Article 4 Direction for the prevention of change of use from office use to a dwelling house

- Approves non-immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for changes of use from office use (Class E(g)(i)) to a dwelling house(Class C3) in the Central Activities Zone and railway arches in Southwark.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches

- Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for changes of use from Commercial, Business and Leisure (Class E - except offices) to a dwelling house (Class C3) in the Central Activities Zone and railway arches in Southwark.

Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL

- Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for changes of use from Commercial, Business and Leisure (Class E)to a dwelling house (Class C3) in the following locations:
 - Town centres including primary and secondary shopping frontages and New Southwark Plan Site Allocations inside town centres.
 - Secondary shopping frontages outside of town centres
 - New Southwark Plan Site Allocations outside of town centres
 - New Southwark Plan proposed Strategic Protected Industrial Land

Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses

- Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class ZA (to be amended) of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for demolition of commercial buildings and construction of new dwelling houses in the following locations:
 - Town centres including primary and secondary shopping frontages and New Southwark Plan Site Allocations inside town centres
 - New Southwark Plan Site Allocations outside of town centres

- New Southwark Plan proposed Strategic Protected Industrial Land

Summary of the Impacts

Overall, the impact of the Article 4 Directions implementation is positive. It protects against the negative impacts of change of uses in key strategic locations including the Central Activities Zones, Town Centres, New Southwark Plan Site Allocations and SPIL. These Article 4 Directions are designed to protect employment generating uses to support a Strong Local Economy across the borough in town centres and key employment areas such as the Central Activities Zone.

The proposed permitted development right undermine the long-term sustainability, vitality and viability of Southwark's town and local centres. High streets are not only important economic places, but also social spaces for elderly people, young people and particular minority ethnic communities.¹ 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 the elderly.² Southwark's high streets are also important places for local and accessible economic opportunities for a range of communities, including young people, mothers and particular minority ethnic communities. The proposed permitted development right would reduce crucial commercial, business and service floorspace, which has many economic, social, health and wellbeing benefits for people with protected characteristics.

The protection of uses which provide active frontages in town centres, high streets and key employment locations, will support their long-term sustainability, vitality and viability, and support quality place-making. The reduction in active ground floor uses, would have a negative impact on 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 have significant impacts for many of the protected characteristics.

The prevention of conversions to residential uses also ensures that residential quality of accommodation, amenity and safety are prioritised. Historically, housing produced through permitted development has been evidenced to produce poor quality accommodation, chronic space shortage; the ignoring of basic standards of light and ventilation; and inappropriate locations for housing. The impacts of poor quality housing has significant implications for a number of protected characteristics, including young people, older people, those with disabilities, pregnancy and maternity, particular ethnic communities and those with socio-economic disadvantage, The health impacts of poor quality housing include respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety. Although space standards have been applied to permitted development housing – there isn't the evidence available yet to suggest improved housing conditions in practice.

There are few specific positive impacts on health from the adoption of Article 4 Directions. The overall impact on health is neutral, and it is likely that the impact of the protection of

¹ We Made That, LSE Cities, High Streets for all (2017)

² Office for National Statistics (2018). Loneliness – What characteristics and circumstances are associated with feeling

certain land uses in town centres and the prevention of change of use to residential from office space will ensure a high quality of residential accommodation and amenity for residents in Southwark, which will benefit long term mental health and wellbeing of local residents.

Section 3: Service users and stakeholders

Service users and stakeholders	
Key users of the department or service	Members of the public; Developers; Local Authorities; Housing Associations; Environment and Leisure Department; Flood and Drainage Department; Children’s and Adult’s Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Place and Wellbeing Department; Greater London Authority; Transport for London; Thames Water; Metropolitan Police; Chief Executive’s Department.
Key stakeholders were/are involved in this policy/decision/business plan	Members of the public; Housing Associations; Local Authorities Environment and Leisure Department; Children’s and Adult’s Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Place and Wellbeing Department.

Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with ‘protected characteristics’, the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council’s declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses.</p> <p>The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses. Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all ages.</p> <p>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.³ The health and social impacts of poor quality housing disproportionately impacts older people, young people. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression.⁴</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.</p> <p>Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for local residents. Those who are very young, or elderly are most vulnerable to the impacts of this, and therefore the Article 4 Direction has positive impacts on health, specifically mental health and wellbeing. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression.⁵ Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.⁶</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality</p>

³ Clifford, B., Canelas, P., Ferm, J. and Livingstone, N., Lord, A. and Dunning, R., *Research into the quality standard of homes delivered through change of use permitted development right* (2020), UCL and University of Liverpool

⁴ Michael Marmot, Jessica Allen, Tammy Boyce, Peter Goldblatt, Joana Morrison (2020) *Health equity in England: The Marmot Review 10 years on*. London: Institute of Health Equity

⁵ *Ibid.*

⁶ *Ibid.*

<p>which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Housing produced through permitted development has been evidenced to produce poor quality accommodation. The health and social impacts of poor quality housing disproportionately impacts older people, young people.</p> <p>Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p>residential accommodation and amenity. Poor quality housing has a number of health impacts. Those who are very young, or elderly are most vulnerable to the impacts of this, and therefore the Article 4 Direction has positive impacts on health, specifically mental health and wellbeing. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression. Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This proposed right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets. For example, poor public realm and non-inclusive design will have significant impacts on young children and older people.⁷</p> <p>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</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>Those who are very young, or elderly are most vulnerable to the impacts of this, and therefore the Article 4 Direction has positive impacts on health, specifically mental health and wellbeing. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression. Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.</p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers. Higher levels of</p>

⁷ Daly S, Allen J, *Healthy High Streets*, Public Health England and Institute of Health Equity: London; 2018

<p>more vulnerable including those who are very young or elderly.</p> <p>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 impacts older people, young people.</p>	<p>fear of crime are experience by young people and older people.⁸</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensuring employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities which has wider positive societal benefits for all, and especially those who are more vulnerable due to their age.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise. The equality and health data specifically relied upon has been referenced throughout this report.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p>	
<p>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.</p>	

<p>Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>

⁸ *ibid.*

<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all abilities. The changes of uses to residential will have a negative impact on individuals with disabilities as office units were not built primarily in mind. For instance, office, commercial and leisure units may not have safe access for wheelchairs and people with limited mobility could struggle. There may be also limited vehicle spaces. Article 4 Directions will ensure there will be quality homes will be built, accessible and adaptable for people with disabilities. Overall, this will ensure there is a positive impact on those of all abilities.</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.</p> <p>Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for local residents. Those who have a disability are likely to experience distinct issues arising from the lack of availability of having an accessible home, including: indignity of not being able to live independently, poorer mental health, mobility problems, feelings of social isolation and anxiety, four times less likely to be in work.⁹</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for those of all abilities. Those who have a disability are likely to experience distinct issues arising from the lack of availability of having an accessible home, including: indignity of not being able to live independently, poorer mental health, mobility problems, feelings of social isolation and anxiety, four times less likely to be in work.</p>

⁹ Equality and Human rights Commission, *Housing and disabled people: Britain's hidden crisis* (2018)

<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This proposed right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets. For example, poor public realm and non-inclusive design will have significant impacts on people with disabilities.¹⁰</p> <p>The Article 4 Direction 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.</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for those of all abilities. Those who have a disability are likely to experience distinct issues arising from the lack of availability of having an accessible home, including: indignity of not being able to live independently, poorer mental health, mobility problems, feelings of social isolation and anxiety, four times less likely to be in work.</p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime, and disproportionate victimisation. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Increased risk of trips and falls, and road traffic injury or mortality.¹¹</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially those of all abilities.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>

¹⁰ Daly S, Allen J, *Healthy High Streets*, Public Health England and Institute of Health Equity: London; 2018

¹¹ Ibid.

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.

Mitigating actions to be taken

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.

Gender reassignment - The process of transitioning from one gender to another.

Potential impacts (positive and negative) of proposed policy/decision/business plan

Potential health impacts (positive and negative)

Article 4 Direction for the prevention of change of use from office use to a dwelling house

This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.

Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.

Article 4 Direction for the prevention of change of use from office use to a dwelling house

By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.

Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches

This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches

This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.

<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations 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.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p> <p>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.</p>	

<p>Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations,</p>

<p>floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.</p>	<p>employment floorspace is protected to deliver more jobs for local people.</p> <p>Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression.¹² Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all, and especially those who are more vulnerable.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough.</p> <p>This permitted development right would reduce the active frontages in town centres, high streets and key employment locations.</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial</p>

¹² Health equity in England: The Marmot Review 10 years on

<p>Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets. For example, poor public realm and non-inclusive design will have significant impacts on people who share the pregnancy and maternity protected characteristic.¹³</p> <p>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.</p>	<p>behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers. Non-inclusive design has a significant impact on parents with young children.¹⁴</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p>	
<p>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.</p>	

¹³ *Healthy High Streets*

¹⁴ *Ibid.*

<p>Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u> This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.</p> <p>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.¹⁵ The effects of poor housing disproportionately impacts the most vulnerable communities, including Black, Asian and minority ethnic communities.</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u> By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.</p> <p>Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. Poor quality housing has a number of health impacts. Particular minority ethnic communities disproportionately experience poor quality housing.¹⁶ Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u> This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u> This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.</p> <p>Poor quality housing has a number of</p>

¹⁵ Research into the quality standard of homes delivered through change of use permitted development right

¹⁶ <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest#by-ethnicity>

<p>employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p> <p>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.¹⁷ The effects of poor housing disproportionately impacts the most vulnerable communities, including Black, Asian and minority ethnic communities.</p>	<p>health impacts. Particular minority ethnic communities disproportionately experience poor quality housing.¹⁸ Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations 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.</p> <p>This permitted development right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets.¹⁹</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. Higher fear of crime is found in black and minority ethnic communities, along with young people, older people and women. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers.</p>
<p><u>Article 4 direction to prevent the demolition</u></p>	<p><u>Article 4 direction to prevent the demolition</u></p>

¹⁷ *Research into the quality standard of homes delivered through change of use permitted development right*

¹⁸ <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest#by-ethnicity>

¹⁹ *Healthy High Streets*

<p><u>of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p>	
<p>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.</p>	

<p>Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people. Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.</p>

<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations 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.</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	

Mitigating actions to be taken

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.

Sex - A man or a woman.

Potential impacts (positive and negative) of proposed policy/decision/business plan

Potential health impacts (positive and negative)

Article 4 Direction for the prevention of change of use from office use to a dwelling house
 This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.
 Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.

Article 4 Direction for the prevention of change of use from office use to a dwelling house
 By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people. Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches
 This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches
 This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.

Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL
 The Article 4 Direction will also protect

Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL
 There are no specific identified positive,

<p>against the loss of small affordable shops, commercial, business and leisure uses locally in key locations 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.</p> <p>This permitted development right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on 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. Higher fear of crime is found in women, along with black and minority ethnic communities, young people, and older people.</p>	<p>negative or neutral impacts on health for this protected characteristic.</p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p>	
<p>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.</p>	

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people. Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>

<p>locally in key locations 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.</p> <p>This permitted development right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on 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. Whilst higher fear of crime is found in women, black and minority ethnic communities, young people, and older people. Disproportionate victimisation is experienced by LGBTQ+ people, alongside young black men, people with disabilities, and women.²⁰</p>	<p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	

²⁰ *Healthy High Streets*

Mitigating actions to be taken

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.

Socio-economic disadvantage – although the Equality Act 2010 does not include socioeconomic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.

Potential impacts (positive and negative) of proposed policy/decision/business plan**Potential health impacts (positive and negative)**Article 4 Direction for the prevention of change of use from office use to a dwelling house

This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.

Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.

The Article 4 Directions will ensure there is strong employment across the borough. 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.²¹

Article 4 Direction for the prevention of change of use from office use to a dwelling house

By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.

Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents, regardless of background. Poor quality housing has a number of health impacts. Particular minority ethnic communities disproportionately experience poor quality housing.²² Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.

²¹ Adam Tinson and Amy Clair, *Better housing is crucial for our health and the COVID-19 recovery*, Health Foundation (2020)

²² <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest#by-ethnicity>

<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all. This is especially important for those from a socio-economic disadvantage background as they are more likely to reside in poor quality housing. This Article 4 Direction aims to reduce poor quality housing in railway arches for this reason.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations 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. Southwark's key commercial areas are important places for local and accessible economic opportunities for a range of communities, including those with socio-economic disadvantage.</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>

societal benefits for all, and especially for those who are more vulnerable.	
Equality information on which above analysis is based	Health data on which above analysis is based
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
Mitigating actions to be taken	
<p>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.</p>	

Human Rights
<p>There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol.</p>
Potential impacts (positive and negative) of proposed policy/decision/business plan
<p>The Council has carefully considered the balance to be struck between individual rights and the wider public interest. The rights of those affected by the proposed Article 4 Directions have been considered under the Human Rights Act 1998 and it has been determined that none of the Articles will be triggered.</p>
Information on which above analysis is based
<p>Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights (ECHR). Various Convention rights may be engaged in the process of making and considering the Article 4 Directions, including under Articles 1 and 8 of the First Protocol. The European Court has recognised that “regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole”. Both public and private interests are to be taken into account in the exercise of the Council’s powers and duties as a local planning authority. Any interference with a Convention Right must be necessary and proportionate.</p>
Mitigating actions to be taken
<p>There are no further mitigating actions to take.</p>