

## Affordable Workspace Supplementary Planning Document Full Equality Impact Analysis

(Note: the Equality Impact Analysis contained herein is referred to as EQIA, and not EIA for the purposes of this report. This is to avoid confusion with Environmental Impact Assessments, which are known as EIA in planning terms.)

Overall Information	Details of Full Equality Impact Analysis
<b>Financial Year and Quarter</b>	2022 Q2
<b>Name and details of policy, strategy, function, project, activity, or programme</b>	<p>The Supplementary Planning Document (SPD) aims to improve implementation of affordable workspace policy objectives by providing further guidance on implementing and signposting of the appropriate local plan and London Plan policies and the commissioned viability reports. The SPD also supports the Council's Core Values and the delivery of objectives of the Industrial Strategy and meets several of the Council's Business Plan commitments. The SPD and up to date evidence base provides detailed guidance to help with negotiating developments to provide affordable space to support local start-up entrepreneurs, small businesses and the voluntary/charity sectors. Details on implementation are included such as an example workspace management plan, to inform a potential affordable workspace provider and make sure it will be targeted at local people and businesses.</p> <p>The SPD establishes more detailed guidance on the application and implementation of policies that seek affordable space in larger schemes, and more flexible space to meet a clear borough need for local start-ups and SMEs. This SPD can address social value as local charities and voluntary organisations can benefit from discounted rates. The SPD is accompanied by an evidence base report on viability of seeking discounted market rents and alternative affordable and flexible options. The SPD and accompanying evidence provides examples of, and guidance on the different types of affordable workspace and example of modal workspace management plan. This should improve implementation and delivery of policy objectives which reflect the Council's vision to achieve a stronger local economy that provides training and job opportunities for local people; and securing and promoting employment.</p> <p>The SPD as all supplementary planning documents, does not propose new policy but strengthens the ability to achieve Local Plan's objectives by guiding planning applications and negotiations that will come forward on suitable sites for contributing towards affordable workspace provision. As the SPD draws upon policies in the Local Plan and principles in the Planning Guidance SPD and the H&amp;F Industrial Strategy, it should be read in conjunction with these policy documents. In response to a changing financial landscape, a number of technical changes were made to the SPD to provide more flexibility and greater clarity in its role a guidance document. These aim to strike a balance between delivery of affordable workspace to benefit local residents and businesses, and ensuring development would remain viable and can still go ahead.</p>

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<b>Date of completion of final EQIA</b>	September 2022

<b>Section 02</b>	<b>Scoping of Full EIA</b>
<b>Plan for completion</b>	<p><b>Timing:</b> This Equality Impact Assessment (EQIA) will support the consultation of the SPD and adoption of the document which is due to take place in Winter 2021/22.</p> <p><b>Resources:</b> Officer time</p> <p><b>Lead Officer:</b> David Gawthorpe, Team Leader Development Planning Team</p>
<b>What is the policy, strategy, function, project, activity, or programme looking to achieve?</b>	<p>The purpose of the Affordable Workspace SPD is to provide guidance on affordable workspace provision, outline existing policy principles and sets out best practice advice on implementation of affordable workspace policy. Informing negotiations from early discussion to planning obligations. The SPD will enable the Council to work with Affordable Workspace operators to ensure workspace continues to deliver specific cultural, social and economic development objectives to the borough.</p> <p>The SPD seeks to secure affordable workspace at rents maintained below the market rate for specific sectors that have social and cultural value such as charities, voluntary and community organisations, artists and creative industries as well as start-ups. As the document focusses on detailed guidance and facilitating implementation, it provides an important resource for identifying maximising the opportunity to meet the needs of a range of small SMEs, start-ups and non-profit organisations which otherwise could not afford to locate in the borough. This should help retain a more diverse local economy and offset losses of business space through permitted development. The will facilitate the delivery of more affordable workspace in Hammersmith and Fulham, supporting social, cultural and economic outputs, economic recovery and contribute to reducing economic deprivation.</p>

<b>Section 03</b>	<b>Analysis of relevant data and/or undertake research</b>
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## Documents and data reviewed

The following documents and data have been used to help inform this Equality Impact Analysis:

### **Consultation on our Draft Equalities Plan 2021-25**

The Council's draft Equality Plan 2021-2025 sets out the Council's vision for tackling inequality and responding to the public sector equality duty. The document draws on five objectives:

1. Everyone in our borough must feel valued when the Covid-19 pandemic ends.
2. Removing barriers to inclusion.
3. Ensuring that our services tackle the disproportionate impact on young people of the risks of street crime and exploitation by gangs.
4. Improving opportunities for all.
5. Becoming an employer of choice and fostering greater inclusion

### **Community Strategy**

The Hammersmith and Fulham Business Plan 2018-2022 sets a framework of the council's main priorities which are fundamental to the Local Plan and the Draft Equality Plan. The plan combines opportunity, with social responsibility and social justice to assist the vast majority of people in the borough to help themselves while supporting the most vulnerable in the community. This is therefore considered to be consistent with the statutory codes in relation to race, gender, disability, and other equalities characteristics.

### **Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-2021**

Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-2021 sets out an ambitious vision for improving the health and wellbeing of people in the borough and securing a sustainable system for the future. The strategy is for a people-centred health and social care system that supports communities to stay well, consistently providing the high quality care and support the most vulnerable people in the community. This includes tackling health inequalities within our communities, overcoming high levels of child poverty and child obesity and severe mental illness in the country. the strategy is therefore considered to be compliant with the statutory codes in relation to equalities characteristics.

### **Census 2011 (ONS)**

The 2011 Census describes the resident population of the UK and its constituent countries, by age and sex, and provides information on how the population has changed over time.

### **GLA projections 2018 and 2020**

The trend-based projections 2020 is the most recent set of projections released in September 2021 by the GLA

### **Office for National Statistics (ONS) population estimates 2020**

The Office for National Statistics provide the annual population estimates in mid-2019 to mid-2020. These figures inform the Equality Impact Analysis on population changes and growth reflecting the impact of the first wave of coronavirus (COVID-19) pandemic and they cover the period up to 30 June 2020.

### **Demographics of Equality Target Groups**

A summary of the demographic situation in relation to each of the equality groups is given below. This provides a starting point for the analysis of likely impacts of the Affordable Workspace SPD on these groups.

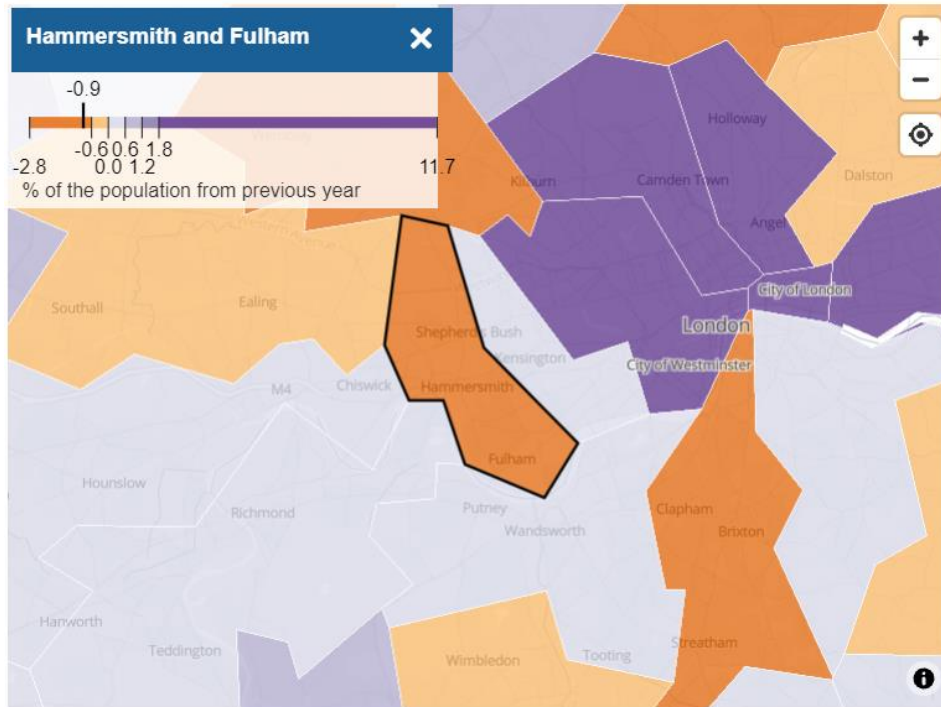
#### **Population**

The Population of Hammersmith and Fulham has risen by over 10% from 165,242 in 2001 to 182,500 in 2011. The population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about half of all households having moved in the previous five years. Nearly half of the population (45%) is between the ages of 20 and 40 years old which is significantly higher than in London (32%) and the rest of the country (27%). The borough has a high proportion of single people, the fourth highest proportion (55.9%) in London. Three in ten (29%) of all households consist of one person (Source: 2011 Census).

According to the 2020 GLA Population projections the borough's population is expected to increase by 20,840 people (11.4%) between 2018 and 2043. The projected increase in population between 2021 and 2031 is 7.2%; a similar level as the London average (7.9%). While there will be growth in the borough's population in all age groups, the main growth will occur for people aged 84 and over. The population in that age group is expected to increase by 1,273 by 2031, equivalent to 42.8%. The population aged 64-83 is expected to grow by 33% during the same period and population aged 50 to 63 to grow by 13.3%.

From mid-2019 and 2020 there have been changes in local populations driven by different factors (migration, births and deaths). Despite the effects of the coronavirus (COVID-19) pandemic and a slowing of national population growth in the year to mid-2020, in this period, ONS estimated the population grew in 294 out of the 374 local authorities of the UK. A decrease of population has been registered in the borough of Hammersmith and Fulham (negative 0.9%) according to the Office for National Statistics.

**Figure 1: Population change and components of change in Hammersmith & Fulham mid-2019 and mid-2020**



Source: ONS

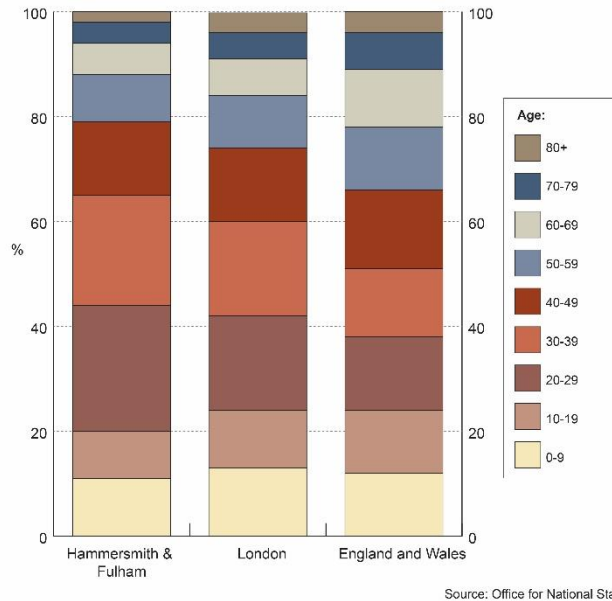
### Age

In 2011, the borough had a higher proportion of young adults aged 25-39 (35.7%) than London (28%) and England and Wales (20%). Conversely, the proportion of children and young adults (0-24) in the borough was lower than in London (26.7% compared to 32.2%) and England and Wales (30.7%). 12.7% of the population is aged 60 or over, which is slightly lower than the London (15.2%) and England and Wales (20.3%) averages.

Similar trends have been reported by the GLA 2020 population projections whereby in 2020 the higher proportion of population in the borough was of young adults aged 25-34.

The Office for National Statistics also confirms that the higher percentage of population in Hammersmith and Fulham in 2020 was aged 23-34.

**Figure 2: Age structure (% of total population, Census 2011) Figure 3: age and sex structure in H&F**



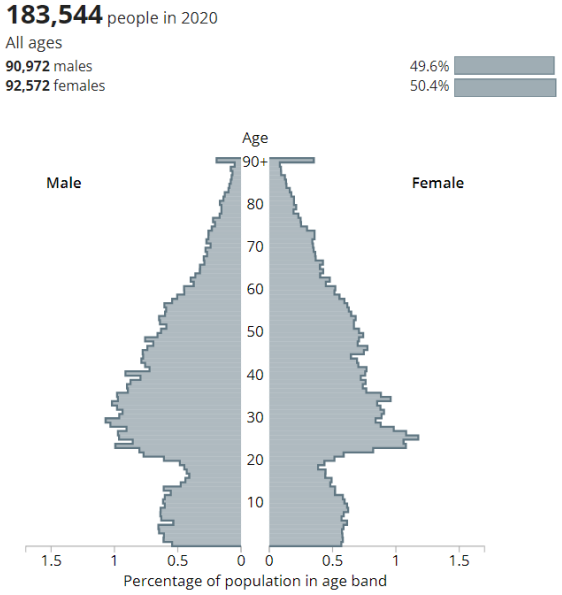
Source: Office for National Statistics

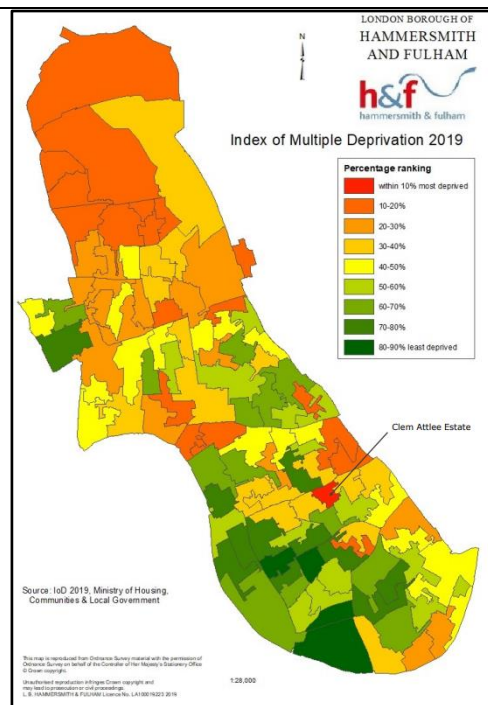
Source: ONS (2020)

**Deprivation**

The borough has high levels of deprivation. According to the 2019 Indices of Deprivation, Hammersmith and Fulham was ranked 112 out of 317 local authority area in the country (91 in 2015). Of the 113 Lower Super Output Areas (LSOAs) one (0.9%) is in the most deprived 10% nationally (Clem Attlee estate). Most of the areas in the north of the borough are in LSOAs 10-20% worst nationally.

**Figure 4: Index of deprivation in H&F**





Hammersmith and Fulham borough not only has high levels of deprivation, it is polarised socially and economically. For example, in the last census 41.6% of the household heads classified themselves as “managers or professionals”, while more than a quarter said they were entirely dependent on benefit. Some 23.9% of households in Hammersmith and Fulham depend on less than £20,000 per annum compared to 27% of London and 34.9% for Great Britain. Just under 40% of borough households have a household’s income between £50k and £80K per year. 16.2% of households have an income greater than £80k per annum; this is equivalent to nearly 13,000 households.

Until the 1970s, social housing and council estates tended to be occupied by households with a greater mix of incomes than is now the case. The mix under social housing tenants has come to include proportionally more people on lower incomes, some experiencing multiple deprivation. Approximately 53% of households living in social housing in Hammersmith and Fulham are currently workless and dependent on benefits and they make up the largest single group within the estimated 13,150 (2011 Census) workless households in the borough. Nearly 2,000 lone parents are dependent on out-of-work benefits and a further 2,800 are claiming Working Tax Credit and/ or Child Tax Credit benefits.

Deprivation and low household incomes also impact on health inequalities and result in high levels of child poverty. About 20% of people are in poverty in Hammersmith and Fulham compared to 32% of children in poverty. Childhood

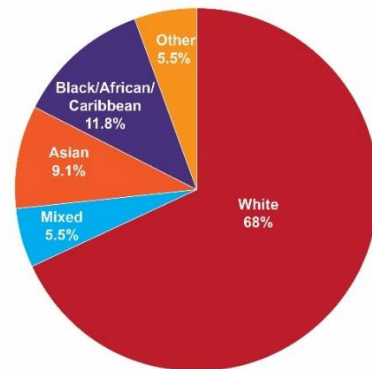
poverty in Hammersmith and Fulham does not follow the general north-south divide but is more scattered geographically across the borough. Further details of health, wellbeing and social care needs of the borough can be found in the Joint Strategic Needs Assessment 2016-2021 carried out by the Council and the NHS Hammersmith and Fulham Clinical Commissioning Group.

### Race

According to the Census 2011, 31.9% of the borough’s population in 2011 belonged to ethnic groups other than white. The main ethnicity in the borough was ‘white people’ (68 %) followed by Black African/Caribbean origin (11.8%), Mixed (5.5%), Asian (9.1%) and the other (5.5%). In Hammersmith & Fulham, there has been a 45 % increase in the number of residents from black and minority ethnic groups between 2001 and 2011.

GLA population projections in 2018 indicates that the main ethnicity in LBHF was white people (British, Irish and other white) 65.5% followed by BAME 34.5% which included Black, Asian and Minority Ethnic.

**Figure 5: Ethnic groups in Hammersmith & Fulham**



Source: Office for National Statistics

Ethnicity	Number	%
White - British	71,685	38.9
White - Irish	6,286	3.4
Other White	42,655	23.2
BAME	63,424	34.5
White and Black Caribbean	2,421	1.3
White and Black African	1,649	0.9
White and Asian	3,048	1.7
Other Mixed	3,722	2
Indian	3,305	1.8
Pakistani	1,598	0.9
Bangladeshi	936	0.5
Chinese	3,697	2
Other Asian	8,726	4.7
Black African	10,883	5.9
Black Caribbean	6,736	3.7
Other Black	4,649	2.5
Arab	6,593	3.6
Any other ethnic groups	5,461	3

source: GLA

### Disability

In 2011, 12.6% of the borough population reported long term health problem or disability that limited the day-to-day activities. This figure was lower compared to London (14.1%) and England & Wales (17.9%). In the north of the



borough the percentage of residents suffering from disabilities is higher. The wards with highest rates were in College Park and Old Oak, Wormholt and White City, Shepherd's Bush Green, Hammersmith Broadway and Askew.

We recognise that people with disabilities and those that support them may be represented in one or more of the other equality groups. The other related group that is usually referenced is age, in particular, we recognise that people with disabilities who can experience difficulty accessing services and accessing the built environment are often children and young people, older people, and those who may provide care for older and younger disabled people. As disability covers a broad spectrum, we also recognise that adaptations for people with mobility impairments may not make the built environment accessible for people with sensory impairments, and that people with mental health or long-term limiting illnesses may have different requirements from their environment. It is for these reasons that we actively engaged with the Hammersmith and Fulham Disability Forum, the local user group representing disabled people.

### **Religion**

The religious profile of the borough is less diverse than in London as a whole. In 2011, 54.1% of residents in the borough were Christians, 10% Muslim and 23.8% stated that they had no religion. This partly reflects the ethnic profile of the borough, with a higher White population who are predominantly Christian and a lower Asian population who have a more diverse religious profile.

The policies in the SPD are not aimed specifically at religious groups, but it is noted that members of this population will also be represented through one or more other equality strands and that race and religion are often linked, meaning that benefits will be experienced by this group in more subtle ways. For example, through increased employment opportunities and quality of built environment.

### **Gender**

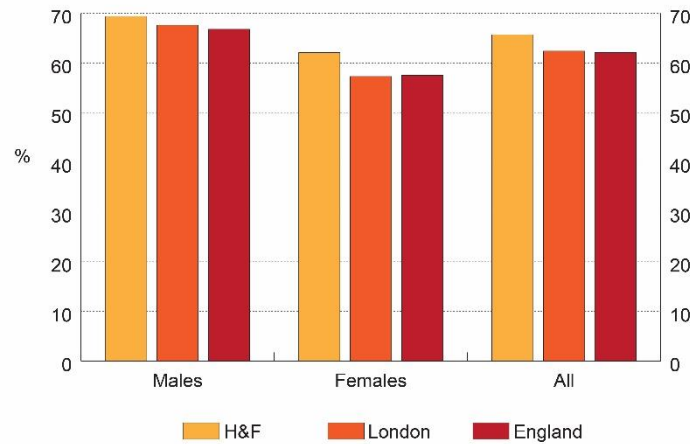
In 2011, there were more females (51.3%) in the borough than males (48.7%). This was slightly higher than the regional and national average but still there were more females than males.

The economic activity rate for females was 70.1 % and for males 78.2%. These figures are higher than the London figures of 66% for females and 77.5% for males (Source: Census 2011).

Hammersmith & Fulham has a marginally higher proportion of male residents in employment (69.4%) than the London (67.6%) and national averages (66.8%). The proportion of female residents in employment (62.1%) is also higher than the London (57.3%) and national averages (57.5%).

For commentary regarding transgendered or transitioning people, see 'sexual orientation (and transgender)' below. For the assessment of policies, transgendered or transitioning people are represented in the gender category (see section 05).

### **Figure 6: Employment in Hammersmith and Fulham, Census 2011**



Source: Office for National Statistics

### Sexual Orientation (and transgender)

The nature of issues facing LGBT people can be similar to transgendered or transitioning people as well, hence the council often use the term LGBT (lesbian, gay, bisexual and transgender).

Data published by the Office for National Statistics (ONS) revealed that in 2019 4.5% of London’s population were LGBT people.

There are no accurate statistics for the numbers of lesbian, gay and bisexual residents in the borough, the 2011 census recorded that 568 people (or 1.1% of couples), aged 16 and over, were living as same sex couples in Hammersmith and Fulham. In 2011, there were 299 same sex civil partnerships in the borough. This gives us some of the picture but within the parameters of the DTI figures, we note that these local statistics may hide single LGBT people, or LGBT people who have not entered into civil partnerships.

We do not have specific data on transgendered or transitioning people. The policies in the SPD are not aimed specifically at LGBT people but it is noted that members of this population will also be represented through one or more other equality strands, meaning that benefits will be experienced by this group in more subtle ways. For example, through increased employment opportunities and quality of built environment.

New research

N/A

<b>Section 04</b>	<b>Undertake and analyse consultation</b>
<b>Consultation</b>	<p>The preparation and adoption of the Affordable Workspace SPD is governed primarily by the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).</p> <p>The SPD has been produced in consultation with head of service and managers in Regeneration and Business teams, Development Management and the planning obligation (S106) officer.</p> <p>A public consultation will take place in mid-November 2021 and will be carried out for four weeks in accordance with the consultation requirements of regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Continuing economic uncertainty resulted in minor technical changes being made to the adoption version of the SPD to provide more flexibility to respond to uncertain market signals.</p>
<b>Analysis</b>	<p><b>Methodology of the Analysis &amp; Protected characteristics and the Public Sector Equality Duties PSED)</b></p> <p>This EQIA analyses the likely impacts of the Supplementary Planning Document on statutorily identified protected characteristics (age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex, and sexual orientation), human rights and children’s rights. It also assesses the SPD principles against the Public Sector Equality Duties in s149 of the Equality Act 2010 which states that in the exercise of its functions the council must have due regard to the need to:</p> <ul style="list-style-type: none"> <li>▪ eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act;</li> <li>▪ advance equality of opportunity between people who share a protected characteristic and those who do not; and</li> <li>▪ foster good relations between people who share a protected characteristic and those who do not.</li> </ul> <p>The relevance of the policies to the protected characteristics is categorised as:</p> <ul style="list-style-type: none"> <li>• High (H)</li> <li>• Medium (M)</li> <li>• Low (L)</li> <li>• Not Applicable (NA)</li> </ul> <p>and the magnitude of the impact on the protected characteristics are categorised as:</p> <ul style="list-style-type: none"> <li>• Positive (+),</li> </ul>

- Negative (-)
- Neutral (blank)

The SPD summaries local needs and different typologies of affordable workspace, and provides guidance on delivery of affordable workspace through the planning application process, and further details to help implementation to ensure policy objectives are delivered:

- Affordable workspace approaches: alternatives to discounted market rents which may be applicable to smaller schemes too – such as flexible leases; discounted desks; flexible workspace/cafe hubs; ()
- Ensuring that existing affordable workspace/ SME occupiers are re-provided for in regeneration/redevelopment schemes;
- Workspace management Plans: improving implementation and promoting early negotiations by setting out model Workspace Management Plans and links to Affordable Workspace Providers and local small businesses looking for premises.

The impacts of the above sections set out in the SPD have been assessed against the protected characteristics as follows and sets out commentary relating to the way in which the SPD is likely to impact upon the protected characteristics:

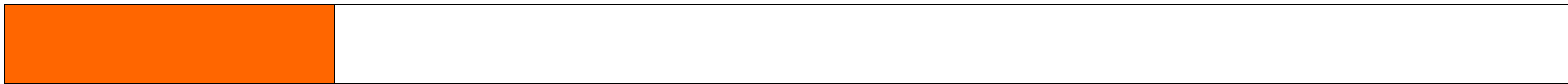
1. Age
2. Disability
3. Gender reassignment
4. Marriage/ Civil Partnership
5. Pregnancy/ Maternity
6. Race
7. Religion/Belief
8. Sex
9. Sexual Orientation
10. Human/ Children's Rights Act

Section 05		Analysis of impact and outcomes										
Analysis	Sections	Age	Disability	Gender Reassignment	Marriage/Civil Partnership	Pregnancy/Maternity	Race	Religion/Belief	Sex	Sexual Orientation	Human/Children's rights	Commentary

	<b>Affordable workspace approaches</b>	M+	M+	N/A	N/A	M	M+	N/A	N/A	N/A	M	<p>This section provides alternatives to discount market rents to help supporting small local businesses, start-ups and not-for-profit sector.</p> <p>This section will not generally impact on the protected characteristics. However, it could create employment opportunities for all including those with protected characteristics and provide subsidised accommodation for charities and voluntary organisations working for groups with such protected characteristics. Positive impacts could be on people of working age, people with impairments and people with different ethnical backgrounds</p>
	<b>Existing affordable workspace</b>	M+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<p>This section will not have impacts on those with protected characteristics, However, by retaining existing affordable workspace and ensuring that this space will be re-provided in redevelopment schemes, this would help supporting SMEs, local start-ups and ensuring they can remain and thrive in the borough. This would also decrease the levels of unemployment within the borough, having therefore positive socio-economic benefits.</p>
	<b>Workspace management Plans/ affordable workspace providers</b>	H+	H+	M+	N/A	M+	M+	N/A	M+	N/A	H	<p>The SPD seeks to improve implementation of the Council's affordable workspace policy by including a template Workspace Management Plan in the Appendix. This template covers accredited affordable workspace providers, monitoring and implementation requirements in respect of target occupiers. The SPD encourages this to be produced at pre application stage, and planning applications will be required to produce a Workspace Management Plan, the provisions of which will be secured by a planning obligation. The Workspace Management Plan also sets out the requirement for workspace providers to</p>



Section 06	Reducing any adverse impacts
Outcome of Analysis	<p>The equalities impact analysis of the proposed SPD found that in general, there is unlikely to be any potential unlawful discrimination against protected groups associated with the implementation of these policies. Public consultation on the SPD and draft EqIA invited comments from the public and other stakeholders on the findings of the draft EqIA. No comments on the draft EqIA were received.</p> <p>The analysis has shown that not all protected characteristics will be impacted upon in a similar manner by the implementation of the SPD. The analysis has revealed that, generally, the SPD will have a POSITIVE or NEUTRAL impact upon all protected groups and characteristics and will increase local employment opportunities for all people in these groups. The protected characteristics of Age, Disability, Pregnancy and Maternity will be positively impacted upon most by the implementation of the SPD. The implementation of the SPD through consideration and determination of planning applications is unlikely to adversely impact upon Human and Children's rights.</p> <p>The council will take the following actions to promote its equalities duties:</p> <ul style="list-style-type: none"> <li>• it will monitor the implementation of the SPD on an ongoing basis. It will require that affordable and flexible workspace delivered is monitored and reported to avoid any issues that may adversely impact on the protected characteristics. The relevant SPD principles may then be amended accordingly, through a statutory review process, to help resolve these issues.</li> <li>• it undertook public and stakeholder consultation on the SPD and associated documents, including the EQIA, to provide an opportunity to comment.</li> <li>• it will monitor the development of equalities legislation and associated case law to help ensure that the SPD remains legally compliant.</li> </ul> <p>It is not considered the SPD will adversely affect human rights as defined by the Human Rights Act 1998.</p> <p>It is considered that the SPD will have a NEUTRAL impact on children's rights under the United Nations Convention on the Rights of the Child (UNCRC), including the following:</p> <ul style="list-style-type: none"> <li>• The right to life, survival and development;</li> <li>• Health and welfare rights, including rights for disabled children, the right to health and health care, and social security; and</li> <li>• The right to education, leisure, culture and the arts</li> </ul>



Section 07		Action Plan					
Action Plan		Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
		Ensure that the SPD remains legally compliant with respect to equalities matters	Monitoring emerging equalities related case law and any future legislative amendments.	Ongoing	To be confirmed	The SPD will continue to remain legally compliant with respect to equalities matters.	N/A
		Ensuring that the plan making process promotes the Council's commitment to the involvement of people (including those with protected characteristics) in decision making.	Ensuring that adequate consultation is carried throughout the plan making process as well as through the implementation of the plan through the development management and regeneration procedures and practices.	Ongoing	To be confirmed	The Council will not only enable legal compliance; however, it will enable social inclusion.	N/A

<b>Section 08</b>	<b>Agreement, publication and monitoring</b>
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<b>Chief Officer sign-off</b>	Name: David Gawthorpe Position: Team Leader, Policy & Spatial Planning Email: david.gawthorpe@lbhf.gov.uk Telephone No: 07776672861
<b>Key Decision Report</b>	Date of report to Cabinet/Cabinet Member to adopt the Affordable Workspace SPD: 5 <sup>th</sup> September 2022