

Resident Impact Assessment

Article 4 Direction: to withdraw Permitted Development right for change of use from office to residential use

Service Area: Planning Policy

1. What are the intended outcomes of this policy, function etc?

In 2013, the Government introduced a permitted development (“PD”) right to allow office uses (B1a use class) to change to residential uses (C3 use class) without the need for planning permission. The PD right was intended to be for a temporary period of three years, from 30 May 2013 to 30 May 2016. The Council, in coordination with support the Greater London Authority (GLA), requested that Islington’s portion of the Central Activities Zone (CAZ) be granted exemption from this PD right on the grounds that nationally significant office accommodation would be lost. This request was successful and the CAZ is currently exempt from this PD right. However, in 2015, the Government announced that the PD right would be made permanent and the current exemptions will be lifted from May 2019.

Islington’s Local Plan policies positively promote sustainable development to ensure that social, environmental and economic goals are achieved across the lifetime of the plan. One of the fundamental Core Strategy objectives, which underpins Islington’s entire Local Plan, is to maintain the growth in employment to ensure there is an adequate supply of office floorspace to meet projected growth in the Borough. Policy CS13 of Islington’s Core Strategy encourages a diverse and vibrant economic base in the borough, supporting sectors and businesses that can adapt to changing circumstances in order to ensure long term economic sustainability in Islington. This has implications for residents, employers, employees and visitors alike. Islington’s Employment Land Study 2016 highlights the specific importance of B1(a) space in terms of meeting the aims of the Local Plan. The amendment to the GPDO could lead to a diminution of B1(a) uses; and could therefore harm local amenity and wellbeing.

Article 4 Directions (A4Ds) allow authorities to withdraw PD rights that would otherwise apply by virtue of the GPDO. An A4D does not prevent the development to which it applies, but instead requires that planning permission is first obtained from the local planning authority for that development. This gives a local planning authority the opportunity to consider a proposal in more detail, i.e. assessing against local planning policies which have been developed in line with equalities requirements.

An Article 4 Directions is proposed for the Central Activities Zone (CAZ) within Islington.

2. Resident Profile

		London	Islington	Bunhill	Clerkenwell
		Total: 8,173,941	Total: 206,125	Total: 15,134	Total: 11,490
Gender	Female	51%	51%	49%	49%
	Male	49%	49%	51%	51%
Age	Under 16	20%	16%	13%	12%
	16-24	12%	14%	23%	20%
	25-44	36%	42%	40%	40%
	45-64	21%	19%	16%	20%
	65+	11%	9%	8%	8%
Disability	Disabled	14%	16%	13%	15%
	Non-disabled	86%	84%	87%	85%
Sexual orientation	LGBT				
	Heterosexual/straight				
Race	BME	40%	32%	31%	27%
	White	60%	68%	65%	71%
Religion or belief	Christian	48.5%	40%	40%	41%
	Muslim	12%	9%	9%	7%
	Other	10%	4%	5%	0.5%
	No religion	21%	30%	28%	31%
	Religion not stated	8.5%	17%	18%	17%
Socio-economic status	Out of work benefit claimants	13%	17%	16%	13%

Data from ONS – 2011 Census, accessed through www.nomis.co.uk

There is a higher than average number of 16-24 year olds in Bunhill and Clerkenwell, in comparison to Islington and London as a whole, and a lower number of children. There is also a relatively smaller BME population, compared to Islington and London.

3. Equality impacts

With reference to the [guidance](#), please describe what are the equality and socio-economic impacts for residents and what are the opportunities to challenge prejudice or promote understanding?

Overview

The confirmation of the A4D will mean that planning permission will be required for the change of use of office floor space to residential use. It does not preclude the development of residential uses; it merely ensures that planning permission is required, and that any proposal for change of use from B1(a) to C3 will be assessed against planning policy in the adopted Local Plan.

During the preparation of the Local Plan, policies underwent a rigorous sustainability appraisal and equalities impact assessment, which assessed the extent to which the (then emerging) Local Plan would help to achieve relevant environmental, economic and social objectives, including an assessment of the emerging policies on specific protected groups. Therefore, by ensuring that more applications will be subject to planning policies which have been thoroughly tested for sustainability and equalities impacts, the A4D will in principle have a broadly positive impact.

In terms of specific groups, the A4D could have impacts on three particular groups: businesses, residents, and office landowners / developers. The following sections assess the impacts of the A4D in relation to businesses, residents, and landowners.

Businesses

The confirmation of the A4D will mean that office floorspace will not be permitted to convert to residential use without the need for planning permission and any proposal for this will be assessed against the Council's planning policies. The Council's existing policy framework seeks to protect business floorspace across the Borough, and particularly in designated Employment Priority Areas, which are located within the CAZ.

a) General positive impacts

Overall, the Article 4 Direction is likely to result in positive impacts for businesses which are already located in the Borough, and those businesses who may wish to locate in the Borough in the future. Firstly, the A4D will prevent the unfettered loss of office floorspace, which will ensure a supply of much needed office space to accommodate businesses (including new businesses and businesses looking for new premises to expand) support the local and Central London economy and meet employment growth projections.

Ensuring a supply of office floorspace in the CAZ, where the majority of jobs in the Borough are located, will also ensure that businesses can locate in close proximity to one another, and therefore benefit from agglomeration benefits. Protecting office floorspace also means that jobs will also be protected. The primary business function of the CAZ will not be undermined as a result of the PD right and the introduction of incompatible uses, such as residential, will not occur without thorough assessment, and will therefore not negatively impact existing businesses.

b) Specific positive impacts

Protected Characteristic	Impact
Age	No positive impacts for businesses in relation to this group.
Disability	No positive impacts for businesses in relation to this group.
Gender Reassignment	No positive impacts for businesses in relation to this group.

Pregnancy and maternity	No positive impacts for businesses in relation to this group.
Race	No positive impacts for businesses in relation to this group.
Religion or belief	No positive impacts for businesses in relation to this group.
Sex and Sexual orientation	No positive impacts for businesses in relation to this group.
Socio-economic	Ensuring a supply of office floorspace will ensure that there is a greater opportunity for job creation and therefore a supply of jobs in the Borough, as businesses are able to remain / locate here. This means that jobs can be protected / created and could therefore be secured by local residents seeking employment or new job opportunities.

c) General negative impacts

There are no general negative impacts of the A4D for businesses.

d) Specific negative impacts

Protected Characteristic	Impact
Age	No negative impacts for businesses in relation to this group.
Disability	No negative impacts for businesses in relation to this group.
Marriage and Civil Partnership	No negative impacts for businesses in relation to this group.
Gender Reassignment	No negative impacts for businesses in relation to this group.
Pregnancy and maternity	No negative impacts for businesses in relation to this group.
Race	No negative impacts for businesses in relation to this group.
Religion or belief	No negative impacts for businesses in relation to this group.
Sex	No negative impacts for businesses in relation to this group.
Sexual orientation	No negative impacts for businesses in relation to this group.
Socio-economic	No negative impacts for businesses in relation to this group.

Residents

Residents are unlikely to be directly affected by the availability of business floorspace or by the potential opportunity to convert office floorspace to residential, unless they are also a business / landowner. The impacts for residents are more indirect and relate to the supply of jobs in the borough.

a) General positive impacts

The A4D may result in an indirect positive impact for Islington residents. As set out above, the confirmation of the A4D will mean that office floor space cannot convert to residential without the need for planning permission. Any proposal would be assessed against the Council's planning policies, which seek to protect office floorspace. This means that a significant amount of office floorspace would be protected in the Borough which will safeguard existing jobs and

maximise opportunities for creation of new jobs. These may be jobs which are filled by Islington residents, or may be secured by Islington residents in the future.

b) Specific positive impacts

Protected Characteristic	Impact
Age	No positive impacts for residents in relation to this group.
Disability	No positive impacts for residents in relation to this group.
Gender Reassignment	No positive impacts for residents in relation to this group.
Marriage and Civil Partnership	No positive impacts for residents in relation to this group.
Pregnancy and maternity	No positive impacts for residents in relation to this group.
Race	No positive impacts for residents in relation to this group.
Religion or belief	No positive impacts for residents in relation to this group.
Sex	No positive impacts for residents in relation to this group.
Sexual orientation	No positive impacts for residents in relation to this group.
Socio-economic	Ensuring a supply of office floorspace will help ensure a supply of jobs in the Borough, which may be filled by Islington residents. The A4D can help protect Islington jobs and safeguard them for the future.

c) General negative impacts

No negative impacts of the A4D for residents were identified.

d) Specific negative impacts

Protected Characteristic	Impact
Age	No negative impacts for residents in relation to this group.
Disability	No negative impacts for residents in relation to this group.
Gender Reassignment	No negative impacts for residents in relation to this group.
Marriage and Civil Partnership	No negative impacts for residents in relation to this group.
Pregnancy and maternity	No negative impacts for residents in relation to this group.
Race	No negative impacts for residents in relation to this group.
Religion or belief	No negative impacts for residents in relation to this group.
Sex	No negative impacts for residents in relation to this group.
Sexual orientation	No negative impacts for residents in relation to this group.
Socio-economic	No negative impacts for residents in relation to this group.

Office Landowners / Developers

The confirmation of the A4D will mean that office landowners / developers will be required to obtain planning permission if they intend to convert their office land / floorspace to residential use.

a) General positive impacts

No positive impacts of the A4D for office landowners / developers were identified.

b) Specific positive impacts

Protected Characteristic	Impact
Age	No positive impacts for office landowners / developers in relation to this group.
Disability	No positive impacts for office landowners / developers in relation to this group.
Marriage and Civil Partnership	No positive impacts for office landowners / developers in relation to this group.
Gender Reassignment	No positive impacts for office landowners / developers in relation to this group.
Pregnancy and maternity	No positive impacts for office landowners / developers in relation to this group.
Race	No positive impacts for office landowners / developers in relation to this group.
Religion or belief	No positive impacts for office landowners / developers in relation to this group.
Sex	No positive impacts for office landowners / developers in relation to this group.
Sexual orientation	No positive impacts for office landowners / developers in relation to this group.
Socio-economic	No positive impacts for office landowners / developers in relation to this group.

c) General negative impacts

Following confirmation of the Article 4 Direction, landowners / developers will be required to obtain planning permission to convert their offices to residential use. Development proposals will be assessed against the Council's planning policies. The landowner / developer may incur additional costs resulting from the need to provide additional reports / evidence setting out how their proposal is in line with policies, as part of the planning application process.

d) Specific negative impacts

Protected Characteristic	Impact
Age	No negative impacts for office landowners / developers in relation to this group.

Disability	No negative impacts for office landowners / developers in relation to this group.
Marriage and Civil Partnership	No negative impacts for office landowners / developers in relation to this group.
Gender Reassignment	No negative impacts for office landowners / developers in relation to this group.
Pregnancy and maternity	No negative impacts for office landowners / developers in relation to this group.
Race	No negative impacts for office landowners / developers in relation to this group.
Religion or belief	No negative impacts for office landowners / developers in relation to this group.
Sex	No negative impacts for office landowners / developers in relation to this group.
Sexual orientation	No negative impacts for office landowners / developers in relation to this group.
Socio-economic	Office landowners / developers may incur additional costs related to any proposed development, as a result of the requirement to submit a planning application.

4. Safeguarding and Human Rights impacts

a) Safeguarding risks and Human Rights breaches

Please describe any safeguarding risks for children or vulnerable adults AND any potential human rights breaches that may occur as a result of the proposal? Please refer to **section 4.8** of the [guidance](#) for more information.

There are no safeguarding risks for children or vulnerable adults, and there are no potential breaches to human rights, as a result of the proposal.

If potential safeguarding and human rights risks are identified then please contact equalities@islington.gov.uk to discuss further:

5. Action

How will you respond to the impacts that you have identified in sections 3 and 4, or address any gaps in data or information?

The Council has identified one negative impact which may arise following the confirmation of the A4D. There may be additional costs for office landowners / developers, related to obtaining planning permission, for any proposal to convert an office to residential use.

Having considered the all issues, the Council intends to progress with the A4D. Although additional costs may be incurred by landowners/developers, there are no actions which the Council can take to mitigate this negative impact. The A4D doesn't preclude future change of use or the submission of such planning applications. Office landowners / developers are able to submit a planning application, which will subsequently be assessed against the Council's planning policy.


Please send the completed RIA to equalites@islington.gov.uk and also make it publicly available online along with the relevant policy or service change.

This Resident Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

Staff member completing this form:

Head of Service or higher:

Signed: Stacey Clark _____

Signed:  _____

Date: 21/11/2018

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