

# APPENDIX 5 - H&F Equality Impact Analysis Tool



## Conducting an Equality Impact Analysis

An EIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool is informed by the [public sector equality duty](#) which came into force in April 2011. The duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Equality Act 2010**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against these three tenets.

## General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

<https://www.gov.uk/government/publications/public-sector-equality-duty>

<https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx>

## H&F Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2024/ Q3
Name and details of policy, strategy, function, project, activity, or programme	<p><b>Title of EIA: New development – Old Laundry Yard/Shepherds Bush Market</b></p> <p>Short summary:</p> <p>The Old Laundry Yard site is in the electoral ward of Shepherds Bush Green</p> <p>December 2023 the Planning Committee approved the refurbishment works to Shepherd's Bush Market (SBM) and the redevelopment of the adjacent Old Laundry Yard (OLY) site and St Mungo's buildings, together with associated access from Goldhawk Road/Uxbridge Road and Pennard Road. To provide reconfiguration and refurbishment of Shepherd's Bush Market, including new and replacement stalls and shops, works to the external facades of the arches, a replacement canopy, new entrance signs at Goldhawk Road and Uxbridge Road, new road surfacing, drainage, public realm, landscape, and associated works.</p> <p>Cabinet approval is being sought to enter into a Development and Land Swap Agreement with YC Shepherds Bush Limited that will enable the development of 40 affordable homes (24 London Affordable rent and 16 Council equity share) on the Council owned Old Laundry Yard site and support the regeneration of the market.</p> <p>To provide a new, ground plus 8 storey building (plus mezzanine and basement levels) to comprise of workspace, cafe, shops, and life science accommodation (Class E) and associated plant, cycle parking and photovoltaic panels (PV's). A new, ground plus 5 storey building for 40 affordable dwellings and associated private amenity space, communal gardens, plant, PVs, cycle parking and bin store.</p> <p>The Council has confirmed a commitment to continue to build a record amount of new genuinely affordable homes for residents in the borough and the Local Plan Strategic Policy WCRA identifies the White City Regeneration Area as one of the key borough regeneration area.</p> <p>The site is currently being use for meanwhile uses, however this is not a sustainable long-term use and is underutilising the council's land asset. The council has considered developing the site on its own, but this has not been successful due to severely restricted access and the Local Plan's vision of a holistic and mixed-use scheme for the OLY and Shepherds Bush market sites.</p> <p>The town centre ward of Shepherd's Bush Green has one of the highest business start-ups. LBHF's Industrial Strategy 'Economic Growth for Everyone' establishes the Borough's plan to promote growth. It is underpinned by four priorities:</p> <ul style="list-style-type: none"> <li>▪ 'West Tech': making LBHF a centre for innovation and growth.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Encouraging Enterprise: becoming the best borough for business to start-up, survive and grow</li> <li>▪ A Great Place in London: improving town centres, delivering new homes and enhancing the arts, cultural and leisure scene.</li> <li>▪ People – Economic Growth for All: supporting residents into high quality training and employment to ensure opportunities for all.</li> </ul> <p>The development will encourage inward investment, help foster job growth and promote the borough’s many smaller and younger firms enabling a highly entrepreneurial economy to develop and remain in the borough.</p> <ul style="list-style-type: none"> <li>▪ Help advance businesses, particularly local firms and the third sector so that they maximise job opportunities, develop apprenticeships and recruit and maintain local people in employment and enhance the vitality and vibrancy of high streets and the market.</li> </ul> <p>Currently, the Market is home to roughly 89 traders across 100+ units (made up of arches, shops and stalls), selling a wide range of goods including fresh produce, clothing, textiles, jewellery, and electronics. Whilst the Market continues to be a popular shopping destination, it requires further improvements to secure its long-term viability, as acknowledged in LBHF’s Local Plan.</p> <p>The Proposed Development will deliver 40 new homes, 100% of which will be affordable. The delivery of high-quality affordable homes will contribute towards LBHF reaching its housing targets. The homes will be transferred to LBHF to own and manage and have been designed in conjunction with the LBHF Housing Team.</p> <p>The workspace proposed will provide 22,783 sqm NIA of Class E space, which comprises 2,040 sqm of life sciences incubator space, 1,988 sqm of co-working space, 18,655 sqm of office space and 100 sqm of ancillary café space. These uses will support significant employment opportunities.</p> <p><b>Note:</b> If your proposed strategy will require you to assess impact on staff, please consult your HR Relationship Manager.</p>
<b>Lead Officer</b>	Name: Jacquie Agyemang-Johnson Position: Development Manager Email: Jacquie.Agyemang-Johnson@lbhf.gov.uk Telephone No: 07787 152733
<b>Date of completion of final EIA</b>	01 / 03 / 24

<b>Section 02</b>	<b>Scoping of Full EIA</b>		
<b>Plan for completion</b>	Timing: Review over construction period – approx period circ. 40 months Resources: TBC		
<b>Analyse the impact of the policy, strategy, function, project, activity, or programme</b>	Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.		
	<b>Protected characteristic</b>	<b>Analysis</b>	<b>Impact:</b> Positive, Negative, Neutral
	Age	<p>According to the 2011 Census, the mean average age for the residents of the Shepherd’s Bush Green Ward was 34.3 years, with the highest proportion aged between 30 to 44 (30%)<sup>30</sup>. This has been stable between the 2011 and 2021 Census data for LBHF, where the mean average age is 34.7. According to 2021 Census data the highest proportion for LBHF was aged 25 to 34 (23.4%) and the second highest aged 35 to 49 (21.7%). This is also similar to the data for London, where the highest proportion is aged 35 to 49 years (22.7%)</p> <p>The Proposed Development is expected to have a positive and differential impact on younger and older residents, as it will help improving their health and wellbeing by enhancing the accessibility, incorporating play spaces and improving the safety of the area:</p> <ul style="list-style-type: none"> <li>• The age profile of the borough continues to be typical of a young, diverse and mobile urban population. In Ward profile residents aged 16-64 represent (74.9%) and aged 65+ represent (8.5%)</li> <li>• Potential disruption to the market and potential retail activity on site during the construction of development.</li> </ul>	<p>Positive</p> <p>Neutral</p>
	Disability	<p>Data from the 2011 Census identified that 22% of households in the Shepherd’s Bush Green Ward are with a long-term health problem or disability (3.4% with dependent children and 18.5% with no dependent children).</p> <p>Accessibility changes may have a negative and differential impact on people with disabilities during the construction works as they can have higher susceptibility to changes. however, a positive and differential impact is expected during the operational</p>	

		<p>phase as there will be significant improvements to the accessibility of Shepherd's Bush Market, as well as the provision of new green areas, amenity spaces, and community uses.</p> <ul style="list-style-type: none"> <li>Residents with mobility issues need to be near existing network, and level access accommodation, assistance with move.</li> <li>This has been addressed in the building design and layout</li> </ul>	Neutral
	Gender reassignment	<ul style="list-style-type: none"> <li>There are no identified impacts for gender re-assignment.</li> </ul>	Neutral
	Marriage and Civil Partnership	<p>2011 Census data identifies the following data regarding marriage or civil partnership: • 60.8% of residents in Shepherd's Bush Green Ward are single (having never married or registered a civil partnership). This figure is greater than those for LBHF (56.5%) and London (46.2%). The proportion of the population that is married or in a registered civil partnership in Shepherd's Bush Green Ward (25%) is lower than it is in LBHF (30.9%) and London (40%) • 14.2% of the residents in the Shepherd's Bush Green Ward are either separated, divorced, or widowed. This is slightly higher than the figures for LBHF (12.6%) and London (13.8%).</p> <p>Proposed Development will have a positive and differential impact on this group with the provision of new open spaces, green infrastructures, site accessibility improvements, amenity uses and community areas.</p>	Positive
	Pregnancy and maternity	<ul style="list-style-type: none"> <li>There are no identified impacts for pregnancy or maternity.</li> </ul>	Neutral
	Race	<p>Statistics on ethnic groups from the 2011 Census for the Shepherd's Bush Green Ward show that the largest ethnic group in the local area are white (59.9%). This is slightly less than in LBHF, where the 2021 data shows that 63.2% of the population is white. The second largest ethnic group shown in the 2011 Census data for Shepherd's Bush Green Ward is Black / African / Caribbean / Black British (17.7%), followed by Asian / Asian British (10.2%).</p> <p>A 6.3% of the population in Shepherd's Bush Green Ward identify themselves as mixed or of multiple ethnic groups is, and a 5.9% as Arab or of another ethnic group. In LBHF, 6.7% of the population is identified as mixed or of multiple ethnic groups, and 7.3% is identified as of another ethnic group</p> <ul style="list-style-type: none"> <li>Crucial that any negotiations/consultation process is open, is consistent, fair and not influenced in any way by someone's racial background.</li> <li>Stallholders/residents who do not speak or read English may be negatively</li> </ul>	Positive

		<p>impacted as they potentially would not understand the process fully.</p> <ul style="list-style-type: none"> <li>• Consultation has been conducted to include and accommodate each of the different cultures represented by stallholders</li> </ul>	
	Religion/belief (including non-belief)	<p>In the Shepherd's Bush Green Ward, 25.2% of the population has no religion. Christianity is the largest religious group (49.6%) followed by Muslim (12.8%). The remainder of the population are Buddhist (1.5%), Hindu (1.0%), Jewish (0.4%), Sikh (0.3%) and other (0.6%). 8.6% of the population did not state their religion. This data is comparable to the 2021 data for LBHF. 30.6% of residents in LBHF do not have a religion. Christianity is the largest religious group in LBHF, accounting for 45.7% of the population. Muslim is the second largest religious group (11.6%). The remainder of the population identifies as Hindu (1.2%) Buddhist (0.9%), Jewish (0.7%), and Sikh (0.2%). Other religions account for 0.7% of the population and 8.5% have not answered.</p> <ul style="list-style-type: none"> <li>• There are no aspects that prevent stallholders/residents from practicing their religion or faith.</li> </ul>	Positive
	Sex	<p>Sex under the 2011 and 2021 Census is classified as either male or female. Based on the 2021 Census, the sex split in LBHF is 53.1% male and 46.9% female. This split is slightly more weighted towards the male sex compared to the 2011 Census data for Shepherd's Bush Green Ward, where 49.5% of the population is male, and 50.5% is female, and the 2021 Census data for London, where 48.5% of the population is male and 51.5% of the population is female.</p> <p>Although it is not considered that there is a disproportionate number of males / females in the local area or LBHF, the traders at Shepherd's Bush Market are predominantly male. Encouraging female enterprise is an aim of the development. It is therefore considered that the Proposed Development could have a positive and differential impact on females in relation to crime, therefore sex as protected characteristic is considered further within this EQIA in relation to crime.</p> <p>Employment created by the Proposed Development will be required to adhere to anti-discrimination laws with respect to sex as set out in the 2010 Act. As such, males / females are expected to experience a neutral impact and no differential or disproportionate impacts as a result of the Proposed Development.</p> <ul style="list-style-type: none"> <li>• No known identified negative impacts.</li> </ul>	Neutral
Sexual Orientation	<ul style="list-style-type: none"> <li>• No known identified negative impacts</li> </ul>	Neutral	

	Care Experienced as a Protected Characteristic	<ul style="list-style-type: none"> <li>No known identified negative impacts</li> </ul>	Neutral
	<p><b>Human Rights or Children’s Rights</b>          If your decision has the potential to affect Human Rights or Children’s Rights, please contact your Equality Lead for advice</p>		
	<p>Will it affect Human Rights, as defined by the Human Rights Act 1998?          No</p>		
	<p>Will it affect Children’s Rights, as defined by the UNCRC (1992)?          No</p>		

<b>Section 03</b>	<b>Analysis of relevant data</b> Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
<b>Documents and data reviewed</b>	Equality Act 2010 London Plan 2021 Inclusive London Mayors Equality, Diversity and Inclusive Strategy 2011 Equality Census 2021 Equality Census - Deep Dive in Hammersmith & Fulham
<b>New research</b>	If new research is required, please complete this section – <b>None required</b>

<b>Section 04</b>	<b>Consultation</b>
<b>Consultation</b>	Details of consultation findings (if consultation is required. If not, please move to section 06)
<b>Analysis of consultation outcomes</b>	Throughout the pre-application process the Applicant has engaged with a wide range of neighbouring businesses, residents, community groups, and stakeholders. The consultation was undertaken both in person and via online events between September 2020 to April 2023. Several stakeholders were contacted for the public consultation events, including politicians, key community and amenity groups, educational institutions, charities, businesses, faith groups and media outlets among others. Key stakeholders invited to and/or attended consultations details can be made available upon request.



	<p>A comprehensive list of all consultees throughout the entire consultation is detailed within the Statement of Community Involvement submitted as part of the Planning Application.</p> <p>To promote each phase of consultation, the following methods were used: • Emails and letters – sent via email to all stakeholders within the wider database inviting them to the public exhibitions and/or a separate individual briefing for key consultees; • Flyers, Social media advertising, dedicated Instagram page <a href="https://shepherdsbushmarket.org">shepherd'sbushmarket</a>, reaching a wider and diverse audience, • Online press advertisements – placed in local media outlets, such as MyLondon, Posters – placed around Shepherd's Bush Market, Website news articles – posted on <a href="https://shepherdsbushmarket.org/news">https://shepherd'sbushmarket.org/news</a></p> <p>The Applicant consulted through COVID-19 and used a wide variety of qualitative and quantitative consultation methods during the consultation, involving: • Pre-application meetings with London Borough of Hammersmith and Fulham, across various council departments; • Extensive engagement with traders to understand their needs and priorities for the redevelopment, including meetings (online and in person) and workshops; • Newsletters displaying updates on the Proposed Development's progress and other logistical matters within Shepherd's Bush Market for traders; • Webinars, online meetings and in-person consultation events, to display the evolving proposals and ask the community to share their thoughts</p>
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<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
<b>Analysis</b>	<p>What has your consultation (if undertaken) and analysis of data shown? You will need to make an informed assessment about the actual or likely impact that the policy, proposal, or service will have on each of the protected characteristic groups by using the information you have gathered. The weight given to each protected characteristic should be proportionate to the relevant policy (see guidance).</p> <p>The Proposed Development has been designed to respond to LBHF's growth objectives for the area, delivering a mix of uses that build on the borough's existing strengths to catalyse further growth. The Proposed Development includes affordable homes, a new life sciences incubator with affordable space for start-ups, office space and high-quality public realm.</p> <p>The new affordable housing, mix of commercial uses, investment in the Market and new public realm will increase activity at this end of the town centre, which will have knock on benefits for the vitality and viability of surrounding shops, services and amenities, including the Market itself. The Proposed Development is therefore a significant opportunity for LBHF and its local community, generating a wide range of benefits, such as the generation of employment, the provision of affordable rents, as well as flexible and affordable options for small businesses. Furthermore, the co-location of uses will create a unique environment helping to foster enterprise and innovation.</p> <p>Overall, these benefits above mentioned will have a positive differential (long-term) impact on all protected characteristics as it will generate a wide range of economic benefits including creation of construction jobs duration the construction phase. re-provision and expansion of Shepherd's Bush Market generating new jobs as well as securing existing ones; Approximately 1,780 jobs accommodated by the new workspace building; Up to £4 million per year in employee spending helping to support local shops and services including the Market; Gross Value Added associated with the new workspace employment equating to approximately £230 million annually; 40 new affordable homes expected to generate up to £420,000 per year in household spending; Council tax revenue of approximately £48,000 each year; New Homes Bonus of</p>

	£88,0000; Increased footfall and activity at the Site, supporting increased vitality and viability of surrounding shops, services and amenities in Shepherd’s Bush town centre; and New public realm improving the health and wellbeing of the local community.
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<b>Section 06</b>	<b>Reducing any adverse impacts and recommendations</b>
<b>Outcome of Analysis</b>	Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for LBHF, and the overall outcome.

<b>Section 07</b>	<b>Action Plan</b>					
<b>Action Plan</b>	Note: You will only need to use this section if you have identified actions as a result of your analysis					
	Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan

<b>Section 08</b>	<b>Agreement, publication and monitoring</b>					
<b>Senior Managers’ sign-off</b>	Name: Matt Rumble Position: Strategic Head of Regeneration & Development Email: matt.rumble@lbhf.gov.uk Telephone No: 07786 747488 Considered at relevant DMT:					
<b>Key Decision Report (if relevant)</b>	Date of report to Cabinet/Cabinet Member: 15/05/2024 Key equalities issues have been included: Yes/No					
<b>Equalities Advice (where involved)</b>	Name: Yvonne Okiyo Position: Strategic Lead Equity, Diversity and Inclusion Date advice / guidance given: 21/03/24					

