

Carbon Offset Cost Guidance Note 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
Financial Year and Quarter	2025 Q1
Name and details of policy, strategy, function, project, activity, or programme	<p>The purpose of this Guidance Note is to provide guidance on carbon offsetting and to help implement the actions contained in the council's Climate Change and Ecology Strategy adopted in 2021 which sets out the route to net zero greenhouse gas emissions by 2030 for the borough.</p> <p>The note aims to guide and help planners and developers calculate the carbon offsetting costs on major development sites to incentivise developers to include more on-site carbon reduction measures.</p> <p>The note introduces a sliding scale approach to calculating carbon offset payments. These payments are used to supplement on-site carbon savings and to achieve an overall net-zero carbon performance.</p> <p>The guidance will be relevant to major domestic and non-domestic mixed-use developments. It is intended for use by developers, landowners, homeowners, planning officers, and other interested parties when preparing and assessing planning applications and negotiating s106 agreements (planning obligations). The note should help improve implementation and delivery of policy objectives which reflect the Council's ambitions for climate mitigation and adaptation.</p>
Lead Officer	<p>Name: David Gawthorpe</p> <p>Position: Team Leader, Policy & Spatial Planning, Place Department</p> <p>Email: localplan@lbhf.gov.uk</p>
Date of completion of final EQIA	February 2025

Section 02	Scoping of Full EIA
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Plan for completion	<p>Timing: This Equality Impact Analysis (EQIA) supports the Carbon Offset Cost Guidance Note</p> <p>Resources: Officer time</p> <p>Lead Officer: David Gawthorpe, Team Leader Development Planning Team</p>
What is the policy, strategy, function, project, activity, or programme looking to achieve?	<p>The H&F Local Plan (2018) sets out the council's vision of being the greenest borough and delivering an environmentally sustainable borough by 2035. As part of this vision, new development will be required to minimise energy use and the use of other non-renewable resources, as well as facilitating an increase in the use of low and zero carbon technologies to help minimise carbon dioxide emissions and air pollutants harmful to health. This will particularly be required of major developments as buildings are the main source of carbon emissions in H&F.</p> <p>In 2019, the council declared a Climate and Ecological Emergency and subsequently adopted a Climate and Ecology Strategy in 2021 which sets out the route to net zero greenhouse gas emissions by 2030 for the borough.</p> <p>The key aim of the guidance is to provide more detail on carbon offsetting aiding s106 negotiations and help implement the actions contained in the council's climate change strategy.</p> <p>The guidance which introduces a sliding scale approach to calculating carbon offset payments, will be used to assist developers, landowners, homeowners, planning officers, and other interested parties in calculating carbon offset costs on development sites, when preparing and assessing planning applications and negotiating s106 agreements (planning obligations).</p>

Section 03	Analysis of relevant data and/or undertake research
Documents and data reviewed	<p>The following documents and data have been used to help inform this Equality Impact Analysis:</p> <p>Equalities Plan 2021-25 The Council's 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:</p> <ol style="list-style-type: none"> 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

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 2021

The 2021 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.

Data source: [[Hammersmith and Fulham population change, Census 2021 – ONS. Hammersmith and Fulham census population profile - 1981 to 2021 \(bothness.github.io\)](#)]

Office for National Statistics (ONS)

The office for National Statistics provides statistics on population as the most up to date data collected from the Census 2021.

Greater London Authority (GLA) projections 2018 and 2020

The trend-based projections 2020 is the most recent set of projections released in September 2021 by the Greater London Authority (GLA).

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 guidance document on these groups.

Population

Most local authorities experienced population increases between 2011 and 2021, although in some areas the population decreased. Hammersmith and Fulham the population size has seen a small 0.4% increase over the past decade, from 182,493 in 2011 to 183,161 in March 2021. The increase is lower than the increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800 and lower than the increase for London (7.7%) - Census 2021.

It is worth keeping in mind that when the Census took place in March 2021, during the pandemic, there were temporary changes in the population which has led to H&F population being underestimated.

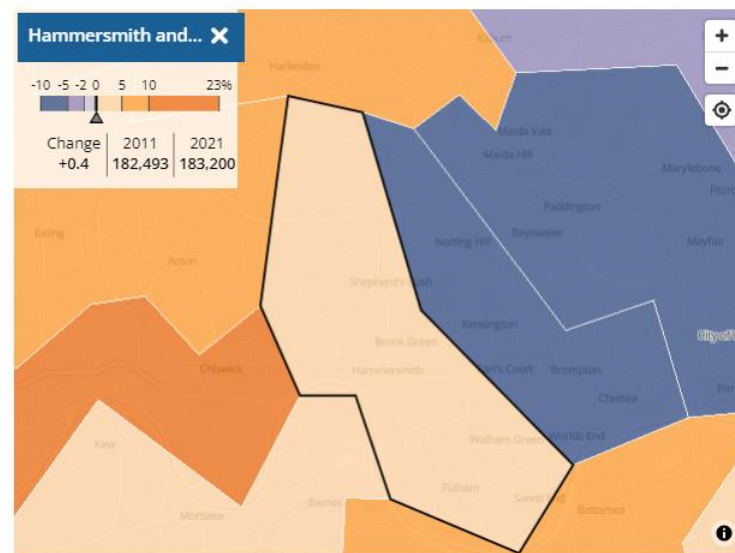
There has been a long-term gradual decline in the Borough of families with young children. Hammersmith and Fulham is one of nine London Boroughs who have experienced an overall decrease in the number of 0-17 residents. In fact, the largest decrease was recorded in the 0-4 age group 23.7%, while the elderly population has increased by 15.7% (London +15.3% and England +20.1%).

H&F is also more diverse than 10 years ago, with 46% of the population born outside of the UK (London 41%), an increase from 43% in 2011 with most residents coming from Italy, France, the US, and Spain.

In 2021, Hammersmith and Fulham ranked 107th for total population out of 309 local authority areas in England, which is a fall of eight places in a decade.

Hammersmith and Fulham covers an area of 16 square kilometres (6 square miles) and has a population density of 11,178 people per square kilometre (km²), based on the latest population estimates taken in mid-2021 (ONS). As of 2021, Hammersmith and Fulham is the sixth most densely populated of London's 33 local authority areas.

Figure 1: Population change between 2011 and 2021 in Hammersmith and Fulham

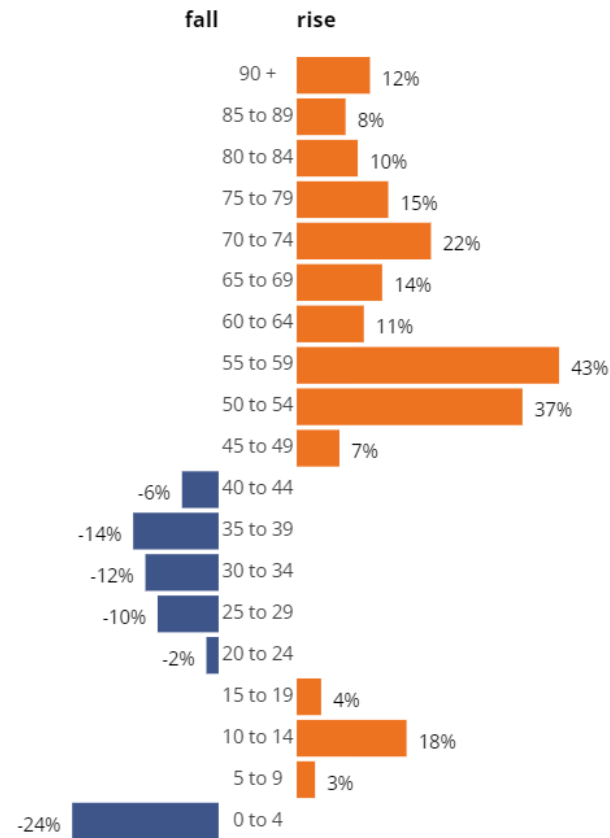


Source: Official National Statistics – Census 2021

Age

In the Census 2011, the largest age group in London was those aged 25 to 29 years. More recently, in 2021, the largest age group in London was those aged 30 to 34 years. Overall, in England, there has been an increase of 20.1% in people aged 65 years and over, an increase of 3.6% in people aged 15 to 64 years, and an increase of 5.0% in children aged under 15 years (Census 2021). In Hammersmith and Fulham there has been an increase of 15.2% in people aged 65 years and over, a decrease of 0.5% in people aged 15 to 64 years, and a decrease of 4.2% in children aged under 15 years.

Figure 2: Population change (%) by age group in Hammersmith and Fulham, 2011 to 2021



Source: ONS Census 2021

It has been estimated that 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 33.9% during the same period and population aged 50 to 63 to grow by 13.3%. This trend is reflected similarly in London with 37.7% and 33% of increase respectively for people aged 64-83 and over.

Figure 3: Age and Sex structure in Hammersmith and Fulham



Source: Office for National Statistics, Population age and sex structure, 2020

Gender

The Census 2021 has reported a higher percentage of female (53%) in the borough than males (47%) with an increase of 4% over the past decade.. This figure has slightly changed throughout the years in terms of percentage of female against males since Census 2011 where females were (51.3%) and males (48.7%). Overall, the percentage of females in the borough has been higher than males.

Hammersmith and Fulham's age structure shows the working-age population to be 137,402 which is 75.0% of the population. People under the age of 16 represent 14.6% of the population, and over 65s represent 10.4% of the population.

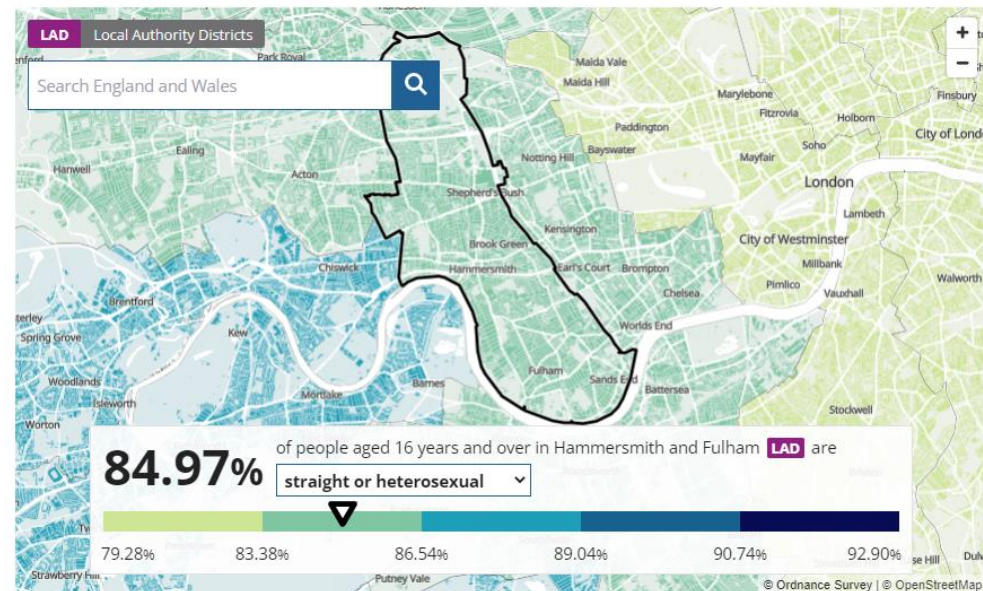
For commentary regarding transgendered or transitioning people, see 'sexual orientation (and transgender)' below. For the assessment of policies, transgendered or transitioning people are represented in the gender category (see section 05).

Sexual Orientation (and transgender)

The nature of issues facing LGB 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.

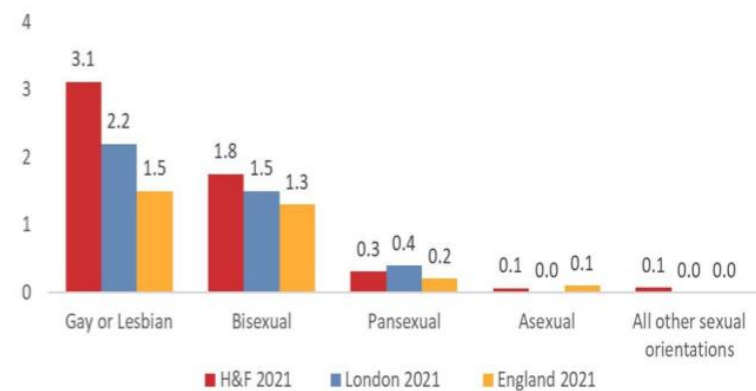
The 2021 Census included the question on sexual orientation which was voluntary and only asked of people aged 16 years and over. Based on the percentage of people who provided an answer, in London, 2.2% described their sexual orientation as gay or lesbian, 1.5% described their sexual orientation as bisexual, and 0.5% wrote in a different orientation. Hammersmith and Fulham has a majority of heterosexual population (84.97%), gay or lesbian account for 3.12%, bisexual (1.76%) and other orientation (0.43%). Hammersmith and Fulham ranks the top 20 in England in terms of proportion of LGB+ population to total population.

Figure 4: Sexual orientation, 2021, local authorities in England



Source: ONS, Census 2021 [[Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/sexualorientationandgender/census2021)]

Sexual orientation (%), 2021



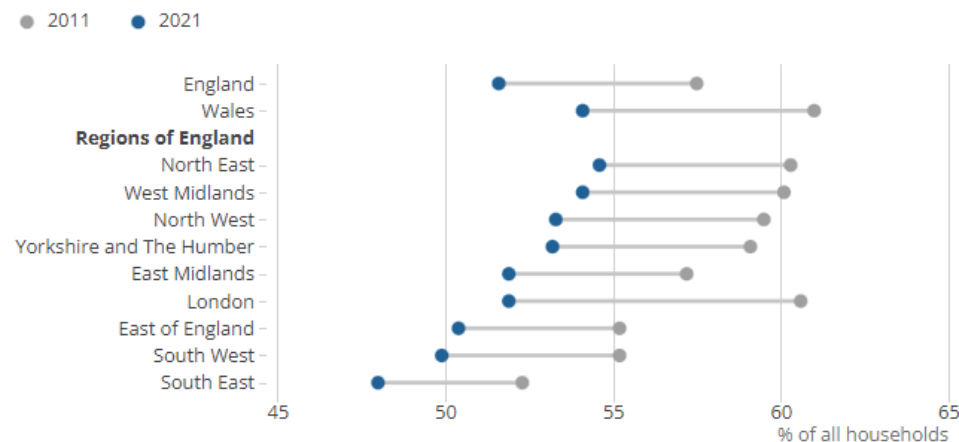
LBHF BI service, Census 2021

Deprivation

Households in England were classified in terms of dimensions of deprivation, based on selected household characteristics. Households were considered to be deprived if they met one of the following four dimensions of deprivation:

- employment: where any member of a household, who is not a full-time student, is either unemployed or economically inactive due to long-term sickness or disability.
- education: no person in the household has at least five or more GCSE passes or equivalent qualifications, and no person aged 16 to 18 years is a full-time student
- health and disability: any person in the household has general health that is “bad” or “very bad” or is identified as disabled
- housing: the household’s accommodation is either overcrowded or is in a shared dwelling, or has no central heating

Figure 5: Households deprived in at least one dimension, 2011 and 2021, England, Wales and regions of England



Source: Office for National Statistics – Census 2021

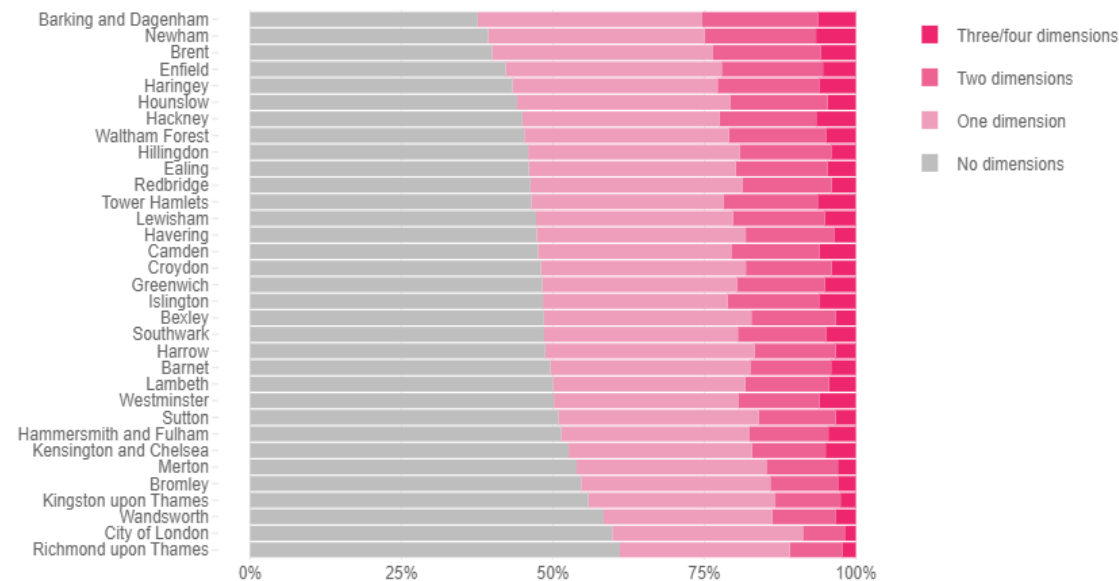
The 2021 Census reported a general improvement on health, as per Hammersmith and Fulham 53.8% of the residents stated that health has been improved since 2011.

Overall, London’s pattern of household deprivation is very close to the rest of England, with just over half of all households deprived on at least one dimension. The proportion of households not deprived in any dimensions increased between 2011 and 2021, with this increase clearly greater for London than for other regions. London remains the region with the highest proportion of households deprived in all four dimensions. Even though that

proportion is small (0.4 per cent), it still represents more than 13,000 households in London showing all aspects of deprivation. London boroughs have both the highest proportion of households deprived on at least one dimension (Barking & Dagenham, Newham and Brent) and among the very lowest (Richmond upon Thames) of any local authorities in England. At ward level, concentrations of deprived households are even more obvious, with more than one in ten households showing at least three of the four dimensions of deprivation in seven wards from Westminster, Kensington & Chelsea, Camden and Enfield.

Hammersmith and Fulham reported 51.3% of household not deprived in any dimension, 31% of household deprivation in one dimension and 4.5% of household deprived in three or four dimensions. (GLA Census 2021 Reports, available at: [Census 2021 Reports \(london.gov.uk\)](https://data.london.gov.uk/reports/census-2021-reports)).

Figure 6: Households deprivation by borough, 2021



Source: GLA Report Census 2021 – household deprivation

At ward level, average dimensions of deprivation in Hammersmith and Fulham were highest (between 0.9-0.97) in the northern part of the borough (College Park & Old Oak, White City and Shepherd's Bush Green) and lowest (0.48-0.5) in the south (Parsons Green 7 Sandford and Fulham Town).

Four wards in London had 1.4 per cent of households derived on all four dimensions, two in Westminster (Church Street and Westbourne) and two in Camden (St Pancras & Somers Town and Kilburn), though seven other boroughs

include wards with at least one in a hundred households deprived in all four dimensions. Those are Haringey, Hammersmith & Fulham, Kensington & Chelsea, Hackney, Barnet, Enfield and Brent [[Census 2021 Reports \(london.gov.uk\)](https://census.gov.uk/reports)].

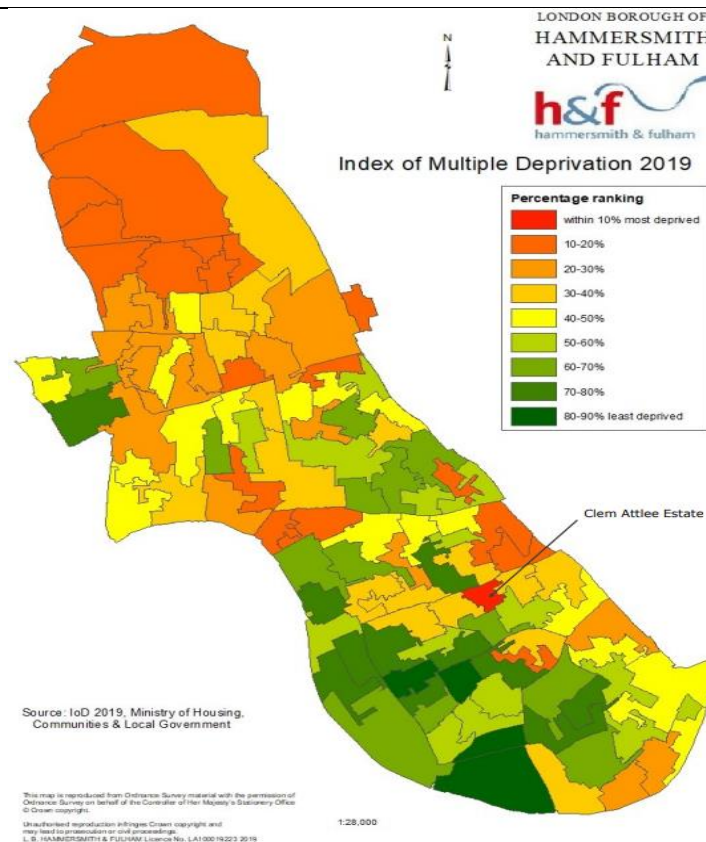
Map 1: Map of average deprivation, London wards, 2021



Source: 2021 Census, ONS, GLA survey

According to the 2019 Indices of Deprivation (IoD), 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 7: Index of Deprivation in Hammersmith and Fulham



Source: Deprivation in Hammersmith and Fulham | LBHF, 2019

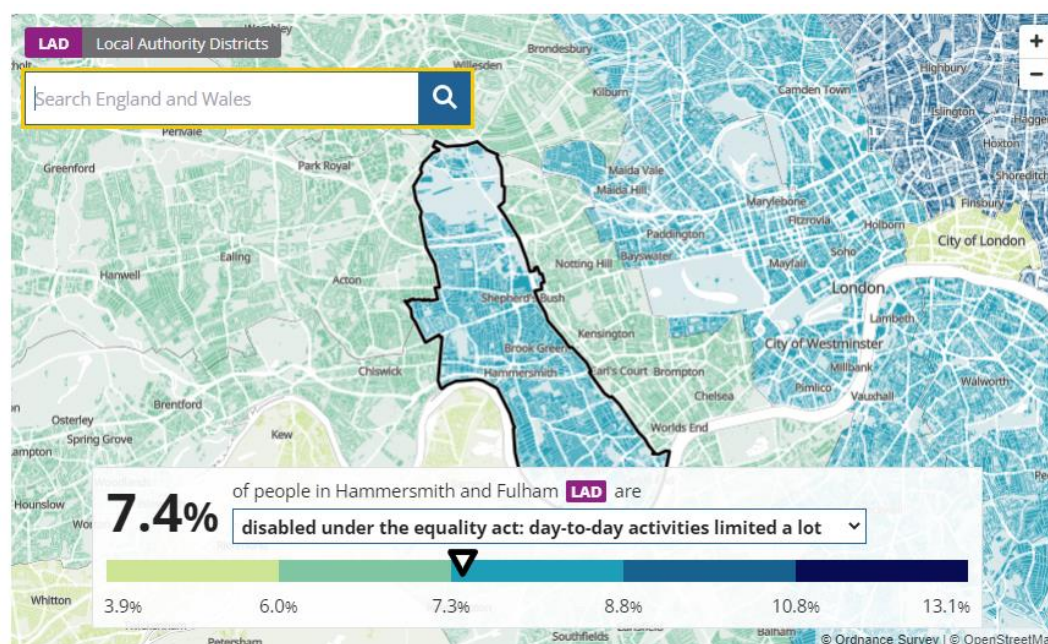
Hammersmith and Fulham not only has high levels of deprivation, it is polarised socially and economically. In the context of London this is demonstrated by the fact that the borough has some wards that have the highest and lowest rankings for the levels of income. Palace Riverside appears in the rankings as having the one of the highest income ranks as well as highest Index of multiple deprivation ranks. On the contrary Wormholt and White City has statistically the one of the lowest income ranks and lowest index of multiple deprivation ranks. The above image shows this effectively, with the brighter orange colours signifying parts of the borough which have high deprivation levels and conversely the brighter green areas showing low levels of deprivation.

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.

Disability

Overall, the portion of disabled people across England and Wales has fallen from 19.3% in 2011 to 17.7% in 2021. Figures from 2021 Census show 22,972 people in Hammersmith and Fulham have a physical or mental impairment, which account to 15.5% of the area's population. Of these people, 12,865 (8.1%) said their disability stopped them from carrying out regular activities 'a little', while 10,107 (7.4%) said it did so 'a lot'. The prevalence of disability rises with age. Two fifths of residents aged 75 and over were disabled, followed by one third of those aged 65 to 74 years and one fifths of residents aged 55 to 64 years.

Figure 8: Disability (age-standardised), 2021 in Hammersmith and Fulham



Source: ONS, 2021 Census [[Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/disability)]

Race

According to the latest 2021 Census, Hammersmith, and Fulham remains ethnically diverse and saw a 6.6% increase in people who are from an ethnic group other than White British (61.7%). Despite this ethnic diversity, 7 in 10 people still identify with a UK national identity. The main ethnic minorities identified are Black African (7.2%), Mixed (6.7%), Black Caribbean (3.6%), and Arab (3%).

	Religion The most populous religious group within Hammersmith and Fulham is Christian (45.7%). This figure has decreased (8.4%) from 2011. The next most common religious group is Muslim (11.6%,) with a population of 21,290, up from 10% in 2011. These trends are similar to London and England as a whole.
New research	N/A

Section 04	Undertake and analyse consultation
Consultation	An internal consultation was carried out in January 2025, with the Climate Change Strategy Team and various council departments consulted and actively involved in the drafting of the guidance note.
Analysis	<p>Methodology of the Analysis & Protected characteristics and the Public Sector Equality Duties PSED)</p> <p>This EqIA analyses the likely impacts of the Guidance Note 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.</p> <p>It also assesses the note 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"> ▪ eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act; ▪ advance equality of opportunity between people who share a protected characteristic and those who do not; and ▪ foster good relations between people who share a protected characteristic and those who do not. <p>The relevance of the policies to the protected characteristics is categorised as:</p> <ul style="list-style-type: none"> • High (H) • Medium (M) • Low (L)

	<ul style="list-style-type: none"> • Not Applicable (NA) <p>and the magnitude of the impact on the protected characteristics are categorised as:</p> <ul style="list-style-type: none"> • Positive (+), • Negative (-) • Neutral (blank) <p>The Guidance Note introduces a sliding scale of carbon offset prices that should be applied to major developments within the borough.</p> <p>The note builds upon the GLA's Energy Assessment Guidance which sets a 50% benchmark for carbon reduction for major developments and Policy SI 2 of the London Plan (2021)⁴ on Minimising Greenhouse Gas Emissions which requires major developments to achieve net zero-carbon performance.</p> <p>The impacts have been assessed against the protected characteristics as follows. Commentary has been provided in relation to the way in which the Guidance Note is likely to impact upon the protected characteristics:</p> <ol style="list-style-type: none"> 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
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Section 05	Analysis of impact and outcomes											
Analysis		Age	Disability	Gender Reassignment	Marriage/Civil Partnership	Pregnancy/Maternity	Race	Religion/Belief	Sex	Sexual Orientation	Human/Children's rights	Commentary

	Carbon Offset Cost Guidance Note	H+	H+	N/A	N/A	H+	N/A	N/A	N/A	N/A	N/A	<p>The note provides guidance on carbon offsetting, helping planners and developers calculate the carbon offsetting costs for major development sites. It aims to encourage developers to include more on-site carbon reduction measures, thereby contributing to a more sustainable environment while implementing actions outlined in the council's climate change strategy.</p> <p>The guidance contained in this document will generally have neutral or positive impacts on the protected characteristics.</p> <p>Wider benefits to the protected characteristics would be in terms of health and wellbeing following the implementation of on-site carbon reduction measures which this guidance note aims to achieve and promote.</p> <p>In this respect, there would be more positive outcomes and benefits to certain age group such as children and elderly people as well as those with impairments, such as those suffering from breathing diseases.</p>

	<u>Human Rights and Children's Rights</u>
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	The Principles in the SPD will not affect Human Rights as defined by the Human Rights Act 1998 nor Children's Rights, as defined by the UNCRC 1992.
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	The implementation of the SPD through consideration and determination of planning applications is unlikely to adversely impact upon Human and Children's rights.
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Section 06	Reducing any adverse impacts
Outcome of Analysis	<p>The equalities impact analysis of the Guidance Note on Carbon Offset Costs has found that in general, there is unlikely to be any potential unlawful discrimination against protected groups associated with the implementation of principles and approach introduced in the note. However, the council welcomes comments from the public and other stakeholders on the findings of this equalities impact analysis.</p> <p>The analysis has revealed that, generally, that the guidance note will have a POSITIVE or NEUTRAL impact upon all protected groups and characteristics and will have benefits in terms of people's health and wellbeing, especially in relation to Age, Disability, Pregnancy and Maternity.</p> <p>The council will take the following actions to promote its equalities duties:</p> <ul style="list-style-type: none"> • it will monitor the implementation of the Guidance Note on an ongoing basis to avoid any issues that may adversely impact on the protected characteristics and will be amended to help resolve these issues. • it will monitor the development of equalities legislation and associated case law to help ensure that the guidance remains legally compliant. <p>It is considered the Guidance Note will have a NEUTRAL impact on human rights as defined by the Human Rights Act 1998.</p> <p>It is considered that the Guidance Note 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"> • The right to life, survival and development • Health and welfare rights, including rights for disabled children, the right to health and health care, and social security and • The right to education, leisure, culture and the arts

Section 07	Action Plan
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Action Plan	Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
	Ensure that the note remains legally compliant with respect to equalities matters	Monitoring emerging equalities related case law and any future legislative amendments.	Ongoing	Paul Baker	The guidance note will continue to remain legally compliant with respect to equalities matters.	N/A
	Ensuring that the guidance note 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 guidance note process as well as through its implementation within relevant procedures and practices.	Ongoing	Paul Baker	The Council will not only enable legal compliance; however, it will enable social inclusion.	N/A

Section 08	Agreement, publication and monitoring
Chief Officer sign-off	Name: David Gawthorpe Position: Team Leader, Policy and Spatial Planning Email: localplan@lbhf.gov.uk Telephone No:
Key Decision Report	Date of report to Cabinet: April 2025