



Equality and Human Rights Impact Assessment

[Equality impact assessment tools \(sharepoint.com\)](https://sharepoint.com)

STEP A) Description of what is to be assessed and its relevance to equality

What is being assessed? Please tick ✓

Review of a service ☐ Staff restructure ☐ Decommissioning a service ☐

Changing a policy ✓ Tendering for a new service ☐ A strategy or plan ☐

An Article 4 Direction would remove permitted development rights allowing conversion of a single dwelling house into a small house in multiple occupation (HMO). Whilst HMOs are concentrated in some areas more than others, they are present in all areas of the borough. The Article 4 Direction is therefore proposed to apply boroughwide. The Article 4 Direction would not prevent the conversion of small dwelling houses into HMOs, it would only mean that such conversions would require planning permission

Who is accountable? E.g. Head of Service or Corporate Director

Director of Planning and Sustainable Growth

Date assessment completed and approved by accountable person

16/11/2025

Names and job titles of people carrying out the assessment

Julia Johnson
Director of Planning and Sustainable Growth

A.1) What are the main aims and intended benefits of what you are assessing?

Review of a policy to enable the council to better manage the impact of small houses of multiple occupation across the borough.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

Residents are looking to access lower-cost housing within the borough. The data indicates the following equalities profile:

Policies targeting HMOs could disproportionately affect groups more likely to live in shared accommodation (young people, migrant workers, low-income residents).

Poor quality housing, which is more common with HMOs, can disproportionately impact more vulnerable residents, including the elderly, young people and pregnant women.

ASB, which is more common where a property is an HMO, can have an impact on community cohesion.

Concentrations of HMOs in more deprived wards may inadvertently exacerbate inequality without mitigating support.

A.3) Who are the stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Residents	Those accessing housing in the private rented sector
Residents	Living in proximity to potential HMOs
Property owners/ Landlords	Those who seek to convert their properties into small HMOs
Public Bodies	Consultations on future planning applications Enforcement activities

A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

Age	✓	Sex	
Disability	✓	Sexual Orientation	
Gender reassignment		Socio-economic status	✓
Marriage or civil partnership		Carers	
Pregnancy or maternity		Community Cohesion	✓
Race/Ethnicity	✓	Community Safety	
Religion or belief		Human Rights	

STEP B) Consideration of information; data, research, consultation, engagement

B.1) Consideration of information and data – what have you got and what is it telling you?

Age – older and younger people – poor quality housing which is more common which HMOs disproportionately impacts older and younger residents who are more vulnerable to mould and damp.

Disability – housing hazards such as damp and mould which are more common in HMOs disproportionately affect disabled people.

Race – the wards with higher concentrations of private rented sector homes are areas which have higher proportions of minority ethnic residents. These wards also have higher levels of housing with serious hazards, ASB, fuel poverty and disrepair complaints implying disproportionate housing disadvantage by ethnicity.

Socio-economic – there is a higher concentration of HMO housing in more deprived wards.

Community Cohesion – HMOs are associated with higher levels of ASB which can cause issues for neighbouring residents.

Consultation

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick ✓ NO ✓ YES ☐

No consultation or engagement has been undertaken. However in accordance with Schedule 3 of the GPDO 2015 a consultation will be undertaken after the introduction of the Article 4 Direction. This consultation will allow representations to be made to the council on the introduction of the Article 4 Direction. Any representations made will be considered by officers before preparing the Cabinet report for the confirmation of the Article 4 Direction.

B.3) Provide any other information to consider as part of the assessment

Legal context

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010)

Financial context – standard text

Since 2010, the council has driven a transformation programme across all services aimed at reducing costs and improving efficiency to ensure that in an environment of increased expenditure from population growth and inflationary uplifts we continue to deliver high quality services that put residents first.

The council continues to prioritise the delivery of its rigorous savings programme maintaining high standards of resident services, however the latest projections indicate that further savings of £34m will be required during 2025-26 to bridge the budget gap as a result of reducing government funding and the increasing cost of service delivery.

National policy context

Paragraph 54 of the National Planning Policy Framework (2024) explains that Article 4 Directions should be used only where necessary to protect local amenity or the wellbeing of an area, and must be supported by robust evidence. Additionally, they should apply to the smallest geographical area needed to address the identified issue. The terms “local amenity” and “wellbeing” are not strictly defined and can vary depending on context. For example, visual amenity relates to the appearance of an area, while residential amenity concerns the living conditions of occupants.

C) Assessment

What did you find in B1? Who is affected? Is there, or likely to be, an impact on certain groups?

C.1) Describe any **NEGATIVE** impacts (actual or potential):

Equality Group	Impact on this group and actions you need to take
Age	Possible slight delays or increased complexity in creating new HMOs may reduce availability of lower-cost accommodation, which is more commonly used by young adults. The risk of this impact is considered low and not significant as it will still be possible for properties to be converted to small HMOs subject to planning permission.
Disability	A reduction in new HMOs (if conversion viability decreases) might reduce lower-cost options for disabled people on fixed or low incomes. The risk of this impact is considered low and not significant as it will still be possible for properties to be converted to small HMOs subject to planning permission.
Race	If planning processes unintentionally make small HMOs less viable in certain areas, this could limit access to affordable accommodation for groups who are statistically more likely to rent privately. The risk of this impact is considered low and not significant as it will still be possible for properties to be converted to small HMOs subject to planning permission.
Socio-Economic	Potential increase in conversion costs or delays may reduce supply of lower-cost housing, affecting low-income renters most. The risk of this impact is considered low and not significant, as it will still be possible for properties to be converted to small HMOs, subject to planning permission.
Community Cohesion	If poorly communicated, residents may incorrectly assume it “bans” HMOs. This risk is considered low and can be mitigating by supporting communications from the council.

C.2) Describe any **POSITIVE** impacts

Equality Group	Impact on this group and actions you need to take
Age	Older residents may benefit from improved neighbourhood amenity, as the Article 4 Direction enables the council to manage concentrations of HMOs in areas where noise, ASB, and transient occupancy previously caused disruption.

	Better planning oversight may improve housing safety for younger tenants, who are over-represented in small HMOs. Assessment during planning can improve space standards, reducing overcrowding which affects families with children
Disability	Planning control allows the council to require accessible design features.
Race	Many high-PRS/high-HMO wards with hazards, overcrowding and ASB also have higher proportions of minority ethnic residents; improving standards and managing concentrations could reduce exposure to unsafe living environments.
Socio-Economic	Increased council oversight through planning enables better quality control, reducing substandard and hidden HMOs, which heavily impact lower-income tenants.
Community Cohesion	Planning permission provides greater opportunity for neighbours to comment, increasing transparency and trust.

D) Conclusions

The introduction of an Article 4 Direction for small HMOs, which does not prevent HMOs but simply requires planning permission for new ones, is likely to have a broadly positive or neutral impact on equality, with some risks that need careful monitoring. By enabling the council to manage the location, quality and concentration of new HMOs, the measure can help improve housing standards and neighbourhood amenity in areas where high levels of hazards, disrepair, ASB and deprivation disproportionately affect older residents, disabled people, minority ethnic communities and low-income households. Better oversight can reduce the prevalence of unsafe or overcrowded conversions and support more stable, cohesive communities by preventing over-concentration of HMOs. However, there is a potential risk that requiring planning permission could marginally reduce the supply or slow the delivery of lower-cost shared housing, which may negatively affect younger people, low paid workers, students, and others for whom HMOs are an essential affordable option. With clear communication, consistent decision-making and safeguards to protect affordable provision, the Article 4 Direction is expected to support more equitable housing conditions while avoiding disproportionate impacts on protected groups.



Signed and dated:.....

.....16/11/2025.

Name and position: Julia Johnson, Director of Planning and Sustainable Growth