



# EQUALITY IMPACT ASSESSMENT

## Partial Assessment Form

<b>Policy, practice, function or project assessed</b>	Affordable Housing Supplementary Planning Document
<b>Lead Officer</b>	Claire Spencer
<b>Team</b>	Planning Policy
<b>Start date of assessment</b>	16 September 2009
<b>Completion of assessment</b>	2 March 2010

Please use this form to record your findings in relation to the assessment of an existing policy, function, service or practice.

## **A. POLICY, PRACTICE, FUNCTION OR PROJECT TO BE ASSESSED**

### **A1. Please describe what are the main aims, objectives, purpose and intended outcomes of the policy or function?**

The purpose of Supplementary Planning Documents (SPD) is to expand on policies set out in Development Plan Documents (DPD) and to provide additional detail. The SPD expands on district-wide policies contained within the adopted Development Control Policies DPD, adopted in July 2007.

Policies in the DPD seek to ensure that a suitable proportion, type and mix of Affordable Housing is provided through new development and also provide for rural exceptions sites, to address the high level of housing need in the district, and this SPD provides additional details on how these policies will be implemented. It provides guidance to applicants and agents preparing development to ensure developers of affordable housing meet desirable standards at an affordable price to benefit all potential future occupiers. It also identifies a framework for selecting future occupiers in an open, transparent and fair way which provides a maximum amount of choice to end users and prioritises vulnerable people.

The overarching objective of the SPD is to assist achievement of the Development Control Policies DPD Objective HG/a “to ensure the provision of a range of affordable housing, to meet the identified needs of all sectors of the community, including key workers.”

Specific objectives of this document are:

- To facilitate the delivery of affordable housing to meet housing needs.
- To assist the creation and maintenance of sustainable, inclusive and mixed communities.
- To provide detailed guidance on the interpretation of the requirements in respect of the amount, type and size of affordable housing to be provided in accordance with the policies in the Local Development Framework.
- To provide certainty to developers about the requirements for affordable housing as part of residential developments or on rural exception sites.
- To provide principles on the design, appearance and layout of affordable housing.
- To provide detailed guidance on the calculation of financial contribution in lieu of on site provision of affordable housing.

### **A2. Is this policy or function associated with any other Council policy or priority?**

The SPD supplements the adopted Development Control Policies Development Plan Document policies HG/3, HG/4 and HG/5.  
[http://www.scambs.gov.uk/Environment/Planning/DistrictPlanning/LocalDevelopmentFramework/Development\\_Control\\_Policies\\_DPD.htm](http://www.scambs.gov.uk/Environment/Planning/DistrictPlanning/LocalDevelopmentFramework/Development_Control_Policies_DPD.htm)

It is also linked with Council Aim C. We are Committed to making South Cambridgeshire a place in which residents can feel proud to live.

**A3. Who are the intended beneficiaries/stakeholders of the policy or function? How many people are affected and from what sections of the community?**

The SPD builds on national policy in Planning Policy Statement (PPS) 3: Housing and Planning Circular 05/05 to provide a balanced and fair approach which ensures the creation of mixed and balanced communities.

Planning Policy Statement 3: Housing (PPS3) introduced Strategic Housing Market Assessments (SHMA) as the new approach to assessing housing needs for the whole of the community, both market and affordable housing. A Cambridge Sub-Region SHMA has been undertaken and will be updated on a rolling basis as significant new data becomes available. Whilst the SHMA was not available to inform the policies in the Development Control Policies DPD and the overall target for affordable housing provision in South Cambridgeshire in the adopted DPD, it does provide an up to date evidence base to inform the implementation of the DPD policies, particularly in terms of the likely profile of household types requiring market housing e.g. families with children, couples, and single persons; and the size and type of affordable housing required.

SMHA findings will help the Council ensure that the provision of social-rented and intermediate affordable housing meets the needs of both current and future occupiers. It shows that the amount of unmet need for affordable housing of various types has now risen to 1,503 affordable homes per annum. This compares with average annual supply as at 2008 of 315 dwellings per annum, whilst 614 dwellings per annum are required simply to stop the backlog increasing. It is therefore clear that the need for affordable homes of all types far exceeds current and likely future levels of provision.

**A4. Is the policy/function corporate and far-reaching?**

Yes the SPD applies district wide, and links with one of Council aims (see A.2 above).

**A5. Are you expecting to make any significant change to the policy or service in the near future? If so, please give details.**

No changes are anticipated.

**A6. Is this a new or existing policy or function?**

The SPD supplements and amplifies the adopted Development Plan Document policy.

## **B. EVIDENCE/ DATA and CONSULTATION**

It is important to consider all information that is available in determining whether the policy or function could have a differential impact. Please attach examples of monitoring information, research or consultation reports.

### **B1. What monitoring or other information do you have about relevant target groups, which will show the impact of the policy or function?**

Local Development Framework Annual Monitoring Report indicators help review the success of the SPD:

- Core Output Indicator CO-H5 Gross affordable housing completions
- Local Output Indicator LOA2 Affordable housing completions by tenure
- Local Output Indicator LOA3 Affordable housing completions on rural exception sites
- LOA7 Affordable housing completions as a % of all housing completions on sites of 2 or more dwellings
- LOA8 Affordable dwellings permitted as a % of all dwellings permitted
- Significant Effect Indicator SE31 House price: earnings ratio
- Significant Effect Indicator SE33 % of all dwellings completed that are affordable

Housing needs will be kept under review by the Strategic Housing Market Assessment and agencies with an interest in commissioning specialist provision e.g. Supporting People, Primary Care Trust etc. This includes Joint Strategic Needs Assessments.

**B2. Have you compared the data you have with the equality profile of the local population? What does it show?**

Section A.3 (see above) outlines the current level of affordable housing need within the district.

The following is taken from the Local Development Framework Annual Monitoring Report, December 2008:

In the last monitoring year, 34% of new dwellings completed were affordable (463 new affordable dwellings out of 1,353 gross new dwellings); this is almost double the number of affordable dwellings completed in the previous monitoring year.

Although there is no longer a set target for the split of affordable housing by tenure it is important to continue to monitor it to record performance of the affordable housing policy. In the last four monitoring years social rented affordable housing has been the majority tenure of affordable dwellings completed. There is significant level of need for social rented housing in the district and therefore it is important to add to the supply in order to address that demand. It is also important to provide new affordable dwellings for key workers and for shared ownership (two types of intermediate housing tenures), however intermediate tenure options can also be satisfied through alternative forms of affordable housing provision, such as equity loans that can be used to purchase any dwelling.

Affordable housing exception sites provided 78 new affordable dwellings in the last monitoring year; these sites provided affordable dwellings on the edge of Balsham, Coton, Duxford, Heydon and Meldreth to meet identified local need.

The threshold of two or more dwellings and the target of 40% or more affordable housing in Development Control Policy HG/3 is a significant change from that sought by Local Plan Policy HG/7. Indicator LOA7 has been created to monitor the relationship between the new affordable housing policy and the output achieved when the planning permissions are implemented. In the last monitoring year, 38% of housing completions on sites of 2 or more dwellings were affordable. Although this is only slightly less than the target, the data is skewed by a significant number of 100% affordable housing schemes being completed in the last monitoring year.

**B3. Have you identified any improvements or other changes that could be made from monitoring the data?**

The Annual Monitoring Report shows that the current provision of affordable housing is not meeting the targets. Although there is no target for the tenure of affordable housing in the Development Control Policies DPD, the SPD addresses this issue. Therefore the SPD should assist with meeting the targets in the future, in particular ensuring the tenure of housing addresses need.

**B4. Have you consulted or involved external stakeholders about the policy or function? If so, what were their views?**

The draft SPD was subject to six-weeks public consultation with a range of external stakeholders from 23 October to 4 December 2009. A Statement of Consultation has been produced and details the representations received and subsequently amendments have been incorporated into the final adopted SPD.

A total of 54 representations were received during the consultation period of which 2 were supporting, 31 objecting and 21 comments to the draft SPD. The main issues raised include:

- More than half of the representations received are from the landowners / developers for the major developments, in particular Gallagher, Homes and Communities Agency and Marshall. They are seeking to ensure that the SPD properly reflects the issues affecting the major developments and that it is consistent with the affordable housing policies in the Area Action Plans. They also raise concerns with the proposals for dealing with development viability, including the proposed 3 year review period in cases where initial viability leads to a reduced affordable housing contribution, the requirement for developers to fund the independent validation of viability evidence, the approach to residual land valuation, and the requirement for the development to provide free serviced land.
- Questions are raised about the proposed indicative tenure mix targets and the approach to size of units, including from the County Council which is concerned that this could have implications for numbers of children on affordable housing developments.
- Cambridge City Council makes a number of detailed comments on the SPD, essentially seeking consistency in approach between the two districts where they felt clarifications would be helpful.
- A number of detailed points are made by other representors e.g. approach to rounding of affordable housing calculations, promotion of energy efficient design, delivery of rural exception sites.

**B5. Have you undertaken any consultation with staff to assess their perception of any impacts of the policy or function? If so, what has been learnt from them?**

Yes, internal consultation was undertaken during the preparation of the SPD. The Consultation Statement details the comments received:  
<http://www.scambs.gov.uk/Environment/Planning/DistrictPlanning/LocalDevelopmentFramework/SPD.htm>

**B6. Please provide information about any other consultation, research, or involvement undertaken in relation to this impact assessment.**

The SPD was published for a six-weeks public consultation, as detailed in B4 above. A public notice was placed in the Cambridge News at the start of the public consultation. A number of stakeholders were sent a letter and CD-Rom containing each of the public participation documents, supporting documents, and forms for making comments. All documents were available to view and / or download from the Council's website: <http://www.scams.gov.uk/Environment/Planning/DistrictPlanning/LocalDevelopmentFramework/SPD.htm>, and a link was included from the home page. Interactive online versions of documents were also available to enable people to make comments online during the consultation period, as well as Word and PDF versions of a response form that could be completed and emailed / posted to the Council. South Cambs Magazine, which is delivered to every household in the district, also included information on the consultation. Printed copies of the document were also available to view or purchase at the Council's offices.

## C1. IMPACT OF THE POLICY OR FUNCTION

Assess the potential impact on each of the equality strands/groups. The impact could be negative, positive or neutral. If you assess a negative impact for any of the groups then you will need to assess whether that impact is low, medium or high. Refer to the evidence you use.

DESCRIPTION OF IMPACT	Nature of Impact (Positive, Neutral, Adverse)	Extent of Impact (Low, Medium, High)
<b>GENDER:</b> Identify the potential impact of the policy or function on men and women	Neutral	
<b>RACE:</b> Identify the potential impact of the policy or function on different race/ethnic groups	Neutral	
<b>DISABILITY:</b> Identify the potential impact of the policy or function on disabled people	Positive	
See C4		
<b>AGE:</b> Identify the potential impact of the policy or function on different age groups	Positive	
See C4		
<b>SEXUAL ORIENTATION:</b> potential impact of the policy on lesbian, gay men, bisexual or heterosexual people	Neutral	
<b>RELIGION/FAITH:</b> Identify the potential impact the policy on different religious/faith groups	Neutral	
<b>OTHER:</b> District-wide housing need, particularly in the rural area	Positive	

**PLEASE NOTE: Following completion of the section above, if the nature of the impact is adverse then you may need to proceed to a full equality impact assessment.**



**C2. Could you minimise or remove any adverse or potential impact that is high, medium or low significance, in advance of a full impact assessment? Explain how.**

N/A

**C3. Does the policy or function actively promote equal opportunities and good community relations? Or could changes be made so that it does so?**

The SPD addresses Council Aim C. We are Committed to making South Cambridgeshire a place in which residents can feel proud to live.

**C4. Please provide any further information, qualitative or quantitative that does not fit into the questions but you feel has a likely impact on this assessment.**

The SPD is concerned with the provision of affordable housing and not its allocation, which is undertaken through the Choice Based Letting process. This process has been subject to a separate Equality Impact Assessment: <http://www.scams.gov.uk/CouncilAndDemocracy/Equality/equalityimpactassessments.htm>. However, the SPD may have a slight positive impact on Disability and Age from the provision of affordable housing, as there is a requirement for the provision of Lifetime Homes, which would benefit the disabled and elderly. In addition, provision of more affordable housing in the rural areas may assist younger residents to remain in the villages where they grew up.

<b>D. CONCLUSIONS</b>			
<b>D1. Was there sufficient data to complete the partial assessment?</b>	Yes?	<input checked="" type="checkbox"/>	<b>If “NO”, what arrangements are in place for evidence gathering and continuing with the assessment?</b>
	No?	<input type="checkbox"/>	
<b>D2. Is the outcome of the partial assessment that the policy or function would have an adverse impact (medium or high impact) on one or more target group?</b>	Yes?	<input type="checkbox"/>	<b>If “YES”, will you proceed to a full assessment? If so, what arrangements are in place to carry out the full assessment?</b>
	No?	<input checked="" type="checkbox"/>	
<b>D3. Is the outcome of the partial assessment that the policy or function would have a neutral or positive impact on equalities?</b>	Yes?	<input checked="" type="checkbox"/>	<b>If “YES”, have you included proposals in the Action Plan to further improve the impact of the policy or function on equalities?</b> No – the SPD already promotes equality of access within affordable homes.  <b>Do you plan to review the service or policy again in future to assess whether there has been any change? If so, when?</b> No.
	No?	<input type="checkbox"/>	<b>Has the Equalities Steering Group and the Consultative Forum reviewed the assessment? If so what were their comments?</b>  No.
<b>D4. Do you have any other conclusions/outcomes from the partial assessment?</b>			

**ACTION PLAN for enhancing existing practice**

Recommendation/ issue to be addressed	Planned Milestone	Planned completion of milestone (date)	Officer Responsible	Progress
The success of the Affordable Homes SPD will be addressed through the Annual Monitoring Report.	-	Annually		

**RESOURCES**

**Does the above action plan require any additional resources?**

No resource issues have been identified.

**ARRANGEMENTS FOR MONITORING**

**Please give your plans for monitoring the achievement of the above actions.**

SIGN OFF: The officers below confirm that this partial assessment has been completed in accordance with the Council's guidance		
Signature of Lead Officer		Date:
Signature of Corporate Manager or Chief Officer:		Date:

**Please retain the original form on your service area and return a copy of the completed form to the Equality & Diversity Officer.**