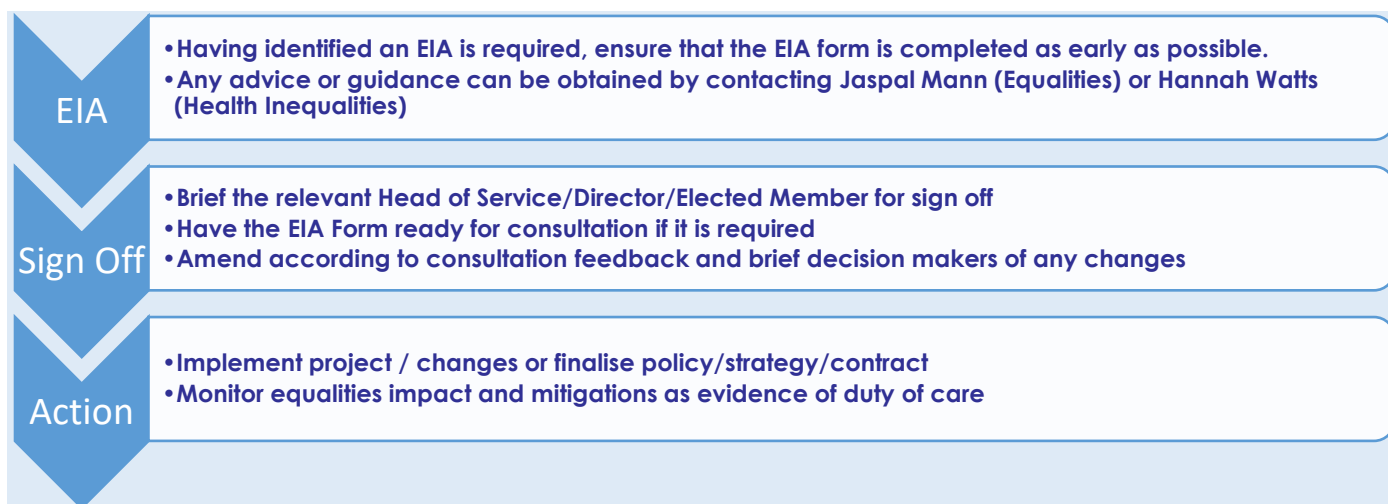


EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA	EIA Affordable Housing SPD	
EIA Author	Name	Clare Eggington
	Position	Principal Town Planner (Planning Policy)
	Date of completion	27/08/2021
Head of Service	Name	David Butler
	Position	Head of Planning Policy and Environment
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (please give details) *Supplementary Planning Document for Affordable Housing*

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1.2 In summary, what is the background to this EIA?

The Affordable Housing Supplementary Planning Document (SPD) adds further details to the Local Plan which was adopted on 6th December 2017 and for which EIA was undertaken. SPDs do not introduce new policy, but provide further detail and guidance to enable the delivery of adopted policies.

Delivering sufficient affordable homes over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan. The aim of this SPD is to facilitate the delivery of affordable homes as set out in the plan and in compliance with the most up to date national policy as set out in the National Planning Policy Framework.

The additional guidance provided within the SPD sets out the different types of affordable housing as defined by Government and provides the detail on how these should be delivered. This includes setting out the process in agreeing affordable housing delivery, affordability types and tenures, dwelling design, management structures and Section 106 Agreements for securing delivery.

1.3 Who are the main stakeholders involved? Who will be affected?

Developers who are required to deliver affordable housing, providers of affordable housing, and those members of the community who need to access affordable homes. The National Planning Policy Framework (NPPF) defines affordable housing as 'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/ or is for essential local workers)'. Further detail on the definition can be found here <https://www.gov.uk/government/publications/national-planning-policy-framework--2> : this includes detail on the different types of product including affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership.

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Policy Service

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

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- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

The Local Plan was formulated using detailed evidence including a Strategic Housing Market Assessment. The Local Plan was independently examined by a Planning Inspector to ensure that its policies were robust and formulated using appropriate evidence before it could be sound and capable of adoption. Further detail on the Local Plan and the evidence base can be found here

<https://www.coventry.gov.uk/localplan>

This SPD details how the policy will be delivered, setting out the process in agreeing affordable housing delivery, affordability types and tenures, dwelling design, management structures and Section 106 Agreements for securing delivery.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Affordable housing is aimed at those whose needs are not met by the market. Whilst those aged 0-18 would generally not be directly able to access affordable products, many will live in households where their parents and carers will not be able to afford open

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		market homes and thus they will indirectly benefit from the policy. 22.5% of children live in low income families which is above the regional and national average (20.2% and 17% respectively) ¹
Age 19-64	P	Affordable housing is aimed at those whose needs are not met by the market. The average gross disposable household income for Coventry is below the regional and national average (£15,353 per head per annum compared to £18,222 and £21,609 respectively in 2018), and the average house price was £185,000 (October 2019 to September 2020 figures). Currently the claimant count stands at 15,320 (ONS July 2021) compared to 8,000 in March 2020. As well as the affordable housing for rent product, the government is promoting a variety of routes to home ownership including starter homes and discounted market sales housing which are most likely to apply to this age group.
Age 65+	P	See above in terms of disposable household income and average house prices. Some affordable housing products (as defined by the Government in the National Planning Policy Framework) will be applicable depending upon the individual / household circumstances
Disability	ID	No direct impact although some affordable products will be applicable depending upon the individual / household circumstances
Gender reassignment	ID	No direct impact although some affordable products will be applicable depending upon the individual / household circumstances
Marriage and Civil Partnership	ID	No direct impact although some affordable products will be applicable depending upon the individual / household circumstances
Pregnancy and maternity	ID	No direct impact although some affordable products will be applicable depending upon the individual / household circumstances
Race (Including: colour, nationality, citizenship ethnic or national origins)	ID	No direct impact although Coventry has a diverse population and affordable products will be applicable depending upon the individual / household circumstances
Religion and belief	ID	No direct impact although some affordable products will be applicable depending upon the individual / household circumstances
Sex	ID	No direct impact although some affordable products will be applicable depending upon the individual / household circumstances

¹ <https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-201415-to-201819>

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Sexual orientation	ID	No direct impact although some affordable products will be applicable depending upon the individual / household circumstances
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HEALTH INEQUALITIES

2.3	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
	Question	Issues to consider
	2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> ● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) ● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
		<p>Response:</p> <p>The Affordable Housing SPD supplements the policies of the adopted Local Plan which was subject to Health Impact Assessment. The Health and Wellbeing chapter of the plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See https://www.coventry.gov.uk/localplan This was supplemented by a Health Impact</p>

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Assessment SPD which provided further detail and guidance including that in relation to affordable housing. See https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd

2.3b How might your work affect HI (positively or negatively).

How might your work address the needs of different groups that share protected characteristics

Consider and answer below:

- Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income
- Consider what the unintended consequences of your work might be

Response:

- a. Potential outcomes including impact based on socio-economic status or geographical deprivation

The Health Impact Assessment SPD referred to above includes the following:

Category 1: Housing Quality and Design

Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management also has an impact on community welfare, cohesion and mental wellbeing.

Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents
<ul style="list-style-type: none"> • Accessible and adaptable dwellings • Internal space standards, orientation and layout • Affordable housing and dwelling mix • Energy efficiency • High Quality Design 	A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.	Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency, and detailed design considerations to make sure that homes are accessible, adaptable and well oriented.	<ul style="list-style-type: none"> • AC2: Road Network • DE1: Ensuring High Quality Design • DS3: Sustainable Development Policy • EM2: Building Standards • EM5: Sustainable Drainage Systems SuDS • H3: Provision of New Housing • H4: Securing a Mix of Housing • H5: Managing Existing Housing Stock • H6: Affordable Housing • H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation
	Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health.	Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community.	
	The quality of design, including internal sound insulation, daylighting and provision of private space can influence the health and wellbeing of occupiers.	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing allows care to be	

		provided in the community more easily.	<ul style="list-style-type: none"> • Sustainable Urban Extension Design Guide SPD
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- b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.

Ensuring access to a range of affordable housing products to meet a range of needs and circumstances is a key aim of the Local Plan housing policies and the SPD provides the further detail to ensure that policy can be delivered.

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

This was considered through the Local Plan (the 'parent document'), this document provides the detail to ensure the Local Plan policies can be delivered effectively

2.5 How will you monitor and evaluate the effect of this work?

The Local Plan already includes monitoring indicators.

2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: lucille.buckley@coventry.gov.uk

Headcount:

Sex:

Age:

Female	
Male	

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16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Service: David Butler	Date: 02/09/2021
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Name of Director: Andrew Walster	Date sent to Director: 02/09/2021
Name of Lead Elected Member: Councillor David Welsh	Date sent to Councillor: 06/09/2021

Email completed EIA to equality@coventry.gov.uk