

## Planning policy consultation

# Draft Affordable Housing Supplementary Planning Document

## Equalities Impact Assessment



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## Contents

1	Introduction.....	4
2	Assessment.....	5
3	Conclusion.....	8

# 1 Introduction

- 1.1 Under the Equality Act 2010, public authorities in England are subject to the Public Sector Equality Duty. This requires public authorities to consider how their policies and decisions affect people who have “protected characteristics.” Public authorities must have due regard to the need to eliminate unlawful discrimination and promote equality for those with the following “protected characteristics”:
- Age
  - Disability
  - Gender reassignment
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Sex
  - Sexual orientation
- 1.2 This Equalities Impact Assessment explains how these protected characteristics have been considered in preparing the Affordable Housing SPD. It is being published for consultation alongside the draft supplementary planning document (SPD) itself, over the period from Thursday 28 March until Friday 10 May 2019. The SPD and supporting documents can be seen on our website: <http://eastdevon.gov.uk/planning/planning-policy/housing-issues/affordable-housing/>

## 2 Assessment

### **Purpose of the Affordable Housing supplementary planning document**

- 2.1 The Affordable Housing supplementary planning document (SPD) is being prepared to provide guidance on the implementation of affordable housing policies in the East Devon Local Plan 2013 to 2031, and the Cranbrook Plan (when adopted). This should assist applicants when making planning applications, and the council in determining them. It is important to note that the SPD explains existing policies, rather than setting a new policy approach on affordable housing.
- 2.2 The East Devon Local Plan 2013 to 2031<sup>1</sup> contains two policies that solely related to affordable housing:
- Strategy 34 – ‘District Wide Affordable Housing Provision Targets’ is the overarching policy on affordable housing, setting targets for different parts of East Devon, the tenure mix, and thresholds, amongst other issues.
  - Strategy 35 – ‘Exception Mixed Market and Affordable Housing At Villages, Small Towns and Outside Built-up Area Boundaries’ provides for exceptions housing schemes, subject to robust evidence.
- 2.3 In addition, Strategy 36 states that, on sites of 10 dwellings or more, all of the affordable housing should meet part M4(2) of the Building Regulations relating to accessible and adaptable dwellings.

### **Existing sources of evidence to help identify the likely impacts upon protected characteristics**

- 2.4 There is limited evidence on affordable housing issues in East Devon with regards to the protected characteristics. For example, whilst there is data available on the amount of affordable housing in East Devon, average house prices and earnings (i.e. affordability), and those registered as being in housing need, these do not generally relate to the protected characteristics.
- 2.5 East Devon has a higher number of retired people than the national average, and demographic projections indicate this will increase. The average price paid by first time buyers, who tend to be younger people, are lower than average house price overall.<sup>2</sup> This is

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<sup>1</sup> East Devon Local Plan 2013 to 2031: <http://eastdevon.gov.uk/media/1772841/local-plan-final-adopted-plan-2016.pdf>

<sup>2</sup> The average price paid for a property in East Devon is £284,426, whilst the average price paid by a first time buyer is £218,776; UK House Price Index, December 2018:

likely due to properties purchased by first time buyers being smaller, rather any discrimination against younger people. In addition, house prices and rents are generally set by the market (apart from affordable housing where prices/rents are capped), rather than being within the control of the council. The age of first time buyers in the UK is 30 years old,<sup>3</sup> but this data, and the size of properties being purchased by them, is not available for East Devon, so represents a gap in evidence.

**Potential impacts of the Affordable Housing SPD on those with protected characteristics**

2.6 The Local Plan was subject to an Equalities Impact Assessment.<sup>4</sup> Informed by this assessment, the following table identifies how equalities issues have been considered in the Affordable Housing SPD.

**Figure 1: Summary of the Affordable Housing SPD impacts upon protected characteristics**

Protected characteristic	Summary of impacts
Age	Affordable housing provision will assist in developing balanced communities, providing opportunities for younger, first time buyers or renters to live in a home. Although not setting policy, the SPD provides guidance on applying the Local Plan, so can help encourage affordable housing provision. This would mean a positive impact upon the age protected characteristic.
Disability	Local Plan Strategy 35 states all affordable housing should meet enhanced standards for adaptable and accessible dwellings. Although not setting policy, by providing guidance on implementing the Local Plan, the SPD should have a positive impact for those with a disability.
Gender reassignment	There are not considered to be any impacts upon this protected characteristic.
Pregnancy and maternity	There are not considered to be any impacts upon this protected characteristic.
Race	There are not considered to be any impacts upon this protected characteristic.

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<http://landregistry.data.gov.uk/app/ukhpi/browse?from=2018-01-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2Feast-devon&to=2019-01-01>

<sup>3</sup> UK and Irish housing markets: a first-time buyer perspective: <https://www.cml.org.uk/news/cml-research/uk-and-irish-housing-markets-a-first-time-buyer-perspective/>

<sup>4</sup> Equalities Impact Assessment of Pre-Submission Consultation Draft Local Plan 2012: <http://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter2.1/pd015-equalitiesimpactassessment.pdf>

<b>Protected characteristic</b>	<b>Summary of impacts</b>
Religion or belief	There are not considered to be any impacts upon this protected characteristic.
Sex	There are not considered to be any impacts upon this protected characteristic.
Sexual orientation	There are not considered to be any impacts upon this protected characteristic.

2.7 As shown above, the Affordable Housing SPD will have limited impacts upon those with protected characteristics.

### 3 Conclusion

- 3.1 The East Devon Local Plan 2013-2031 was subject to an Equalities Impact Assessment. The Affordable Housing SPD is being prepared to provide additional guidance on implementing the Local Plan, and does not set new policy. There will be some positive impacts upon age through encouraging affordable housing provision for young people to buy or rent; and disability through guidance on enhanced standards on accessible and adaptable homes. There are not considered to be any impacts upon the other protected characteristics.
- 3.2 This assessment has demonstrates the council has complied with the Public Sector Equality Duty in preparing the Affordable Housing SPD.



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