



## Equality impact assessment form

### Information about the person completing this assessment

Name: Esther Lyons

Job title: Housing Strategy & Enabling Manager

Service area: Housing Strategy & Enabling

Email: esther.lyons@waverley.gov.uk

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### Section 1 – what is the policy or activity trying to achieve?

Describe the policy/strategy/procedure/function which is the subject of this impact assessment.

The Affordable Housing SPD sets out WBC's expectations of housing associations and developers regarding affordable housing provision on development sites.

What outcomes are wanted from this policy/activity (what are you trying to achieve)?

An updated supplementary planning document (SPD) on affordable housing, to provide applicants with more detail on how affordable housing should be provided in line with policies AHN1 and AHN2 of the adopted Waverley Local Plan (part 1). The updates to the SPD are all either as a result of national policy changes, or in line with our Affordable Homes Delivery Strategy.

The equality impact of national policy, e.g. the 25% First Homes requirement or the 10% affordable homeownership requirement, are not assessed in this EqIA. This is because as a local authority we are required to implement national policy requirements. We have little scope to change them. Our view, however, is that these national policy changes do not have a positive impact on equality. The Government is pushing homeownership as the preferred tenure at the expense of social rented housing, the tenure that is most needed to meet the needs of low income and vulnerable households.

In an attempt to mitigate this negative impact and in line with updated needs evidence, the revised SPD will require a reduction in Affordable Rent levels from 80% of market rent to 70% (1 and 2 beds) and 65% (3 and 4 beds). It is anticipated that this will have a positive impact on equality (see below).

### Who is affected by this policy/activity?

- Households in housing need including low income households
- Older people
- Younger people
- Women, including young pregnant women
- Households with disabilities
- LGBTQ+ households
- Gypsy and Traveller households seeking settled accommodation in the form of social housing
- Tenants of affordable housing seeking to transfer
- Housing associations
- Developers

### Who are the main people involved in this activity?

Households in housing need are the end-users of affordable housing. The Housing Strategy and Enabling Team, Planning and Legal teams are involved in implementing and enforcing the guidance in the SPD. Those involved in delivering affordable housing are the Housing Strategy and Enabling Team, Housing Development Team, housing associations, developers, Town and Parish Councils, Surrey County Council Adult Social Care Commissioning Team, Homes England, the Surrey Rural Housing Enabler and local community groups.

Is the responsibility for the proposed policy/activity shared with another department, authority or organisation? If so, what responsibility and with whom is it shared?

No.

## Section 2 – Information gathering and consulting stakeholders

Do you have any monitoring data available on the number of people (from protected characteristic groups) who are using or are potentially impacted upon by your policy/activity?

Data from Waverley Housing Affordability Study, Strategic Housing Market Assessment, WBC tenant profile, JSNA 2013; Census 2011; ASC Commissioning: Statement Accommodation with care, residential & nursing care for older people, 2019.

The data on our growing elderly population supports the action to develop suitable housing for older people, including Extra Care and dementia specialist housing.

The proportion of women and ethnic minority groups living in social housing in Waverley is higher than the proportion of women and ethnic minority groups who live in the borough, reflecting the nationwide trend that women and ethnic minority groups are more likely to access social housing.

### **Waverley BC tenants – protected characteristics**

- 35% of tenants are aged 65 or above
- 25% have recorded a disability
- 60% of tenants are female
- 90% of tenants are white British
- 30% of tenants provided information on their sexual orientation:
  - 3% of tenants who provided information identify as LGBTQ+ (0.9% of all tenants)
  - 94% of residents who provided information identify as heterosexual (28.2% of all tenants)

### **Waverley BC tenants – socio economic disadvantage**

- 17% of tenants receive full housing benefit
- 23% receive Universal Credit
- 40% of tenants do not receive any benefits for housing costs
- 20% receive partial housing benefit

### **Older people**

The 2011 Census shows us that the total population in Waverley is 121,572, of which 49% are men and 51% are women. Approximately 20% of people are older adults, aged 65 years and older, with 3.2% of people aged 85 years and over. 51% of Waverley's economically inactive

population is retired. 14% of households are occupied by people over 65 living on their own. Waverley has the largest older population in Surrey and a growing over 85 year old population. The borough has the second highest number of residents over 65 years of age

who have suffered a stroke. Dementia also poses a significant challenge, with Waverley having the highest number of residents predicted to have dementia in Surrey.

If monitoring has NOT been undertaken or information is not available, specify the arrangement you intend to make; if not please give a reason for your decision.

Lack of readily reportable data on protected characteristics of households in housing need on the Housing Register. Future Service Improvement project to improve inputting and reporting of this data in Orchard.

What research or consultation has been undertaken to understand the impacts of the strategy/policy/procedure/project/function?

The updates to the SPD are all either as a result of national policy changes, which have been EqIA'd by the Government, or in line with our Affordable Homes Delivery Strategy. Consultation on the Affordable Homes Delivery Strategy was carried out via Waverley Homes and People, social media and in person with Landlord Services Advisory Board and Tenant Panel representatives between 27.01.22-24.02.22. Residents, Town and Parish Councils, partner organisations, developers and affordable housing providers were consulted.

Monitoring data of respondents (those responding as individuals, rather than organisations) suggests that the response rate was very low for those aged 85+ despite our elderly population. Several responses were received from organisations working to meet the needs of older people and people needing supported accommodation. Over 95% of respondents were white, which reflects the local population but not the makeup of WBC tenants. The Tenants' Panel, representing all tenants, was also consulted.

Consultation on the Affordable Housing SPD will take place from 17.10.22 – 28.11.22. This Equality Impact Assessment will be updated following the consultation.

### Section 3 – assess the impact on protected characteristic groups

Using examples from the evidence you have collected and using the list below for reference, how might different equality groups be affected by

**this policy, procedure or practice? Where possible please describe the impact as either 'positive', 'negative' or 'neutral'.**

- Sex
- Gender reassignment
- Race
- Disability
- Sexual orientation
- Age
- Religion or belief
- Pregnancy and maternity
- Marriage and civil partnership
- Other groups such as carers, care leavers or socio-economic disadvantage

Possible positive impact on women, transgendered men and women, people from ethnic minority groups, people with disabilities, LGBTQ+ people, young pregnant women and families with young children, carers,

Data shows that women are more likely to access social housing. Developing new affordable housing therefore benefits this group.

Trans people face challenges such as homelessness and lack of work opportunities. More affordable housing may therefore benefit Trans people.

Our data shows that when compared to the population of the borough as a whole, ethnic minority groups are more likely to access social housing. Developing new affordable housing and reducing rent levels therefore benefits this group.

The need for pitches for Gypsy, Roma & Traveller groups is being met through Local Plan Part 2. However, this Affordable Housing SPD and reduction in rent levels may benefit those Gypsy, Roma & Traveller households seeking settled accommodation in the form of social housing.

When assessing planning applications Waverley BC will work with Adult Social Care Commissioners to meet the specific housing needs of those with physical, sensory or learning disabilities, long term health impairments or mental health issues.

LGBTQ+ people face challenges such as homelessness and lack of work opportunities. More affordable housing at reduced rent levels may therefore benefit LGBTQ+ people.

Young pregnant women and families with children on low incomes will benefit from reduced rent levels.

Older people needing affordable housing / sheltered accommodation will benefit from lower rent levels and social rents.

A broader offer of affordable housing suitable for those needing a carer may positively impact carers.

Reduction in Affordable Rent levels actively promotes equality, reduces economic and social disparities and helps to ensure an adequate standard of living for all, regardless of income or background.

Possible negative impact on single people.

Low impact on single people – affordability pressures are more severe for single person households. The proposal to reduce affordable rents to 70% for 1 and 2 bed homes, but 65% for 3 and 4 bed homes, may disproportionately impact single people. However, the priority to enable more social rented homes will help to mitigate this. Single person households receiving full housing benefit would be unaffected by the new cap. Overall, the policy to cap rents below 80% still benefits single person households, albeit to a lesser extent than the larger families in 3 / 4 beds.

**No potential negative impacts are intentional or of high impact.**

## Section 4 – Consider alternatives or changes

List any changes – explain how policy/activity has changed or needs to change and the reason for this.

n/a

## Section 5 – Action planning

List actions required, officer action is assigned to, resource implication, comments and time scale.

n/a

## Section 6 – Sign off

Name of assessor: Esther Lyons

Date: 04.08.22

Signed off by: Louise Norie

Date: 05.10.22

Name of HOS or Director: Andrew Smith

## Further guidance

If you need more advice and guidance, you may find the following sources useful:

- [Government Equality Office: Equality Act guidance](#)
- [Equality and Human Rights Commission: Public Sector Duty](#)
- [Equality and Human Rights Commission: \*Protected Characteristics\*](#)