

## **Draft strategies/policies – Equality and human rights impact check**

**Draft strategy/policy being checked: Joint Housing Delivery Strategy**

**Is this draft strategy/policy:**

<input type="checkbox"/>	<b>South only</b>
<input type="checkbox"/>	<b>Vale only</b>
<input checked="" type="checkbox"/>	<b><u>Joint across both councils</u></b>

**Service team: Development and Housing**

**Officer completing this: Helen Novelle**

**Once completed:**

Date completed: 16/03/2017

Signed \_\_Helen Novelle\_\_ (Officer)

Signed \_\_Gerry Brough\_\_ (Head of Service)

Signed \_\_Cheryl Reeves\_\_ (Cheryl Reeves, equalities officer)

**PLEASE NOTE – THIS CHECK MUST BE COMPLETED BEFORE YOUR DRAFT STRATEGY IS SUBMITTED TO MANAGEMENT TEAM AND COUNCILLORS FOR APPROVAL**

## Why do you need to do this Equality and human rights impact check?

Our strategies and policies set out the way we will deliver our services (including employment opportunities). When we are developing them, we need to check that they are not going to create any barriers which could prevent people from accessing our services.

People in Southern Oxfordshire may face barriers because of things like **disability, gender (including transgender, pregnancy and maternity), age, sexual orientation, rural isolation, income, religion/belief or ethnicity.**

As well as thinking about how our services will meet the needs of these groups of people, we also need to consider how our draft strategies and policies will help us to:

- promote positive relations within communities
- give everyone a voice
- respect and value everyone
- protect people's human rights

This equality and human rights impact check provides officers with a framework to help them work through these considerations in relation to their draft policy/strategy, ensuring that we are meeting our legal duties with regards to equality, diversity and human rights.

We have a statutory duty to carry out these assessments and they contribute towards our corporate priority to 'optimise access to services (Vale)'/provide equality of access to our services' (South).

**If you have any queries about this Check or would like some advice/support in completing it, please contact the Shared equalities officer (see contact details below).**

**Once you've completed this equality and human rights impact check, please send the paperwork to the shared equality officer, along with a copy of the draft strategy/policy.**

Cheryl Reeves (equalities officer)  
Email: [cheryl.reeves@southandvale.gov.uk](mailto:cheryl.reeves@southandvale.gov.uk)  
Telephone: x2108

## OUTLINE OF THE DRAFT STRATEGY / POLICY YOU ARE CHECKING:

### 1. What are the aims and objectives of this draft strategy/policy?

To provide a strategic framework to assess the current and future requirements of housing to meet the needs of our communities and the local economy.

This framework will provide a strategy to:

1. Deliver an appropriate range of housing to meet the full range of needs in the community
2. Ensure that the location and type of housing supports economic growth objectives
3. Ensure that overall housing targets are delivered
4. Ensure that homes are built to a high design code

### 2. Who is the proposed strategy or policy designed to support / help / serve?

- The evidence base supporting the Housing Strategy and the output in terms of recommendations will support the production of policies and supplementary planning documents directing future housing requirements, including standards and tenure types.
- The Strategy will provide clarity within the councils and externally (for housing developers, Registered Providers of affordable housing etc.) on the councils' expectations from future housing developments
- The Strategy will support the delivery of housing which is key to supporting the future of mixed, sustainable and vibrant communities.

### 3. If the draft strategy/policy relates to an existing council service/function, has an Equality & Human Rights Impact Assessment (EHRIA) already been completed on the service/function?

- No (*this has been done in the past with a range of activities identified*)
- Yes – please list any issues/barriers identified within the assessment that your draft strategy needs to address:

Previous Housing Strategies are considerably out of date and not considered to be relevant

4. Does the draft strategy or policy have the potential to cause a negative impact or discriminate against certain groups in the community?

Equality group	Yes	No	If 'yes', please explain how the strategy/policy could cause a negative impact or discriminate. If you can not justify this you will need to take mitigating action, complete the action plan at the end of this assessment.	If 'No,' What existing evidence (presumed or otherwise) do you have for this? e.g. Will the service changes advance equality of opportunity between people who share a protected characteristic? This means will they <ul style="list-style-type: none"> <li>• Remove or minimise disadvantages suffered by people due to their protected characteristics.</li> <li>• Take steps to meet the needs of people from protected groups where these are different from the needs of other people</li> </ul>
People from ethnic minority groups		No		<p>The base of evidence supporting the Joint Housing Strategy provides an understanding of migration patterns in terms of age, access to employment, and, in particular, affordability levels. Quality of life and environment affects everyone and whilst this is a key issue for businesses/employers, the availability of low cost, decent quality housing with access to work in an attractive job market provides a benefit across different cultures/ethnic groups and other equality groups.</p> <p>The sources of data used have provided an insight into a wide range of socio economic issues including</p>
People living in rural areas		No		
Men or women (including pregnant women, women on maternity and transgender people)		No		
Gay, lesbian or bisexual people		No		

Equality group	Yes	No	If 'yes', please explain how the strategy/policy could cause a negative impact or discriminate. If you can not justify this you will need to take mitigating action, complete the action plan at the end of this assessment.	If 'No,' What existing evidence (presumed or otherwise) do you have for this? e.g. Will the service changes advance equality of opportunity between people who share a protected characteristic? This means will they <ul style="list-style-type: none"> <li>• Remove or minimise disadvantages suffered by people due to their protected characteristics.</li> <li>• Take steps to meet the needs of people from protected groups where these are different from the needs of other people</li> </ul>
People from different religions/beliefs <i>(including people without a religion/belief)</i>		No		<p>migration patterns, affordability, life stages and household size and, whilst there is no specific focus on issues for individual equality groups, the aim has been to identify trends in accessing housing that may be driven by factors impacting on people in general, such as access to jobs, services and facilities.</p> <p>Poverty can also affect anyone and evidence for the strategy has focused on affordability for all types of tenures, identifying the proportions of households who need to claim Housing Benefit and the specific problems facing younger people and families on low incomes.</p> <p>This evidence has highlighted the continuing need for significant levels of affordable rented accommodation to be maintained although recommendations include the need to consider a flexible approach to tenure balance in situations where localised housing need may be more suitably addressed. To support this the strategy includes a checklist to consider affordable housing tenure mix.</p>

Equality group	Yes	No	If 'yes', please explain how the strategy/policy could cause a negative impact or discriminate. If you can not justify this you will need to take mitigating action, complete the action plan at the end of this assessment.	If 'No,' What existing evidence (presumed or otherwise) do you have for this? e.g. Will the service changes advance equality of opportunity between people who share a protected characteristic? This means will they <ul style="list-style-type: none"> <li>• Remove or minimise disadvantages suffered by people due to their protected characteristics.</li> <li>• Take steps to meet the needs of people from protected groups where these are different from the needs of other people</li> </ul>
Older or younger people		No		<p>A significant amount of data review has provided a clear focus on the need for future provision of housing suitable for older people both from enabling people to continue to live independently for longer by moving to specialised accommodation, and the impact this will have on releasing general needs stock of all tenures for younger households. The strategy suggests the council could consider making explicit reference to criteria for extra care development so that developers are aware of how their schemes will be assessed in terms of location and quality.</p> <p>Research has identified gaps in general housing for younger people such as the need for good quality private rented accommodation providing a range of options, including house-share, to meet need from those taking up employment and who may be on low incomes. The strategy also recommends exploring whether specific products could be developed to support housing for essential workers (teachers, nurses, and science based professionals) as low cost home ownership tenures on new development sites maybe out of reach for many young professionals. It also recommends South and Vale consider providing guidance to RP's on affordable rent levels that are accessible to those on the waiting list and take account of the benefit cap.</p>

Equality group	Yes	No	If 'yes', please explain how the strategy/policy could cause a negative impact or discriminate. If you can not justify this you will need to take mitigating action, complete the action plan at the end of this assessment.	If 'No,' What existing evidence (presumed or otherwise) do you have for this? e.g. Will the service changes advance equality of opportunity between people who share a protected characteristic? This means will they <ul style="list-style-type: none"> <li>• Remove or minimise disadvantages suffered by people due to their protected characteristics.</li> <li>• Take steps to meet the needs of people from protected groups where these are different from the needs of other people</li> </ul>
People with disabilities <i>(including carers)</i>		No		<p>Standards in new homes and accessible housing was one of the 4 main themes of evidence based research to support the Joint Housing Strategy. The evidence base quantifies the level of population living with a long-term health problem or disability and their current housing tenure. Data on Disabled Facilities Grants and DLA claimants also helps to determine the extent of the need for adapted/adaptable housing.</p> <p>Work has been undertaken to support the councils' aim to require higher space standards, at least National Space Standards Level 1.</p> <p>Draft recommendations focus on a proposals for all new affordable housing and 15% of market housing to be delivered to Category 2 standards. In addition, 5% of new affordable housing should be built to Category 3 standard and, for sites of 100 units or more, there should be allowance made for 2% of the market homes to be delivered to Category 3 standards if the need arises. The strategy also includes a longer term suggestion (5-10 years) to consider the viability impact of applying category 2 'accessible and adaptable' dwellings to all market homes and specifically those planned to be developed in Didcot Garden Town and Berinsfield. This approach would, if feasible, have the greatest impact on housing stock over time.</p>

Equality group	Yes	No	If 'yes', please explain how the strategy/policy could cause a negative impact or discriminate. If you can not justify this you will need to take mitigating action, complete the action plan at the end of this assessment.	If 'No,' What existing evidence (presumed or otherwise) do you have for this? e.g. Will the service changes advance equality of opportunity between people who share a protected characteristic? This means will they <ul style="list-style-type: none"> <li>Remove or minimise disadvantages suffered by people due to their protected characteristics.</li> <li>Take steps to meet the needs of people from protected groups where these are different from the needs of other people</li> </ul>
Local Voluntary, Community and Faith sector organisations				The draft Housing Strategy does not relate directly to the VCF sector

**5. Have reasonable adjustments been made for people with disabilities to ensure they can use the draft strategy or policy? This might mean treating disabled people better than non-disabled people in order to meet their needs**

- No
- Yes - please provide detail:

The Housing Strategy will take account of the needs of people with disabilities. The evidence base includes recommendations for Cat 2 & 3 housing which is currently being considered by the planning policy team. It also includes future provision for specialist housing suitable for older people which enable them to continue living independently. This type of housing can also be suitable for some people with disabilities.

**6. Have there been any equality related recommendations in the area that your draft policy/strategy is covering which have arisen from, for example, internal/external audits or scrutiny reports?**

Recommendation made	Is this being addressed in your draft strategy or policy? If not, please explain why.
N/A	



**7. Will the draft strategy or policy help to foster good relations between people who share a protected characteristic and people who do not share it e.g will the changes help to tackle prejudice and promote understanding between the different groups**

~~No~~ (If you feel there is scope to improve how you foster good relations, amend your decision accordingly)

**Yes** – please explain how

Both councils' housing policies have historically promoted integration of affordable housing that is indistinguishable from open market housing.

The draft Joint Housing Strategy makes recommendations for expanding the future tenure offer to meet the needs of households in varying stages of life, income levels and specialised housing requirements which, in turn, will enhance the creation of mixed and sustainable communities.

## **HUMAN RIGHTS CONSIDERATIONS**

**8. Will the draft strategy or policy have an impact on any relevant human rights [You may find it helpful to view the human rights guide for public authorities on the intranet to help you decide]. Please identify which human rights have been considered?**

**What impact was identified?** A Housing Strategy can protect Human Rights

Was the impact identified positive (fulfilling, protecting, promoting, respecting)

**Please indicate the positive effect:** ..... In applying the joint Housing Strategy, the Housing Team will comply with Human Rights

**Was the impact negative** (removing, unjustifiably interfering with any human rights)?

If so, please indicate how the strategy / policy will be amended to reduce or eliminate any negative impact

**9. Has there been consultation with relevant community groups to help inform this draft strategy or policy?**

If not, please explain why:

The Joint Housing Strategy is primarily supported by a strong base of empirical evidence determining both the characteristics of the local housing markets and specific issues in accessing housing for local residents.

An extensive review of the evidence has provided draft recommendations based on technical understanding of the overall need for housing delivery to meet significant target levels over the course of the next ten years.

The recommendations from the Strategy will impact directly on housebuilders, housing associations, Vale and South's planning teams and Oxfordshire County Council officers involved in the commissioning of specialised housing schemes.

As the draft Joint Housing Strategy has a specific aim of supporting economic growth, major employers in both districts were contacted both directly and through the use of a questionnaire to determine issues affecting recruitment and retention of staff.

A 'Stakeholder' event was held on 18<sup>th</sup> January 2017 attended by representatives from these main organisations which provided extensive feedback on a number of issues, including considerable reference to the need for specialised housing.

The draft Housing Strategy addresses needs based on evidence which will support the production of planning policy.

If yes, please list who you have consulted:

A four-week period of public consultation will be undertaken from 25<sup>th</sup> September 2017

During August 2017, awareness of the draft Housing Delivery Strategy and initial consultation was undertaken with specific groups (VDAG, DAG, MIGGS and MIGWAL)

Do you feel there are any groups that the draft strategy or policy significantly affects who you have not currently consulted? If yes, please contact the shared equality officer for advice (see page 2 for contact details).

**10. Has the draft strategy or policy missed opportunities to advance equality of opportunity, positive attitudes and promote respect for human rights?**

No

Yes – please outline the plans you have to address the missed opportunities (complete table below)

**Action plan for mitigating action or advancing equality of opportunity and promoting respect for human rights**

<b>Action</b>	<b>Person responsible</b>	<b>Target completion date</b>