

**Affordable Housing  
Supplementary Planning Document**

**Equalities Analysis Scoping Report**

**April 2013**



## Section 1 – General Information (Aims and Objectives)

|   |   |
|---|---|
| Name:   | Affordable Housing Supplementary Planning Document (SPD)  |
| Purpose:                                      | To provide supplementary guidance to Local Plan Spatial Policy 02 and development management policy DM3.  |
| Aim / Objective:                              | Establish a framework for implementing Affordable Rent, Social Rent and intermediate housing products to maximise the delivery of affordable housing to meet the full range of housing needs, with a key priority of providing new affordable homes for families.   |
| Who is expected to benefit from the proposal? | Key stakeholders that seek to facilitate the delivery of affordable housing. These include the local community, people in housing need, businesses, developers, landowners, Registered Providers, service providers and statutory consultees such as the GLA. The Council has a statutory obligation to consult the public and key stakeholders as part of the preparation of this supplementary planning document. |

|   |  |
|---|--|
| Service area:                                   | Planning and Building Control, Strategic Planning  |
| Team name:                                      | Plan Making  |
| Service manager:                                | Owen Whalley (Planning & Building Control Service Head); Michael Bell (Strategic Planning Manager) |
| Name and role of the officer completing the EA: | Peter Farnham, Senior Planner  |

## Section 2– Evidence (Consideration of Data and Information)

|   |   |
|---|---|
| What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff? | <p>The <b>National Planning Policy Framework (2012)</b> and <b>GLA Housing SPG (2013)</b> provide guidance on the use of the Affordable Rent product which can be up to 80% of the local market rent. Affordable Rent is envisaged to be used alongside Social Rent to deliver affordable housing. If Affordable Rent is not managed carefully there may be a risk that affordable housing will not meet the needs of local people.</p> <p>The Affordable Housing SPD provides a management tool for Officers to help ensure that affordable housing which is being proposed as part of a development scheme continues to be delivered for those people in need.</p> <p>The SPD is informed by the <b>LBTH Affordable Rent Programme 2011-15. Tower Hamlets Affordable Case Studies and Mapping (2011)</b> which provides technical information to inform the use of the Affordable Rent product.</p> |
|---|---|

### Section 3 – Assessing the Impacts on the 9 Equalities Groups

#### How will what you're proposing impact upon the nine Protected Characteristics?

| Target Groups                   | Impact – Positive or Adverse | Reason(s)   |
|---------------------------------|------------------------------|---|
| Race                            | Positive                     | <p>The Affordable Housing SPD will contribute positively towards delivering affordable housing for existing and future residents of the borough who are in need of affordable housing. In this manner, all target groups will benefit given the need for housing is common across all socio-economic and minority groups. Specifically the SPD will support the priority to deliver Social Rent and Affordable Rent housing (that is set at an appropriate level of local market rent) and addresses housing related deprivation shown in the Indices of Deprivation (2010) and the 2011 Census. Also, given local needs and demographic profile, it is important that new affordable homes make an effective contribution to meeting the range of identified needs, especially for families, and that they provide a high quality residential environment.</p> <p>The Indices of Deprivation (2010) show that 78% of the borough's 'Lower Super Output Areas' (i.e. small areas used to measure population data) fall into the most deprived 10% of areas nationally. This reflects the high levels of housing deprivation faced by residents which is measured by indicators relating to overcrowding, homelessness and affordability. The 2011 census also supports this by showing that Tower Hamlets is ranked 2nd nationally for the proportion of households which suffer overcrowding.</p> <p>This is compounded by the 2011 census showing that Social Rented households, as a proportion of total households in the borough, fell from 52.5% in 2001 to 39.6% in 2011. The low level of supply of new affordable housing and the high cost of housing available in the private market sector is likely to have impacted strongly on those groups whose incomes are average or below average.</p> <p>The SPD will also help to address the need for affordable housing demonstrated in the Strategic Housing Market and Needs Assessment (2009).</p> |
| Disability                      | Positive                     |   |
| Gender                          | Positive                     |   |
| Gender Reassignment             | Positive                     |   |
| Sexual Orientation              | Positive                     |   |
| Religion or Belief              | Positive                     |   |
| Age                             | Positive                     |   |
| Marriage and Civil Partnerships | Positive                     |   |
| Pregnancy and Maternity         | Positive                     |   |
| Other Socio-economic Carers     | Positive                     |   |

#### Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence of or view that suggests that different equality or other protected groups (inc' staff) could have a disproportionately high/low take up of the new proposal?

**No**

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added/removed?

*(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. AN EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)*

n/a

#### Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

**Yes**

How will the monitoring systems further assess the impact on the equality target groups?

The Monitoring Report has the potential to review the SPD and this EqA scoping report on an annual basis. This will be considered as part of the action plan stated in section 6.

Does the policy/function comply with equalities legislation?  
(Please consider the OTH objectives and Public Sector Equality Duty criteria)

**Yes**

If there are gaps in information or areas for further improvement, please list them below:

None

How will the results of this Equality Analysis feed into the performance planning process?

- The outputs of this scoping exercise will be reviewed and acknowledged within the Plan Making section of the Planning and Building Control Service Plan (updated annually).
- The SPD and this scoping report will be subject to a 6-week consultation period in accordance with the Council's 'Statement of Community Involvement'.

## Section 6 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

| Recommendation   | Key activity  | Progress milestones including target dates for either completion or progress  | Officer responsible                                 | Progress  |
|--|---|---|---|---|
| <p>Ensure that the local community, key stakeholders and developers are consulted on the draft Affordable Housing SPD, as required by the Statement of Community Involvement, and that the SPD is adopted within the shortest possible timeframes by the Council to ensure appropriate levels of affordable housing are secured from developments in the context of national and regional government policy.</p> | <p>Undertake consultation with the local community, key stakeholders and developers during May 2013 to ensure that comments on the policies are taken into account in the finalisation of the SPD.</p> <p>Ensure appropriate forms of consultation to reflect the diversity of the borough and in the 10 target equalities groups identified in the Screening Report.</p> <p>Take into account relevant comments and issues raised during other current previous consultation particularly around the s106 SPD, Core Strategy and Managing Development DPD.</p> | <ul style="list-style-type: none"> <li>• Confirm May 2013 consultation period following Cabinet approval of the content of the draft document;</li> <li>• Update draft SPD to reflect representations received during consultation during August and September 2013</li> <li>• Cabinet approval of final SPD in October 2013</li> </ul> | <p>Michael Bell,<br/>Strategic Planning Manager</p> | <p>Draft Affordable Housing SPD prepared for Cabinet and preparations for May consultation under way.</p> |
| <p>Ensure any changes made to the SPD following consultation are assessed for potential equality impacts.</p>  | <p>Update the EqIA Screening Report to reflect any key changes made to the SPD following consultation.</p>  | <ul style="list-style-type: none"> <li>• Updated EqIA to be prepared ahead of final SPD progressing to Cabinet in October 2013</li> </ul>   | <p>Michael Bell,<br/>Strategic Planning Manager</p> | <p>Current EqIA Screening provides a baseline position.</p>   |

**Section 7 – Sign Off and Publication**

|                         |                            |
|-------------------------|----------------------------|
| <b>Name:</b>            | Michael Bell               |
| <b>Position:</b>        | Strategic Planning Manager |
| <b>Date signed off:</b> |                            |

**Section 8 Appendix – FOR OFFICE USE ONLY**

This section to be completed by the One Tower Hamlets team

**Policy Hyperlink :**

| <b>Equality Strand</b>            | <b>Evidence</b> |
|-----------------------------------|-----------------|
| Race                              |                 |
| Disability                        |                 |
| Gender                            |                 |
| Gender Reassignment               |                 |
| Sexual Orientation                |                 |
| Religion or Belief                |                 |
| Age                               |                 |
| Marriage and Civil Partnerships.  |                 |
| Pregnancy and Maternity           |                 |
| Other<br>Socio-economic<br>Carers |                 |

| <b>Link to original EQIA</b>         | <b>Link to original EQIA</b> |
|--------------------------------------|------------------------------|
| <b>EQAID<br/>(Team/Service/Year)</b> |                              |