

## **Equality impact assessment (EqIA) – interim housing number, April 2012**

All public authorities are required by the Equalities Act 2010 to specifically consider the likely impact of their policy, procedure or practice on certain groups in the society. These groups (sometimes referred to as equality stands) are defined by the 2010 Act as:

- age
- disability
- gender (sex)
- race
- sexual orientation
- religion or belief
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity

It is our responsibility to ensure that our policies, procedures and service delivery do not discriminate, including indirectly, on any sector of society. Council policies, procedures and service delivery may have differential impacts on certain groups, and these will be highlighted in the EqIA screening. Likely differential impacts must be highlighted, and described, as some may be positive. Where likely significant adverse differential impacts are identified, consideration should be given to opportunities to reduce or mitigate this through a full equalities impact assessment.

<b>Section</b>	Planning Policy, Planning Services		<b>Officer responsible for the screening/scoping</b>	Tracey Haskins	
<b>Name of Policy to be assessed</b>	Interim housing number	<b>Date of Assessment</b>	23 April 2012	<b>Is this a proposed new or existing policy/procedure/practice?</b>	Proposed new interim housing number (pending adoption of a local housing number through the Local Plan Core Strategy in 2014)
<b>1. Briefly describe the aims, objectives and purpose of the policy/procedure/practice?</b>		The key objective of the interim housing number is to avoid uncertainty and difficulties for all involved in the development process, particularly when preparing and assessing planning applications and monitoring, when the South East Plan is revoked this year and with it Guildford borough's remaining housing target (for its portion of the Western Corridor Blackwater Valley sub-region).			
<b>2. Are there any associated or specific objectives of the policy/procedure/practice? Please explain.</b>		<p>The establishment of an interim housing number will support work to comply with the requirements of the National Planning Policy Framework, as detailed in the accompanying committee report to the Guildford Borough Council Executive, 24 May 2012. In summary these are to:</p> <ul style="list-style-type: none"> <li>• help to address issues highlighted by the Annual Monitoring Report for the monitoring year 2010/11</li> <li>• provide clarity for decision-taking on planning applications and at appeal</li> <li>• provide clarity for development monitoring purposes</li> <li>• demonstrate the Council's local leadership and work in support of its responsibilities as a planning and housing authority</li> <li>• confirm that the borough is open to appropriate housing development.</li> </ul>			
<b>3. Who is intended to benefit from this policy and in what way?</b>		Those living, working or visiting Guildford borough through greater certainty in the period to adoption of the Local Plan Core Strategy in 2014. In particular those involved in planning development processes within the borough, including those preparing and submitting planning applications and the Council itself, as both local planning authority (when determining planning applications and plan-making including monitoring). See also the benefits listed under 2. above.			

<b>4. What outcomes are wanted from this policy/procedures/practice?</b>	The achievement of the objectives summarised above.		
<b>5. What factors/forces could contribute/detract from the outcomes?</b>	<p>Factors beyond the control of the Council that influence delivery in line with such an interim housing number including the economic cycle and market forces. Further risks are summarised in section four of the accompanying committee report to the Guildford Borough Council Executive, 24 May 2012. In summary these are:</p> <ul style="list-style-type: none"> <li>• developers may not recognise the interim housing figure and continue to submit speculative planning applications</li> <li>• risk of planning appeals for housing development being upheld on greenfield sites outside settlement boundaries, which may prejudice the preparation of the Local Plan Core Strategy and affect the Council's ability to objectively determine the most appropriate strategy and sites for future housing development</li> <li>• the published SHLAA could identify insufficient capacity to meet the 322 homes annual level of residential development within existing boundaries, requiring release of greenfield land for development.</li> </ul>		
<b>6. Who are the main stakeholders in relation to the policy?</b>	Developers and their representatives (planning agents) with an interest in housing development in Guildford borough, the Council itself, all those living in the borough.	<b>7. Who implements the policy, and who is responsible for the policy?</b>	Guildford Borough Council is responsible for the interim housing number and for adopting it. Implementation will be through the Council's Planning Service and the Planning Committee and by others relying upon the policy statement when preparing to make a planning application for residential development (agents) and take planning decisions (appeal Inspectors, the Secretary of State)
<b>8. Are there concerns that the policy <u>could</u> have a differential impact on racial groups?</b>	Y	N	<b>Please explain</b> A housing number, like the Local Plan Core Strategy, is a high level strategic policy that sets out the level of development that the Council, its partners, and other interested parties including the development industry, and the community would like to see.

<b>What existing evidence (either presumed or otherwise) do you have for this?</b>	The interim housing number is strategic, applying equally to all involved in the development process.		
<b>9. Are there concerns that the policy <u>could</u> have a differential impact due to gender?</b>	Y	N	The establishment of an interim housing number, in principle and of this quantum (322 homes a year) would not appear to have implications for gender bias.
<b>What existing evidence (either presumed or otherwise) do you have for this?</b>	The interim housing number is strategic, applying equally to all involved in the development process.		
<b>10. Are there concerns that the policy <u>could</u> have a differential impact due to disability?</b>	Y	N	The establishment of an interim housing number, in principle and of this quantum (322 homes a year) would not appear to have differential implications for those with a disability
<b>What existing evidence (either presumed or otherwise) do you have for this?</b>	The interim housing number is strategic, applying equally to all involved in the development process.		
<b>11. Are there concerns that the policy <u>could</u> have a differential impact due to sexual orientation?</b>	Y	N	The establishment of an interim housing number, in principle and of this quantum (322 homes a year) would not appear to have differential impacts involving sexuality bias.
<b>What existing evidence (either presumed or otherwise) do you have for this?</b>	The interim housing number is strategic, applying equally to all involved in the development process.		
<b>12. Are there concerns that the policy <u>could</u> have a differential impact due to their age?</b>	Y	N	The establishment of an interim housing number, in principle and of this quantum (322 homes a year) would not appear to have differential impacts by reason of age.
<b>What existing evidence (either presumed or otherwise) do you have for this?</b>	The interim housing number is strategic, applying equally to all involved in the development process.		
<b>13. Are there concerns that the policy <u>could</u> have a differential impact due to their religious belief?</b>	Y	N	The establishment of an interim housing number, in principle and of this quantum (322 homes a year) would not appear to have differential implications according to religious belief.
<b>What existing evidence (either presumed or otherwise) do you have for this?</b>	The interim housing number is strategic, applying equally to all involved in the development process.		

14. Are there concerns that the policy <u>could</u> have a differential impact due to them having dependants/caring responsibilities?	Y	N	The introduction of an interim housing number will support the delivery of appropriate housing development in Guildford borough, which may positively assist those in hidden or overcrowded housing circumstances. However this would be a positive not an adverse impact and could similarly also affect all other parts of our local communities.
What existing evidence (either presumed or otherwise) do you have for this?	The interim housing number is strategic, applying equally to all involved in the development process.		
15. Are there concerns that the policy <u>could</u> have a differential impact due to them have an offending past?	Y	N	The establishment of an interim housing number, in principle and of this quantum (322 homes a year) would not appear to have differential implications for those with an offending past.
What existing evidence (either presumed or otherwise) do you have for this?	The interim housing number is strategic, applying equally to all involved in the development process.		
16. Are there concerns that the policy <u>could</u> have a differential impact due to them being Transgender or transsexual?	Y	N	The interim housing number will not have a differential impact in this respect.
What existing evidence (either presumed or otherwise) do you have for this?	The interim housing number is strategic, applying equally to all involved in the development process.		
17. Could the differential impact identified in 8-16 amount to there being the potential for adverse impact in this policy/procedure/practice?	Y	N	<p><b>Please explain</b> Adverse impacts are not anticipated as a result of the establishment of an interim housing number. The quantum of development proposed is in line with that previously supported by the Council.</p>
18. Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or any other reason?	Y	N	<p><b>Please explain for each heading (questions 8-16) on a separate piece of paper.</b> The Council has carried out research – the Strategic Housing Market Assessment - which highlights local housing need. This need is likely to include the housing needs of some or all of the above mentioned groups. In line with the National Planning Policy Framework, the Council is working through its plan-making process to address identified needs.</p>
19. Is there any concern that there are unmet needs in relation to any of the above groups?	Y	N	<p><b>Please explain</b> n/a</p>

<p><b>20. Does differential impact or unmet need cut across the equality strands (e.g. elder BME groups)?</b></p>	<p><b>Y</b></p>	<p><b>N</b></p>	<p><b>Please explain</b> Potentially yes – see response to question 18 above.</p>
<p><b>21. If yes, should the full EIA be conducted jointly with another service area/contractor/partner/agency?</b></p>	<p><b>Y</b></p>	<p><b>N</b></p>	<p><b>Please explain</b> As no adverse impacts have been identified, a full equalities impact assessment is not required.</p>
<p><b>22. Is there a missed opportunity to improve your business in relation to any of the policies, procedures or practices to promote racial, gender, disability, age, sexual orientation, religion or belief equality?</b></p>			<p>The forthcoming Local Plan Core Strategy will be tested through an EqlA screening/scoping and, if applicable a full assessment, to consider the implications and opportunities arising.</p>

23. Should the policy proceed to a full equality impact assessment?	Y	N					Yes	No
23. Should the policy proceed to a full equality impact assessment?	N		<b>Impact on each group to score:</b> 0 – no relevance, no adverse impact, or positive impact 1 – extremely low relevance and adverse impact 2 – relatively low relevance and adverse impact 3 – medium relevance and adverse impact 4 - relatively high relevance and adverse impact <b>Total Impact Score:</b> 0-8 points low adverse impact, no need for full EIA 9-17 points medium adverse impact, full EIA required 18-24 points high adverse impact, full EIA required					
			<b>Age</b>	<b>Disability</b>	<b>Gender (sex)</b>	<b>Race</b>	<b>Sexual Orientation</b>	<b>Religion or Belief</b>
			0	0	0	0	0	0
			<b>Gender Reassignment</b>	<b>Marriage and Civil Partnership</b>		<b>Pregnancy and Maternity</b>		<b>Total Impact</b>
			0	0		0		0
24. If No, are there any changes required to the policy to improve it around the equality agenda?					No such changes have been identified.			

Signed  
(completing officer) Tracey Haskins

Date 23 April 2012

Signed  
(Head of Section) Carol Humphrey

Date 10 May 2012

Countersigned  
(Corporate Diversity/Diversity/Policy Team) Sarah-Jane Willmott

Date 21 May 2012