

Equality Impact Analysis Tool: RBKC Community Housing Supplementary Planning Document, June 2020

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2020 Q1
Name and details of policy, strategy, function, project, activity, or programme	<p>RBKC Community Housing Supplementary Planning Document</p> <p>The Supplementary Planning Document (SPD) provides guidance on the Royal Borough of Kensington and Chelsea's approach to affordable housing, particularly guidance in respect of Local Plan Policy CH2: Affordable Housing and London Plan Policies 3.11 and 3.13.</p> <p>The SPD is looking at maximising the opportunities to deliver much needed affordable homes in the borough, which will address the pressing need for them but also create socially inclusive communities.. It sets out a number of objectives including providing a definition of what would be considered truly housing in the borough and details the affordable housing tenure mix required based on latest evidence of need and viability. .</p> <p>The SPD will operate alongside relevant policies of the Local Plan (2019) and the Planning Contributions SPD (2019).</p>
Lead Officers	<p>Name: Preeti Gulati Tyagi Position: Planning Policy Team Leader Email: Preeti.GulatiTyagi@rbkc.gov.uk Telephone No: 07739314997</p>
Lead Borough	RBKC
Date of completion of	N/A

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing: The SPD is due to be adopted in June 2020. On adoption it will become material consideration in planning decisions.</p> <p>Resources: The SPD will be prepared within the existing staff and budget resources of the Planning Policy Team.</p>
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality.</p> <p>The RBKC Community Housing SPD provides detailed guidance on how Local Plan policy relating to Affordable Housing will be implemented, in particular Policy CH2 of the Local Plan. The Local Plan 2019 policies were subject to an Integrated Impact Assessment (IIA). The IIA assessed the impact of the Local Plan policies on Equalities. The assessment is set out in Section 9.4 of the submission report. This followed a Health and Equalities Workshop held in June 2016, which raised the concern of a lack of venues for volunteer, charity and public sector organisations to carry out their community work affordably or effectively. The baseline information on which equalities assessment was based is set out in the IIA Scoping Report at Section 7.6.</p> <p>Section 9.4 of the IIA explains how equalities groups have been considered and summarises the assessment on equalities of the Local Plan policies. The residual effect of Local Plan Policies, including Policy CH2 is that it will have a positive effect on equalities. The IIA reports that <i>“Policies CP1, CP2, CP3, CH1, CH2, CH3, CH4 and CH6 present an opportunity to improve the proportion of housing which is suitable for all people, including those with disabilities, throughout their lifetimes (IIA Objective 4, first decision-guiding question). More specifically, CP1, CH1 and CH6 provide for an increase in housing / homes which create the opportunity for better-quality homes meeting higher standards relative to equality matters, including energy-efficiency and adaptable for people over their lifetimes. CH1 also seeks to protect existing affordable homes, CH2 requires that the maximum reasonable amount of ‘affordable homes’ is provided with any proposal (with further provision, e.g. min. 35% affordable home ownership products for major schemes of 650 m2 or over, and the mix of social rented vs. intermediate), and CH3 and CH4 include support for older people’s housing (and resistance of loss), meeting a design standard of being adaptable for people over their lifetimes, London Plan requirements for Lifetime Neighbourhoods, and housing that meets a range of specific other needs.”</i></p> <p>Therefore, the overarching policy that the SPD is providing guidance on and the SPD itself have been subject to equalities assessment. An overall appraisal of the positive, negative or neutral impact is set out below.</p>

Protected characteristic	Borough Analysis	Impact: Positive, Negative, Neutral
Age	<p>RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough. It will not have direct equality impacts on this target group.</p>	Neutral
Disability	<p>RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough.</p> <p>It will result in a change in the nature of the affordable housing being provided, with an increase in the provision of “social rented” housing. Social rented housing is of particular benefit with those with disabilities, with 20% of applicants on the Council’s housing register having “declared a primary medical condition”, and 12% of all applicants having particular “accessibility requirements”.</p>	Slight Positive
Gender reassignment	<p>RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough. It will not have direct equality impacts on this target group.</p>	Neutral
Marriage and Civil Partnership	<p>RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough. It will not have direct equality impacts on this target group.</p>	Neutral
Pregnancy and maternity	<p>RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough. It will not have direct equality impacts on this target group.</p>	Neutral
Race	<p>RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough.</p> <p>It will result in a change in the nature of the affordable housing being provided, with an increase in the provision of “social rented” housing. Social rented housing is of particular benefit to those in BME groups. 64% of all applicants on</p>	Slight positive

		the with Council's housing register are in BME groups. This compares with 29% of the resident population.	
	Religion/belief (including non-belief)	RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough. It will not have direct equality impacts on this target group.	Neutral
	Sex	RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough. It will result in a change in the nature of the affordable housing being provided, with an increase in the provision of "social rented" housing. Social rented housing is of particular benefit to women, with 68% of all applicants on the with Council's housing register being female. However, it should be noted that the housing register records the 'main applicant' or head of the household rather than the whole family. Therefore, the 68% figure does not necessarily mean that the applicant is a single woman or single parent woman.	Neutral
	Sexual Orientation	RBKC The guidance in the SPD will work alongside the Local Plan 2019 to help secure additional affordable homes for residents in the borough. It will not have direct equality impacts on this target group.	Neutral
<p>Human Rights or Children's Rights If your decision has the potential to affect Human Rights or Children's Rights, please contact your Borough Lead for advice</p> <p>N/A</p>			

Section 03	<p>Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.</p>
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Documents and data reviewed	National planning Policy Framework, Planning Practice Guidance, London Plan (2016), Draft New London Plan (2019), Mayor’s Housing SPD, RBKC Local Plan (2019)
New research	If new research is required, please complete this section N/A

Section 04	Consultation
	The Council published a draft of the SPD for a six-week consultation from 11 February to 24 March 2020. Engagement took place on a new term for the word “affordable” as it is often misunderstood and has lost its meaning. Some 250 individuals participated in polls on this question using the digital platform built-id. The majority favoured the term “RBKC Community Housing”. This is now reflected in the title of the SPD and throughout the document. Many individual comments were also supportive of the approach to <i>affordable</i> housing proposed within the SPD. A further fifteen detailed responses via email and on-line responses were received. Most responses from residents/residents’ associations were supportive, two housing associations also wrote in support and so did the Mayor of London. Whilst the developers of Kensal Canalside and Earl’s Court Opportunity Area sites in the Borough were supportive of the principles, they raised particular concerns regarding the viability of their sites. No comments were relates to equalities or the protected characteristics were raised. There were no further findings relevant to the EqIA Screening.

Section 05	Analysis of impact and outcomes
Analysis	N/A

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for each borough, and the overall outcome. N/A

Section 07	Action Plan					
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis					
	Issue identified	Action (s) to be taken	When	Lead officer and borough	Expected outcome	Date added to business/service plan
	N/A					

Section 08	
Chief Officers' sign-off	Name: Amanda Reid Position: Director, Planning and Place Email: amanda.reid@rbkc.gov.uk Telephone No: 07790363868
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: LT Meeting, 3 June 2020 Key equalities issues have been included: Yes
Lead Equality Manager (where involved)	Name: Angela Chaudhry Position: Corporate Equality and Diversity Lead Date advice / guidance given: 15 May 2020 Email: angela.chaudhry@rbkc.gov.uk Telephone No: 07739 314 257

Please ensure that a final version of your EqIA is sent to the Equalities Officer, Angela Chaudhry, so that it can be published on our intranet