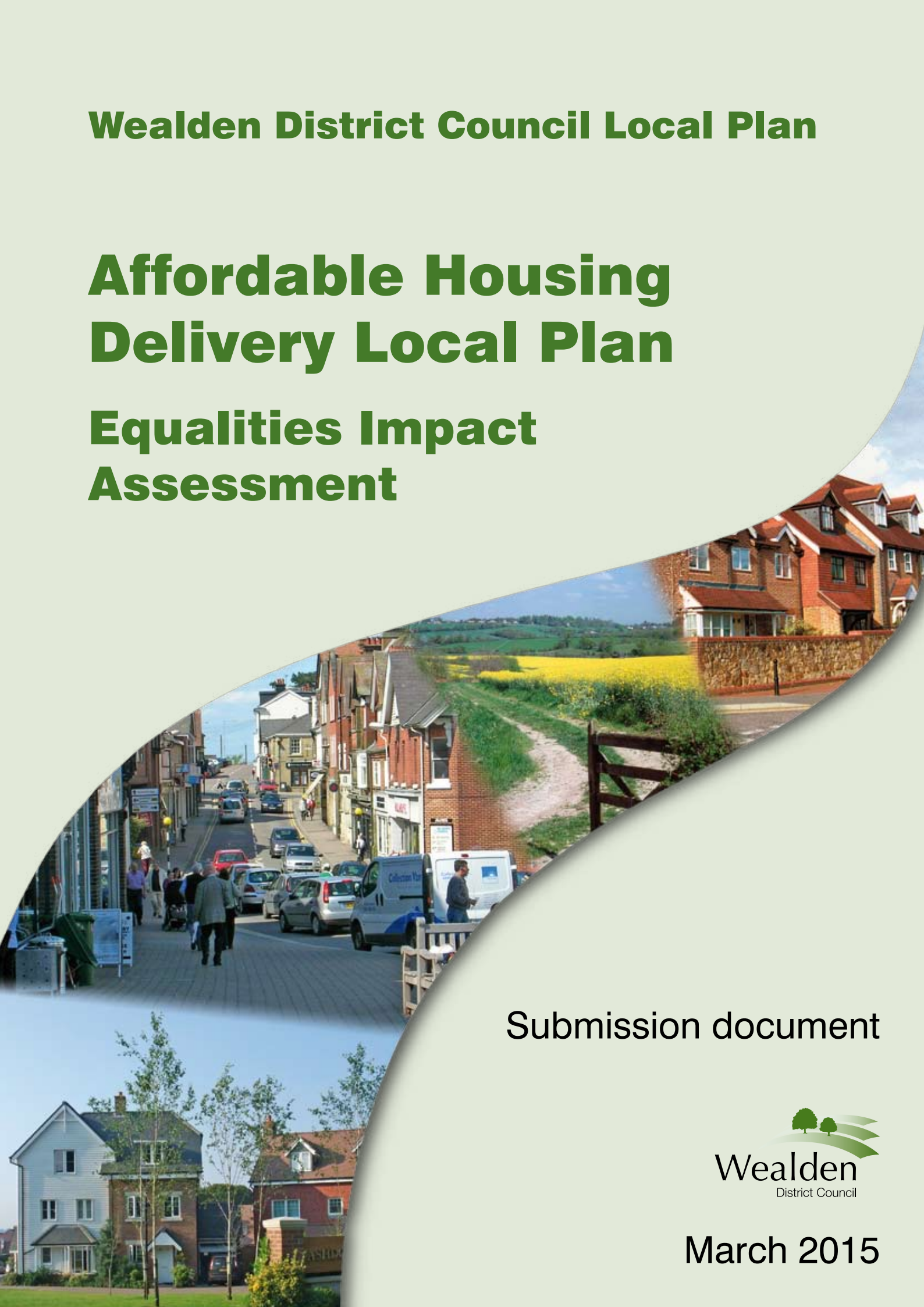
Wealden District Council Local Plan

Affordable Housing Delivery Local Plan

Equalities Impact Assessment



Submission document

Wealden District Council

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Contents

1 Background

1.1 The Council has prepared a number of background papers to accompany the Affordable Housing Delivery Local Plan (AHDLP). This paper details the results of the Equalities Impact Assessment in relation to Wealden District Council's AHDLP.

1 Background

2 Introduction

2.1 The aim of this report is to set out the findings of the Equalities Impact Assessment (EqIA) in relation to the Wealden District Council's AHDLP. The EqIA is a way of helping to identify the likely or actual effects of policies on people in respect of their age, race, disability, gender, sexual orientation, religion or belief. The aim of the assessment is to make sure that, as far as possible, any negative consequences for minority groups are eliminated or minimised, and opportunities for promoting equality are maximised.

2.2 The requirement to undertake an EqIA stems from the duty placed on local authorities to ensure that unlawful discrimination against different groups within the community is eliminated and opportunities to promote equality are maximised. This is a requirement of the Equality Act 2010, which covers issues such as age, disability, marriage and civil partnership, gender reassignment, race, sex, sexual orientation, religion and belief and pregnancy and maternity. These issues are now 'protected characteristics'.

2.3 This assessment has been prepared in accordance with the Wealden Equality Scheme for assessing the impact of the AHDLP on the aforementioned groups. The Council's Equality Impact Assessment programme covers race, disability, gender, sexual orientation, age, religion and belief. This document follows the questions set out in the Wealden Equalities Impact Assessment form.

2.4 The AHDLP will review the Wealden District (Incorporating the South Downs National Park) Core Strategy Local Plan Policy WCS8 concerning affordable housing. The Policy within this document however relates to the area of Wealden District which does not include the South Downs National Park.

2 Introduction

3 Key Equality Groups

Introduction

3.1 As part of the Local Plan process, key social, economic and demographic data has been gathered and analysed. This information is vital to the development of each document within the Local Plan as it provides the context within which the planning policies will be applied.

Demographics

3.2 Wealden is the largest district in East Sussex occupying 324 square miles; some 48% of the East Sussex area. The District is predominantly rural and consists of five main towns, a number of larger villages and many smaller villages and hamlets.

3.3 The 2011 Census recorded that Wealden had a total population of 148,915[(1)], an increase of 8,892 (5.9%) on the 2001 Census and this comprised 62,676 households[(2)]. By 2027 it is estimated that the population of Wealden will have reached 160,750[(3)] comprising some 70,355 households[(4)].

3.4 The age structure of Wealden recorded in the 2011 Census is detailed in Table 1.

Table 1 Wealden District Age Structure

Age Structure	All people	0-14	15-29	30-44	45-64	Over 65
Wealden (number)	148,915	24,631	21,275	24,958	43,909	34,142

3.5 The District's age profile is not consistent with the national average. Wealden has lower than the national average proportions of people in the 0-44 age categories and higher than the national average proportion of people aged over 45. This is particularly pronounced in the over 65 age bracket. The proportion of people in each age group compared to the national, regional and County figures is shown in Table 2.

1 Population by resident type in 2011 – parishes (East Sussex in Figures): http://www.eastsussexinfigures.org.uk/webview/index.jsp?mode=area&submode=result&areaname=Wealden&areatype=

2 Households and average household size in 2011 – parishes. (East Sussex in Figures): http://www.eastsussexinfigures.org.uk/webview/index.jsp?mode=area&submode=result&areaname=Wealden&areatype=

3 Population projections policy based 2012-2027. (East Sussex in Figures): http://www.eastsussexinfigures.org.uk/webview/welcome.html

4 Household projections policy based 2012-2027 – districts. (East Sussex in Figures): http://www.eastsussexinfigures.org.uk/webview/welcome.html

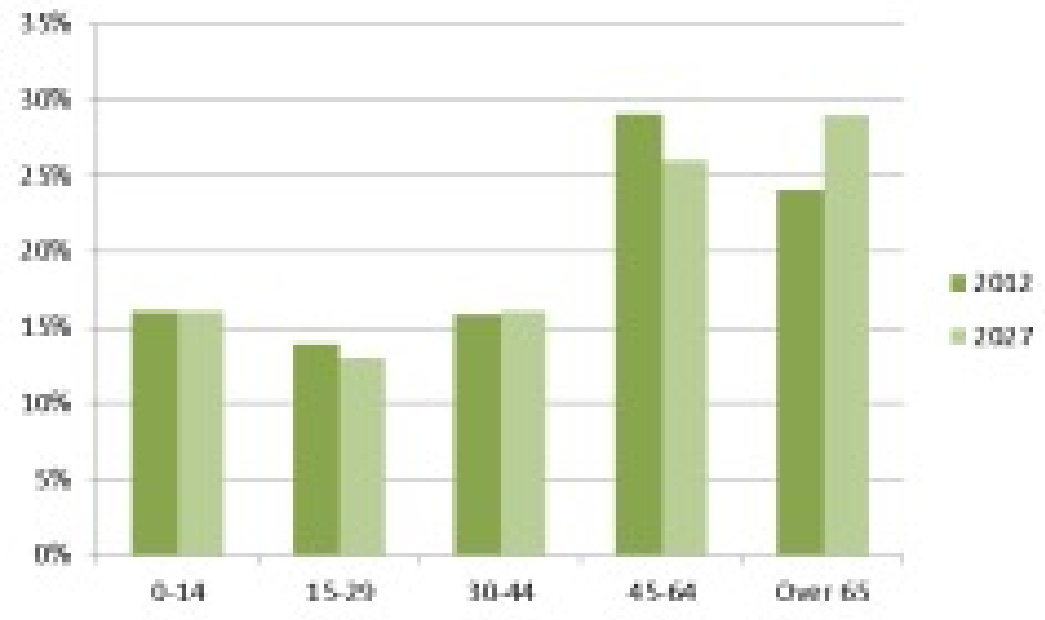
Table 2 Wealden District age structure compared to the East Sussex, South East and National average (% of people based on the 2011 census)

Age Structure	All people (%)	0-14 (%)	15-29 (%)	30-44 (%)	45-64 (%)	Over 65 (%)
England and Wales	100	17.6	19.9	20.5	25.4	16.4
South East	100	17.8	18.6	20.4	26.1	17.2
East Sussex	100	16.1	15.9	17.2	28.0	22.7
Wealden	100	16.5	14.3	16.8	29.5	22.9

3.6 Population projections are calculated using either a 'trend-based' or 'policy-based' approach. A trend-based approach shows what the population will be if recent trends in terms of births, deaths and migration continue. A policy based approach takes into account planning policies and future planned housing development.

3.7 Figure 1 below shows the projected population (%) in 2027 compared to that in 2012 by age category. The projections show that population totals in the 0 – 44 age groups remain fairly stable, whilst there is a 3% decrease in 45 – 64 year olds and a 5% increase in over 65s during this period.

Figure 1: Projected population by age group 2012 and 2027 (% of total population)



Source: Adapted from Populations projections policy based 2012-2027 – Districts (East Sussex in Figures) http://www.eastsussexinfigures.org.uk/webview/welcome.html

Gender

3.8 In terms of gender, it was recorded by the 2011 Census that there were 71,807 (48.2%) males in the District compared to 77,108 (51.8%) females[5]. This trend continues from the 2001 Census, although the gap has closed from 47.6% (males) and 52.4% (females). The trend is also in line with the East Sussex, South East and national trends.

Employment

3.9 Between January 2013 and December 2013 Wealden's employment rate [6]stood at 78 and compared favourably to the rate for East Sussex (74); the South East (75) and nationally (72).Wealden's employment rate has been consistently high over a number of years[7]. In terms of the economically active population[8] Table 3 shows this defined by gender. Table 4 also details the economically inactive population of Wealden by gender.

Table 3 Economically Active population 2011 by gender and category

	Gender	All people aged 16-74 (%)	Employee (%)	Self employed (%)	Unemployed (%)	Full time student (%)
Economically Active	Male	76.6	49.1	22	3	2.4
	Female	64	49.3	9.8	2.1	2.8

Table 4 Economically inactive population 2011 by gender and category

	Gender	All people aged 16-74 (%)	Long term sick/disabled (%)	Looking after home/family (%)	Retired (%)	Students (part and full time) (%)	Other (%)
Economically inactive	Male	23.4	2.7	0.5	15.3	3.6	1.4
	Female	36	2.6	7.8	20.6	3.3	1.7

3.10 Whilst the percentage of the economically active population that are employees is very similar for males and females, labour statistics show that a higher proportion of males are in full time employment compared to females. A significantly higher proportion of females are employed part time compared to males. Employment hours can directly affect income and Table 5 below shows estimates of the number of employees by employment status and gender for Wealden.

5 Population by age group and gender in 2011 – parishes. East Sussex in Figures http://www.eastsussexinfigures.org.uk/webview/welcome.html
6 employment to population ratio
7 Employment Rate 2004-2012 – districts. (East Sussex in Figures). http://www.eastsussexinfigures.org.uk/webview/welcome.html
8 Economically active in this instance relates to people in employment, not in employment but seeking work, not in employment but waiting to start a job and full time students who also meet the aforementioned criteria at the time of the 2011 Census.

Table 5 Employee numbers and % by employment status and gender

	Female (no. / %)		Male (no. / %)	
Full time work	13,992	25.7	22,457	43.6
Part Time work	12,847	23.6	2,829	5.5

3.11 Wealden District's average earnings are below the national, regional and County average for both male and female employees. However the workplace earnings pay gap between males and females follows a similar trend to the national average with gross weekly earnings being lower for female workers than their male counterparts. Table 6 illustrates the 2012 figures for gross weekly average earnings in Wealden.

Table 6 Gross weekly average (mean) earnings, workplace-based 2006-2012 - districts

	All employees			Full-time			Part-time		
	All people	Male	Female	All people	Male	Female	All people	Male	Female
Great Britain	£492	£599	£382	£609	£663	£525	£198	£206	£196
South East	£516	£641	£386	£640	£705	£534	£205	£211	£203
East Sussex	£406	£506	£321	£533	£572	£477	£168	£154	£172
Wealden	£340	£448	£247	£491	£519	£430	£159	-	£158

3.12 In the 2011 Census Wealden District had the lowest percentage (2.5%) of economically active persons who were unemployed within the South East and also compared favourably to the national figure of 4.4%. Only 0.3% of the economically active population in the District stated they had never worked whilst 0.9% were long term unemployed[(9)]. This compared to 0.4% and 1.5% respectively in East Sussex, 0.4% and 1.3% respectively in the South East and 0.7% and 1.7% nationally.

3.13 In September 2014 there were 690 claimants of Job Seekers Allowance (JSA) in the District[(10)]. This compares to 1,280 claimants in February 2013 and 1,445 claimants in February 2012[(11)]. The majority of September 2014 claimants (390) had been on JSA

9 'Long-term unemployed' are those who stated they had not worked since 1999 or earlier (at the time of the Census in April 2001), or those who stated that they had not worked since 2009 or earlier (at the time of the Census in March 2011).

10 JSA Claimant Count by duration 2012-2014 – districts. (East Sussex in Figures): http://www.eastsussexinfigures.org.uk/webview/welcome.html

11 JSA Claimant Count by duration 2011-2013 – districts. (East Sussex in Figures): http://www.eastsussexinfigures.org.uk/webview/welcome.html

for 6 months or less. Only 45 claimants had been on JSA for more than 3 years, whilst 115 claimants had been on JSA for 6-12 months, 90 for 1 – 2 years and 50 for 2 – 3 years.

Ethnic and Cultural Origins

3.14 Wealden District has a low proportion of people from ethnic minority groups and only 1.6% of respondents to the 2011 Census identified themselves as being either Asian, Black, Chinese or "other ethnic groups". This is just below the East Sussex average of 2.6%[(12)].

3.15 Gypsy and Travellers are also an established ethnic group in Britain. In the 2011 Census some 368 people within Wealden identified themselves as Gyspy or Irish Traveller which represents approximately 0.2% of the District's total population and 45% of the County's Gypsy and Irish Traveller population. Wealden therefore has the highest population of all the local authority areas within the County. [(13)]

3.16 The East Sussex Traveller Strategy 2010-2013[(14)] reports that Gypsies and Travellers have significantly poorer health status and significantly more self-reported symptoms of ill-health than other UK-resident, English speaking ethnic minorities and economically disadvantaged white UK residents. The scale of health inequality between Gypsies and Travellers and the UK general population is large, with reported health problems between twice and five times more prevalent.

3.17 In addition, out of 128 face to face interviews that took place with Gypsies and Travellers in the 2005 Gypsy and Traveller Accommodation Needs Study[(15)] it was found that there were higher than expected levels of disability and illness. In fact 31.7% of the respondents were found to either have a disability or illness.

3.18 There is a low level of access to schools for Gypsy and Traveller children. Gypsy and Traveller pupils both nationally and locally are the lowest achieving of any group of pupils in schools. A long history of discrimination, lack of safe and secure stopping places plus traditional values of family self-reliance goes a long way to explain parental fear of, or antipathy towards, education. As a result Gypsy and Traveller children often have a significantly lower level of attainment than other groups of children[(16)].

Religion / Belief

3.19 Of the population who declared a religion or belief in the 2011 Census, the majority of the District's population are Christian. Table 7 details the percentage of the District's population of a certain religion or belief.

12 Ethnic group in 2011 – parishes (East Sussex in Figures). http://www.eastsussexinfigures.org.uk/webview/welcome.html
13 Ethnic group in 2011 – super output areas (East Sussex in Figures). http://www.eastsussexinfigures.org.uk/webview/welcome.html
14 The East Sussex Traveller Strategy 2010-2013 www.eastsussex.gov.uk
15 East Sussex and Brighton and Hove Gypsy and Traveller Study Final Report 2005 www.eastsussex.gov.uk
16 The East Sussex Traveller Strategy 2010-2013 www.eastsussex.gov.uk

Table 7 Religion and/or belief (2011 Census)

	Christian (%)	Buddhist (%)	Hindu (%)	Jewish (%)	Muslim (%)	Sikh (%)	Other (%)	No religion (%)	Religion not stated (%)
England & Wales	59.3	0.4	1.5	0.5	4.8	0.8	0.4	25.1	7.2
South East	59.8	0.5	1.1	0.2	2.3	0.6	0.5	27.7	7.4
East Sussex	59.9	0.4	0.3	0.2	0.8	0	0.7	29.6	8.1
Wealden	64	0.3	0.1	0.2	0.4	0	0.8	26.3	7.9

Sexual Orientation

3.20 There is a visible community of lesbian, gay, bisexual and transgender (LGBT) people within Wealden but the Council recognises that there is also a significant invisible LGBT community within the District. No accurate data currently exists on sexual orientation as it applies to Wealden however Stonewall and the local LGB network suggest that some 6% of the population may be lesbian, gay or bisexual. The planning system however has no direct influence on this equality group.

Disability and Health

3.21 In the UK only half of disabled people of working age are in work compared with 80% of non disabled people[17].

3.22 In February 2014 a total of 5,130 Wealden residents claimed Disability Living Allowance (DLA). The majority of claimants (3,100) are in the 16 - 64 age group, 650 are in the under 16 age group and 1,380 are in the over 65s age group[18].

3.23 In the 2011 Census, 17.5% of the District's population were recorded as having a limiting long-term illness. This is the lowest of all the local authority areas in East Sussex. The 2011 Census recorded that Wealden also had the highest percentage of people in the County whose health was 'very good' or 'good' (82.5% combined)[19]. Life expectancy in Wealden is also above that recorded for the South East and for England / Wales. This is demonstrated in Table 8.

17 Shaw Trust - Ability at work, Disability and employment statistics www.shaw-trust.org.uk
18 Disability Living Allowance (DLA) Claimants by age and gender 2009-2014 – districts. East Sussex in Figures. http://www.eastsussexinfigures.org.uk/webview/welcome.html
19 General Health in 2011 – parishes. (East Sussex in Figures) http://www.eastsussexinfigures.org.uk/webview/welcome.html

Table 8 Healthy life expectancy (1999-2003)

Health expectancy	Life expectancy		Healthy life expectancy[20]		Disability-free life expectancy[21]	
	Male	Female	Male	Female	Male	Female
England and Wales	75.9	80.5	68.8	72.1	61.4	63.9
South East	77.2	81.5	71.7	74.8	64.7	66.9
Wealden	78.4	82.8	73.3	76.5	66.1	68.4

3.24 No accurate information currently exists in relation to residents' type of disability. However, in East Sussex Downs and Weald there are approximately 51,760 wheelchair users, 528 people registered as having hearing loss and 73 people who are deaf. There are also 629 people who are registered blind and 587 who are registered as having a hearing impairment[22].

21 This is defined as expected number of years of life free from a limiting long standing illness or disability.
20 This is defined as the expected number of years of life in 'good' or 'fairly good' health from birth.
22 Wealden Equality Scheme 2011 - 2014, www.wealden.gov.uk

3 Key Equality Groups

4 Purpose of the AHDLP

4.1 The Core Strategy Local Plan sets out the strategic planning policies to guide development and growth across the District, including a strategic Vision and Spatial Planning Objectives. The delivery of affordable housing is a high priority for the Council and forms part of this vision, whilst existing policy WCS8 sets out detailed requirements for affordable housing provision in new development.

4.2 The AHDLP proposes a number of modifications to the text of policy WCS8 including:

- Introducing a threshold of 11 dwellings (net) or more for development within the defined Affordable Housing Policy Area, and with a combined gross floorspace of more than 1,000 sqm, and a threshold of 6 dwellings (net) in all other areas of the District;

- Introducing a new tenure split of 40% social rented, 40% affordable rented and 20% intermediate accommodation for development sites of 50 or more dwellings (net).

4.3 This first measure is required to update local policy to reflect new Government guidance, and to ensure that an appropriate amount of affordable housing will be captured on development sites. The second measure should increase the prospects of viability of housing development on larger sites, which evidence shows have greater financing costs than smaller sites.

4.4 The AHDLP will ultimately supersede policy WCS8 for the area of the District outside of the South Downs National Park. Policy WCS8 will therefore remain relevant to this part of the District until it is superseded by a relevant Local Plan produced by the South Downs National Park Authority.

4 Purpose of the AHDLP

5 Beneficiaries of the AHDLP

5.1 The AHDLP, together with the Core Strategy Local Plan and other Development Plan Documents, will be used by the Council to inform decision making on development proposals within the District.

5.2 The AHDLP is therefore relevant to a number of stakeholders including:

- People living in or who wish to live in the District;
- People who work in or who wish to work in District:
- Businesses, developers and landowners;
- Voluntary and community groups; and
- Partner organisations.

5.3 The Core Strategy Background Paper on Housing [(23)] identifies significant issues in respect of housing in Wealden, many of which have the potential to affect specific equalities groups. Average house prices in the District are over £50,000 higher than the national average, and this disparity is particularly pronounced in respect of detached homes where prices are also significantly higher than the County average.

5.4 This is compounded by the strong bias towards detached homes in the District's current housing stock. Overall some 46% of dwellings in Wealden are detached homes, and only 22% are terraced houses or flats/maisonettes. Together these issues significantly affect the affordability of homes in the District, and this is exacerbated for Wealden residents who are less well off.

5.5 The need for affordable housing units in Wealden generally is acute and the Housing Needs Assessment[(24)] (2010) estimated "current need" for affordable housing at almost 1200, with an annual need of 812[(25)]. The assessment concluded that 57% of households in need were families with children whilst around 13% were older person households.

5.6 Analysis of the Council's housing register in November 2014 revealed high representation of families with children (45%) however there was also strong representation of single person households (40%). Approximately 61% of those on the register were female, whilst over 26% people on the register were aged 17 - 29, with only 10% were aged over 70. These figures include representation across all bands however, and therefore do not differentiate between those in immediate need and those in much lower need. Moreover, the register provides only a partial snapshot of affordable housing needs in Wealden and the new Strategic Housing Market Assessment will provide a much more comprehensive picture of affordable housing needs over the longer term.

23 http://www.wealden.gov.uk/nmsruntime/saveasdialog.aspx?lID=7418&sID=2838
24 http://www.wealden.gov.uk/nmsruntime/saveasdialog.aspx?lID=7497&sID=2838
25 Affordable housing need does not directly translate to the amount of new affordable housing required

5 Beneficiaries of the AHDLP

6 The production of the AHDLP

6.1 The AHDLP has been informed by a number of different elements. These include other Wealden District Council and partner organisation plans, policies and strategies, public participation and a number of evidence based studies.

The Core Strategy Local Plan

6.2 The Wealden Core Strategy Local Plan[(26)] was formally adopted in February 2013 and sets out a number of high level, strategic policies to guide development in the District to 2027. The Core Strategy is therefore the overarching planning document for the District and sets the basis for subsequent planning documents including the AHDLP.

6.3 The Core Strategy Local Plan was itself informed by the views of a wide range of stakeholders including the Local Strategic Partnership (LSP), Parish and Town Councils and community groups. The Vision and Spatial Planning Objectives contained within the Core Strategy were shaped by the input of these stakeholders and others and the AHDLP policy is specifically designed to deliver the strategic policy objectives.

The Strategic Sites Local Plan

6.4 The Strategic Sites Local Plan identifies a number of policies to deliver the majority of plan led growth in the District. The Plan, which is currently at examination, sets out a number of site specific policies which detail the type, level and location of growth allocated to the strategic sites, and identify specific requirements including the provision of infrastructure.

6.5 The Strategic Sites Local Plan was again informed by a series of consultations and exhibitions, and significant stakeholder and public input.

Wealden Sustainable Community Strategy (SCS)

6.6 The Wealden Sustainable Community Strategy[(27)] also informed the preparation of the AHDLP. The Strategy was produced by the LSP which consists of representatives from a number of organisations and community groups.

6.7 The Strategy itself involved wide community consultation and focuses on issues and priorities that local people are concerned about including housing, employment, health and the environment. The Strategy also sets out a long term vision for improving people's quality of life and creating strong communities.

6.8 The Strategy sets out specific objectives for housing, including encouraging provision of affordable housing in all settlements, and lobbying for an increase in the percentage of affordable housing in new development. In this respect the AHDLP policy is closely aligned with the objectives and priorities set out in the Wealden Sustainable Community

26 http://www.wealden.gov.uk/nmsruntime/saveasdialog.aspx?lID=12254&sID=2829
27 http://www.wealdencommunitystrategy.co.uk/documents/Wealden%20action%20plan%20June%202009%20.pdf

Strategy. The AHDLP therefore reflects local need and aims to provide equality of opportunity for all who live within the District.

Evidence Based Studies

6.9 During the production of the Core Strategy Local Plan the Council commissioned a number of background technical studies to provide evidence to inform its policies. Many of the social and economic studies provided specific information in relation to community groups and strengthened our understanding of the key issues and challenges facing the District and key drivers for change. The evidence from these studies contributed to the Vision, Strategic Objectives and policies within the Core Strategy and therefore shaped the context of the AHDLP.

6.10 Further studies were commissioned during the production of the Strategic Sites Local Plan and these have provided a more detailed understanding of how the positive impacts of specific policies may be maximised to the benefit of different community groups. For instance, studies into the viability of development within the strategic sites produced detailed analysis to inform policies which achieve the optimum balance between the provision of infrastructure and affordable housing for each site.

6.11 Many of these evidence based studies were undertaken by consultants on behalf of the Council. In appointing specific consultants the Council's procurement procedures were adhered to and equal opportunities statements were checked to ensure that they conformed with the Council's Equality Scheme. This was undertaken as part of the pre-selection process during the tender assessment.

Consultation

6.12 The Council has a duty to involve the community and stakeholders in the preparation and development of the AHDLP. The production of the Core Strategy was informed by three major consultation exercises and this document now provides the context for the AHDLP. So far three major consultation exercises have taken place on the AHDLP. The AHDLP Issues and Options was published for consultation between September and November 2014, the Proposed Submission AHDLP was published for representations between December 2014 and January 2015, and the Revised Proposed Submission AHDLP was published for representations between February and March 2015.

6.13 The Issues and Options Consultation Paper **(28)** identified a number of issues in respect of the existing policy in the Core Strategy (WCS8), and set out a number of potential options to address these. The Paper also proposed a series of questions regarding the options and invited comments on these. In total 69 consultation responses were received from 22 respondents and these comments helped to shape the policies contained in the Proposed Submission AHDLP.

28 http://www.wealden.gov.uk/nmsruntime/saveasdialog.aspx?lID=16111&sID=5618

6.14 More limited responses were received during publication of the Proposed Submission and Revised Proposed Submission iterations of the AHDLP.

Summary of Consultation Methods

6.15 As part of the consultation process for the Core Strategy Local Plan itself, a variety of consultation methods were adopted including numerous meetings and workshops attended by the LSP, Town and Parish Councils, stakeholders and community groups. The consultation exercises were undertaken in accordance with the Wealden Statement of Community Involvement and exceeded the consultation requirements of Planning Regulations.

6.16 Both the public and stakeholders were invited to respond to the AHDLP Issues and Options Consultation Paper and Proposed Submission AHDLP by completing the questionnaire provided or by letter, fax or email. People were also able to respond using an online consultation system.

6.17 Given the potential impacts that the AHDLP could have on specific equalities groups, a number of community organisations were notified directly of the consultation. In addition, the internet web pages and electronic documents were written in a way that is accessible for partially sighted computer users and all of the forms and documents could be ordered in other fonts/colours/languages for accessibility purposes. The Council also used deposit point libraries and parish council offices to make hard copies available to those that do not have the internet and cannot easily travel to the District Council offices.

Results of the Consultation

6.18 A full discussion of the Issues and Options consultation exercise was presented in a report[(29)] which was considered at the Wealden District Council Local Development Framework Sub-Committee on 13 November 2014. The appendix[(30)] to this report summarises all responses received during the consultation.

6.19 Wealden District Council Local Development Framework Sub-Committee met on 15 January 2015 to consider the publication of the Revised Proposed Submission Affordable Housing Delivery Local Plan [(31)].

Equality Monitoring

6.20 The Council endeavours to collect information about its service users by equalities monitoring alongside Council surveys and consultations. The purpose of this is to ensure that the Council understands its service users, measures the use of services by equality groups and gathers views to establish the level of satisfaction in our service provision.

6.21 As part of the Issues and Options consultation exercise an equalities monitoring form was made available through the on-line consultation system. However, of the 22

29 http://council.wealden.gov.uk/documents/s42114/Affordable%20Housing%20Delivery%20Local%20Plan%20Report.pdf
30 http://council.wealden.gov.uk/documents/s42115/Appendix%20A%20Summary%20of%20responses%20Reg%2018.pdf
31 http://council.wealden.gov.uk/documents/s42798/Revised%20Proposed%20Submission%20Affordable%20Housing%20Delivery%20Local%20Plan.pdf

individual respondents, only 2 completed the form. For subsequent iterations of the AHDLP the equalities monitoring form was attached to the representation form however no completed forms were returned.

6.22 Although the results of the equalities monitoring do not allow any meaningful conclusions to be drawn, previous monitoring exercises have indicated a strong bias towards white British respondents who are heterosexual and not disabled. Previous monitoring has indicated that the majority of respondents are male, and most are in the 50 plus age group, meaning that women and younger people are perhaps underrepresented in the consultation process.

6.23 Nevertheless, the consultation exercise, in addition to the previous consultations relating to the Core Strategy and the Strategic Sites Local Plan, together with the incorporation of the Wealden Sustainable Community Strategy and the detailed evidence that has been accumulated in relation to the District's population, ensures that equalities groups have been fully considered throughout the preparation of the AHDLP.

Sustainability Appraisal (SA)

6.24 As part of the production of the AHDLP the Council has undertaken a Sustainability Appraisal (SA). The SA process involves assessing the potential economic, social and environmental impacts of the Plan and its policies and makes recommendations as to how they can be improved in sustainability terms. The SA has played a key role in the development of the AHDLP.

6.25 Although the SA does not assess the differential effects of the AHDLP on specific equalities groups, it does however provide an holistic assessment of the potential impacts of the policies on the District's population in respect of social inclusion, health and the provision of housing.

6.26 The SA concludes that the AHDLP has the potential to positively benefit all those who live or work within the District. The Sustainability Appraisal of the Revised Proposed Submission AHDLP can be viewed on the Council's website.

7 Equality Impact Assessment

7.1 The AHDLP sets out revised planning policy on affordable housing in new development within Wealden District. In doing so the Plan identifies the thresholds at which affordable housing will be required, where differential thresholds will be applied, the proportion of affordable housing that will be required and the tenure split of new affordable housing.

7.2 This assessment focuses on the proposed policy within the Plan, and does not address accompanying or contextual text, as it is the policy itself that will influence the decision making process and therefore has the potential to impact differentially on specific equalities groups.

7.3 The outcome of the EqIA is detailed in Appendix 1. The table outlines the AHDLP policy and identifies where the policy, or a part of the policy, is likely to have a differential impact on specific equalities groups.

Outcome of the Equalities Impact Assessment

7.4 Overall the AHDLP looks to maximise the provision of affordable housing in new residential development, taking into account Government guidance, the significant needs across Wealden and matters such as development viability. In this respect the Plan has the potential to benefit all equalities groups.

7.5 The Plan will also have positive benefits for a number of specific equalities groups. Primarily this is due to the requirement to provide a mix, type and tenure of units which will meet the identified needs of the local area. This should result in new affordable housing having a positive impact on the equalities groups who are most in need in any given area, and should assist in reducing inequalities across the District.

7.6 In particular, the provision of affordable housing within Wealden is likely to have positive impacts for the less well off, for families with children, for the young and the elderly and for women, as evidence indicates that these are the groups most in need.

7.7 Within the Affordable Housing Policy Area the higher thresholds at which provision is required may result in fewer affordable homes being provided than would have been the case under Core Strategy Policy WCS8. This revision follows Government guidance however and the policy maximises provision within the parameters set nationally.

7.8 No elements of the policy are found to have negative impacts on any specific equalities groups. It can therefore be concluded that the policies contained within the AHDLP will not lead to unlawful discrimination on different equalities groups. Instead, the Plan seeks to reduce inequalities within the District through the increased provision of, and access to, affordable homes.

7 Equality Impact Assessment

8 Different Expectations

8.1 Different equalities groups within the community may have differing expectations in respect of what the AHDLP can or will deliver.

8.2 The adopted Core Strategy Local Plan and its vision, objectives and policies take full account of key social, economic and demographic data and the Core Strategy is closely aligned to the specific housing, employment and social needs of the District's residents. Consultation also plays a key role in establishing these needs and has shaped specific policies within the Core Strategy. This background provides the context to the AHDLP which seeks to enhance the delivery of affordable housing through revised policy, whilst ensuring .

Housing

8.3 Certain equalities groups may have differing expectations regarding the location, type, size, adaptability and affordability of housing to be provided through the planning process. For example, younger people may be looking for smaller, affordable housing which could provide access to the housing ladder whereas families are likely to require larger dwellings. Elderly people are more likely to require adaptable, smaller properties whilst disabled people may require specialist accommodation. Different racial groups may also have particular housing requirements.

8.4 The relationship between household size and the type and size of dwelling is not straightforward and should not be assumed. Therefore the points below outline the possible different expectations in more detail, taking evidence from the Wealden Housing Market Assessment[(32)] and the Wealden Housing Needs Survey[(33)].

- Research suggests that owner occupation is the dominant tenure amongst Black and Minority Ethnicity (BME) households in the District, although there are a relatively high percentage of BME households in social rented accommodation in the south of the District. National research indicates that BME households (particularly Indian and Pakistani households) often live in overcrowded accommodation and therefore BME households may benefit from the provision of larger homes. BME households are also more likely to be on relatively low incomes and therefore an expectation for large affordable homes may exist;
- A significant proportion of people (71%) within Wealden who have a disability remain economically active which means that many disabled people are able to access private sector housing. However, disability is strongly connected to age and the majority of disabled people are over 60. This has implications for the District as the proportion of the Wealden population aged over 65 is forecast to increase significantly over the coming years. At a national level the majority of disabled people are able to remain in their own homes without adaptation. However, there are often barriers when alternative adapted or specialist accommodation is required. Disabled people may therefore have expectations in respect of the type, size and adaptability of

32 ttp://www.wealden.gov.uk/Wealden/Housing/Strategies_and_Key_Documents/Strategies/Housing_Market_Assessments.aspx
33 http://www.wealden.gov.uk/Wealden/Housing/Strategies_and_Key_Documents/Housing_Needs_Survey

housing in addition to its accessibility and location. With an aging population there may be a greater expectation for suitable and adaptable housing with both the private and social sector.

- The housing requirements of elderly residents will often be influenced by health. Whilst many elderly people will remain in their existing home, some may need to move in order to easily access services and facilities. Some elderly people may require specialist housing such as sheltered accommodation or care homes. Different expectations may therefore exist depending on changing personal circumstances, including in later life.
- Approximately half of Wealden's residents live in rural areas where house prices are higher than most urban areas, especially in north Wealden. This provides low levels of affordability for newly forming households especially if incomes are relatively low. The Housing Needs Survey identified that the majority of people requiring homes were between the ages of 20 – 29. There may be an expectation therefore for smaller, affordable homes particularly in the rural areas in order to meet the housing needs of younger people.

8.5 In view of these expectations, it is clear that the provision of market and affordable housing will have a direct impact upon different equalities groups. The AHDLP therefore seeks to maximise the delivery of affordable housing in order to maximise the positive benefits for specific equalities groups.

9 Community and Council Relations

9.1 It is not anticipated that the AHDLP will affect relations between different equalities groups or between the Council and different equalities groups.

9 Community and Council Relations

10 Next Steps

10.1 The publication of the Revised Proposed Submission AHDLP for a period of consultation from 2 February to 16 March 2015 will provide an opportunity for the public and stakeholders to make representations on the document. Representations will be considered prior to the submission of the AHDLP to the Secretary of State for an Examination in Public (EiP). The Council aims to adopt the Affordable Housing Delivery Local Plan in November 2015, although this is dependent upon the outcome of the EiP and the timetable of the Planning Inspectorate.

10.2 Should any changes to the AHDLP take place as a result of representations or the EiP, it may be necessary to review the EqIA.

10.3 Once the AHDLP is adopted, the Council will have an obligation to monitor the implementation the policy to ensure that the objectives are being delivered effectively. The Council's progress is recorded in its Annual Monitoring Report (AMR) which uses core output indicators to assess activities related to the policies such as the delivery of housing and employment floorspace. The AMR will help the Council to assess whether the needs of the community are being met through implementation of planning policies and should any be found to be having a negative impact, the Council will review its position and provide appropriate mitigation. This could potentially result in a review of the AHDLP. Should this occur, it will be necessary to review the EqIA.

10.4 Over the coming years the Council will be producing further local plan documents and it will be necessary to assess the impact of policies within these plans on different equalities groups, to ensure that proposed policies have a positive outcomes for, and do not differentially affect, specific equalities groups.

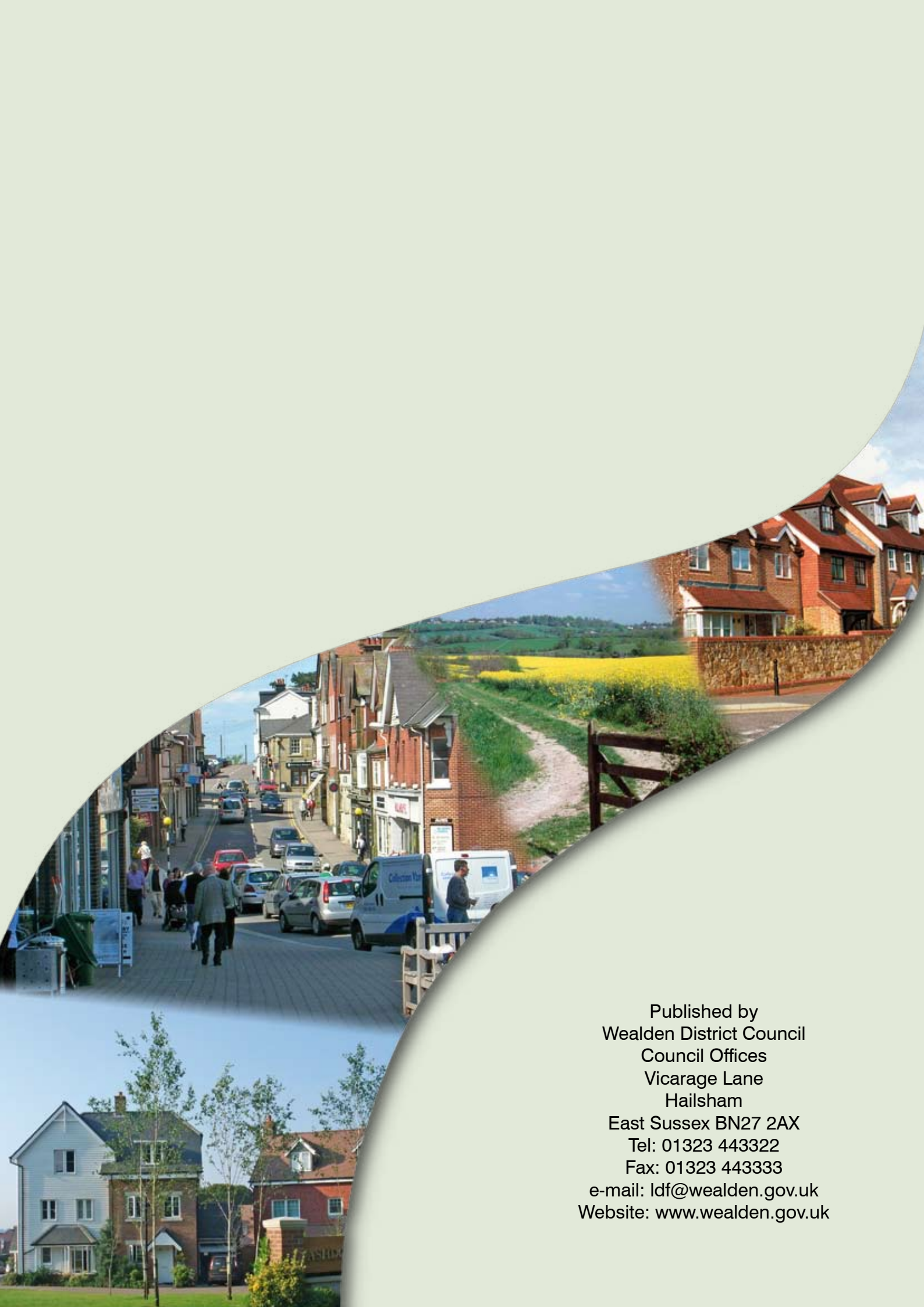
10 Next Steps

11 Appendix 1 - Summary of Equalities Impacts

Table 9 Summary of equality impacts of the Affordable Housing Delivery Local Plan

Affordable Housing Delivery Local Plan Policy	Race	Disability	Gender	Sexual Orientation	Age	Religion/ Belief	Comments
AFH 1 is a strategic policy which seeks to secure the delivery of affordable housing in new residential development. The policy requires that the mix, type and tenure of affordable units should meet the identified housing needs of the local area. The policy sets out thresholds at which the requirements apply, where in the District differential thresholds apply, the proportion of affordable units required on qualifying developments and tenure splits.			**X**		**X**		Policy AFH 1 looks to maximise the provision of affordable housing units in new housing development and therefore has the potential to benefit all equality groups. Crucially, the policy requires the mix, type and tenure of new affordable homes to meet identified housing needs in the local area, and therefore should have positive impacts for those equality groups who are most in need in any given area. In particular, the policy should benefit the young, the elderly, families with children, females and those who have difficultly accessing market housing, as the need for affordable housing within these community groups is understood to be greater.

11 Appendix 1 - Summary of Equalities Impacts



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