

Equality Impact Assessment

This **online** equality impact assessment should:

An equality impact assessment should take place when considering doing something in a new way. Please submit your completed EIA as an appendix to your committee report. Please remember that this will be a public document – do not use jargon or abbreviations.

Service

Title of policy, service, function, project or strategy

Type of policy, service, function, project or strategy: Existing ☐ New/Proposed ☒

Lead Officer

People involved with completing the EIA

Step 1.1: Make sure you have clear aims and objectives

Q1. What is the aim of your policy, service, function, project or strategy?

Lancaster City Council received an allocation of £737K Community Housing Fund from the Department of Communities and Local Government for the period 2016/17. The level of funding allocated has been calculated by central government against the prevalence of second homes ownership nationally. There is a presumption in favour of supporting schemes in rural communities which are often the most affected by second homes ownership, but the funding is not restricted to rural areas. Subject to approval, the council has established its own policy in order to allocate the funding. It is envisaged that the grant funding will be used to support to community groups who require financial or officer support to investigate, develop and deliver community led housing developments. The grant funding could potentially be used to fund the cost of initial advice, steering group support and community consultation, incorporation, viability, predevelopment costs and construction costs.

Q2.

Who is intended to benefit? Who will it have a detrimental effect on and how?

The funding is intended to directly benefit community groups who are looking to bring forward and deliver housing projects that will meet their own identified need and in some instances a wider community need. It will only be clear to what extent proposals will directly benefit communities and community groups once each application is received and assessed and any evidence submitted to support proposals along with whatever data the council holds or has access to around need.

Step 1.2: Collecting your information

Q3. Using existing data (if available) and thinking about each group below, does, or could, the policy, service, function, project or strategy have a negative impact on the groups below?

Group	Negative	Positive/No Impact	Unclear
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Faith, religion or belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Gender including marriage, pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual orientation including civic partnerships	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other socially excluded groups such as carers, areas of deprivation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Rural communities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Step 1.3 – Is there a need to consult!

Q4. Who have you consulted with? If you haven't consulted yet please list who you are going to consult with? Please give examples of how you have or are going to consult with specific groups of communities

Consultation has already taken place with a number of rural parishes, neighbourhood plan groups, a large number of city councillors and neighbouring local authorities. Subject to the draft policy being approved and implemented, a new officer post is being created which will be jointly funded through the Community Housing Fund allocations received by Lancaster City Council and Fylde Borough Council's and the appointed postholder will be responsible for awareness raising and engagement with a wide range of community groups across the two districts to formulate a pipeline of schemes to maximise future funding opportunities. This will allow detailed engagement with a wider range of community groups including groups with protected characteristics and the need and demand for community led housing schemes amongst these groups. However, in terms of the engagement work undertaken so far, and given that rural communities are often directly affected through second homes ownership, there has already been direct engagement with rural parishes in order and also to assist in the development of their neighbourhood plans where applicable.

Step 1.4 – Assessing the impact

Q5. Using the existing data and the assessment in questions 3 what does it tell you, is there an impact on some groups in the community?

Age: It is hoped the impact will be positive. The council recognises the need to plan for the ageing population and that proposals emerging from communities groups could be supported. To date, a proposal has already emerged to extend an existing community led development to provide an over 55's mixed tenure scheme. The biggest challenges in developing a scheme specifically for the elderly would include the actual development costs in ensuring that an appropriate design and layout is incorporated that is fit for the intended client group, and how the provision of any support related services are made available given that Lancashire County Council have recently decommissioned services/funding for older people. In the case of rented accommodation, there is an intention to review the existing funding framework for supported housing. Developing market housing for a fixed age group also poses some risks depending on the quality of data available about local demand. However, a community group should have a very clear idea about the perceived need that they are looking to meet. There are also examples of community led developments where the support element provided to residents is provided directly from the community rather than through state intervention, which is one of the drivers for the government allocating this funding.

Disability: It is again hoped the impact would be positive but there could be challenges around the level of funding that can be used to support projects and the degree of officer/specialist support that might be required to take schemes forward and deliver the right type of housing.

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This could vary depending upon the needs of the community group and the type of housing deemed necessary to meet the needs of that group. However, given the level of specialist housing that exists locally, the council will raise awareness about the type of housing required to meet a local need and explore opportunities with community groups to consider the merits of including property types that are accessible to people with disabilities.

Faith, Religion or Belief: Although LCC data suggests that the ethnic mix in Lancaster district is much lower than the national average, there are examples of schemes in neighbouring authorities (Cumbria) that have been taken forward by Faith Groups/Organisations that have recognised a local need in that group and had a desire to meet that need. Awareness raising would be required to understand whether similar needs exist in Lancaster district.

Gender including Marriage, Pregnancy and Maternity: The policy would have no bias towards any particular gender so a negative impact is not thought to apply.

Gender Reassignment: The policy would have no bias towards any particular gender so a negative impact is not thought to apply. Awareness raising would again be important to understand if there are groups that currently have an unmet need.

Race: The policy would have no bias towards any particular race so a negative impact is considered not to apply and again should provide an opportunity for the council to have better engagement with specific groups to understand an unmet need and whether there is potential to use the funding to support community led developments that would meet an existing/future need. Although it is envisaged that new schemes will provide an element of affordable housing, mixed tenure schemes will be considered and the flexibility around tenure could encourage proposals from groups that would not otherwise consider a community led development, particularly where certain ethnic groups normally have a preference for market housing.

Sexual Orientation including Civic Partnership: The policy should not have a detrimental effect but again the council will need to raise aware to understand the needs of this group and whether there is a need and demand for a community led development

Rural Communities: Access to housing in rural areas across tenures is often problematic either because of scarcity, due to affordability or depending on the level of services/infrastructure that exists which varies considerably across Lancaster district. Rural communities could potentially benefit the most from the Community Housing Fund given that the funding derives from the impact of second homes ownership which is most prevalent in rural areas and engagement with rural communities has already commenced because of the ongoing dialogue around development of neighbourhood plans. The council would like to support projects in rural communities particularly those that are linked to neighbourhood plans and would give additional weighting for this when applications are being assessed. One proposal has already been received from a rural community and more could follow.

Step 1.5 – What are the differences?

Q6. If you are either directly or indirectly discriminating, how are you going to change this or mitigate the negative impact?

Schemes emerging from rural communities are likely to receive additional weighting at the application stage but this is due to the nature of the funding and acknowledging that access to housing in rural communities is often more challenging. Also given the level of funding involved and the level of uncertainty about future funding (at what rate and for how long) the council may find the funding will be over-subscribed depending on how many applications are received. Engagement work with the other groups will be important to mitigate any negative funding and to try and support bids from other groups. However, schemes that are supported should be accessible and available to the widest possible range of groups within those communities. There are other funding streams available and greater opportunities to increase the provision of housing

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in urban areas (given that the Local Plan has identified a number of strategic housing sites in the main urban areas rather than in rural areas, the overall impact should still be positive. It could be argued that smaller sites that are better suited to community led projects are more likely to come forward in rural areas and this is referred to in the DCLG guidance issued.

Q7.

Do you need any more information/evidence eg statistic, consultation. If so how do you plan to address this?

The results from the recently commissioned Housing Needs Survey 2017 should assist in having up to date information about the housing needs of specific groups. As the council is also commissioning an affordable housing viability study, this work will explore the opportunities that might exist to develop planning policies which will include affordable housing provision through community led developments. Data should also be collected from the engagement work that will be undertaken through the new officer post, and as part of drafting a new Housing Strategy for Lancaster district, there is an intention to consult a range of groups and stakeholders to establish how the council can best meet their housing needs.

Step 1.6 – Make a recommendation based on steps 1.1 to 1.5

Q8. If you are in a position to make a recommendation to change or introduce the policy, service, function, project or strategy, clearly show how it was decided on.

The policy relates directly to the allocation of government funding, which was received by local authorities at very short notice and was a direct allocation rather than a bid process. Had the funding not been received, the policy would not be implemented. Notwithstanding this, the council has consulted other local authorities that were eligible for funding in order to develop a framework for the Community Housing Fund, and is working in partnership with Fylde Borough Council

Q9.
If
you
are

not in a position to go ahead, what actions are you going to take?

N/A.

Q10. Where necessary, how do you plan to monitor the impact and effectiveness of this change or decision?

It is likely that as a condition of the grant funding, some regular monitoring of how the funding is being used will be undertaken annually by DCLG. The council will maintain monitoring statistics of the number of applications received and correlations between groups with protected characteristics. Assumptions cannot be made about unmet need until the engagement work and awareness raising has taken place and some conclusions can be drawn. There was no opportunity to do this work prior to receiving the funding, and as DCLG will be expecting to see progress and delivery, delaying the implementation of the policy could weaken the position and likelihood of securing future funding (if available). It should also be noted that the level of funding could fluctuate depending on future methodology used and this could impact upon the number of projects that can supported and type of projects that can be supported. If the funding reduces and depending upon take-up of grants, the policy may need to be reviewed.