

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	Housing and Communities / Finance		
Service Area:	Housing Delivery / Property		
Name of the proposal :	Update on the Housing Delivery Programme and the Disposal of Surplus Sites		
Lead officer:	Sophie Round / Nick Collins		
Date assessment completed:	20 th June 2024		
Names of those who contributed to the assessment :			
Name	Job title	Organisation	Area of expertise
Sophie Round	Housing Delivery Programme Manager	CYC	Housing development
Nick Collins	Property Manager	CYC	Commercial property

Step 1 – Aims and intended outcomes

<p>1.1</p>	<p>What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.</p>
	<p><i>The paper seeks to increase the provision of affordable housing delivered both through the Council's Housing Delivery Programme and through Registered Providers operating in the City. The report seeks to dispose of Lowfield green Plot B for 100% affordable housing for adults aged over 55, dispose of Morrell House for 100% affordable housing, enter into negotiations for a land disposal to a Registered Provider to deliver 100% affordable homes on Castle Mills. The report also seeks to dispose of a number of sites at market value where it is deemed they are unsuitable for affordable housing (22 The Avenue and Shambles flats) and end the development agreement at Hungate for a capital premium to support wider council objectives. The paper also seeks to procure an operator to manage facilities at Marjorie Waite Court.</i></p>
<p>1.2</p>	<p>Are there any external considerations? (Legislation/government directive/codes of practice etc.)</p>
	<p>Given the value and method of disposal, Lowfield B will need to follow a compliant procurement route to market under the Council's Contract procedure Rules. It is likely all affordable homes will be funded through Homes England grant and therefore will be developed in accordance with the Capital Funding Guide.</p>
<p>1.3</p>	<p>Who are the stakeholders and what are their interests?</p>
	<ul style="list-style-type: none"> - City of York Council – key stakeholders within the council include Housing Services, Property Services, Communities team, Climate reduction team - Council tenants – Registered providers

1.4	What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans.
	<p>The recommendations set out in the paper reflect the 4 Core Commitments of the Council Plan 2023-2027</p> <p>1) Equalities and Human Rights The paper proposes the delivery of increased levels of affordable housing which benefits those from lower socioeconomic backgrounds ensuring good quality housing provision. The new build homes will be built to a minimum standard of Part M4(2) 'Accessible and Adaptable dwelling' ensuring that the homes provide a good level of accessibility for residents throughout their lives. Approximately 10% of new build homes will be delivered as Part M4(3) 'Wheelchair accessible dwelling' ensuring a supply of adapted housing for residents with additional needs. Providing a high quality operator for the facilities at Marjorie Waite Court promotes social cohesion for residents and the wider community.</p> <p>2) Affordability The affordability of housing is a key issue for residents of York evidenced by the fact that the average house price is in excess of 10 times the average salary in the city. Increasing the supply of affordable housing for a broad range of residents including those on the housing waiting list and key workers.</p> <p>3) Climate All homes delivered directly by the Housing Delivery Programme aims to achieve certified Passivhaus and utilise renewables such as Heat pumps and Photovoltaic panels. Homes delivered through RP partners will meet high energy efficiency standards and remove the reliance on fossil fuels.</p> <p>4) Health and Wellbeing Good quality affordable housing has a positive benefit to the health and wellbeing of the residents. This paper aims to improve access to good quality housing for the city's residents.</p>

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Step 2 – Gathering the information and feedback

2.1	What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.	
	Source of data/supporting evidence	Reason for using
	Lettings and Housing Management staff within CYC	Understanding the housing demand within the city is critical to designing homes needed by our residents. The Local Housing Needs Assessment demonstrates the greatest need for affordable housing is for smaller properties and this influences the homes delivered across both HDP sites and RP disposal sites.
	Soft market testing with Registered Providers	The disposal of Lowfield B and Morrell House depends on interest from Registered Providers to build and manage the properties. Whilst there is interest from RPs the sites are small/constrained and therefore there are likely to be some viability challenges in providing 100% affordable housing however, to date – engagement has been good and feedback has been positive.

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.		
Gaps in data or knowledge		Action to deal with this	
Further consultation is needed as detailed designs are developed to ensure the accessibility standards are met. Whilst we use the standards set within Building Regulations to design the homes, further detailed engagement from the community will have positive benefits to the projects.		Engage with the Council's Access Officer and present future Designs to the York Access Forum.	

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	Lowfield Green Plot B will be developed to meet the needs of those aged 55 and over.	Positive	Medium
Disability	Lowfield green will be designed to very high accessibility standards to meet the needs of the aging population. As a minimum all homes either delivered by the Council directly through HDP or via disposals to	Positive	Medium

	Registered Providers will provide a minimum of 10% of new build homes will be designed to meet M4(3) Wheelchair accessible dwellings with all homes designed to meet M4(2) Accessible and Adaptable homes. The proportion of fully accessible homes will be reviewed during engagement with stakeholders and increased where there is a known housing need.		
Gender	The proposals do not relate directly to gender. There are no known implications related to gender.	Neutral	Low
Gender Reassignment	The proposals do not relate directly to those undergoing gender reassignment. There are no known implications related to gender reassignment.	Neutral	Low
Marriage and civil partnership	The proposals do not relate directly to marriage and civil partnership. There are no known implications related to marriage and civil partnership.	Neutral	Low
Pregnancy and maternity	The proposals do not relate directly to pregnancy and maternity. There are no known implications related to pregnancy and marriage.	Neutral	Low
Race	The proposals do not relate directly to race. There are no known implications related to race.	Neutral	Low
Religion and belief	The proposals do not relate directly to race. There are no known implications related to race.	Neutral	Low
Sexual orientation	The proposals do not relate directly to sexual orientation. There are no known implications related to sexual orientation.	Neutral	Low
Other Socio-economic groups including :	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		

Carer	The proposals do not relate directly to carers.	Neutral	Low
Low income groups	The proposals benefit low income groups. Affordable housing is more accessible to low income groups.	Positive	High
Veterans, Armed Forces Community	There is a high prevalence of homelessness among this socio-economic group and therefore the increased provision of affordable housing will impact this group.	Positive	Low
Other	None		
Impact on human rights:			
List any human rights impacted.	Promotes rights to housing	Positive	Low

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	<p>Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?</p>
<p>No adverse impacts have been noted above through the analysis however the projects will need to be managed thoroughly to ensure the benefits are realised. Affordability is critical to the delivery of the Council Plan’s objectives and therefore this will need to be monitored closely to ensure that these objectives are delivered.</p>	

Step 6 – Recommendations and conclusions of the assessment

6.1	<p>Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:</p>
<p>- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.</p>	

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
No major change to the proposals	The analysis demonstrates that the proposals are robust with no direct impact to individuals or communities with protected characteristics. However, the Housing Delivery Programme is committed to creating inclusive and welcoming communities and will work collaboratively with stakeholders throughout the design and development process to deliver against objectives and monitor and adjust to any failure to meet these outcomes.

Step 7 – Summary of agreed actions resulting from the assessment

7.1 What action, by whom, will be undertaken as a result of the impact assessment.			
Impact/issue	Action to be taken	Person responsible	Timescale
Good quality affordable housing delivered by RPs	Clear specification for land disposals to RPs to ensure aspirations of the report are realised	Sophie Round	Dec 2024
Engagement	Monitor the proposals for delivery of affordable housing at each RIBA stage	Sophie Round	2025/26

Step 8 - Monitor, review and improve

8. 1	How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?
	Continuous discussion and communication with residents and other stakeholders to identify and issues or improvement. Post occupation surveys to be carried out of new build projects to understand the outcomes for protected characteristic and marginalised groups.