

# Taunton Deane Borough Council

**Executive – 9 October 2013**

## **Taunton Deane Borough Council Planning Obligations Affordable Housing Supplementary Planning Document**

### **Report of the Housing Enabling Lead**

(This matter is the responsibility of Councillor Jean Adkins, Housing Portfolio Holder.)

#### **1. Executive Summary**

The Taunton Deane Core Strategy 2011-2028 was adopted in September 2012. The proposed affordable housing supplementary planning document is intended to provide additional guidance in decision making relating to planning applications that include residential development, where an affordable housing contribution is to be sought.

#### **2. Background**

- 2.1 The purpose of the proposed Supplementary Planning Document (SPD) is to provide greater detail on Policy CP4 Housing in the Council's Core Strategy 2011-2028.
- 2.2 Policy CP4 aims to ensure that affordable housing is provided as part of all development schemes which provide five or more net additional dwellings. The policy states that 25% of all new housing should be in the form of affordable units.
- 2.3 Gypsy and Traveller sites are covered by separate Development Management policy (DM3) within the adopted Core Strategy, therefore this SPD is not applying consideration to Gypsy and Traveller sites.
- 2.4 The Council operates an Affordable Housing Development Partnership which delivers affordable housing in the Borough and the adoption of this supplementary planning document will provide a clear guide for the TDBC affordable housing development partnership to work with.
- 2.5 The Housing Association partners have been informally consulted and have contributed to the formation of this document.
- 2.6 This proposed SPD will be processed through the Statutory Consultation process in line with the Statement of Community Involvement.

- 2.7 As the proposed SPD is intended as additional guidance to the adopted Core Strategy and emerging site allocations document a separate sustainability appraisal has not been deemed as required.
- 2.8 The LDF Steering Group and Strategic Planning Working Group (SPWG) have been also been consulted.

### **3. Taunton Deane Borough Council Planning Obligations Affordable Housing Supplementary Planning Document**

The complete document is appended to this report. A summary of key points are:

- 3.1 Policy CP4 aims to ensure that affordable housing is provided as part of all development schemes which provide five or more net additional dwellings. The policy states that 25% of all new housing should be in the form of affordable units.

#### **3.2 Tenure**

The Council will seek a tenure split of 60% social rented housing and 40% intermediate housing or Affordable Rented on affordable housing provision of 3 affordable dwellings or more.

On schemes yielding 3 or fewer affordable dwellings the Council may seek a partial financial contribution in lieu of housing in order to bring the total overall provision within a development up to the required 25% affordable housing.

All financial contributions will be ring fenced for expenditure to develop affordable housing within the Borough.

#### **3.3 Site Viability**

Policy CP 4 seeks 25% affordable housing provision and states that when assessing proposals, the Council will have regard to the economics of provision.

In instances where applicants claim that full or partial delivery of the affordable housing as required by CP4 is not possible on viability grounds, the Council, through the Housing Enabling Lead, will consider in the first instance a revised tenure split and unit types for the development.

In the event that viability issues cannot be resolved through changes to the tenure and/or unit types, the applicant will be expected to submit a viability statement.

#### **3.4 Off site provision**

In exceptional circumstances, where the Council agrees that affordable housing can be provided off-site, its location will be sought in the following

priority order taking into account local need and site availability:

- Adjacent to the development
- Elsewhere within the Parish (or Taunton urban area in the case of the unparished area)
- Elsewhere in the Borough

It is expected that such off-site provision will accommodate the same number and type of units that would otherwise be required on the application site.

### 3.5 Financial Contribution

The Council will likewise only accept financial contributions in-lieu of on-site provision in exceptional circumstances. In such cases the applicant should set out a detailed statement alongside their application outlining the reason or reasons why on-site provision is not considered to be appropriate.

The Council will use the financial contributions in the following ways:

- Fund the provision of new affordable housing through Registered Providers;
- Purchase land for new affordable housing schemes either directly by the Council or through Registered Providers;
- Fund activities relating to the delivery of affordable housing.

### 3.6 Exception Sites

The Council intends as far as possible to plan for meeting affordable housing needs within or adjacent to rural settlements by identifying and prioritising sites for housing development through the site allocations process.

Within the adopted Core Strategy, Development Management Policy DM2, Development in the Countryside states under point 6. that Affordable Housing will be supported outside of defined settlement limits if

- a. adjoining settlement limits, provided not suitable site is available within the rural centre;
- b. in other locations well related to existing facilities and to meet an identified local need which can not be met in the nearest identified rural centre.

The National Planning Policy Framework recognises that on occasion it may be appropriate to permit the development of affordable homes on sites that would otherwise not be released for housing development, that is 'exception sites'.

The Council will expect these developments to be small scale and should:

- Meet or help to meet a proven and specific local need for affordable housing in the Parish or adjoining rural Parishes, which would not

otherwise be met. Local housing needs will need to be demonstrated via an up to date Parish survey. The cost of the survey is to be borne by the applicant.

- Be within or adjacent to the settlement boundary, well related to existing community services and facilities and sympathetic to the form and character of the village.
- Arrangements will be secured to ensure that initial and subsequent occupancy of the dwellings is restricted first to those having an identified local need for affordable housing through the use of appropriate safeguards, including planning conditions or Section 106 obligations.
- In the event that a small proportion of cross subsidy through open market housing is required to facilitate the provision of the remaining affordable housing to meet an identified local need, this will need to be discussed with the planning officer and housing enabling lead prior to submitting a planning application. A detailed statement, including viability information should be submitted with the planning application.

### 3.7 Design, Quality and Sustainability Standards

Policy CP 4 expects the delivery of mixed, balanced and sustainable communities with affordable housing will be integrated with market housing.

The affordable housing should be built to meet the latest Homes and Communities Agency Design and Quality Standards including the relevant Code for Sustainable Homes level requirement applicable at the date of commencement of the development.

### 3.8 Housing Need

The Council will refer to Housing Needs data held within the Choice Based Lettings System in the first instance.

In the event if further housing needs information is deemed necessary by the Borough's Housing Enabling Lead, the applicant will be expected to provide a local Housing Needs Survey for approval at their own cost.

### 3.9 Local Connection

A local connection clause will be included in Section 106 Agreements in relation to all schemes outside the Taunton and Wellington urban area to ensure that the Parish which is accommodating the development has the priority access to the affordable homes which can contribute towards absorbing the Parish's housing need.

Where a scheme gives rise to a requirement for 25 affordable homes or more on one site a local connection clause is not required

### 3.10 Occupancy

Affordable housing for social rent and Affordable Rent secured through planning obligations will be allocated in accordance with the Choice Based Lettings System, Homefinder Somerset or such other register or scheme that may supersede the Homefinder Somerset Register.

In the first instance, applicants for intermediate housing secured through the planning obligations will be taken from either Homefinder Somerset register or the Homebuy Agent list or such register of list that may supercede.

In exceptional circumstances and in the event of there being no one available on the Homefinder Somerset Register or Homebuy agent list, any person approved in writing by the Housing Enabling Lead (such approval not to be unreasonably withheld)

## 4. Finance Comments

Comments received from Nick Tregenna, Principal Accountant:

There are no financial implications arising from the proposals outlined within the report which will impact directly upon the Council's revenue budget. However, the recommended **Affordable Housing Supplementary Planning Document** would provide the Council with the opportunity to maximise the potential for Affordable Housing through either an allocation within specific developments; or in exceptional circumstances, from funding provided by an applicant to supplement development elsewhere within the Borough.

## 5. Legal Comments

Comments received from Roy Pinney, Legal Services Manager

The proposed SPD reflects the purpose for such documents identified in Annex 2 of the NPPF, which identifies them as "*Documents which add further detail to the policies in the Local Plan*", which "*can be used to provide further guidance for development on...particular issues*". The NPPF specifically states that in the decision making process, a supplementary document is to be regarded as a material planning consideration, but confirms that such documents are not to be regarded as forming part of the development plan.

The process of adoption of Supplementary Planning Documents is regulated by Part 5 of the Town and Country Planning (Local Plans) (England) Regulations 2012, and the post-adoption procedural steps required by these Regulations will need to followed. Any decision by a local planning authority to adopt an SPD will represent a decision of the authority which is technically susceptible to a possible application for permission for judicial review.

## 6. Links to Corporate Aims

The affordable housing supplementary planning document supports the

Councils Business Plan Aim 1: Quality Sustainable Growth and Development and is identified under the 'Affordable Housing' key activity.

## **7. Environmental Implications**

The proposed SPD will require that the affordable housing are built to meet the latest Homes and Communities Agency Design and Quality Standards including the relevant Code for Sustainable Homes level requirement applicable at the date of commencement of the development.

## **8. Community Safety Implications**

The proposed SPD is intended to encourage the delivery of mixed, balanced and sustainable communities with affordable housing being integrated with market housing.

## **9. Equalities Impact**

Evidence taken shows no potential for discrimination specific to protected groups

A full equalities Impact Assessment is provided at appendix 4

## **10. Risk Management**

The key risk for TDBC is not optimising affordable housing delivery to meet the local housing need and maintain high quality, sustainable affordable homes.

## **11. Partnership Implications**

The adoption of the affordable housing SPD would provide a clear guide for the TDBC affordable housing development partnership to work with.

## **12. Recommendations**

The Executive are invited to recommend that it approves the Affordable Housing Supplementary Planning Document for public consultation

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## **Taunton Deane Borough Council Planning Obligations Affordable Housing Supplementary Planning Document**

### **1.1 Introduction**

The purpose of the proposed Supplementary Planning Document (SPD) is to provide greater detail on Policy CP4 Housing in the Council's Core Strategy 2011 - 2028. The guidance within the SPD is intended to be used in decision making relating to planning applications that include residential development, where an affordable housing contribution is to be sought.

Policy CP4 aims to ensure that affordable housing is provided as part of all development schemes which provide five or more net additional dwellings. The policy states that 25% of all new housing should be in the form of affordable units.

The type and size of the affordable housing units to be provided should fully reflect the distribution of property types and sizes in the overall development.

Affordable housing is currently defined in Annex 2 of National Planning Policy Framework. A copy of current definitions is included in *Appendix 1*

### **1.2 Affordable Housing Threshold**

25% of all new housing should be in the form of affordable units. Affordable Housing will be sought on sites of 5 or more net additional dwellings.

Affordable Housing maybe secured via on-site or off-site affordable housing provision, whether provided in-kind or an equivalent financial contribution.

### **1.3 Location**

Where it is provided on site, affordable housing should be located on the same site as and be an integral part of the development. The practicalities of managing and maintaining units will be taken into account when agreeing the appropriate spatial distribution of units on the site.

### **1.4 Tenure**

The Council will seek a tenure split of 60% social rented housing and 40% intermediate housing or Affordable Rented on affordable housing provision of 3 affordable dwellings or more.

This tenure mix was identified in the evidence base which informed the adopted Core Strategy: Fordhams Locally Balanced Housing Projections (2010, 2011)

The 40% can be intermediate housing or Affordable Rented accommodation, in line with the definitions in the NPPF (see appendix 1).

The unit types should reflect the mix of the overall development.

On schemes yielding 3 or fewer affordable dwellings the Council may seek a partial financial contribution in lieu of housing in order to bring the total overall provision within a development up to the required 25% affordable housing.

All financial contributions will be ring fenced for expenditure to develop affordable housing within the Borough.

## **1.5 Affordable Housing Scheme**

Proposals involving affordable housing should be discussed at the earliest opportunity with the Borough's Housing Enabling Lead as part of pre-application discussions.

The affordable housing scheme is to be agreed in writing by the Housing Enabling Lead at the Council.

The scheme must include:-

- The location and layout of the affordable housing
- The mix and anticipated tenure of the affordable housing

The Council is keen to use Planning Performance Agreements (PPA) as a mechanism for managing large scale developments. The approach to affordable housing should be included in any PPA.

## **1.6 Registered Providers**

The Council operates an Affordable Housing Development Partnership which delivers affordable housing in the Borough.

The Council's current list of Approved Partners is included in *appendix 2*.

## **1.7 Site Viability**

Policy CP 4 seeks 25% affordable housing provision and states that when assessing proposals the Council will have regard to the economics of provision.

In instances where applicants claim that full or partial delivery of the affordable housing as required by CP4 is not possible on viability grounds, the Council, through the Housing Enabling Lead, will consider in the first instance a revised tenure split and unit types for the development.

In the event that viability issues cannot be resolved through changes to the tenure and/or unit type, the applicant will be expected to submit a viability



statement. Ideally this should be completed as part of the pre-application process prior to the submission of the planning application.

In such development proposals where the applicant considers that full or part delivery of affordable housing is not possible, the Local Planning Authority will expect the application for planning permission to include detailed calculations and submissions to enable an assessment of viability to be carried out. This will prevent delays to determination or the prospect of refusal of planning permission.

Applicants should ideally have their figures independently assessed using the services of the Council's preferred independent assessor prior to submitting them to the Council. This open book approach will enable any affordable housing contribution to be assessed and agreed prior to the submission of a formal planning application. In this way data which the applicant may regard as commercially sensitive will remain outside the public domain.

Pursuit of this approach by applicants will assist in the efficient consideration of planning applications. The applicant will be expected to meet the costs of the Council's preferred independent assessor.

## **1.8 Off site provision**

In exceptional circumstances, where the Council agrees that affordable housing can be provided off-site, its location will be sought in the following priority order taking into account local need and site availability:

- Adjacent to the development
- Elsewhere within the Parish (or Taunton urban area in the case of the unparished area)
- Elsewhere in the Borough.

It is expected that such off-site provision will accommodate the same number and type of units that would otherwise be required on the application site.

## **1.9 Financial Contribution**

The Council will likewise only accept financial contributions in-lieu of on-site provision in exceptional circumstances. In such cases the applicant should set out a detailed statement alongside their application outlining the reason or reasons why on-site provision is not considered to be appropriate.

Where the Borough Council agrees that a financial contribution in lieu of on-site provision of affordable housing would be acceptable, the contribution will be calculated through the Taunton Deane Borough Council Financial Contribution Calculator system.

The Council will use the financial contributions in the following ways:

- Fund the provision of new affordable housing through Registered

- Providers;
- Purchase land for new affordable housing schemes either directly by the Council or through Registered Providers;
  - Fund activities relating to the delivery of affordable housing.

### **1.10 Exception Sites**

The Council intends as far as possible to plan for meeting affordable housing needs within or adjacent to rural settlements by identifying and prioritising sites for housing development through the site allocations process.

Within the adopted Core Strategy, Development Management Policy DM2, Development in the Countryside states under point 6. that Affordable Housing will be supported outside of defined settlement limits if

- a. adjoining settlement limits, provided not suitable site is available within the rural centre;
- b. in other locations well related to existing facilities and to meet an identified local need which can not be met in the nearest identified rural centre.

The National Planning Policy Framework recognises that on occasion it may be appropriate to permit the development of affordable homes on sites that would otherwise not be released for housing development, that is 'exception sites'.

The Council will expect these developments to be small scale and should:

- Meet or help to meet a proven and specific local need for affordable housing in the Parish or adjoining rural Parishes, which would not otherwise be met. Local housing needs will need to be demonstrated via an up to date Parish survey. The cost of the survey is to be borne by the applicant.
- Be within or adjacent to the settlement boundary, well related to existing community services and facilities and sympathetic to the form and character of the village.
- Arrangements will be secured to ensure that initial and subsequent occupancy of the dwellings is restricted first to those having an identified local need for affordable housing through the use of appropriate safeguards, including planning conditions or Section 106 obligations.
- In the event that a small proportion of cross subsidy through open market housing is required to facilitate the provision of the remaining affordable housing to meet an identified local need, this will need to be discussed with the planning officer and housing enabling lead prior to submitting a planning application. A detailed statement, including viability information should be submitted with the planning application.

### **1.11 Design, Quality and Sustainability Standards**

Policy CP 4 expects the delivery of mixed, balanced and sustainable communities with affordable housing will be integrated with market housing.

In order to achieve a successful development the affordable housing should not be visually distinguishable from the market housing on site in terms of build quality, materials, architectural details, levels of amenity space, parking provision and privacy. It should be fully integrated with the market housing and distributed across the site or in clusters distributed throughout the development.

The affordable housing should be built to meet the latest Homes and Communities Agency Design and Quality Standards including the relevant Code for Sustainable Homes level requirement applicable at the date of commencement of the development. These Standards can be viewed on the Homes and Communities Agency website (<http://www.homesandcommunities.co.uk/>) or such Standards which may supersede.

Developers are strongly advised to consult with the Council's Registered Provider Partners at an early stage to ensure that the design of affordable housing units will meet these Standards.

### **1.12 Delivery – Phasing**

The Council will expect timely delivery of the affordable housing element of implemented schemes.

Where ever possible developers should ensure that they are in contract with an approved registered provider prior to commencement of the development on site.

### **1.13 Service Charge**

Any service charges applicable to affordable housing are to be agreed with the Registered Provider at the earliest opportunity.

If in the course of the negotiations it is deemed by the Registered Provider that the proposed service charge is unaffordable, the developer should then liaise with the Borough's Housing Enabling Lead to resolve this matter.

### **1.14 Specialist residential development**

The requirement for affordable housing as set out in CP4 extends to all types of residential development including retirement flats. A retirement flat comes within the same use class as residential (class C3) and is therefore subject to the same policy requirement to provide 25% affordable housing on schemes of five or more net additional dwellings

Care homes, residential and nursing homes (class C2) that do not provide individual units of self contained accommodation are not required to provide affordable housing.

For example, developments of student accommodation, in which the units are not self contained (where each unit shares a kitchen or bathroom), will not be expected to include provision for affordable housing. Where student accommodation units are self contained, they will be treated in the same way as general needs housing and the developer will be expected to provide 25% affordable housing.

Within schemes which include 25 units or more affordable housing provision, the Council will seek a 10% provision of fully adapted disabled units within the affordable housing. These homes should comply with a recognised and approved wheelchair design guide.

### **1.15 Housing Need**

The Council will refer to Housing Needs data held within the Choice Based Lettings System in the first instance.

In the event if further housing needs information is deemed necessary by the Borough's Housing Enabling Lead, the applicant will be expected to provide a local Housing Needs Survey for approval at their own cost.

Housing Needs Surveys should be undertaken through close liaison with the Parish Council and Housing Enabling Lead and should be of a standard to provide robust evidence.

### **1.16 Local Connection**

A local connection clause will be included in S106 agreements in relation to all schemes outside the Taunton and Wellington urban area to ensure that the Parish which is accommodating the development has priority access to the affordable homes which can contribute towards absorbing the Parish's housing need.

Where a scheme gives rise to a requirement for 25 affordable homes or more on one site a local connection clause is not required.

Maps of the Taunton and Wellington urban areas are available in **appendix 3**.

### **1.17 Occupancy**

Affordable housing for social rent and Affordable Rent secured through planning obligations will be allocated in accordance with the Choice Based Lettings System, Homefinder Somerset or such other register or scheme that may supersede the Homefinder Somerset Register.

Homefinder Somerset is the housing register of persons who have registered for and require affordable housing in the County of Somerset. It is jointly maintained by the five local authorities of Somerset being Taunton Deane Borough Council, Sedgemoor District Council, South Somerset District Council, Mendip District Council and West Somerset Council and can be found at <http://www.homefindersomerset.co.uk/>.

In the first instance, applicants for intermediate housing secured through the planning obligations will be taken from either Homefinder Somerset register or the Homebuy Agent list or such register of list that may supercede.

The Homebuy agent list is a list of applicants who are assessed as eligible to acquire Intermediate Housing properties from the relevant Registered Provider of Affordable Housing. It is compiled and maintained by the regional agent for the South West of England appointed by the Homes and Communities Agency .

In exceptional circumstances and in the event of there being no one available on the Homefinder Somerset Register or Homebuy agent list, any person approved in writing by the Housing Enabling Lead (such approval not to be unreasonably withheld).

## Appendix 1 – Affordable Housing SPD

### Annex 2 – National Planning Policy Framework – March 2012

#### Affordable housing

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

**Social rented** housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

**Affordable rented** housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

**Intermediate housing** is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.

## Appendix 2 – Affordable Housing SPD

### Affordable Housing Registered Providers

#### Main Registered Provider Partners.

This is the primary level of the Partnership and the preferred developers of affordable housing in the Borough

- ***Curo (formerly Somer and Redland Housing)***

[www.curo-group.co.uk](http://www.curo-group.co.uk)

email: [enquiries@curo-group.co.uk](mailto:enquiries@curo-group.co.uk)

- ***DCH (formerly Devon and Cornwall Housing)***

[www.dchgroup.com](http://www.dchgroup.com)

- ***Knightstone Housing Association***

[www.knightstone.co.uk](http://www.knightstone.co.uk)

email: [talktous@knightstone.co.uk](mailto:talktous@knightstone.co.uk)

- ***Magna West Somerset***

[www.magnaws.org.uk](http://www.magnaws.org.uk)

email: [westsom@magna.org.uk](mailto:westsom@magna.org.uk)

- ***Yarlington Housing Group***

[www.yhg.co.uk](http://www.yhg.co.uk)

email: [first@yhg.co.uk](mailto:first@yhg.co.uk)

## Approved Development Partners

This is the secondary level of the Partnership for registered providers which have been vetted by the local authority

- ***Aster Group***

[www.aster.org.uk](http://www.aster.org.uk)

email: [info@aster.co.uk](mailto:info@aster.co.uk)

- ***Raglan Housing***

[www.raglan.org](http://www.raglan.org)

email: [development@raglan.org](mailto:development@raglan.org)

- ***SHAL Housing***

[www.shal.org](http://www.shal.org)

email: [information@shal.org](mailto:information@shal.org)

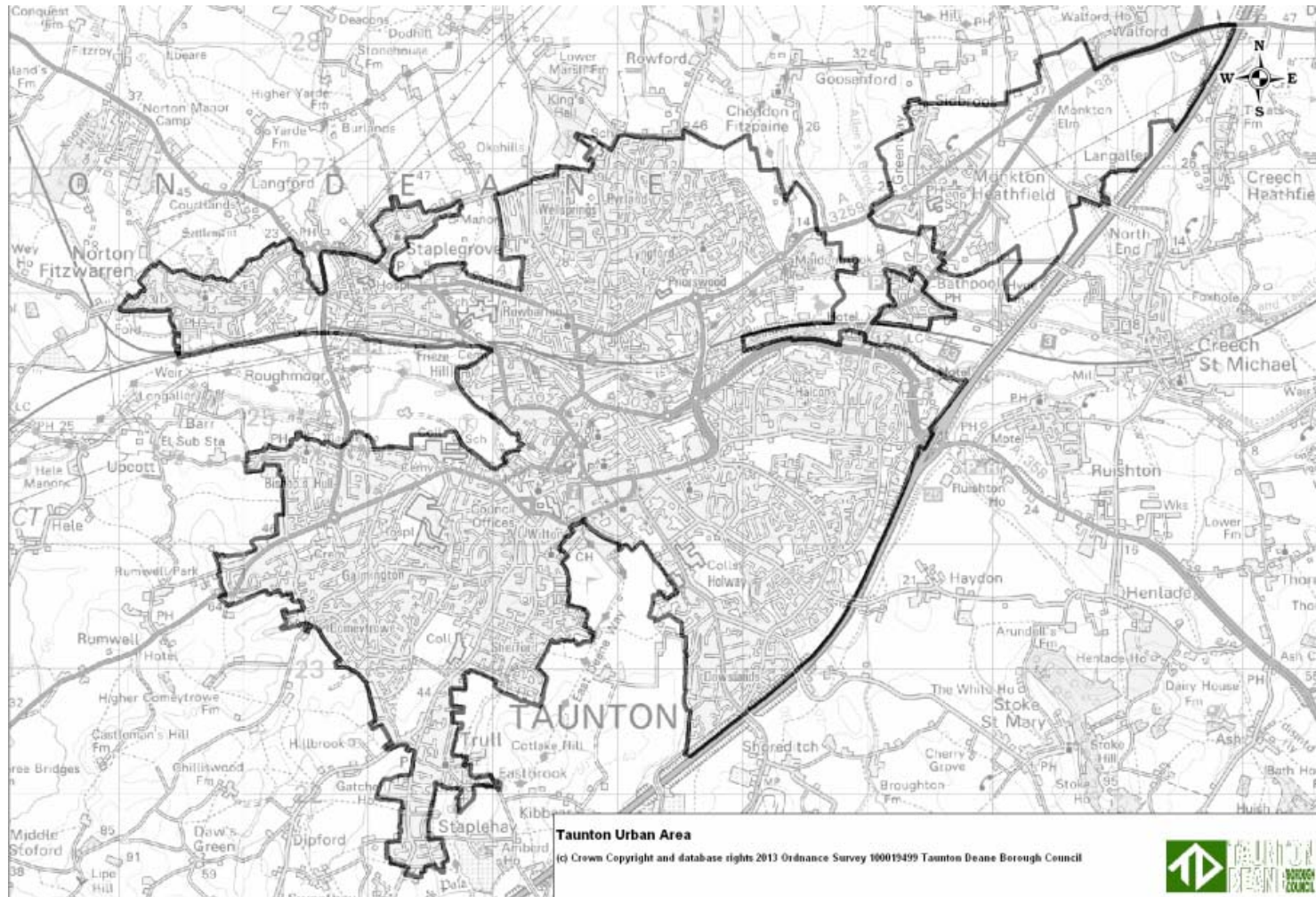
- ***Sanctuary Housing***

[www.sanctuary-group.co.uk](http://www.sanctuary-group.co.uk)

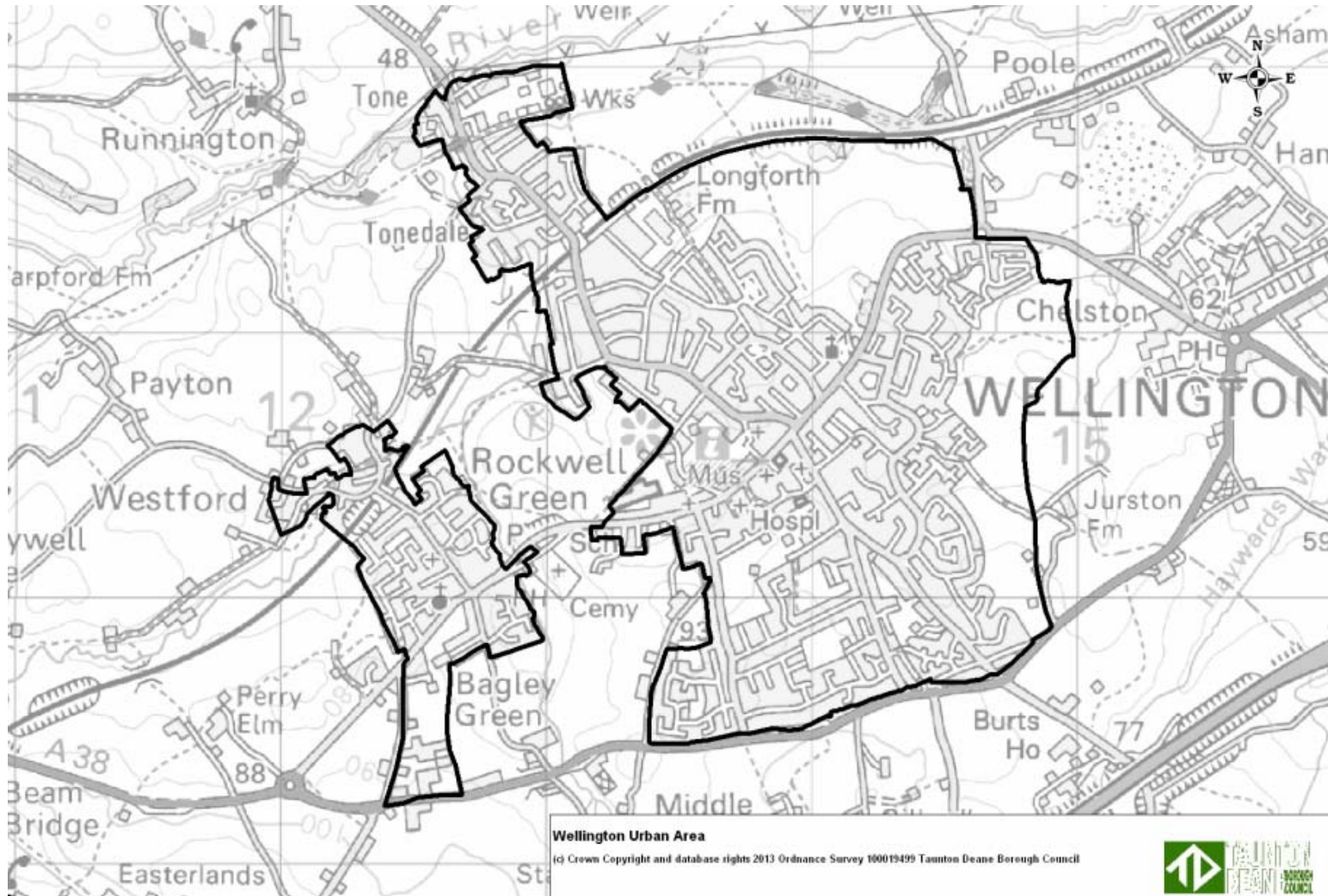
email: [contactus@sanctuary-housing.co.uk](mailto:contactus@sanctuary-housing.co.uk)



## Appendix 3 – Affordable Housing SPD Taunton Urban Area



## Wellington Urban Area



## Appendix 4 - Affordable Housing SPD

### Equality Impact Assessment – pro-forma

<b>Responsible person</b>	Jo Humble	<b>Job Title</b> Housing Enabling Lead
<b>Why are you completing the Equality Impact Assessment? (Please mark as appropriate)</b>	Proposed new policy/service	X
	Change to Policy/service	
	Budget/Financial decision – MTFP	
	Part of timetable	
<b>What are you completing the Equality Impact Assessment on (which, service, MTFP proposal)</b>	<b>Proposed adoption of Affordable Housing Supplementary Planning Document</b>	
<b>Section One – Scope of the assessment</b>		
What are the main purposes/aims of the policy/decision/service?	To provide guidance to be used in decision making relating to residential planning applications, where an affordable housing contribution is to be sought.	
Which protected groups are targeted by the policy/decision/service?	The policy is to facilitate the delivery of affordable housing in the Borough to those identified in housing need. It is not specific to a 'protected group'.	
What evidence has been used in the assessment - data, engagement undertaken – please list each source that has been used The information can be found on....	Homefinder Somerset Equality impact assessment TDBC Core Strategy Equality impact assessment Homes and Communities Agency equality objectives 2012-2015  Consultations for this report included the Housing Association partners, TDBC LDF Steering Group and Strategic Planning Working Group.	
<b>Section two – Conclusion drawn about the impact of service/policy/function/change on different groups highlighting negative impact, unequal outcomes or missed opportunities for promoting equality</b>		
Lettings will be taken from the choice based lettings system 'Homefinder Somerset' and potential purchasers will be registered through the Homebuy Agent, South West Homes. Both agencies have equality and diversity policies in place to ensure protected groups are		

not disadvantaged. Affordable homes should be built to the Homes and Communities Agency Design and Quality standards which gives consideration to equality.

Age – Provision is made within affordable housing development for all age groups, including specialist accommodation for younger and older persons.

Gender – no specific policy or mention in the text because no general inequalities were identified or known about to show disadvantage.

Sexual orientation - no specific policy or mention in the text because no general inequalities were identified or known about to show disadvantage.

Gender reassignment - no specific policy or mention in the text because no general inequalities were identified or known about to show disadvantage.

Pregnancy and maternity - no specific policy or mention in the text because no general inequalities were identified or known about to show disadvantage.

Religion /Belief - no specific policy or mention in the text because no general inequalities were identified or known about to show disadvantage.

Disability – Provision for disabled accommodation has been made within the policy to prevent disadvantage.

Race – Gypsy and Traveller sites are covered by separate Development Management policy (DM3) within the adopted Core Strategy, therefore this SPD is not applying consideration to Gypsy and Traveller sites.

<b>I have concluded that there is/should be:</b>	
No major change - no adverse equality impact identified	Evidence taken shows no potential for discrimination specific to protected groups
Adjust the policy/decision/service	
Continue with the policy/decision/service	
Stop and remove the policy/decision/service	
Reasons and documentation to support conclusions	
<b>Section four – Implementation – timescale for implementation</b>	
<b>Section Five – Sign off</b>	
Responsible officer Date	Management Team Date
<b>Section six – Publication and monitoring</b>	
Published on	
Next review date	Date logged on Covalent

### Action Planning

The table should be completed with all actions identified to mitigate the effects concluded.

<b>Actions table</b>						
<b>Service area</b>				<b>Date</b>		
<b>Identified issue drawn from your conclusions</b>	<b>Actions needed</b>	<b>Who is responsible?</b>	<b>By when?</b>	<b>How will this be monitored?</b>	<b>Expected outcomes from carrying out actions</b>	