

Equalities Comprehensive Impact Assessment - Head of service review

Reference: ECIA483309746

Submitted: 16 February 2023 13:50 PM

Executive summary

Title of policy / decision: Essex Housing - Annual Delivery Plan 2022/23

Policy / decision type: Cabinet Decision

Overview of policy / decision: In July 2020, ECC Cabinet agreed to the establishment of a limited liability partnership, Essex Housing Development LLP ((FP-692-05-20) Essex Housing Optimisation Project) to carry out development activity. A five-year Business Plan was approved by Cabinet to outline the LLP's long-term objectives. This set out the blueprint to deliver an ambitious development programme, by building upon the work to date of the existing Essex Housing model. A commitment was made to bring an Annual Delivery Plan back to Cabinet each year and this decision seeks to:

- Agree the Essex Housing Annual Delivery Plan 2023/24
- Note that that further formal decisions will need to be taken for each site for development, financing, and land disposal to Essex Housing Development LLP for 2023/24

What outcome(s) are you hoping to achieve?: The delivery of the Annual Delivery Plan will link to the following strategic aims of ECC:

- To enable inclusive economic growth
- To help people get the best start and age well
- To help create great places to grow up, live and work
- To transform the council to achieve more with less

Executive Director responsible for policy / decision: Tom Walker (Economy, Investment and Public Health)

Cabinet Member responsible for policy / decision: Lesley Wagland (Economic Renewal, Infrastructure and Planning)

Is this a new policy / decision or a change to an existing one?: New policy / decision

How will the impact of the policy / decision be monitored and evaluated?: The operation of Essex Housing is overseen by the Essex Housing Board. The Board is responsible for:

- Owning the Essex Housing Business Plan
- Recommending investment decisions to ECC
- Performance management/monitoring
- Overseeing the operation of the LLP
- Reporting to the Shareholder Leads and Cabinet Member

ECC and Seax Trading are invited to (and ECC attends) Board meetings as observers through shareholder leads (Cllr Lesley Wagland and Ben Finlayson). The Board meets circa monthly and also has informal meetings in between Board meetings.

In addition to this, the following further governance measures are in place:

- ECC retains control over the LLP and limits it's authority by retaining various Reserved Matters. E.g. ECC

approval of decisions with implications over £2m, business plans and new funding requirements.

- Essex Housing attends the Annual Shareholder meeting held with all ECC companies.

An internal audit was undertaken (signed off in April 2022) to evaluate the control design and test the operating effectiveness of key controls around Essex Housing. This audit gave 'Satisfactory Assurance'.

From September 2022, Essex Housing has been working with Legal and Assurance to undertake the Local Authority company governance review framework developed by Local Partnerships.

Will this policy / decision impact on:

Service users: Yes

Employees: Yes

Wider community or groups of people: Yes

What strategic priorities will this policy / decision support?: Strong, Inclusive and Sustainable Economy, High Quality Environment, Health, Independence and Wellbeing for All Ages, A good place for Children and Families to Grow

Which strategic priorities does this support? - Economy?: Good jobs, Infrastructure, Future growth and investment, Green growth, Levelling up the economy

Which strategic priorities does this support? - Environment: Net zero, Transport and built environment, Green communities, Levelling up the environment

Which strategic priorities does this support? - Health: Healthy lifestyles, Promoting independence, Carers, Levelling up health

Which strategic priorities does this support? - Families: Family resilience and stability, Levelling up outcomes for families

What geographical areas of Essex will the policy / decision affect?: All Essex

Digital accessibility

Is the new or revised policy linked to a digital service (website, system or application)?: No

Equalities - Groups with protected characteristics

Age

Nature of impact: Positive

Extent of impact: Low

Disability - learning disability

Nature of impact: Positive

Extent of impact: Low

Disability - mental health issues

Nature of impact: None

Disability - physical impairment

Nature of impact: Positive

Extent of impact: Low

Disability - sensory impairment

Nature of impact: Positive

Extent of impact: Low

Sex

Nature of impact: None

Gender reassignment

Nature of impact: None

Marriage / civil partnership

Nature of impact: None

Pregnancy / maternity

Nature of impact: None

Race

Nature of impact: None

Religion / belief

Nature of impact: None

Sexual orientation

Nature of impact: None

Rationale for assessment, including data used to assess the impact: Age Positive - Essex Housing resource supports delivery some 'Independent Living Older People schemes' – The LLP will seek to secure planning permission on schemes and ECC would then seek to appoint a Developer/provider to deliver.

Disability – learning disability Positive - Essex Housing develops Specialist Housing for residents with learning disabilities within its annual delivery plan.

Affordable Housing - Essex Housing through delivery of it's annual delivery plan will construct housing that will be sold to a registered provider as affordable housing. Housing allocations are dealt with by the Local Housing Authority for each area and Essex County Council and Essex Housing have no authority or influence in the prioritisation of housing allocations. Housing Authorities have an obligation to ensure that they do not unlawfully discriminate against a person on the basis of their protected characteristic (disability, race, religion or belief, pregnancy or maternity, gender, gender reassignment and sexual orientation. The Equality Act also imposes obligations on those concerned with the provision of services to the public or to a section of the public, whether in the private, public, or voluntary sectors. This covers schemes for allocation of social housing. A Policy Briefing produced by Joseph Rowntree in 2021 'What's causing structural racism in housing?' highlighted structural racism in the housing system for BAME communities: "BAME communities are more likely to work in lower-paid jobs in sectors with less secure contracts and spend a higher proportion of their incomes on housing. Social

security policies like the benefit cap have a disproportionate impact on BAME groups, leading to shortfalls in income needed to pay housing costs. Further, people with temporary migration status, a disproportionate number of them BAME, are barred from accessing social housing." While this decision has no direct impact or bearing on the allocations policy of local housing authorities, it should be borne in mind that as an indirect consequence of building affordable housing that any structural inequalities within the social housing sector may impact those that ultimately access housing that is built following sale to a registered provider and the nominations process undertaken by the housing authority.

What actions have already been taken to mitigate any negative impacts: n/a

Levelling up - Priority areas & cohorts

Children and adults with SEND, learning disabilities or mental health conditions (taking an all-age approach)

Nature of impact: Positive

Extent of impact: Medium

Children on Free School Meals

Nature of impact: None

Working families

Nature of impact: Positive

Extent of impact: Low

Young adults (16-25 who have not been in education, training or employment for around 6-12 months)

Nature of impact: Positive

Extent of impact: Low

Harlow

Nature of impact: Positive

Extent of impact: Low

Jaywick and Clacton

Nature of impact: None

Harwich

Nature of impact: None

Basildon (Town) housing estates

Nature of impact: None

Canvey Island

Nature of impact: None

Colchester (Town) - Housing Estates

Nature of impact: Positive

Extent of impact: Low

Rural North of the Braintree District

Nature of impact: None

Rationale for assessment, including data used to assess the impact: Children and adults with SEND, LD or MH – Essex Housing promotes the wellbeing of some of our most vulnerable residents by creating homes that enable them to live independently. The programme includes housing that will improve outcomes for Adults with Learning Disabilities, with further work on other priority areas ongoing. The scheme at Shernbroke will deliver 10 units for Adults with Learning Disabilities to support them to live independently and improve their outcomes. Over the course of our programme, Essex Housing will deliver a significant programme of housing delivery for the provision of these cohorts as set out in the Annual Delivery Plan. Further schemes are also being identified and a statement of need that has been provided by ECC social care colleagues will underpin the development of new pipeline sites.

Working Families – Investment in housing in Essex supports the economy by creating new jobs and working with local contractors. Essex Housing will also provide good quality housing in an appropriate mix of type and tenure. This decision will create a sizable number of jobs and opportunities for working people and businesses in Essex as well as good quality housing for working families which is significant in relation to the investment. This has been classified as medium, rather than high, as this decision is related to delivery of the Essex Housing programme only and does not impact on broader strategic intervention to stimulate the local economy and support working families across the County.

Young Adults 16-25 – The Essex Housing construction procurement approach prioritises bidders that provide apprenticeships and skills and training opportunities on site. We have also provided good quality housing for young adults in this cohort which is complemented with a broader care, education and employment package and will look to provide more of these types of schemes based on need. Previously identified apprenticeship and skills and training opportunities are limited only to Essex Housing schemes. While this is a significant impact in relation to our programme, this decision will not impact on broader opportunities outside of the Essex Housing programme.

Harlow and Colchester – Our programme is pan Essex but we have schemes identified in the Annual Delivery Plan in both of these localities. The next schemes to be in construction in these localities are Purford Green (Harlow) and Essex County Hospital (Colchester). Both of these sites not only provide good quality housing but regenerate vacant sites in key localities. Other schemes in these two localities are also being progressed. While the schemes that we deliver will have a high impact on the immediate areas that they are based in, this is quite focused around particular sites and therefore the overall impact on the entire population of these towns is low.

What actions have already been taken to mitigate any negative impacts: n/a

Equalities - Inclusion health groups and other priority groups

Refugees / asylum seekers

Nature of impact: None

Homeless / rough sleepers

Nature of impact: None

Offenders / ex-offenders

Nature of impact: None

Carers

Nature of impact: None

Looked after children

Nature of impact: None

Veterans

Nature of impact: None

People who are unemployed / economically inactive

Nature of impact: Positive

Extent of impact: Low

People on low income

Nature of impact: Positive

Extent of impact: Low

Working families

Nature of impact: Positive

Extent of impact: Low

Rationale for assessment, including data used to assess the impact: People who are unemployed/ economically inactive - Investment in housing in Essex supports the economy by creating new jobs. The Essex Housing construction procurement approach prioritises bidders that provide apprenticeships and skills and training opportunities on site. We have also provided good quality housing for young adults in this cohort which is complemented with a broader care, education and employment package and will look to provide more of these types of schemes based on need. Significant investment will be made through the Essex Housing programme into both of these areas as above. This has been classified as medium rather than high as the decision relates only to the Essex Housing programme, rather than the suite of broader strategic interventions that will have a high impact on these categories.

People on low income – A focus on investing in skills development and training will provide more opportunities for residents to improve their skills and therefore employability. Essex Housing will also meet all of its affordable housing requirements as part of planning compliance on each scheme.

Looked after children – Essex Housing is working with ECC colleagues to identify potential new projects to support looked after children. The extent of work required from Essex Housing has not yet been scoped and no projects with Essex Housing have been identified yet. Should a project be identified this would need to be reconsidered.

What actions have already been taken to mitigate any negative impacts: n/a

Equalities - Geographical Groups

People living in areas of high deprivation

Nature of impact: Positive

Extent of impact: Low

People living in rural or isolated areas

Nature of impact: None

People living in coastal areas

Nature of impact: None

People living in urban or over-populated areas

Nature of impact: Positive

Extent of impact: Low

Rationale for assessment, including data used to assess the impact: The overall Essex Housing programme has a significant role to play in place shaping and regenerating areas of intervention. The impact is restricted currently to only those parts of the county that Essex Housing has live schemes in and therefore the impact will grow as the programme and pipeline of projects does.

What actions have already been taken to mitigate any negative impacts: n/a

Families

Family formation (e.g. to become or live as a couple, the ability to live with or apart from children)

Nature of impact: None

Families going through key transitions e.g. becoming parents, getting married, fostering or adopting, bereavement, redundancy, new caring responsibilities, onset of a long-term health condition

Nature of impact: None

Family members' ability to play a full role in family life, including with respect to parenting and other caring responsibilities

Nature of impact: None

Families before, during and after couple separation

Nature of impact: None

Families most at risk of deterioration of relationship quality and breakdown

Nature of impact: None

Rationale for assessment, including data used to assess the impact: n/a

What actions have already been taken to mitigate any negative impacts: n/a

Climate

Does your decision / policy involve elements connected to the built environment / energy?: Yes

Do you know what products, materials, and qualified built environment professionals you will be using?

Are you maximising the opportunity to source materials locally and maximise use of sustainable materials such as wood?: Yes

Are you using a qualified architect / design team / consultant with the experience and capability to design and secure planning permission to deliver to the highest carbon zero building standards?: Yes

Are you clear that the builder, sub-contractor is qualified and capable of delivering climate resilient buildings (noting risks including subsidence, flooding, overheating), to the highest net zero carbon build quality?: Yes

Is your proposed development / building using the best practice guidance and advice on design quality, climate change and health?

Are you using the design quality and advice provided by the Essex Design Guide?: Yes

Are you using the Climate Change guidance and advice provide by the Essex Design Guide?: Yes

Are you providing a policy compliant development which accords with the District Local Plan policies?: Yes

Are using the Health and Wellbeing guidance provided by the Essex Design Guide?: Yes

Have you provided a costed net zero option for consideration?: Yes

Is your proposed development / building as efficient as possible?

Is the Energy performance Certificate (EPC) rating of the achieving and EPC A+ or net zero carbon standard?: Yes

Have opportunities to reduce energy use through the use of smart digital systems been considered?: Yes

Does your development by design avoid the need for air conditioning?: Yes

Does your new development have water efficiency measures in place?: Yes

Do you know where your energy is coming from and how much of it comes from renewable sources?

Are you maximising opportunities to use onsite renewable energy (e.g. roof top solar panels) to deliver this service?: Yes

Are you maximising opportunities to use onsite renewable energy (e.g. roof top solar panels) to deliver this service?: Yes

Is your new or extended development using a renewable heat source e.g. district heating or a form of heat pump?: Yes

Is your development resilient to climate risks including flooding, overheating and subsidence?

Is your site at risk of coastal erosion? Is there a plan in place to protect the coastline: if the coastline is being allowed to erode, this may impact the lifetime of your site.: No

Have you reviewed environment agency to ascertain your flood risk? Do you need to put in place

mitigation such as sustainable drainage?: Yes

Water is scarce and needs to be absorbed into the land wherever possible. Are you prioritising nature based flood risk mitigations such as sustainable drainage, water butts, planting and ponds which protect against water scarcity?: Yes

Are you using external planting, green walls and green roofs to insulate the building and provide shading to cut risks of overheating?: Yes

Is your development supporting active travel and minimising pollution?

Does your site allow connection to key public transport and active travel routes?: Yes

Are you using Green Infrastructure to interrupt the pathway of carborne pollutants to the public e.g. use of hedges, shrubs and trees?: Yes

Have you provided space for secure cycle parking, showering, cycle and walking pathways on site etc?:
Yes

Does the building have adequate space for recycling and waste separation?: Yes

Does your decision / policy involve designing service provision and procurement to minimise freight and staff travel and enable use of active and public transport options?: Yes

Where are staff coming from and how they are travelling? Using local staff to reduce travel needs, use sustainable modes of travel to get to sites. Where car journey are essential, can staff be incentivised to car share?: Each scheme has a travel and access plan to reduce movements through densely populated areas. Local supply chains are used wherever possible.

Are you specifying electric cars?: No

Are you specifying transition to low emission vehicles for heavier vehicles as these become available?:
No

Does your decision / policy involve elements connected to waste?: No

Nature of impact

Built Environment / Energy: Positive

Sustainable Transport / Travel: Positive

Extent of impact

Built Environment / Energy: Low

Sustainable Transport / Travel: Low

Rationale for assessment, including data used to assess the impact: Built Environment/Energy – This decision benefits the built environment by developing in a sensitive way and including sustainable measures on sites such as EV charging, solar panels, heat pumps as well as a scheme of net zero homes. Essex Housing also seek to achieve biodiversity net gain and provide good quality public open space for residents to obtain the benefits of being outdoors.

Sustainable Travel – Essex Housing provides EV car charging points across it's development. The design process takes into account local transport links to ensure connectivity with local bus and train terminals. Site permeability and linkage to footpaths and cycling routes are also considered as part of the design process and cycle shelters are provided on each private housing scheme.

What actions have already been taken to mitigate any negative impacts: n/a

Action plan to address and monitor adverse impacts

Does your ECIA indicate that the policy or decision would have a medium or high adverse impact on one or more of the groups / areas identified?: No

Details of person completing the form

I confirm that this has been completed based on the best information available and in following ECC guidance: I confirm that this has been completed based on the best information available and in following ECC guidance

Date ECIA completed: 16/02/2023

Name of person completing the ECIA: Dan Taylor

Email address of person completing the ECIA: daniel.taylor@essex-housing.co.uk

Your function: Economy, Investment and Public Health

Your service area: Essex Housing

Your team: Essex Housing

Are you submitting this ECIA on behalf of another function, service area or team?: No

Email address of Head of Service: gwyn.owen@essex-housing.co.uk