APPENDIX 3

Southwark southwark.gov.uk

Equality Impact and Needs Analysis

Affordable Housing Supplementary Planning Document (SPD)

Section 1: Equality impact and needs analysis details

Proposed	
policy/decision/business plan to	Affordable Housing Supplementary
which this equality analysis	Planning Document
relates	

Equality analysis author	Eden Hall and Nicolette Harriott		
Strategic Director:	Clive Palfreymar	Clive Palfreyman	
Department	Planning Policy	Division	Planning and Growth
Period analysis undertaken	June 2025	June 2025	
Date of review (if applicable)	June 2025		
Sign- off	Position	Dat	e

Section 2: Brief description of policy/decision/business plan

2.1 Brief description of policy/decision/business plan

The purpose of the SPD is to set out the council's approach to delivering affordable housing. This is a key objective of the Southwark Plan 2022, outlined in strategic policy SP1 'Homes for all'.

The guidance in this SPD is relevant to all housing development (including new build, change of use, conversions and extensions) with a policy requirement for affordable housing. It provides detailed guidance about how decisions on planning applications will be made.

This SPD provides further guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration in determining a planning application.

The SPD has the following objectives:

- Support the implementation of Southwark Plan 2022 strategic policy SP1 'Homes for all'
- Provide clear definitions of what is considered affordable housing
- Set out the hierarchy for the delivery of affordable housing, including for small sites and non-conventional housing
- Set out the Council's approach to assessing viability during the determination of planning application and in viability reviews
- Set out the expectations for the design and management of affordable housing
- Set out monitoring arrangements to retain affordable housing

3.1 Service users and stakeholders		
Key users of the department or service	Externally, the key users of the SPD will be for developers and other individuals applying for planning permission. Other users may include registered providers, planning agents, architects or those working in housing development. Internally, the SPD will be used by planning officers to assess planning applications.	
Key stakeholders were/are involved in this policy/decision/business plan	The SPD was prepared and developed by the planning division with input from officers in planning policy and development management and other council departments. The SPD has been reviewed by the Cabinet member for New Homes and Sustainable Development and will be taken to the Council's Cabinet on the 18th July 2024 to agree the SPD for public consultation. Members of the public will be able to give comments on the SPD at the consultation stage.	

Section 3: Overview of service users and key stakeholders consulted

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio- economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

- 1. Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under-represented groups
- 3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values that we will:

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)Affordable housing deliveryThis SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the noeds of residents including for social rented and intermediate homes.The guidance in this SPD will have beneficial socio-economic impacts on residents including for social rented housing of residents including for social rented housing on-site unless off-site provision or an appropriate financial contributions in lieu can be robustly justified. The expectation is also set out for securing affordable housing delivery for mon-conventional housing such as the payment in lieu.Social rented homes are vital to social regeneration as it allows residents who cannot afford market housing to remain close to their families, friends and employment.The SPD further sets out the expectation of affordable housing delivery for anon-conventional housing such as the borough as the guidance generall promotes the on-site provision of genuinely affordable housing and will ensure a wide range of homes are delivered taffordable housing and will ensure a wide range of homes are delivered to meet different needs.This sublenefit to children that different to be concentrated. Child poverty rates are particularly high in overcrowded homes also often achieve poorly at school and suffer disturbed sleep.
This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented needs. The sequenciation of affordable housing and in particular social rented homes. Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing delivery for scritibutions from small sites through payment in lieu. The SPD further sets out the expectation of affordable housing delivery for mon-conventional housing such as Purpose-built Student Accommodation (PBSA) and Houses in Multiple Occupation the borough as the guidance generally promotes the on-site provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.
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	The guidance supports the provision of affordable housing in the borough which can help young adults and families who cannot afford market cost to enter the housing market or secure stable rental options.
Assessing viability during the determination of planning applications and in viability reviews	
This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews). This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development. This will benefit residents of all ages in the borough as it will allow for a continued provision of affordable homes or financial contributions towards affordable housing	This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite. This will have beneficial socio- economic impacts on residents of all ages in the borough as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.
delivery. Expectations for design and management of affordable housing	
This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable and high quality to those who occupy them. This includes ways of using design and management to minimise future repair costs as well as recommendations to keep service charges affordable.	This SPD provides guidance on ensuring affordable homes are also affordable and of the highest quality once occupied, as stated opposite. This will have beneficial socio- economic impacts on residents of all ages in the borough.
This will benefit residents of all ages in the borough.	

Monitoring requirements to retain affordable housing	
This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete. This guidance will support the council in monitoring the provision of affordable	This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite. This will have beneficial socio- economic impacts on residents of all ages in the borough.
housing and enforcing against developers who breach legal agreements.	
This will benefit residents of all ages as it will help the retention of affordable housing in the borough.	
Equality information on which above analysis is based	Socio-Economic data on which above analysis is based
General data	
The median age in Southwark is 33, which is below that of London as a whole (35). (Source: How life has changed in Southwark: Census 2021 (ons.gov.uk)). Southwark has an ageing population. Between 2011 and 2021, the proportion of Southwark residents aged 0-9 fell from 12.6% to 10.5%, while the	children aged 0-15 in Southwark were living in poverty, after housing costs were factored in, equating to 36% of children in the borough. This is higher than the London average of 33%. (Source: JSNA Annual Report - Southwark Council).
The median age in Southwark is 33, which is below that of London as a whole (35). (Source: How life has changed in Southwark: Census 2021 (ons.gov.uk)). Southwark has an ageing population. Between 2011 and 2021, the proportion of Southwark residents aged	children aged 0-15 in Southwark were living in poverty, after housing costs were factored in, equating to 36% of children in the borough. This is higher than the London average of 33%. (Source: JSNA Annual Report -

Home or freehold ownership	
Home or freehold ownership	
In 2019, only 5% of households in London headed by someone aged 16-24 owned their own home. By contrast, home ownership rates for householders headed by someone aged 45+ are over 50%. (Housing in London 2020). Leasehold households generally have younger household reference persons (HRPs) than non-leasehold households. In the England Housing Survey 2021-2022, there was a significantly higher proportion of 25–34-year-olds in leasehold households in the owner-occupied sector (14%) than in non-leasehold households overall (8%). (English Housing Survey 2021 to 2022: leasehold households - GOV.UK (www.gov.uk)).	Within London, owner occupiers with mortgages are significantly under- represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Source: GLA - <u>Housing in London 2020).</u>
Housing need	
In Southwark, 4.3% of young people aged 24 and under are living in social rented housing (Southwark Key Housing Stats 2020)	As identified in the Strategic Housing Market Assessment (SHMA) approximately 78% of our total affordable housing need is for intermediate housing to meet the housing needs of lower- and middle- income residents. However, the most acute need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions. (Southwark Council, Strategic Market Housing Assessment, 2019)
Mitigating and/or improvement actions to	be taken
As there are no negative impacts,	a 1 1
no mitigating actions are required. The Council will continue to monitor	mitigating actions are required. The Council will continue to
impacts on this group. The Council	monitor impacts on this group.
will mitigate against any unforeseen issues	The Council will mitigate against
that arise.	any unforeseen issues that arise.

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Please note that under the PSED due regard includes:

Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities."

This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Affordable housing delivery	
This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes. Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.	This guidance may be of particular benefit to disabled people as they are less likely than non-disabled people to own their own home. The guidance supports the provision of affordable housing in the borough which can help disabled residents who cannot afford market cost to enter the housing market or secure stable rental options.

Assessing viability during the determination of planning applications and in viability reviews	
This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews). This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development. This will benefit all residents in the borough,	This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including those who are disabled, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.
including those who are disabled. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.	
Expectations for design and management of affordable housing	
This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs	This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite. This will have beneficial socio-
and recommendations to keep service charges affordable.	economic impacts on all residents in the borough, including those who are disabled.
This will benefit all residents in the borough, including those who are disabled.	
Monitoring requirements to retain affordable housing	
This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting	This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.
out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring	This will have beneficial socio- economic impacts on all residents in

Schedule (AHMS) and annual audit which developers must complete. This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements. This will benefit all residents in the borough, including those who are disabled. This is because it will help the retention of affordable housing in the borough.	the borough, including those who are disabled.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
GeneralIn 2021, 8.2% of Southwark residentsidentified as being disabled and limited a lot.This was a decrease from 11.1% in 2011.Almost a quarter of households (33,000)had at least one resident with a disability.(Source: How life has changed in Southwark: Census 2021 (ons.gov.uk)).The neighbourhoods with higher proportions of disability are Old Kent Road, South Bermondsey and Nunhead & Queen's Road. (Source: Census 2021, quoted in JSNA Annual Report - Southwark Council).	The Joseph Rowntree Foundation has found that poverty rates for households with a disabled person or informal carer are much higher than average. <u>(UK Poverty 2023:</u> <u>The essential guide to understanding</u> <u>poverty in the UK Joseph Rowntree</u> <u>Foundation (jrf.org.uk)).</u>
<u>Home ownership</u> According to the ONS, in 2021 40% of disabled people in the UK owned their own home, compared to 53% of non-disabled people (<u>Outcomes for disabled people in the</u> <u>UK - Office for National Statistics</u> (ons.gov.uk)).	Within London, owner occupiers with mortgages are significantly under- represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Housing in London 2020).

Housing need	
In 2019 there were 613 households in Southwark with unmet wheelchair accessible accommodation needs. (Southwark Council, Strategic Market Housing Assessment, 2019)	•

As there are no negative impacts,	As there are no negative impacts, no
no mitigating actions are required. The	mitigating actions are
Council will continue to monitor	required. The Council will
impacts on this group. The Council	continue to monitor impacts
will mitigate against unforeseen issues	on this group. The Council will
that arise.	mitigate against unforeseen
	issues that arise.

Gender reassignment:

- The process of transitioning from one gender to another.

Gender Identity:

Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio- economic disadvantage (positive and negative)
Affordable housing delivery This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be	This guidance may be of particular benefit to transgender people as they are less likely than cis-gender people to own their own home.
genuinely affordable and meet the needs of residents including for social rented and intermediate homes. Guidance is also provided on the expectation of affordable housing delivery from major development. This	The guidance supports the provision of affordable housing in the borough which can help transgender residents who cannot afford market cost to enter the housing market or secure stable rental options.

sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu. This will benefit all residents in the borough, including those of all gender identities. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.	
Assessing viability during the determination of planning applications and in viability reviews	
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Expectations for design and management of affordable housing	
This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and	This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.

management to minimise future repair costs and recommendations to keep service charges affordable.This will benefit all residents in the borough, including those of all gender	This will have beneficial socio-economic impacts on all residents in the borough, including those of all gender identities.
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Equality information on which	Socio-economic data on which above
above analysis is based	analysis is based
<u>General data</u>	
1.23% of people aged 16 years and over in Southwark have a gender identity different from their sex registered at birth. (Census 2021)	No positive or negative socio-economic impact applicable.
8.1% of people in the Burgess Park area have reported a gender identity different from their sex registered at	

birth. This is the highest figure of any area (medium super output area) in England and Wales. (Census 2021)	
Home ownership	
In the last census, 31% of cisgender Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). By contrast, only 13.3% of trans women and 16.7% of trans men in Southwark selected one of these housing tenures. (Source: <u>Gender identity by tenure -</u> <u>Office for National Statistics</u> (ons.gov.uk)).	Within London, owner occupiers with mortgages are significantly under- represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. <u>(Housing in</u> London 2020).
Housing need	
A survey by the Albert Kennedy Trust (a charity dedicated to supporting LGBTQ+ homeless young people) found that 77 per cent of young LGBTQ+ people surveyed consider their sexual or gender identity as the main cause of rejection from home (9 LGBT Youth Homelessness: A UK National Scoping Of Cause, Prevalence, Response, And Outcome, Albert Kennedy Trust. (https://www.akt.org.uk/research)	One in four trans people have experienced homelessness at some point in their lives. (Stonewall, 'LGBT in Britain: Trans Report 2018 (available at: <u>https://www.stonewall.org.uk/system/files/</u> <u>lgbt in britai trans report final.pdf</u>)
Mitigating and/or improvement action	ns to be taken
As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise	The Council will continue to monitor impacts on this group. The Council will mitigate against

arise.

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favorably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)

Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Affordable housing delivery	
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Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing on-site for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.	
This will benefit all residents in the borough, including those of all marriage statuses. This is because the guidance promotes the on-site provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.	

Assessing viability during the determination of planning applications and in viability reviews	
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Expectations for design and management of affordable housing	
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includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.	This will have beneficial socio- economic impacts on all residents in the borough, including those of all marriage statuses.
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Monitoring requirements to retain affordable housing	
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Schedule (AHMS) and annual audit which developers must complete. This guidance will support the council in monitoring the provision of affordable	the borough, including those of all marriage statuses.
housing and enforcing against developers who breach legal agreements.	
This will benefit all residents in the borough, including those of all marriage statuses. This is because it will help the retention of affordable housing in the borough.	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<u>General data</u>	
The latest census found that 26.9% of Southwark residents were married or in a civil partnership. This was a fall from 29.4% in 2011. Southwark had the fourth-highest percentage of adults who had never been married or in a civil partnership of all English local authorities. The proportion of residents who are married or in a civil partnership is significantly higher in the south of the borough than the north. (Source: <u>How life has changed in Southwark: Census 2021</u> (ons.gov.uk)).	No positive or negative socio- economic impact applicable.
Mitigating or improvement actions to be ta	aken
As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.	As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio- economic disadvantage (positive and negative)
Affordable housing delivery	
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Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off- site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.	
This will benefit all residents in the borough, including those who are pregnant or in maternity. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.	
Assessing viability during the determination of planning applications and in viability reviews	
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This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.	

This will benefit all residents in the borough, including those who are pregnant or in maternity. This is because it will help the retention of affordable housing in the borough.	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<u>General data</u> The total number of babies born in Southwark has been decreasing year on year over the past 10 years. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women. The average age of mothers giving birth in Southwark in 2022 was around 33 years. <u>(JSNA Annual</u> <u>Report - Southwark Council</u>).	No positive or negative socio- economic impact applicable.

As there are no negative impacts, no	As there are no negative impacts, no
mitigating actions are required.	5 5 I
The Council will continue to	
monitor impacts on this group. The	to monitor impacts on this group.
Council will mitigate against any	The Council will mitigate against
unforeseen issues that arise.	any unforeseen issues that arise.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio- economic disadvantage (positive and negative)
Affordable housing delivery	
This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council	The guidance in this SPD will have beneficial socio-economic impacts on all residents, including those of all ethnicities, as it supports the provision

considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes. Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off- site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu. This will benefit all residents in the borough, including those of all ethnicities. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.	of affordable housing, as stated opposite. The guidance may be of particular benefit to residents of certain ethnicities who are less likely to own their own home or live with overcrowding. Home ownership varies greatly between ethnic minorities and is below average for most. Overcrowding levels also vary greatly between ethnic minorities and is above average for most. Black, Black British, Black Welsh, Caribbean or African households have the highest level of overcrowding. The guidance supports the provision of affordable housing in the borough which can help those residents who cannot afford market cost to enter the
Assessing viability during the determination of planning applications and	housing market or secure stable rental options.
 <u>in viability reviews</u> This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews). This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development. This will benefit all residents in the borough, including those of all ethnicities. This is because it will allow for a continued provision of affordable homes or financial 	This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including those of all ethnicities, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.

Expectations for design and management of affordable housing	
This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable. This will benefit all residents in the	This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including those of all ethnicities.
borough, including those of all ethnicities.	
Monitoring requirements to retain affordable housing	
This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete. This guidance will support the council in monitoring the provision of affordable	This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including those of all ethnicities.
housing and enforcing against developers who breach legal agreements.	
This will benefit all residents in the borough, including those of all ethnicities. This is because it will help the retention of affordable housing in the borough.	
Language	
Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language.	No positive or negative socio- economic impact applicable.

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
General data	
Southwark is a very ethnically diverse borough. In 2021, 51.4% of residents identified as white (a decrease from 54.2% in 2011). 25.1% identified as 'Black, Black British, Black Welsh, Caribbean or African'. 9.9% identified as 'Asian, Asian British or Asian Welsh'. 6.3% identified as 'Arab of any other ethnic group'. (Source: How life has changed in Southwark: Census 2021 (ons.gov.uk)) Areas (medium super output areas) in Southwark with the highest proportions of Black residents include Peckham Park Road (48.8%), Burgess Park (38.7%) and South Bermondsey West (31.7%). In addition, the area with the highest proportion of residents identifying as 'other	29% of Black residents live in the borough's most deprived neighbourhoods, while only 17% of the borough's white residents live in these neighbourhoods. (JSNA Annual Report - Southwark Council). Data shows that ethnic minority residents are more likely to experience deprivation and disadvantage. For example, 72% of Southwark households consisting of only Black residents experience disadvantage, compared with 45% of households consisting solely of White residents. Similarly, there are clear differences in health outcomes between ethnic groups. (Source: JSNA Annual Report - Southwark Council).
ethnic group' is Burgess Park (15.6%). These areas overlap with the Old Kent Road Opportunity Area. The Areas with the highest proportions of Asian residents are Elephant and Castle (21%) and Borough and Southwark Street (19%). These areas overlap with the Elephant and Castle and London Bridge/Bankside Opportunity Areas. (Source: Ethnic group - Census Maps, ONS).	Within Southwark, the areas with the highest levels of deprivation are largely in the centre of the borough. Council wards with the highest levels of deprivation include St George's, North Walworth, and Faraday. (Source: JSNA Annual Report - Southwark Council). These areas are also home to large Black, Asian, and 'other ethnicity' communities. (Source: Ethnic group - Census Maps, ONS).
Home ownership	
The English Housing Survey 2017-2018 found that 68% of White British households owned their own home (outright or with a mortgage). The level of home ownership is lower among all other ethnic groups except Indian and Mixed White/Asian. The level of home ownership is lowest among Black African and Arab households (20% and 17% respectively). (Home ownership - GOV.UK Ethnicity facts and figures (ethnicity-facts- figures.service.gov.uk)).	Within London, owner occupiers with mortgages are significantly under- represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Housing in London 2020).

Housing need	
The 2021 census found that 2.5% of households in England where all residents identified as white were overcrowded. This is lower than any other ethnic group or combination of groups. Households where all members identified as "Black, Black British, Black Welsh, Caribbean or African" had the highest level of overcrowding (16.1% in England). (<u>Overcrowding and under-occupancy by household characteristics, England and Wales - Office for National Statistics (ons.gov.uk)). ONS data for England in 2018 shows that the proportion of households with four or more individuals is 35% for White households, but much higher for many other types of households, including 51% of Black households and 82% of Pakistani or Bangladeshi households. (<u>Estimated number of people in households by households size and ethnicity, England, 2018 - Office for National Statistics (ons.gov.uk)).</u></u>	In the 2021 Census, a larger proportion of people in England and Wales identified as homeless identified within the "Black, Black British, Black Welsh, Caribbean or African" (15.0%), "Mixed or Multiple ethnic groups" (5.1%), or "Other ethnic group" (6.1%) high-level categories, when compared with the rest of the population of England and Wales (4.0%, 2.9%, and 2.1%, respectively). (People experiencing homelessness, England and Wales - Office for National Statistics (ons.gov.uk))
Languages 244,000 (79%) Southwark residents reported their main language to be English. This is comparable to London, where 76% of residents recorded English as their main language, but lower than across England (88% of the population). Spanish is the most common main language other than English, spoken by 13,000 Southwark residents. 'All other Chinese' is the most common Asian language, while Somali is the most spoken African language of Southwark residents. Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency. (Source: Southwark Demographics - Southwark Council).	No positive or negative socio- economic impact applicable.

Mitigating and/or improvement actions to be taken	
Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language.	mitigating actions are required. The Council will continue to monitor impacts on this group.
Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency.	
To mitigate this, the Council can translate the SPD into different languages upon request. The SPD has further adhered to Hemingway Plain English guidelines to ensure the text is as accessible as practical.	

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio- economic disadvantage (positive and negative)
Affordable housing delivery	The suidence is this ODD will have
This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social	The guidance in this SPD will have beneficial socio-economic impacts on all residents, including those of all religious and belief groups, as it supports the provision of affordable housing, as stated opposite.
rented and intermediate homes. Guidance is also provided on the	The guidance may be of particular benefit to residents of certain religious and belief groups who are less likely to own their own
expectation of affordable housing	home or live with overcrowding.

delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu. This will benefit all residents in the borough, including those of all religious and belief groups. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.	Home ownership varies greatly between religious and belief groups. The level of home ownership is below average among Muslims, Buddhists, and non-religious people. Overcrowding levels also vary greatly between religious and belief groups. Muslim households have the highest level of overcrowding. Overcrowding is also higher than average among Hindu, Sikh, and Buddhist households. The guidance supports the provision of affordable housing in the borough which can help those residents who cannot afford market cost to enter the housing market or secure stable rental options.
Assessing viability during the determination of planning applications and in viability reviews	
This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews). This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.	This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite. This will have beneficial socio-economic impacts on all residents in the borough, including those of all religious and belief groups, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.
This will benefit all residents in the borough, including those of all religious and belief groups. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.	

Expectations for design and management of affordable housing	
This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable. This will benefit all residents in the borough, including those of all religious	This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite. This will have beneficial socio-economic impacts on all residents in the borough, including those of all religious and belief groups.
and belief groups.	
Monitoring requirements to retain affordable housing	
This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete.	This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite. This will have beneficial socio-economic impacts on all residents in the borough, including those of all religious and belief groups.
This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.	
This will benefit all residents in the borough, including those of all religious and belief groups. This is because it will help the retention of affordable housing in the borough.	

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<u>General data</u> The latest census found that 43.3% of Southwark residents identify as Christian and 9.6% identify as Muslim. 1.1% identify as Hindu, 1% identify as Buddhist, and 0.2% identify as Sikh. 36.4% identify as having no religion. (<u>How life has changed in Southwark:</u> <u>Census 2021 (ons.gov.uk)</u>).	No negative socio-economic impact applicable.
Home ownership	
The 2021 Census found that 63% of people in England and Wales lived in households that owned their own accommodation (outright, with a mortgage, or shared ownership). Only 46% of Muslim people and 57% of Buddhist people lived in a household that owned their own accommodation. For people of no religion the figure is 59%. The figure is higher than average for people who are Sikh, Jewish, Christian or Hindu. (Religion by housing, health, employment, and education, England and Wales - Office for National Statistics (ons.gov.uk)).	Within London, owner occupiers with mortgages are significantly under- represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Housing in London 2020).
Housing need	
The 2021 Census found that 4.4% of all households in England were overcrowded. The rate of overcrowding among Muslim households was 22.5%. The rate of overcrowding was also higher than average among Hindu, Sikh, and Buddhist households. (Overcrowding and under-occupancy by household characteristics, England and Wales - Office for National Statistics (ons.gov.uk)).	No positive or negative socio-economic impact applicable.

	As there are no negative impacts, no
mitigating actions are required.	mitigating actions are
The Council will continue	required. The Council will continue
to monitor impacts on this group.	to monitor impacts on this group. The
The Council will mitigate	Council will mitigate against
against unforeseen issues that	unforeseen issues that arise.
arise.	

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Affordable housing delivery	
This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.	The guidance in this SPD will have beneficial socio-economic impacts on all residents, including both men and women, as it supports the provision of affordable housing, as stated opposite.
Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.	
This will benefit all residents in the borough, including both men and women. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.	

Accessing visbility during the determination of	
Assessing viability during the determination of planning applications and in viability reviews	
This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews). This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development. This will benefit all residents in the borough, including both men and women. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.	This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including both men and women, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.
Expectations for design and management of affordable housing	
	This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including both men and women.
This will benefit all residents in the borough, including both men and women.	
Monitoring requirements to retain affordable housing	
the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory	This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including both men and women.
Monitoring requirements to retain affordable housing This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers	in monitoring affordable housin delivery and retention, as state opposite. This will have beneficial socio economic impacts on all resident in the borough, including both me

This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.			
This will benefit all residents in the borough, including both men and women. This is because it will help the retention of affordable housing in the borough.			
Equality information on which above analysis is based	Socio-economic data on which above analysis is based		
General data			
The Census 2021 found that 51.6% of Southwark's residents are women and 48.4% are men. (Census 2021)	No positive or negative socio- economic impact applicable.		
Housing need			
In the 2021 Census, of all people identified as homeless in England and Wales, around two- thirds were male and one-third were female (67.1% males compared with 32.9% females). (People experiencing homelessness, England and Wales - Office for National Statistics (ons.gov.uk)). In 2022/23, 86% of rough sleepers in Southwark were male. ((Public Pack) Appendices – Part 1 Agenda Supplement for Cabinet, 06?03?2024 11:00)	The GLA reports that women earning the women's median wage need to spend 63% of their earnings to afford the median private rent in London. Men only need to spend 49% of their earnings on average. (London Assembly, 'Women and housing: a gap in the market', 2023 (Gender pay gap continues to impact women in housing London City Hall)		
Mitigating and/or improvement actions to be taken			
As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.	As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforces		

mitigate

issues that arise.

against

unforeseen

Sexual orientation - Whether a person's sexual attraction is towards their own
sex, the opposite sex or to both sexes

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio- economic disadvantage (positive and negative)
Affordable housing delivery	
This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.	The guidance in this SPD will have beneficial socio-economic impacts on all residents, including all sexual orientations, as it supports the provision of affordable housing, as stated opposite.
Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.	
This will benefit all residents in the borough, including all sexual orientations. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.	
Assessing viability during the determination of planning applications and in viability reviews	
This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of	This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.
review mechanisms (such as early, mid- stage or late-stage reviews).	This will have beneficial socio- economic impacts on all residents in the

This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development. This will benefit all residents in the borough, including all sexual orientations. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.	borough, including all sexual orientations, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.	
Expectationsfordesignandmanagement of affordable housingThis SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.This will benefit all residents in the borough, including all sexual orientations.	This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including all sexual orientations.	
Monitoring requirements to retain affordable housing This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete. This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.	This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite. This will have beneficial socio- economic impacts on all residents in the borough, including all sexual orientations.	

This will benefit all residents in the borough, including all sexual orientations. This is because it will help the retention of affordable housing in the borough.		
Equality information on which above analysis is based	Socio-economic data on which above analysis is based	
General		
In the latest census 8.08% of Southwark's residents identified as LGBTQ+. This is the fourth highest figure of any local authority district in England and Wales. The areas with the highest proportion of LGBT+ residents are in the north-west of the borough. (Census 2021)	No negative socio-economic impact applicable.	
Home ownership		
In the last census, 30.2% of heterosexual Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). For lesbian and gay people, this figure was 45.4%, but for bisexual people it was only 24.4%. For people who selected the 'all other sexual orientations' option, the figure was 16.7%. (Source: <u>Office for National</u> <u>Statistics (ons.gov.uk)</u>)	Within London, owner occupiers with mortgages are significantly under- represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Housing in London 2020).	
Housing need		
One in six LGB people have experienced homelessness at some point in their lives. (Stonewall and Yougov, 'LGBT in Britain: Home and Communities', 2018)	With one in four (24%) of homeless people under 25 are thought to be LGBTQ+. (World Habitat Report - Left out: Why many LGBTQ+ people aren't accessing their right to housing in the UK (https://www.housinglin.org.uk/ assets/ Resources/Housing/OtherOrganisation /Left-out-Why-many-LGBTQ-people- arent-accessing-their-right-to-housing- in-the-UK.pdf)	

As there are no negative impacts, no	As there are no negative impacts, no	
mitigating actions are required.	mitigating actions are	
The Council will continue to	required. The Council will continue	
monitor impacts on this group. The	to monitor impacts on this group. The	
Council will mitigate against	Council will mitigate against	
unforeseen issues that arise. unforeseen issues that arise.		

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

Potential impacts (positive and negative) of proposed policy/decision/business plan

The SPD offers guidance on applying vital policies outlined in the Southwark Plan 2022 and does not create any new policy. It aims to offer clearer direction on implementing, delivering and monitoring affordable housing within Southwark, along with precise definitions of what qualifies as affordable housing in the borough.

This protects local identity and improves public realm considerate of the Human Rights Act.

Information on which above analysis is based

All data illustrated in Southwark Plan Integrated Impact Assessment (February 2022) for Strategic Policy 1 Homes for All, Strategic Policy 2 Southwark Together and Strategic Policy 5 Thriving neighbourhoods and tackling health inequalities. The SPD provides guidance and contributes to IIA01 To tackle poverty and encourage wealth creation', 'IIAO5 'To promote social inclusion, equality, diversity and community cohesion', IIAO15 'To provide everyone with the opportunity to live in a decent home'.

Mitigating and/or improvement actions to be taken

As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on human rights. The Council will mitigate against any unforeseen issues that arise.

Conclusions

Overall, the SPD will have no negative impacts on the equalities of residents in Southwark. There are many benefits of the SPD for all residents in the borough, including all protected characteristics.

The SPD provides clear guidance on the council's approach to delivering affordable housing. Guidance is also provided on the expectation of affordable housing delivery from major development. The SPD further sets out the expectation of affordable housing delivery for non-conventional housing such as Purpose-built Student Accommodation (PBSA) and Houses in Multiple Occupation (HMOs). This will benefit residents of all protected characteristics in the borough as the guidance generally promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.

The SPD will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development. This will benefit residents of all protected characteristics in the borough as it will allow for a continued provision of affordable homes and financial contributions towards affordable housing delivery.

The SPD promotes good design and management of affordable housing which will benefit future residents of all protected characteristics in the borough as it ensures the homes remain affordable to those who occupy them.

The SPD will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements. This will benefit residents of all protected characteristics as it will help the retention of affordable housing in the borough.

Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language. Mitigation measures to address this concern have been set out in section 5.

The Council will continue to monitor impacts on all protected characteristics and will mitigate against any unforeseen issues that arise.

5. Further actions				
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.				
Number	Description of issue	Action	Timeframe	
1	Ensure that the Affordable Housing SPD is adopted within the shortest timeframe possible by the Council so that the benefits identified can be secured.	Progress the Affordable Housing SPD towards public consultation and then formal adoption at Cabinet.	Public consultation proposed to be agreed at Cabinet on 22 nd July 2024.	
2	Ensure that the implementation of the Affordable Housing SPD is monitored following adoption for potential actual effects on different groups.	The outcomes of implementing the guidance in the SPD will be monitored through the Authority Monitoring Report (AMR). Equality analysis is an ongoing process and that does not end once the SPD is implemented.	Monitoring will be undertaken annually.	
3	Ensure that there is no language barrier preventing residents from accessing the SPD.	Upon request the Council can translate the documents into other languages.	Upon request.	