



Cherwell
DISTRICT COUNCIL
NORTH OXFORDSHIRE



Appendix 2

Equality and Community Impact Assessment

Cherwell District Council

Tenancy Strategy and Affordability Statement

September 2021

Contents

Section 1: Summary details.....	3
Section 2: Detail of proposal	4
Section 3: Impact Assessment - Protected Characteristics	6
Section 3: Impact Assessment - Additional Community Impacts	10
Section 3: Impact Assessment - Additional Wider Impacts.....	12
Section 3: Impact Assessment - Climate Change Impacts	14
Section 4: Review	15

Section 1: Summary details

Directorate and Service Area	Housing Services – Cherwell District Council Directorate: Adults and Housing Services
What is being assessed (e.g. name of policy, procedure, project, service or proposed service change).	Cherwell District Council Tenancy Strategy and Affordability Statement (2021)
Is this a new or existing function or policy?	New (replacing the existing Tenancy Strategy (2017))
Summary of assessment Briefly summarise the policy or proposed service change. Summarise possible impacts. Does the proposal bias, discriminate or unfairly disadvantage individuals or groups within the community? (following completion of the assessment).	<p>The Tenancy Strategy is a statutory requirement. S.150 of the Localism Act 2011 requires Local Housing Authorities to publish a Tenancy Strategy that sets out the matters to which registered providers of social housing are to have regard when formulating their policies relating to the types and terms of tenancies they grant. The strategy includes all these requirements and has been developed following a review of the existing Tenancy Strategy 2017 and discussions with social housing providers in the district.</p> <p>The strategy is aligned to the principles set out in the adopted Housing Strategy 2019-2024, the Homelessness and Rough Sleeping Strategy 2021-2026 and the Housing Allocation Scheme. The Council will work in partnership with social housing providers and developers to ensure that housing is provided at genuinely affordable rents having regard to local incomes. By doing this, the Council will ensure that that the housing needs of vulnerable people and those receiving a low income can be met. This in turn helps to reduce the risk of homelessness, create sustainable thriving communities, improve health and wellbeing and support the local economy.</p>
Completed By	Frances Evans
Authorised By	Vicki Jessop (Interim Assistant Director Housing and Social Care Commissioning)
Date of Assessment	23/09/21

Section 2: Detail of proposal

<p>Context / Background</p> <p>Briefly summarise the background to the policy or proposed service change, including reasons for any changes from previous versions.</p>	<p>The Tenancy Strategy is a statutory requirement under S.150 of the Localism Act 2011. Cherwell District Council's Tenancy Strategy, adopted in 2017, was out of date and did not reflect the need to provide longer-term or 'lifetime' tenancies and more properties to be let at Social Rent levels. The strategy was approved at a time when Fixed Term Tenancies were intended as 'the norm' after they were introduced as an alternative to lifetime tenancies and rented affordable housing in Cherwell has since been delivered as Affordable Rent rather than Social Rent tenure. Housing affordability in Cherwell is an issue with high rents and house prices being 9.3 times the median workplace-based income. Affordable Rent tenure is also becoming increasingly unaffordable for those receiving low income. Since the adoption of the Tenancy Strategy in 2017, legislation and national policies have changed, and this has allowed us to re-focus on the provision of lifetime tenancies and social rent tenure in the district to meet the needs of vulnerable people and those receiving low income.</p>
<p>Proposals</p> <p>Explain the detail of the proposals, including why this has been decided as the best course of action.</p>	<p>See above for rationale.</p> <p>Given the changes in the national policy and the local concerns about the increasing affordability gap in the local housing market, the Tenancy Strategy and Affordability Statement sets out our expectations and ambition to secure social rented homes as the default position unless there are issues of development scheme viability or the social rent plus service charges would become cost-prohibitive for the tenants to sustain. The strategy also promotes 'lifetime' tenancies as the 'norm'. It makes clear that the Tenancy Strategy and Affordability Statement should be given due regard when considering affordable housing provision on new development sites. This is not intended as a planning policy, but as a guide to developers in terms of what the Council will expect of registered providers of social housing to whom the developers may need transfer affordable housing once it has been built.</p> <p>The Council undertook consultation with the public, and with statutory, voluntary and community sector stakeholders and registered providers on the draft Tenancy Strategy and Affordability Statement. The consultation, which ran over a 6-week period from 3 August 2021 to 14 September 2021 (inclusive), sought views on the strategy and the Equality and Climate Impact Assessment. The feedback helped us to identify any additional equality or climate impacts to those already considered in this assessment. Whilst there was nothing significant highlighted in the consultation feedback, this assessment has been reviewed to make sure it is robust.</p>

<p>Evidence / Intelligence</p> <p>List and explain any data, consultation outcomes, research findings, feedback from service users and stakeholders etc, that supports your proposals and can help to inform the judgements you make about potential impact on different individuals, communities or groups and our ability to deliver our climate commitments.</p>	<p>Data, evidence, and findings from early discussions with registered providers of social housing, are all explained in more detail in the Tenancy Strategy and Affordability Statement. This can be found throughout the document but mainly through sections 3, 4, 5, 6, and Appendix 2 and Appendix 3.</p> <p>The Tenancy Strategy should be read alongside the Homelessness and Rough Sleeping Strategy 2021-2026, the Housing Strategy 2019 - 2024 and the Housing Allocation Scheme. All of which are evidence-based and are supported by their own Equality and Climate Impact Assessment. The monitoring and implementation of these strategies and policies, plus the monitoring and implementation of this Tenancy Strategy, will help to develop further intelligence and evidence over time. This will include any issues relating to positive or negative impact on equalities and climate.</p>
<p>Alternatives considered / rejected</p> <p>Summarise any other approaches that have been considered in developing the policy or proposed service change, and the reasons why these were not adopted. This could include reasons why doing nothing is not an option.</p>	<p>The following alternative options have been rejected:</p> <p>Option 1: Do nothing. This approach is not recommended, as it is a statutory requirement to review the Tenancy Strategy periodically and it would leave the Council open to legal challenge if it has not done so where national policies have influence. In addition, the adopted Housing Strategy 2019-2024 and the Homelessness and Rough Sleeping Strategy 2021-2026 set out an ambition to deliver more social rent tenure to meet identified needs. It will be difficult to achieve this ambition without an updated Tenancy Strategy as the 2017 version strongly promotes Affordable Rent and fixed-term tenancies.</p> <p>Option 2: Delay the approval of the amended Tenancy Strategy and Affordability Statement (2021) until later in the year. This approach is not recommended as the outcome of the consultation is largely positive and subsequent adoption of the new strategy will contribute towards informing the evidence base in support of the new Local Plan policies to 2040 which are currently being developed.</p> <p>We recognise the need to update the Tenancy Strategy 2017 and to provide our social housing provider partners and stakeholders with a robust and transparent approach to achieving our ambitions and expectations in regard to meeting the housing needs of vulnerable people and those receiving local incomes in the District.</p>

Section 3: Impact Assessment - Protected Characteristics

Protected Characteristic	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Implementation of the strategy will help people of all age ranges who are eligible for social housing. Provision of secure tenancies at genuinely affordable rents to young adults, parents of children, older people and people with disabilities will help them to sustain their home, building opportunities to improve health and wellbeing, and a thriving community and economy.	Monitoring of the strategy implementation will help to identify any future shortfalls in outputs. The affordability data can be updated annually. Note: The Tenancy Strategy and Affordability Statement will be implemented alongside the aims and objectives set out in other housing-related strategies and policies, all of which have their own Equality and Climate Impact Assessment.	CDC Housing Strategy Team	Annual monitoring
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As above. Whilst section 11 of the document suggests that disabled adapted properties should be exempt from the list of properties available within a Voluntary Right To Buy (VRTB) scheme, this has	As above. The strategy document can be made available in other formats upon request. The Government is yet to agree a date when the	CDC Housing Strategy Team	Annual monitoring

Protected Characteristic	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
				been suggested in order to protect the already limited availability of such properties within social housing stock especially as they are difficult to secure with developer contributions in the first place and therefore expensive and difficult to replace if they were to be sold via VRTB.	VRTB scheme is rolled out nationally. The pilot scheme was operational in the Midlands, therefore no imminent risk to the loss of properties in the Cherwell area through this scheme. If a tenant can afford to buy a home on the market, a Disabled Facilities Grant could be made available to adapt the property to meet specific needs.		
Gender Reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	CDC Housing Strategy Team	Annual monitoring
Marriage & Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	CDC Housing Strategy Team	Annual monitoring
Pregnancy & Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	CDC Housing Strategy Team	Annual monitoring
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	CDC Housing Strategy Team	Annual monitoring of this and other housing-related strategies and

Protected Characteristic	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
							policies will include ethnicity data)
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Many single parent households with children who apply to join our housing register are women with limited income. Secure tenancies at social rent would support them (and their children) to settle in their homes and communities. The same benefit applies to single male households on the housing register.	Monitoring of the strategy implementation and that of other housing-related strategies and policies will help to identify any gaps in service or support.	CDC Housing Strategy Team	Annual monitoring
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Research by the Albert Kennedy Trust has found that LGBT young people are more likely to find themselves homeless than their non-LGBT peers, comprising up to 24% of the youth homeless population. The proposals in the Tenancy Strategy to enable the	It will be important in measuring performance against the strategy outputs, how tenure type and security of tenancy has helped to reduce any inequalities in service delivery due to sexual orientation of the customer. This will need to be	CDC Housing Strategy Team	Annual monitoring

Protected Characteristic	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
				provision of more social rent properties may help to address the housing and affordability issues experienced by people LGBTQ+	captured via personal housing plans/support plans and customer input.		
Religion or Belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	CDC Housing Strategy Team	Annual monitoring

Section 3: Impact Assessment - Additional Community Impacts

Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
Rural communities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The strategy aims to enable and promote the delivery of more social rent homes with lifetime tenancies. This more affordable tenure option may help to bridge the affordability gap in rural areas where house prices and private rents tend to be higher – sometimes pricing out those households who would like to remain in the community where they live or work.	Annual monitoring	CDC Housing Strategy Team	Annual monitoring
Armed Forces	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The council's Allocations Scheme for affordable housing already recognises Armed Forces personnel as a priority for housing as they are one of the identified reasonable preference groups. Armed Forces personnel will have access to the social rent and affordable rent housing	No negative impact as a result of this new strategy due to the provisions within the Allocations Scheme and the Council's commitment to the Armed Forces Covenant arrangements.	CDC Housing Strategy Team	Annual monitoring

Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
				delivered in the district.			
Carers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Areas of deprivation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Tenancy Strategy promotes the delivery of more social rent housing which is the most affordable tenure and should provide opportunities for those households living in areas of deprivation across the district to access suitable and affordable accommodation to meet needs.	N/A	N/A	N/A

Section 3: Impact Assessment - Additional Wider Impacts

Additional Wider Impacts	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Other Council Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Providers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Monitoring of the Tenancy Strategy will enable us to understand any impact on social housing providers. Potentially the main impact would be the cost of delivery of new social housing at Social Rent levels. This would be assessed on a scheme by scheme basis. The Strategy identifies that where there are viability issues or the social rent tenure would not be suitable for a particular scheme, then Affordable Rent or alternative tenure can be considered.	Annual monitoring This has been identified and discussed with Registered Providers as part of the strategy consultation.	CDC Housing Strategy Team	Annual monitoring

Additional Wider Impacts	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Social Value ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The strategy sets out how the provision of more lifetime tenancies and affordable housing at social rent levels will contribute to households being able to settle and create sustainable, thriving communities and economy. Good quality, suitable and affordable housing can contribute towards improved health and wellbeing and educational attainment.	Annual monitoring could be undertaken in partnership with the Communities and Place Making Teams.	CDC Housing Strategy Team	Annual monitoring

¹ If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area

Section 3: Impact Assessment - Climate Change Impacts

OCC and CDC aim to be carbon neutral by 2030. How will your proposal affect our ability to reduce carbon emissions related to:

Climate change impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (* Job Title, Organisation)	Timescale and monitoring arrangements
Energy use in our buildings or highways	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A – this strategy does not impact on CDC or OCC buildings. New social housing is developed to high energy efficiency standards with renewable energy sources where possible.	N/A	N/A	N/A
Our fleet	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Staff travel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Purchased services and products (including construction)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Maintained schools	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	NA	N/A	N/A

We are also committed to enable Cherwell to become carbon neutral by 2030 and Oxfordshire by 2050. How will your proposal affect our ability to:

Climate change impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
Enable carbon emissions reduction at district/county level?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A – this strategy does not impact on CDC or OCC buildings. New social housing is developed to high energy efficiency standards with renewable energy sources where possible. Consideration is given at planning stage regarding sustainable travel. In addition, registered providers have a cyclical programme of maintenance and retrofit energy efficiency measures to ensure properties retain a suitable EPC rating.	N/A	N/A	N/A

Section 4: Review

Where bias, negative impact or disadvantage is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review Date	On or around the anniversary of adoption of the strategy from November 2021.
Person Responsible for Review	Housing Strategy & Development Team Leader (Cherwell DC)
Authorised By	Assistant Director, Housing and Social Care Commissioning. Oxfordshire County Council and Cherwell District Council.