

Equality Impact Assessment / Equality Analysis

(Updated December 2022)

Item name	Details
Title of service or policy	Englishcombe Lane Supported Housing Scheme
Name of directorate and service	Regeneration and Housing
Name and role of officers completing the EIA	Nick Plumley - Housing Enabling & Development Manager Rebecca Hales - Project Manager
Date of assessment	07 May 2024

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>A multi-disciplinary design team has been appointed through a mini-competition tender by the Project Manager. Design progress is in consultation with Adult Services and HCRG.</p> <p>In 2018, the Council submitted a planning application to develop 37 homes, on land to the rear of 89 – 123, Englishcombe Lane, Bath. The planning committee approved the application subject to conditions and a s106 Agreement. The administration decided not to pursue the application.</p> <p>The new scheme responds to the Pre-Application Planning Response received in late 2023, the scheme is a smaller sympathetic scheme with the following headline benefits:</p> <ol style="list-style-type: none"> 1. Realises the aspirations of people with a learning disability and/or autism to live as independently as possible in their own homes but with care and support as needed. 2. Provides an opportunity for some of the housing to meet the bespoke needs of individuals especially those with sensory needs and requiring accessible accommodation. The site provides a peaceful and low

	<p>stimulus environment which will suit many individuals with sensory needs.</p> <ol style="list-style-type: none"> 3. Reduces the necessity for people to move out of area to access housing, care, and support, enabling people to remain in the district, close to family, community and friends and care teams. 4. Provides an opportunity for those: inappropriately housed in residential accommodation (often out of area) to return to the district if they wish; ability for clients to step down in more independent living; or those who are living in family or other inappropriate accommodation and ready to move into further independence. 5. Opportunity to integrate and test latest assistive technology. 6. Repatriating people from out of area residential care settings back into supported living within their local communities. <p>The delivery of high-quality adapted housing for vulnerable client groups has a positive impact on equality. It provides housing options for those residents who are unable to cope or compete on the open-market and may otherwise be forced to leave the area or reside in unsuitable housing conditions.</p> <p>The scheme proposes the erection of 16 no. supported living units (Use Class C3(b)) with an associated communal hub (to include ancillary carers' accommodation), access, landscaping and ancillary works'.</p> <p>10 of the dwellings are proposed to be 1-bed bungalows, 4 are 2-bed split level and 2 are 2-3 bedroom dwellings, accommodating 16 residents and providing overnight accommodation and/or office for their carers</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). 	<p>This is a new service.</p> <p>There is currently no similar service within B&NES.</p>

<ul style="list-style-type: none"> ● How much room for review is there? 	<p>Alternative design iterations have been considered through initial feasibility studies. Proposals strike the balance between responding to the constraints posed by the site and meeting the identified need.</p> <p>The scheme will be reviewed as the planning submission progresses and the next design stage is progressed.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The project objectives align with and complement the following council policies:</p> <p>Strategic Land Allocation SB17</p> <p>We have two core policies – tackling the climate and nature emergency and giving people a bigger say. The scheme specification responds to ecological and climate emergencies and is compliant with Planning Policy SCR6.</p> <p>The scheme translates our purpose into commitments and also complies with our extended ambitions so far as we are working towards a resilient future and improving frontline services whilst protecting the most vulnerable.</p> <p>The scheme complies with further priorities- The right homes in the right places, Clean, safe and vibrant neighbourhoods, Support for vulnerable adults and children.</p> <p>This scheme will improve people’s lives and will deliver a housing option which is currently not met within county.</p> <p>The delivery of specialist housing is supported by the following:</p> <p>Local Authorities (Land) Act 1963 which allows Councils to develop land for the benefit or improvement of their area.</p>

	<p>Local Government Act 2000 (section 2) which allows Councils to act to promote or improve the economic, social or environmental wellbeing of their area.</p> <p>Localism Act 2011 (sections 1) which provides the local authority's general power of competence.</p> <p>The Council is registered with the Regulator of Social Housing as a Local Authority Registered Provider of Social Housing.</p> <p>The Care Act 2014 (part 1) provides Local Authorities with a general duty to promote an individual's well-being.</p> <p>Children and Families Act 2014 (section 25) promoting integration and wellbeing.</p>
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2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<p>Equality, Diversity, and Inclusion training has been undertaken by the Project Manager.</p> <p>Design Team consultants have a strong personal understanding of Autism Spectrum Disorder (ASD) and neurodivergence, active involvement in related professional and personal causes, and leadership of the recently launched National Neurodiversity in Planning Network (NNPN) and worked with key health bodies contributing to Health Building Notes (HBNs) and Health Technical Memorandum (HTMs).</p>

<p>2.2 What is the equalities profile of service users?</p>	<p>People with a learning disability and/or autism.</p> <p>A strategic review of the local care and support market was undertaken by the Specialist Commissioning team in 2021. It identified a significant under supply of supported living provision in the district which in turn results in an over reliance on meeting people’s needs through out of area residential care placements. At that point there were 52 people with learning disabilities and/or autism on the Council’s housing demand matrix who needed a move or supported housing.</p>
<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>Five scheme options were investigated before developing a master plan for Pre Application submission.</p> <p>Throughout the design process, information has been collected from local residents through consultation and with HCRG and Adult Services. Soft consultation has been ongoing with local residents since 2022.</p> <p>Prior to submission, a Pre Planning Public Exhibition and Pre Planning Public Consultation took place, further details can be found at https://englishcombelanesupportedhousing.com/ and https://newsroom.bathnes.gov.uk/news/revised-plans-supported-housing-englishcombe-lane-site-go-public-view.</p> <p>A dedicated email address is also available for queries relating to the scheme.</p>
<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>The results from and details of the public consultation are included in the planning submission.</p> <p>Application Reference: 24/01168/REG03.</p>
<p>2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include</p>	<p>Further consultation will take place with HCRG colleagues and Adult Services.</p> <p>The public consultation for the Planning Application is live until the end of May 2024.</p>

equalities considerations within this?	
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3. Assessment of impact: ‘Equality analysis’

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	The service realises the aspirations of people with a learning disability and/or autism to live as independently as possible in their own homes but with care and support as needed. This will have a positive impact on equality.	
3.2 Sex – identify the impact/potential impact of the policy on women and men.	This project does not discriminate on the grounds of this protected characteristic.	
3.3 Pregnancy and maternity	This project does not discriminate on the grounds of this protected characteristic.	
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	This project does not discriminate on the grounds of this protected characteristic.	

3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)

A clear interior circulation path is provided around a central storage space in each property, which creates a circulation path for residents to move around.

All entrance doors will be designed to meet the requirements of Part M.

Transitional lighting will be provided between the exterior and interior of the units.

All areas accessible to residents would be provided on a single level, with step-free access.

All rooms accessible to residents are designed to be compliant with the spacial requirements of Building Regulations Part M4(3). All other rooms are designed to be at least compliant with the requirements of Part M4(2).

Wheelchair transfer space will be provided next to every entrance.

All internal doors will have a 300mm clear space on the pull side, to the side of the leading edge of the doors.

	<p>The clear opening widths of doors will be a minimum of 800 mm wide.</p> <p>The key aims for landscape design Have been informed by an inclusive and accessible design for neurodiversity and a legible access and movement strategy.</p> <p>This will have a positive impact on equality.</p>	
3.6 Age – identify the impact/potential impact of the policy on different age groups	This project does not discriminate on the grounds of this protected characteristic.	
3.7 Race – identify the impact/potential impact on across different ethnic groups	This project does not discriminate on the grounds of this protected characteristic.	
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	This project does not discriminate on the grounds of this protected characteristic.	
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	This project does not discriminate on the grounds of this protected characteristic.	
3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	This project does not discriminate on the grounds of this protected characteristic.	
3.11 Socio-economically disadvantaged* – identify the impact on	This project does not discriminate on these grounds.	

<p>people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>		
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>This project does not discriminate on these grounds.</p>	
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>This project does not discriminate on these grounds.</p>	

*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: *Mike Plumley* (Divisional Director or nominated senior officer)

Date: 03/07/24