

Appendix 3: South Gloucestershire Council

Houses in Multiple Occupation Article 4 Direction Proposal: Consultation on Proposed Controls on HMO Conversions in Filton and Stoke Park & Cheswick

Equality Impact Assessment Report

Houses in Multiple Occupation: Consultation on Proposed
Controls on HMO Conversions in Filton and Stoke Park &
Cheswick

July 2022

www.southglos.gov.uk



Contents

1.	Introduction	3
2.	Equalities Assessment	6
3.	Summary	11

1. Introduction

1.1 Background

This Equality Impact Assessment (EqIA) Report has been prepared on behalf of South Gloucestershire Council (SGC) following the public consultation on the 'Proposed Controls on HMO Conversions in Filton and Stoke Park & Cheswick', which was held between 7th February 2022 and 4th April 2022.

The consultation sought feedback on the proposals to withdraw specified permitted development rights to convert dwellinghouses (Use Class C3) to small Houses in Multiple Occupation (HMO) (Use Class C4) without planning permission, within specifically defined areas of Filton and Stoke Park & Cheswick wards through a direction made under Schedule 3 Procedures for Article 4 Directions of the Town and Country Planning (General Permitted Development) Order (GPDO) 2015.

Through the making of an Article 4 Direction (A4D), the GPDO enables the Secretary of State or the relevant local planning authority to withdraw specified permitted development rights across a defined area in order to support the necessary protection of the local amenity and/or the wellbeing of the area. In the areas where an A4D applies, all property owners or prospective landlords would no longer have permitted development rights to convert a dwelling house (Use Class C3) to a small HMO (Use Class C4) without planning permission. This would not mean that HMOs within A4D areas are unacceptable, rather that it would bring these into the planning system to allow consideration of the proposed development against policies.

The consultation on the proposals to introduce an A4D in two areas of South Gloucestershire included the publication of the SGC Executive Member Report and a technical report by consultancy Arup ('Informal Business Case for the Introduction of A4Ds for HMOs in South Gloucestershire') which set out the policy and legislative context for the proposals, as well as the evidence base informing the proposals to introduce an A4D within two wards of the district, Filton and Stoke Park & Cheswick.

1.2 Legislative background

Equality Analysis (which can take the form of Equality Impact Assessment) is a statutory requirement; public sector bodies have obligations under the Public Sector Equality Duty (PSED), set out in Section 149 of the Equality Act 2010¹. The broad purpose of the Duty is to ensure that discrimination, the advancement of equality and good relations are issues which are robustly considered in the day-to-day business of public authorities. It requires equality considerations to be reflected into the design of policies and the delivery of services. In the case of SGC, this is delivered in line with the Equality Plan (2019-2022)².

The Equality Act provides a legal framework to protect the rights of individuals and advance equality of opportunity. This requires that public bodies have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

An EqIA assesses whether a policy or project could have the potential to result in impacts for groups of people with 'protected characteristics'. These are defined in Section 4 of the Equality Act as age; disability;

¹ <https://www.legislation.gov.uk/ukpga/2010/15/>

² <https://www.southglos.gov.uk/documents/Approved-Equality-Plan-2019-2022.pdf>

gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

1.3 Purpose of this report

This document provides an assessment of the A4D proposals against the Public Sector Equality Duty defined within the Equality Act 2010, in order to inform the decision to be made by SGC as to whether to confirm and implement the proposed A4D.

The Executive Member Report published as part of the consultation set out the equalities considerations for SGC in consulting upon the proposals for the A4D in South Gloucestershire. This stated in paragraphs 42 to 46:

“Through its ‘Houses in Multiple Occupation Strategic Environmental Assessment and Equality Impact Assessment Screening Report’, the council is aware that people with certain Protected Characteristics are disproportionately more likely to live in HMOs. Therefore reducing HMOs is likely to have a negative equality impact as it would impact disproportionately on these groups for whom HMOs provide a practical and affordable housing option that meets their housing needs. These groups are:

- *Younger persons, particularly those who are students in the identified wards;*
- *Disabled People - given national statistics indicate that there is greater potential for economic disadvantage amongst this group, it is plausible that a proportion may rely on HMOs (where non-specialist accommodation is not required);*
- *People from Black, Asian and Minority Ethnic backgrounds - in the South West, 70% of white British households own their home versus 40% of BAME households. Social renting is particularly high among some ethnic minorities: in 2014–16, 48% of African, 45% of Caribbean and other black and 42% of Bangladeshi households in England rented from a local authority or housing association compared with 16% of white British households. Pakistani, Chinese and Indian households were less likely to rent in the social sector, at 11%, 9% and 7% respectively (Cabinet Office, 2017). Homelessness disproportionately affects ethnic minorities. People from ethnic minorities are at higher risk of homelessness in England. While HMO licensing data does not include the specifics of race, it is acknowledged that there are higher proportions of people from BAME backgrounds (including Filton and Stoke Park & Cheswick) located in areas identified with higher HMO concentrations.*

However, evidence shows that there has been an increase in this type of development in South Gloucestershire over recent years to meet demand. This has resulted in concentrations of HMOs in particular parts of the district which has, in some cases, heightened concerns from neighbouring properties and wider community with regard to parking pressures, noise, management of waste and recycling and anti-social behaviour, and in some cases has resulted in a perception that mixed communities are no longer supported. This will need to be balanced against the demand for affordable accommodation in these same areas in making a final decision following public consultation.

It is also worth noting at this stage that the Covid-19 pandemic has shone a spotlight on health inequalities which have included an increased likelihood of Covid infection and mortality in those homes which are overcrowded. These impacts will also need to be balanced against the demand for affordable housing.

It is of exceptionally high importance therefore that the views of a diverse range of residents are heard and acted upon within development plans and supporting policy framework documents – this specifically includes ensuring the voice of people with the above identified Protected Characteristics is heard and acted upon.

Accordingly, the council will also consult our equalities partners representing people with the above Protected Characteristics on the proposals to introduce the two A4Ds with the objective to strengthen community and stakeholder involvement and awareness of the procedures for implementing the A4Ds.”

This report has therefore been prepared to provide an assessment of the equalities impacts of the proposals to introduce an A4D in South Gloucestershire, taking into account the feedback from the public consultation.

2. Equalities Assessment

2.1 Methodology of assessment

The EqIA has been prepared with reference to The Equality Act 2010, including the legal requirements for local authorities (defined under Schedule 19 of the Act) to eliminate discrimination, advance equality of opportunity and address any impacts upon the identified protected characteristics. For the purposes of this EqIA screening assessment, Part 3 Section 29 of the Act ('Services and Public Functions') is interpreted as SGC's role as a public 'service-provider'.

The purpose of this assessment is to systematically identify whether the A4D would create impacts on different groups of people (the 'protected characteristics' as set out in The Equality Act 2010). The consequence of policies on particular groups have been analysed, to understand whether any negative consequences can be eliminated or minimised and opportunities for ensuring equality can be maximised.

Evidence used to inform the EqIA includes demographic data and other statistics, including Census data; and recent and relevant research findings (local and national). At the time of preparing this assessment, only the first phase of Census 2021 data has been released. This comprises of rounded population and household estimates for local authorities in England and Wales and as such, is limited in its scope to district-level. Census 2021 data has therefore been used where appropriate in this report, alongside Census 2011 data.

2.2 Consultation feedback

Public consultation on the proposals for the A4D was undertaken between 7th February 2022 and 4th April 2022. Whilst SGC's equalities partners were notified and invited to comment on the proposals, no response was received. However, in total 296 responses from other stakeholders were received. These responses have been analysed and are presented in the Engagement Report. Where those responses have raised matters that are relevant to the EqIA they have been considered within this assessment; for example, where a matter relates to potential impacts on those with protected characteristics. This consideration of the consultation feedback further enables SGC to identify and assess the proposals' potential impacts on those with protected characteristics and to take into account the extent to which it will eliminate discrimination, advance equality of opportunity and foster good relations.

2.3 Assessment

The EqIA is presented in **Table 1**.

Table 1 Equalities Assessment and Analysis of the proposed A4D

The Equality Act 2010 Protected Characteristic Group	Summary of protected characteristic group research (Section 2)	Identification and analysis of equalities issues and impacts (Section 3)			Proposed mitigation / action(s) (Section 5)
		Risks	Opportunities	Potential for effect (Y/N) (Section 4)	
Age – Older persons	<p>18.7% of the total population of South Gloucestershire is of pensionable age (65+ years) (Census 2021), representing a 21.8% increase since the last census. Whilst 2021 Census data at a LSOA level is not yet released, 2018 mid-year estimates identified that Stoke Park & Cheswick (2%) has the lowest proportion of older residents and 17% of the population within Filton are older residents³.</p> <p>While local ONS data provides an overview of household statistics and age structure by South Gloucestershire profile, there is no sub-data in the public domain that identifies the proportion of older persons that occupy HMOs⁴.</p> <p>HMO licensing applications do not contain this criterion and as such there is no specific data available for this protected characteristic.</p>	<p>No specific risks of the A4D are identified for older persons. However, it is noted that the prevalence of disability increases with age⁵, and therefore the below assessment in regard to disability is relevant as disability clearly links with age.</p>	<p>More effective planning controls implemented through the A4D are likely to help ensure mixed communities are retained and harmful impacts of HMOs are reduced, including for older persons.</p>	N (neutral)	<p>None required, however, please see below assessment in regard to disability.</p>
Age – Younger persons	<p>Within South Gloucestershire, 55% of HMOs are estimated to be occupied by students and 43% are estimated to be occupied by professionals⁶.</p> <p>Significant population growth has taken place in the 15-29 age bracket, which includes Stoke Park & Cheswick ward⁷. The median age of South Gloucestershire's wards is lowest in Stoke Park & Cheswick and Filton⁸. The Council's Housing Register identifies people aged 25 – 44 as being disproportionately over-represented in housing need. 57.8% of people on the Housing Register are aged 25 – 44.</p> <p>The last 6 years of data (2015/16 – 2020/21) on access to welfare and debt advice services show younger people are consistently, significantly more likely to access these services.</p> <p>In the 2020/21 academic year, a total of 36,716 students were enrolled at UWE (both part-time and full-time), 24,900 of which were undergraduates and 6,738 of which were international students⁹.</p> <p>According to local data, approximately 55.2% of those living in HMOs within Filton and 93.5% of those living in HMOs located in Stoke Park and Cheswick are students¹⁰.</p> <p>SGS College is a further and higher education college with six campuses across Bristol, South Gloucestershire and Stroud, with a total population of around 15,500 students. In the academic year 2017/18 – 2,390 apprenticeships started in South Gloucestershire¹¹, including those based at major employers.</p> <p>Whilst SGC does not provide on-site accommodation, it is partnered with private sector PBSA provider Unite to accommodate students in Bristol city centre. Students may also choose to rent through private landlords.</p>	<p>Given national and local statistics indicate that there is greater potential for economic disadvantage amongst this group, it is plausible that a proportion may rely on HMOs. As such, there is clear potential for differential negative impact.</p> <p>While accurate data about private tenants (or landlords) is not readily available, there is potential that the A4D may affect the delivery of HMOs within their boundary, as permitted development rights for the conversion of existing houses to small HMOs will be removed. This may deter development of small HMOs compared to the existing rate and planning applications for small HMOs (which otherwise would not have been subject to an application) may be refused consent if found non-compliant with national and local policy. Current concentrations of HMOs exist in areas around Filton and Stoke Park, with students and young professionals typically occupying these properties.</p> <p>Specifically in these areas of higher concentrations, the impact of the A4D may result in some increases in commuting distances for work/study, a potential sense of isolation from peers if located in peripheral areas, or future changes in rent in certain areas. It is noted that a number of respondents to the consultation have raised concern that an A4D may exacerbate the housing crisis through reducing the supply of a housing tenure popular with young professionals and students.</p>	<p>The only areas that are likely to be most affected by the A4D are those within its proposed boundary, and as the A4D will have no retrospective effect on concentrations, the existing supply of accommodation in such areas will not change.</p> <p>More choice / availability of HMOs in more dispersed areas of South Gloucestershire could attract young professionals and / or support lower-paid employees.</p> <p>Some respondents to the consultation identified concerns that HMO development in their area is reducing the availability of single dwellings to rent, particularly for young families or single households wishing to settle in the area. An A4D may help to ensure a mix of housing which protects supply for young families or households.</p>	<p>Y (positive)</p> <p>Y (negative)</p>	<p>Provide information with regards to local amenities, transport access, safety measures and support helplines (e.g. for student housing).</p> <p>Continue to explore PBSA as a complimentary offer to HMOs.</p> <p>The impact of the A4D will be kept under review through monitoring the number of applications determined through the planning process. This will be reported as part of preparing the Council's annual Authority's Monitoring Report (AMR). Officers will also review community correspondence, and feedback from elected local ward district councillors, members of the Council's Development Management Committee and Scrutiny Commission.</p>

³ <https://www.southglos.gov.uk/documents/Ward-level-population-estimates-2018.pdf>

⁴ <https://www.southglos.gov.uk/documents/Population%20and%20housing%20data%20by%20parish%20compilation.pdf>

⁵ Barlow F.K., Walker N. (2015) Disability and Ageing. In: Pachana N. (eds) Encyclopedia of Geropsychology. Springer, Singapore. https://doi.org/10.1007/978-981-287-080-3_81-

⁶ <https://www.southglos.gov.uk/documents/Note-on-HMOs-Oct-2020v3.pdf>

⁷ South Gloucestershire Joint Strategic Needs Assessment <https://edocs.southglos.gov.uk/jsna2017/pages/demographics/population-and-protected-characteristics/>

⁸ <https://www.southglos.gov.uk/documents/Ward-level-population-estimates-2018.pdf>

⁹ UWE (accessed July 2022) Student and staff numbers [Student and staff numbers - Demographic data | UWE Bristol](#)

¹⁰ <https://www.southglos.gov.uk/documents/Note-on-HMOs-Oct-2020v3.pdf>

¹¹ Skills Funding agency and Department for Business, Energy and Industrial Strategy (vis FE data Library).

The Equality Act 2010 Protected Characteristic Group	Summary of protected characteristic group research (Section 2)	Identification and analysis of equalities issues and impacts (Section 3)			Proposed mitigation / action(s) (Section 5)
		Risks	Opportunities	Potential for effect (Y/N) (Section 4)	
		However, there are other areas with good public transport links that could be suited to HMO development and provide opportunities for connectivity, which could reduce this potential risk.			
Disability	<p>According to the 2011 census 18% of the population of South Gloucestershire aged 16+ has day to day activities limited by a long-term health problem or disability, lower than the England average of 21% (2011 Census).</p> <p>At a national level, disabled people are more likely to be living in poverty¹². Those who can't work rely on an increasingly restricted welfare regime that is projected to lower their living standards further¹³. The current cost of living/energy crisis and the potential economic impacts of Covid-19 are considered likely to increase the vulnerability of disabled people to poverty¹⁴.</p> <p>The last 6 years of data (2015/16 – 2020/21) on access to welfare and debt advice services show disabled people are consistently, significantly more likely to access these services (61% of those accessing were disabled).</p> <p>1 in 3 households with a disabled person live in non-decent accommodation and 1 in 5 disabled people requiring adaptations to their home believe that their accommodation is not suitable¹⁵.</p>	<p>Given national and local statistics indicate that there is greater potential for economic disadvantage amongst this group, it is plausible that a proportion may rely on HMOs (where non-specialist accommodation is not required). As such, there is clear potential for differential negative impact.</p> <p>It is also acknowledged that the completion of HMO planning applications can be challenging for those with certain impairments.</p>	Through providing increased regulation and scrutiny of new HMO development within the A4D boundary, the A4D may be likely to help protect mixed communities from harmful impacts of HMOs (e.g. parking and access), including for neighbouring disabled persons.	Y (positive) Y (negative)	<p>Housing delivery would be expected to be compliant with Policy CS1 High Quality Design of the Local Plan.</p> <p>The Equality Act 2010, states that private landlords must make 'reasonable adjustments' for disabled persons (Under Section 20 of the Act¹⁶). 'Reasonable' adaptations are detailed in Equality and Human Rights Commission Guidance¹⁷</p> <p>Guidance to be offered to applicants to complete the planning application process.</p>
Sexual Orientation and Gender Reassignment	<p>There is no hard data on the number of lesbians, gay men, bisexuals and transgendered people (LGBTQ+) in the UK. However, the Government is using the figure of 5-7% of the population and Stonewall¹⁸ agree that this is a reasonable estimate. Based on 2021 Census population data, this equates to approximately 17,424 residents who identify as being LGBTQ+ within South Gloucestershire</p> <p>Homelessness disproportionately affects LGBTQ+ young people and the Covid pandemic has highlighted that LGBTQ+ people are more likely to experience domestic abuse (increased since Covid social isolation measures were introduced)¹⁹. The Council's draft Housing Strategy 2022 – 2052 highlights that: "We also know that people from LGBTQ+ communities are over-represented in homelessness data nationally and this is likely to be mirrored in South Gloucestershire."</p>	<p>There is no evidence at this stage that there will be any significant impacts of the A4D based on a person's sexual orientation.</p> <p>It is noted that a respondent to the consultation has raised concern that it could impact on those with non-traditional lifestyles (e.g. polyamory) due to being identified as a HMO rather than a family unit, however the definition of a HMO is set nationally and is separate to the A4D mechanism.</p>	The only areas that are likely to be most affected by the A4D are those within its proposed boundary, and as the A4D will have no retrospective effect on concentrations, the existing supply of accommodation in such areas will not change.	N (neutral)	The impact of the A4D will be kept under review through monitoring the number of applications determined through the planning process. This will be reported as part of preparing the Council's annual Authority's Monitoring Report (AMR). Officers will also review community correspondence, and feedback from elected local ward district councillors, members of the Council's Development Management Committee and Scrutiny Commission.
Pregnancy and maternity	The number of babies born to residents of South Gloucestershire rose from approximately 2,600 in 2003 to a peak of 3,400 in 2012 – an increase of over 30%. The baby boom has started to show signs of decline with the number of resident births falling between 2012 and 2014. In the period to 2037, there is projected to be a 6% increase in births ²⁰ .	This group may be at risk of eviction should they become pregnant whilst being an occupant of an HMO, if the tenancy and/or licensing agreement limits the number of permitted occupants in a dwelling, or if the increase of an occupant triggers the need for planning consent. Children of any age	Through providing increased regulation and scrutiny of new HMO development within the A4D boundary, the A4D may be likely to help protect mixed communities from harmful impacts of HMOs, including for families, who may be particularly sensitive to some effects such as noise or parking	Y (negative) Y (positive)	Monitoring of the impact of the A4D.

¹² <https://www.equalityhumanrights.com/sites/default/files/is-britain-fairer-accessible.pdf>

¹³ <https://www.equalityhumanrights.com/sites/default/files/is-britain-fairer-accessible.pdf>

¹⁴ Why disabled people are at the centre of the cost-of-living crisis | Disability charity Scope UK

¹⁵ <https://www.gov.uk/government/statistics/disability-facts-and-figures/disability-facts-and-figures#:~:text=The%20prevalence%20of%20disability%20rises,Pension%20age%20%5Bfootnote%203%5D.>

¹⁶ <https://www.legislation.gov.uk/ukpga/2010/15/section/20>

¹⁷ https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-your-rights-england_0.pdf

¹⁸ <https://www.stonewall.org.uk/>

¹⁹ <https://www.stonewall.org.uk/about-us/news/how-covid-19-affecting-lgbt-communities>

²⁰ <https://edocs.southglos.gov.uk/cyp-mps/pages/3-demographic-profile-trends-and-forecast/3-2-children-and-young-people/>

The Equality Act 2010 Protected Characteristic Group	Summary of protected characteristic group research (Section 2)	Identification and analysis of equalities issues and impacts (Section 3)			Proposed mitigation / action(s) (Section 5)
		Risks	Opportunities	Potential for effect (Y/N) (Section 4)	
	Single parents make up a quarter of families with dependent children; single parents have the highest poverty rate among working-age adults, with 43% living in poverty (90% of single parents are women) ²¹ .	are to be classified as HMO occupants ²² . An A4D removes permitted development rights for small HMOs only and therefore the need for consent would only be triggered where an existing house of two separate households is increased to three occupants (across two households) through pregnancy.	issues/road safety. The A4D would also enable the conversion of single dwellings to HMOs to be managed more comprehensively through the planning process, to ensure an appropriate mix and availability of housing for all members of the community, including for families or single parents.		
Race	<p>The percentage of the South Gloucestershire population classified as 'white' - English, Welsh, Scottish, Northern Irish, British) is 91.9%. (2011 Census). The percentage of people from Black, Asian and Minority Ethnic (BAME) backgrounds is 8.1% (2011 Census). Filton and Stoke Park Wards are the areas of South Gloucestershire with the two highest proportions of residents from BAME heritage.^{23,24}</p> <p>According to local data, of those living in Filton 43% speak Polish, 9% speak Portuguese, 6% speak Hungarian and 6% speak all other Chinese languages.</p> <p>People from BAME backgrounds, depending on ethnic group, are twice as likely to be living in poverty (20% of adults regardless of ethnicity are living in relative poverty and 30% of children are living in households in poverty in the UK). In South Gloucestershire, data relating to the Community Resilience and Household Support Funds show that BAME population groups are just over 3 times more likely to apply for a fund, with people from Pakistani, Black African, Mixed Ethnicity and White Other heritage being significantly over-represented in the Fund data. These same groups, along with Gypsy, Roma Traveller and Bangladeshi heritage people are also significantly over-represented in South Gloucestershire Free School Meals uptake data. The last 6 years of data (2015/16 – 2020/21) on access to welfare and debt advice services show people from BAME backgrounds are consistently significantly more likely to access these services.</p> <p>Nationally, White British households in England are less likely to rent in either the private or the social sector than any other ethnic group²⁵. This is consistent across all age groups, regions and socio-economic groups²⁶. In the South West, 71% of white British households own their home versus 40% of BAME households. Social renting is particularly high amongst some ethnic minorities: in 2014–16, 48% of African, 45% of Caribbean and other black households and 42% of Bangladeshi households in England rented from a local authority or housing association compared with 16% of white British households. Pakistani, Chinese and Indian households were less likely to rent in the social sector, at 11%, 9% and 7% respectively (Cabinet Office, 2017). Within the South West 12% of BAME household rent social housing between 2016-2018²⁷.</p> <p>Homelessness disproportionately affects ethnic minorities. People from ethnic minorities are at higher risk of homelessness in England²⁸.</p>	<p>While HMO licensing data does not include the specifics of race, it is acknowledged that higher proportions of people from BAME backgrounds are located in areas identified with higher HMO concentrations³², and as such there could be differential effects of the A4D on this protected characteristic.</p> <p>Given national and local statistics indicate that there is greater potential for economic disadvantage amongst people from minority ethnic heritage, it is plausible that a proportion may rely on HMOs. Comparing this to the higher BAME populations in the 2 areas concerned shows a clear potential for differential negative impact.</p>	The only areas that are likely to be most affected by the A4D are those within its proposed boundary, and as the A4D will have no retrospective effect on concentrations, the existing supply of accommodation in such areas will not change.	N (neutral)	The impact of the A4D will be kept under review through monitoring the number of applications determined through the planning process. This will be reported as part of preparing the Council's annual Authority's Monitoring Report (AMR). Officers will also review community correspondence, and feedback from elected local ward district councillors, members of the Council's Development Management Committee and Scrutiny Commission.

²¹ <https://www.gingerbread.org.uk/policy-campaigns/living-standards-and-poverty/>

²² Paramaguru v Ealing LBC [2018] EWHC 373 (Admin)

²³ http://atlas.southglos.gov.uk/HTML9_allgeogs/atlas.html

²⁴ <https://www.southglos.gov.uk/documents/ONS-key-population-group-profile-for-South-Glos-Summer-2020.pdf>

²⁵ <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-25.pdf>

²⁶ <https://www.equalityhumanrights.com/sites/default/files/is-britain-fairer-accessible.pdf>

²⁷ [https://www.ethnicity-facts-figures.service.gov.uk/housing/social-housing/renting-from-a-local-authority-or-housing-association-social-housing/latest#:~:text=data%20shows%20that%3A-in%202016%20to%202018%2C%2017%25%20of%20households%20\(3.9%20million,likely%20to%20rent%20social%20housing](https://www.ethnicity-facts-figures.service.gov.uk/housing/social-housing/renting-from-a-local-authority-or-housing-association-social-housing/latest#:~:text=data%20shows%20that%3A-in%202016%20to%202018%2C%2017%25%20of%20households%20(3.9%20million,likely%20to%20rent%20social%20housing)

²⁸ <https://www.equalityhumanrights.com/sites/default/files/is-britain-fairer-accessible.pdf>

³² <https://www.southglos.gov.uk/documents/Note-on-HMOs-Oct-2020v3.pdf>

The Equality Act 2010 Protected Characteristic Group	Summary of protected characteristic group research (Section 2)	Identification and analysis of equalities issues and impacts (Section 3)			Proposed mitigation / action(s) (Section 5)
		Risks	Opportunities	Potential for effect (Y/N) (Section 4)	
	<p>At a national level, one in 10 (10.5%) ethnic minority households experience overcrowding compared with one in 50 (2.0%) White households²⁹. People from ethnic minorities are also at higher risk of homelessness in England³⁰.</p> <p>According to local data, no HMOs located within Filton and Stoke Park wards are occupied by asylum seekers³¹.</p>				
Religion or belief	<p>The majority of the population of South Gloucestershire consider themselves as Christian, with slightly above the England and Wales average (59.6% compared to 59.3%).</p> <p>Percentages of other major religions (Buddhism, Hinduism; Judaism; Islam; Sikhism) are all significantly above the South Gloucestershire average in the Filton and Stoke Park wards (2011 Census).</p> <p>There are clear links between religion and ethnicity and the issues raised above under the heading of 'Race' are relevant to the protected characteristic of Religion or Belief.</p>	<p>While HMO licensing data does not include the specifics of race, it is acknowledged that higher proportions of people identifying with religions other than Christian are located in areas identified with higher HMO concentrations³³, and as such there could be differential effects of the A4D on this protected characteristic.</p> <p>Given national and local statistics indicate that there is greater potential for economic disadvantage amongst people identifying with religions other than Christian, it is plausible that a proportion may rely on HMOs. Comparing this to the higher populations of people identifying with religions other than Christian in the 2 areas concerned shows a clear potential for differential negative impact.</p>	<p>The only areas that are likely to be most affected by the A4D are those within its proposed boundary, and as the A4D will have no retrospective effect on concentrations, the existing supply of accommodation in such areas will not change.</p>	<p>Y (positive)</p> <p>Y (negative)</p>	<p>The impact of the A4D will be kept under review through monitoring the number of applications determined through the planning process. This will be reported as part of preparing the Council's annual Authority's Monitoring Report (AMR). Officers will also review community correspondence, and feedback from elected local ward district councillors, members of the Council's Development Management Committee and Scrutiny Commission.</p>
Sex	<p>The population in South Gloucestershire is: males 49.5%; and females 50.5% (ONS 2021)³⁴.</p> <p>Across Britain, women are more likely to live in poverty than men and are also more likely than men to experience severe material deprivation. In South Gloucestershire, women are significantly over-represented in accessing welfare and debt advice services and are significantly over-represented on the Housing Register.</p>	<p>Given national and local statistics indicate that there is greater potential for economic disadvantage amongst women, it is plausible that a proportion may rely on HMOs. As such, there is clear potential for differential negative impact.</p>	<p>The only areas that are likely to be most affected by the A4D are those within its proposed boundary, and as the A4D will have no retrospective effect on concentrations, the existing supply of accommodation in such areas will not change.</p>	<p>Y (positive)</p> <p>Y (negative)</p>	<p>The impact of the A4D will be kept under review through monitoring the number of applications determined through the planning process. This will be reported as part of preparing the Council's annual Authority's Monitoring Report (AMR). Officers will also review community correspondence, and feedback from elected local ward district councillors, members of the Council's Development Management Committee and Scrutiny Commission.</p>

²⁹ Same as reference 36.

³⁰ Same as reference 36.

³¹ <https://www.southglos.gov.uk/documents/Note-on-HMOs-Oct-2020v3.pdf>

³³ <https://www.southglos.gov.uk/documents/Note-on-HMOs-Oct-2020v3.pdf>

³⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021>

3. Summary

Following a public consultation on the proposals for an A4D within part of South Gloucestershire, this EqIA has sought to assess the potential impacts of the proposals on those with protected characteristics (as defined by The Equality Act 2010), should SGC take the decision to proceed with making the A4D. This assessment has taken into account the general response to the consultation and any matters that were raised related to those with protected characteristics.

The EqIA has identified that there are a number of potential differential and disproportionate effects for people with protected characteristics that could arise from the implementation of the A4D. However, overall, it is considered that the additional regulation of HMOs which would be delivered by the implementation of the A4D should prevent harmful impacts arising from HMO concentrations and help to support the creation / sustaining of mixed communities which should have a positive impact on members of those communities affected by HMO development. In some instances this includes some positive impacts expected for those with protected characteristics. Mitigation and actions have been identified where possible to address differential and/or disproportionate effects.

In accordance with its Public Sector Equality Duty, SGC will take into account the findings of this EqIA in making the decision whether to proceed with the proposals for the A4D.