Business Impact Assessment (BIA)



Ref No: HS2019

Proposal: Housing strategy 2020 to 2025 **Draft Business Impact Assessment** ¹

Conducted by: Housing Services

Date: April 2021

1. Aims of the proposal

That the proposals, priorities and actions in the housing strategy are adopted and that Housing remains a priority for Teignbridge District Council.

2. Methodology

This assessment uses the methodology and approach set out in Teignbridge's Engagement Strategy toolkit. Every new, or revised, strategy requires the undertaking of such an assessment to make sure that the proposals within the strategy address the Council's equalities policies and statutory requirements.

The BIA has considered the draft housing strategy's proposals and has analysed whether they are likely to have a positive, or negative, impact upon the environment and the community. Action to be taken to prevent direct and indirect discrimination and to positively promote harmonious community relations is set out below. Action references refer to our priorities below.

Housing strategy themes

1 Build affordable homes

- 1.1 Build rented homes
- 1.2 Build homes for low cost ownership
- 1.3 Develop innovative and specialist homes

2 Improve homes

- 2.1 Improve housing conditions
- 2.2 Improve energy efficiency and reduce fuel poverty
- 2.3 Keep people independent at home

3 Prevent homelessness and address rough sleeping

- 3.1 Prevention
- 3.2 Intervention
- 3.3 Sustainment

4 Put our clients first

Cuts across all of the things we do

5 Tackle climate change

Cuts across all of the things we do

3. Environment impacts

·	Please score
The proposal indicates the following impacts on the environment.	+3 ← 0 → -3
a. Natural environment (wildlife, landscape, trees)	-1
b. Built environment (townscape, design, archaeology, conservation)	+1
c. Climate change (adaptation, mitigation)	+1
d. Resource use (land, energy, water, minerals)	+1

3a. Natural environment (wildlife, landscape, trees) -1

All development, particularly in rural areas, will have an impact upon the natural environment, however each planning application is assessed on its own merits by the Planning Department and is ratified by the Planning Committee, should there be a need to do so. The Council Strategy ensures that all decisions consider climate change implications and the Local Plan includes various measures to tackle the climate emergency, including the requirement that all new development should be carbon neutral.

We will enable as many affordable homes to be developed on brown field sites as financially viable. Unfortunately, we do not have enough brownfield land to provide all the homes we need.

3b. Built environment (townscape, design, archaeology, conservation) +1

To positively impact on the built environment the strategy will:

Actions	Priority
Meet council strategy objective to 'manage, maintain and review use of our own assets to support our objectives, maximise income and improve the customer experience' (Vital, viable council)	1.1
Enable as many affordable homes on available brown field sites as financially viable	1.1
Survey residents of new affordable homes to improve service design, delivery and allocation	1.1
Reduce the number of empty homes by working with property owners, targeting those empty for over 2 years	2.1

3c. Climate change (adaptation, mitigation) +1

To positively impact on climate change the strategy will:

Action	Priority
Enable as many affordable homes on available brown field sites as financially viable	1.1
Develop as many low carbon, affordable homes as possible, according to viability	1.1
Take measures to reduce the carbon footprint of existing housing in line with the council strategy, local plan and Devon carbon reduction plan	2.2
Apply for funding to target those most in need to improve energy efficiency, tackle fuel poverty and reduce carbon emissions, supporting a whole house retrofit approach	2.2
Promote energy advice through our Local Energy Advice Partnership to ensure that householders can access funding for energy measures, fuel switch and access income maximisation advice	2.2
Work with our partners CosyDevon (a partnership of all Devon local authorities and community energy groups) to access funding and explore joint working opportunities, for example, Solar Together (Devon wide scheme for installation of solar panels)	2.2

Use enforcement action to target landlords not meeting the minimum energy efficiency standards	2.2
Target park home households to improve thermal comfort, reduce fuel poverty and improve energy efficiency	2.2
Proactively support independent living and make best use of the Better Care Funding stream to target and improve housing for vulnerable households	2.3

3d. Resource use (land, energy, water, minerals) +1 To positively impact on resource use the strategy will:

Action	Priority
Meet council strategy objective to 'manage, maintain and review use of our own assets to support our objectives, maximise income and improve the customer experience' (Vital, viable council)	1.1
Enable as many affordable homes on available brown field sites as financially viable	1.1
Enable affordable homes using our own land and assets to keep rents low	1.1
Develop homes to help households 'downsize', freeing-up bigger rented homes for larger households	1.3

4. Value and financial impacts

·	Please score
The proposal indicates the following financial impacts.	+3 ← 0 → -3
a. Jobs, or training opportunities	+1
b. Business investment within the area	+1
c. Tourism	0
d. The supply, or quality of housing	+3
e. Access to services and benefits	+2
f. Reduce cost, or increase income	+2
g. Increase capital receipts/funding	+2

4a. Jobs, or training opportunities +1T positively impact on jobs, and/or training the strategy will:

Action	Priority
Reduce the number of empty homes by working with property owners, targeting those empty for over 2 years	2.1
Enable the building of affordable, rented homes according to Local Plan targets	1.1
Work in partnership with preferred registered providers to meet affordable housing priorities and targets	1.1
Develop as many low carbon, affordable homes as possible, according to viability	1.1
Levy a partner fee from registered providers on each new affordable home to enhance the council's capacity to deliver	1.2
Promote custom and self-build sites and monitor demand	1.3
Review our Enforcement Policy to regulate and raise standards in the private rented sector	2.1

Work with our partners CosyDevon (a partnership of all Devon local authorities and community energy groups) to access funding and explore joint working opportunities, for example, Solar Together (Devon wide scheme for installation of solar panels)	2.2	
Work with Devon County Council to 'increase the supply of accessible homes through adaptations to existing homes' (Supporting people to live independently in Devon, 2020/25, Priority 2)	2.3	
Work with the Department of Works and Pensions and the community and voluntary sector to improve options for employment, education and training for people who have experienced homelessness.	3.3	

4b. Business investment within the area +1

The positively impact on business investment we will:

Actions	Priority
Work in partnership with preferred registered providers to meet affordable housing priorities and targets	1.1

4d. The supply, or quality of housing +3 To positively impact on the supply, or quality of housing we will:

Actions	Priority
Enable the building of affordable, rented homes according to Local Plan targets	1.1
Work with town and parish councils to identify suitable sites for affordable housing to meet local need	1.1
Develop as many low carbon, affordable homes as possible, according to viability	1.1
Enable gypsy and traveller sites in accordance with Local Plan targets	1.3
Promote custom and self-build sites and monitor demand	1.3
Work with DCC to 'increase the supply of accessible homes through new developments' (Supporting people to live independently in Devon, 2020/25, Priority 2)	1.3
Reduce the number of empty homes by working with property owners, targeting those empty for over 2 years	2.1
Review our Enforcement Policy to regulate and raise standards in the private rented sector	2.1
Deliver forums and other networking opportunities for private landlords and letting agents, giving quality advice and support to promote high standards in the private rented sector	2.1
Promote our Property Agent Rating Scheme to improve property, promote confidence in landlords using agents, to protect tenants and ensure agents comply with legislation	2.1
Monitor and proactively target non-compliant landlords, taking appropriate action where standards are not being met, to tackle disrepair and poor housing conditions in the private rented sector	2.1
Promote low interest loans to support the improvement of housing conditions	2.1
Use enforcement action to target landlords not meeting the minimum energy efficiency standards	2.2
Target park home households to improve thermal comfort, reduce fuel poverty and improve energy efficiency	2.2

Work with Devon County Council to 'increase the supply of accessible homes through adaptations to existing homes' (Supporting people to live independently in Devon, 2020/25, Priority 2)	2.3
Review, deliver and promote our grants and loan policy to ensure that it reflects the needs of the householders and meets identified local need	2.3
Provide advice and support for self-funded disabled adaptations so people can make informed choices regarding adaptations	2.3
Proactively support independent living and make best use of the Better Care Funding stream to target and improve housing for vulnerable households	2.3
Survey all households receiving adaptations to improve service design and delivery	2.3
Work with housing providers to explore how better use might be made of existing homes	3.2
Investigate the feasibility of delivering more specialist forms of housing, such as the acquisition of houses of multiple occupation to provide more housing options for young people on low and middle incomes	3.2

4e. Access to services and benefits +2

T positively impact on the access to services and benefits we will:

Actions	Priority
Continue to improve the Housing Solutions Service, to make sure that we give residents high quality advice when they need it	3.1
Continue to recognise the strong links between mental health, substance misuse and homelessness, and work with Devon County Council to ensure that service design supports tenancy sustainment and homelessness prevention	3.1
Improve our approach to preventing private sector evictions and to preventing homelessness for people living with family, or friends through targeted and proactive mediation	3.1
Explore further tenancy rescue solutions for private tenants including the potential for targeted grants and loans	3.1
Review the financial advice services available to identify any gaps, duplication, or problems with accessing services	3.1
Continue to work with housing providers operating locally, through which we have agreed common policies and approaches and help minimise the number of social housing evictions	3.1
Improve how we capture the reasons for homelessness and identify trends	3.1
Improve our understanding of what impact COVID-19 might have on the risk of homelessness, so that we can plan and respond according	3.1
Work with members, partners and clients to develop homelessness and rough sleeping strategy that is fit for purpose and meets statutory and legislative requirements	3.1
Improve engagement with private landlords, letting agencies, social housing providers and tenants; and promote the importance of those threatened with homelessness seeking help at an early stage	3.1
Review the Devon Home Choice Policy and our approach to Local Lettings Plans in the context of access to housing for those with high levels of need	3.2

Look for alternative ways of providing temporary and emergency accommodation to more effectively support those with complex needs	3.2
Develop a model of accommodation based and floating support that meets the housing and health needs of our service users	3.2
Build on the work of our Rough Sleeper Multidisciplinary Team, and explore how working arrangements with mental health, substance misuse and social services can be improved including the potential of some co-location of service	3.2
Review the scope and effectiveness of accommodation based and floating support, particularly in relation to move on advice and maintaining settled homes	3.3
Continue to provide financial inclusion advice and support for those at risk of or already homeless.	3.3
Ensure that we are able to provide the support to landlords and social housing providers experiencing issues with tenants so that we can resolve problems before they reach a point of crisis.	3.3
Actively involve clients with a lived experience of homelessness to shape our services	3.3
Strengthen work with partners to provide a joined-up approach to preventing and tackling drug and alcohol related anti-social behaviour.	3.3

4f. Reduce cost, or increase income +2 T positively impact on reduced cost, or increased income we will:

Actions	Priority
Continue to recognise the strong links between mental health, substance misuse and homelessness, and work with Devon County Council to ensure that service design supports tenancy sustainment and homelessness prevention	3.1
Improve our approach to preventing private sector evictions and to preventing homelessness for people living with family, or friends through targeted and proactive mediation	3.1
Continue to work with housing providers operating locally, through which we have agreed common policies and approaches and help minimise the number of social housing evictions	3.1
Work with members, partners and clients to develop homelessness and rough sleeping strategy that is fit for purpose and meets statutory and legislative requirements	3.1
Actively involve clients with a lived experience of homelessness to shape our services	3.3
Strengthen work with partners to provide a joined-up approach to preventing and tackling drug and alcohol related anti-social behaviour.	3.3

4g. Increase capital receipts/funding +2

To positively impact on increased capital receipts/funding we will:

Actions	Priority
Work with members, partners and clients to develop homelessness and rough sleeping strategy that is fit for purpose and meets statutory and legislative requirements	3.1
Enable the building of affordable, rented homes according to Local Plan targets	1.1
Reduce the number of empty homes by working with property owners, targeting those empty for over 2 years	2.1
Proactively support independent living and make best use of the Better Care Funding stream to target and improve housing for vulnerable households	2.3
Apply for funding to target those most in need to improve energy efficiency, tackle fuel poverty and reduce carbon emissions, supporting a whole house retrofit approach	2.2
Work with our partners CosyDevon (a partnership of all Devon local authorities and community energy groups) to access funding and explore joint working opportunities, for example, Solar Together (Devon wide scheme for installation of solar panels)	2.2

5. Social impacts and duties

The man coldinates the following a circling cots	% of	Please score
The proposal indicates the following social impacts.	population	$+3 \leftarrow 0 \rightarrow -3$
a. Age Children (Under 16)	16.25%	+1
Young (16-24)	7.88%	+2
Working age (25-59)	42.51%	+1
Older (60+)	31.82%	+2
b. Women	51.4%	+2
c. Men	49.85%	+1
d. Transgender	0.01%	0
e. BAME (Black, Asian, minority ethnic)	3.8%	+1
f. LGB (lesbian, gay, bisexual)	5%	0
g. Marriage and Civil Partnership	52%	0
h. Religion and belief (or none)	71.9%	0
i. Disability	20.6%	+3
j. Pregnancy and Maternity		0
k. Rural	27%	+2
I. Economic Deprivation	21.8%	+2

Bold = 'Protected characteristics'

5a. Age

To positively contribute to the following characteristics we will:

Children +1

Actions	Priority
Further develop our existing plans to reduce reliance on the use of Bed and Breakfast style emergency accommodation	3.2

Young +2

Actions	Priority
Promote custom and self-build sites and monitor demand	1.3
Investigate the feasibility of delivering more specialist forms of housing, such as the acquisition of houses of multiple occupation to provide more housing options for young people on low and middle incomes	3.2
Promote and monitor local interest in the Help to Buy Scheme	1.2
Develop homes to help households 'downsize', freeing-up bigger rented homes for larger households	1.3
Investigate funds, suitable land, or property to accommodate a shared housing project	1.3
Investigate funding to develop a temporary accommodation scheme, providing tailored support to residents	1.3

Working age +1

Actions	Priority
Promote custom and self-build sites and monitor demand	1.3
Promote and monitor local interest in the Help to Buy Scheme	1.2
Develop homes to help households 'downsize', freeing-up bigger rented homes for larger households	1.3

Older +2

Actions	Priority
Develop homes to help households 'downsize', freeing-up bigger rented homes for larger households	1.3
Proactively support independent living and make best use of the Better Care Funding stream to target and improve housing for vulnerable households	2.3
Work with DCC to 'increase the supply of accessible homes through new developments' (Supporting people to live independently in Devon, 2020/25, Priority 2)	1.3
Target park home households to improve thermal comfort, reduce fuel poverty and improve energy efficiency	2.2
Work with Devon County Council to 'increase the supply of accessible homes through adaptations to existing homes' (Supporting people to live independently in Devon, 2020/25, Priority 2)	2.3
Provide advice and support for self-funded disabled adaptations so people can make informed choices regarding adaptations	2.3
Survey all households receiving adaptations to improve service design and delivery	2.3
Work with social care and other services to ensure a joined-up approach and understanding of support available for those wishing to remain independent at home	2.3

5e. Ethnicity +1

To positively contribute to this characteristic we will:

Actions	Priority
Enable gypsy and traveller sites in accordance with Local Plan targets	1.3
Work with partners to bring forward a plot of land suitable for gypsy and traveller transit provision	1.3

5i. Disability +3To positively contribute to this characteristic we will:

Actions	Priority
Maintain and regularly review our allocations policy to fairly allocate rented homes via Devon Home Choice	1.1
Work with DCC to 'increase the supply of accessible homes through new developments' (Supporting people to live independently in Devon, 2020/25, Priority 2)	1.3
Work with Devon County Council to 'increase the supply of accessible homes through adaptations to existing homes' (Supporting people to live independently in Devon, 2020/25, Priority 2)	2.3
Provide advice and support for self-funded disabled adaptations so people can make informed choices regarding adaptations	2.3
Proactively support independent living and make best use of the Better Care Funding stream to target and improve housing for vulnerable households	2.3
Work with social care and other services to ensure a joined-up approach and understanding of support available for those wishing to remain independent at home	2.3
Survey all households receiving adaptations to improve service design and delivery	2.3

5k. Rural Communities +2

To positively contribute to this characteristic we will:

Actions	Priority
Work with town and parish councils to identify suitable sites for affordable housing to meet local need	1.1
Enable as many affordable homes on available brown field sites as financially viable	1.1
Assist, promote and monitor the shared equity scheme at Chudleigh to help up to 13 households get onto the housing market	1.2

5I. Economic deprivation +2

To positively contribute to this characteristic we will:

Actions	Priority
Maintain and regularly review our allocations policy to fairly allocate rented homes via Devon Home Choice	1.1
Enable affordable homes using our own land and assets to keep rents low	1.1
Investigate funds, suitable land, or property to accommodate a shared housing project	1.3
Investigate funding to develop a temporary accommodation scheme, providing tailored support to residents	1.3

Promote energy advice through our Local Energy Advice Partnership to ensure that householders can access funding for energy measures, fuel switch and access income maximisation advice			
Work with our partners CosyDevon (a partnership of all Devon local authorities and community energy groups) to access funding and explore joint working opportunities, for example, Solar Together (Devon wide scheme for installation of solar panels)			
Target park home households to improve thermal comfort, reduce fuel poverty and improve energy efficiency	2.2		
Work with Devon County Council to 'increase the supply of accessible homes through adaptations to existing homes' (Supporting people to live independently in Devon, 2020/25, Priority 2)			
Proactively support independent living and make best use of the Better Care Funding stream to target and improve housing for vulnerable households			
Work with social care and other services to ensure a joined-up approach and understanding of support available for those wishing to remain independent at home			
Survey all households receiving adaptations to improve service design and delivery	2.3		
Continue to improve the Housing Solutions Service, to make sure that we give residents high quality advice when they need it	3.1		
Continue to recognise the strong links between mental health, substance misuse and homelessness, and work with Devon County Council to ensure that service design supports tenancy sustainment and homelessness prevention			
Improve our approach to preventing private sector evictions and to preventing homelessness for people living with family, or friends through targeted and proactive mediation			
Explore further tenancy rescue solutions for private tenants including the potential for targeted grants and loans	3.1		
Review the financial advice services available to identify any gaps, duplication, or problems with accessing services	3.1		
Continue to work with housing providers operating locally, through which we have agreed common policies and approaches and help minimise the number of social housing evictions	3.1		
Improve our understanding of what impact COVID-19 might have on the risk of homelessness, so that we can plan and respond according	3.1		
Prevent homelessness by helping clients remain at home, or with alternative accommodation	3.1		
Work with members, partners and clients to develop homelessness and rough sleeping strategy that is fit for purpose and meets statutory and legislative requirements	3.1		
Improve engagement with private landlords, letting agencies, social housing providers and tenants; and promote the importance of those threatened with homelessness seeking help at an early stage	3.1		
Review the Devon Home Choice Policy and our approach to Local Lettings Plans in the context of access to housing for those with high levels of need	3.2		
Review the extent to which housing related debt should remain a barrier to being offered a home	3.2		

Encourage and promote the take-up of private rented housing options, considering additional incentives and improving upon the support available to landlords and tenants	
Look for alternative ways of providing temporary and emergency accommodation to more effectively support those with complex needs	3.2
Build on the work of our Rough Sleeper Multidisciplinary Team, and explore how working arrangements with mental health, substance misuse and social services can be improved including the potential of some co-location of service	3.2
Review the scope and effectiveness of accommodation based and floating support, particularly in relation to move on advice and maintaining settled homes	3.3
Continue to provide financial inclusion advice and support for those at risk of or already homeless.	3.3
Work with the Department of Works and Pensions and the community and voluntary sector to improve options for employment, education and training for people who have experienced homelessness.	3.3
Improve collaboration with statutory partners at a strategic level to address the underlying causes of homelessness.	3.3
Ensure that we are able to provide the support to landlords and social housing providers experiencing issues with tenants so that we can resolve problems before they reach a point of crisis.	3.3

6. Summarise potential impacts and planned mitigations:

Have representatives of those likely to be affected by the proposal been consulted?	Yes
Are there ongoing plans to monitor the impact of the proposals	Yes
Are there any relevant Human Rights considerations?	No

Consultation

The consultation details were sent via the following groups and platforms:

- Affordable Housing Partnership (27)
- Devon Home Choice applicants (978)
- Gypsy and Traveller Forum
- Living Options
- Members' Newsletter (47)
- Housing Partner Newsletter (136)
- Plymouth and Devon Racial Equality Council (social media)
- Senior Voice of Devon
- Staff Newsletter (600)
- Teignbridge Association of Local Councils
- Teignbridge Council website, Facebook and Twitter
- Teign Housing (social media)
- Town and Parish Councils (50)
- Welfare Reform Group* (47)

^{*}The Welfare Reform Group includes local agencies, such as the Department of Work and pensions, registered providers, foodbanks, SSAFA, British Legion, Cass Pluss (court advocacy), SW Water, Citizens Advice, Community Voluntary Service and Young Devon.

From the consultation we received 569 survey responses and have directly responded to 295 comments and questions, many of which can be categorised under 14 main headings. These are discussed in further detail in the Committee reports.

Monitoring

We will publicly review the effectiveness of our actions via the scrutiny of elected members on a quarterly basis. We will also review these actions annually to make sure that they remain effective as government and local policy emerges. To this end we intend to regularly consult with elected members and stakeholders every year before finalising plans and then putting them into action.

Action plans are recorded in our 'Service, Performance and Risk' monitoring system and are reported quarterly to the Overview and Scrutiny and Executive Committees, where they are debated publicly.

7. Duties

Under the Equality Act 2010 s.149 the Council must annually publish what actions we have taken in response to our three equality duties. This proposal contributes to the duties in the following ways:

a] The elimination of discrimination, harassment, victimisation and other prohibited conduct by:

People experiencing domestic abuse, or harassment, remain in priority need under the Housing Act

b] The advancement of equality of opportunity by:

The housing strategy broadens the social housing offer and identifies the need to create a comprehensive suite of housing options tailored to all local residents, taking into account their circumstances.

By linking tenants and customers to financial assistance, education, children and young people services, health services, as well as employment related agencies, this strategy promotes equal opportunities and overall has a positive impact.

In relation to equalities the housing strategy is focused on providing services to residents that are accessible and designed to meet the needs of those communities being served. An important aim of the strategy is to provide advocacy and choice for customers and we are striving to improve communications with all members of the community to encourage greater participation in service delivery.

c] The fostering of good relations between people by:

- 1. Contributing to the Teignbridge Gypsy and Travellers Forum
- 2. Hosting a quarterly welfare reform forum with partners who work with vulnerable people, for example Community Voluntary Service, foodbanks. Citizen's Advice and the Job Centre Plus
- 3. Integrating housing services into the health and voluntary sector via the Teignmouth and Dawlish trips and falls hub

Service information here: www.teignbridge.gov.uk/equalityduties

8. Managers' evaluation

$\overline{\mathbf{V}}$	No major change required	
X	Adjustments have been made to better advance equality	
NA	Continue despite having identified some potential for adverse impacts.	
X	Cease the proposal. It shows actual or potential unlawful discrimination.	

9. Recommended action

That the housing strategy is adopted and that Housing remains a priority for the Council

10. Sign off

	Business Manager		BID
	Amanda Pujol		Rebecca Hewitt
Signed	A Pujal	Signed	Rebecca Hewitt
Date	31 March 2021	Date	24 March 2021
Review date	NA	Review date	NA

11. Further information

If you need this information in another format, please contact us.

Email: housing@teignbridge.gov.uk **Web:** www.teignbridge.gov.uk/counciltax

Text 07768 808 160 **Tel:** 01626 361 101

Teignbridge District Council Forde House Brunel Road Newton Abbot TQ12 4XX

TDC Housing strategy BIA

G:\Housing\Strategy\TDC Housing Strategy 2021-26\BIA