

# Development Viability SPD Equalities Analysis Final Equalities Analysis:

November 2015

# Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Draft Development Viability Supplementary Planning Document
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Department	Chief Executive Division		Planning Policy		
Period analysis undertaken	November 2015				
Date of review (if applicable)					
Sign- off	Position			Date	November 2015

### 1.1 Brief description of policy/decision/business plan

The council is required by UK law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and on Human Rights.

The general equality duty does not specify how public authorities should analyse the effect of their existing and new policies and practices on equality, but doing so is an important part of complying with the general equality duty.

'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 primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community.

This equalities analysis looks at how the objectives of the Draft Development Viability Supplementary Planning Document ("SPD") relate to equality and which aspects may have particular importance to equality. It describes the purpose of the guidance, the context in which it will operate, who it is intended to benefit, what results are intended and why it is needed.

The Draft Development Viability SPD will be a key guidance document for Southwark as it will set out detailed guidance in relation to existing planning policies in the Development Plan. The Development Plan consists of the existing borough-wide planning documents, the Core Strategy (2011) and the saved Southwark Plan policies (2007) which set out policies for the future development of the borough alongside the Mayor's London Plan policies. The National Planning Policy Framework (NPPF) and associated guidance and National Planning Practice Guidance (NPPG) also provide guidance, but do not form part of the Development Plan

The purpose of the Draft SPD is to provide greater detail and explanation of the council's adopted policies on affordable housing and the procedure for ascertaining the level of affordable housing provision that can be viably secured through planning obligations.

Planning obligations are used as part of the planning application process to address specific planning issues and impacts arising from a development proposal, often including affordable housing. In dealing with planning applications, local planning authorities consider each on its merits and reach a decision based on whether the application accords with the relevant development plan, unless material considerations indicate otherwise.

Where applications do not meet these requirements, they may be refused. However, in some instances, it may be possible to make acceptable development proposals which might otherwise be unacceptable, through the use of planning conditions or, where this is not possible, through planning obligations. They are normally agreed between the Council, land owners and developers in a legal agreement called a Section 106

#### agreement.

To the benefit of developers and the wider public the Draft Development Viability SPD will provide clear guidance on when a viability appraisal is required, what methodology should be followed and the basis on which viability appraisals will be assessed by the council. This will ensure all applications are dealt with efficiently, consistently and transparently.

The Draft Development Viability SPD does **not** constitute new policy. Rather, it will be used to implement a number of existing policies and guidance as set out in the NPPF, NPPG, the Core Strategy (2011), Canada Water Area Action Plan (2015), Peckham and Nunhead Area Action Plan (2014) and the Aylesbury Area Action Plan.

The Draft Development Viability SPD should be considered alongside the Affordable Housing SPD (2008), the Draft Affordable Housing SPD (2011) and the Section 106 Planning Obligations and Community Infrastructure (CIL) SPD (2015). Taken together these documents provide detailed guidance on implementation of Southwark's affordable housing policies and the use of planning obligations to secure planning policy requirements.

#### 2. Service users and stakeholders

Planning is a statutory function carried out by local authorities. The development of planning policies and the impacts of planning decisions can affect everyone with an interest in land in the borough. The document will be of most relevance to the following stakeholders:

- Current and future residents who will benefit from the new provision of and improvements to affordable housing provision that are funded by developer contributions or provided directly by developers.
- Developers (and their clients), landowners and those acting on their behalf (e.g. architects and planning agents) and members of the public who will be submitting or commenting on a planning application for a site in Southwark.
- The council.

The council will consult on the Draft Development Viability SPD and its stage 1 Equality Analysis between 1<sup>st</sup> December 2015 and 14th February 2016. Consideration of responses and amendments to the Draft Development Viability SPD will commence from 15th February 2015. It is envisaged that the Draft Development Viability SPD will be adopted on the 15<sup>th</sup> March 2016.

The Council's Statement of Community Involvement (SCI) explains how the local community can get involved in the preparation of planning policy documents and sets out methods of consultation for target groups.

#### Key stakeholders involved in the preparation of the SPD include:

- Cabinet Member for Regeneration, Transport and Planning
  - Southwark Councillors
  - Internal stakeholders including housing, property and planning teams
  - External stakeholders including the GLA and other London boroughs.

The Planning Policy team have received corporate equalities training and equalities analysis report writing training. A number of service deliverers within the Council will also have received corporate equalities training.

# Key stakeholders are involved in this policy guidance

Key users of the

department or

service

Section 4: Pre-implementation updated equality analysis

This section considers the potential impact (positive and negative) of the proposed guidance in the draft SPD on the different groups protected from discrimination by the Equality Act 2010 and Human Rights Act. There are two reasons for this. First, to consider if there are any unintended consequences for some groups, and second, to consider if the policy will be fully effective for all target groups. The actual and potential effect on equality of the proposed guidance, and appropriate mitigating measures, are considered to ensure that inequalities between different equality groups have been identified and do not continue or widen. It involves using equality information, and the results of engagement with protected groups and others, to understand the actual effect or the potential effect of the proposed guidance.

Equality analysis starts prior to policy development or at the early stages of a review. It is not a one-off exercise, it is on-going and cyclical and it enables equality considerations to be taken into account before a decision is made. This equality analysis is not simply about identifying and removing negative effects or discrimination, but it is also an opportunity to identify ways to advance equality of opportunity and to foster good relations.

#### **Equality information**

Before assessing the impact of the Draft Development Viability SPD on key protected characteristics, it is important to understand the demographic context of the borough.

#### General

- The Census 2011 confirms that there are 288,283 Southwark residents. This is an 18% increase from the 2001 Census.
- In 2010 Southwark was ranked the 41st most deprived Local Authority in England and the 12th most deprived in London. This is a relative improvement from previous rankings in 2004 and 2007.
- Southwark has a high population density of 105.5 persons per hectare, compared to 54 persons per hectare across London as a whole.
- Job density is also very high, given that Southwark is a central London borough. It
  is approximately 1.16. This is the number of jobs per resident of working age. For
  example, a job density of 1.0 would mean that there is one job for every resident of
  working age.
- The largest demand for housing in Southwark is for family and affordable housing, particularly social rented housing. In 2013, average house price in Southwark was 12.8 times the average full-time worker's earnings. This is higher than the London average of 11.8 times earnings.

#### Age

- The proportion of the population aged between 16-64 years is 73.6% making it the largest age group in Southwark at 212,176 people. This is 4.9% higher than the London region as a whole, and 8.8% higher than the UK as a whole. Southwark has a smaller proportion of people in the 0-15 (53,620 people) and 65+ (at 22,486 people) age groups than the London region and the UK as a whole. Between mid-2003 to mid-2012, the proportion of people in the 65+ age group decreased by 9.6%. This is the only age group to see a decrease. The 0-15 age group saw a 7.7% increase and 16-64 age group saw a 20.6% increase. The average age of a Southwark resident is 33.8 years.
- Southwark has fewer numbers of older people than the rest of London, although this is predicted to rise with an extra 900 people aged 85 or over expected by 2020, which is an increase of nearly 30% on current levels. The number of people with disabilities and learning difficulties is also rising steadily, with those under 65 years predicted to increase to around 20,000 by 2025.

- Major health indicators such as mortality and life expectancy have improved (life expectancy at birth for males is 77.8 years compared to 78.6 years in London and 82.9 years for females compared to 83.1 years in London, January 2007-December 2009, ONS), although significant inequalities are evident across the population. The difference in life expectancy, for example, between the worst off and best off is 9.5 years for men and 6.9 years for women.
- Nearly two thirds (74%) of people in Southwark are aged 16-64 i.e. the age where they can be economically active. Of this percentage, 78% of 16-64 year olds are economically active. Of this 78%, 8% are unemployed, which is 1% higher than the London average. 71% of Southwark's working age population are employed, and of this 11% were self employed.
- There are significant disparities in educational attainment and skills in Southwark.
   In 2012, 9.4% of people aged between 16 and 64 had no qualifications. This was a higher percentage than in London as a whole. However, the trend was downwards and Southwark's percentage had dropped 1.4% since 2009.
- In 2012, the proportion of 16 to 18 year-olds NEET (not in education, employment or training) in Southwark was 7.7% compared to 4.7% in London.

# **Disability**

- In total, 13% of 16-64 year olds are claiming key out-of—work benefits. As well as JSA, this includes disabled, lone parents, cares and the bereaved. JSA and Incapacity Benefit make up the largest share of out of work benefits claimed in Southwark, at 6%.
- Over the period 2012-2032 the number of working age people with serious physical disability is expected to increase by 23% from 3,600 to almost 4,450. Current unmet need for wheelchair housing stands at close to 550 households.
- There is a greater concentration of mental health need in the centre of the borough than in the north or the south, corresponding both to higher levels of deprivation, and lower levels of employment.
- Southwark has a below average supply of specialised elderly accommodation (compared with the average for South East London). 33% of elderly households in the borough are owner-occupied while 61% are in the social rented sector. Southwark has fewer elderly people with mobility issues than other South East London boroughs (with around 4,200) however this group is expected to increase by 17% between 2012 and 2020.
- A steady increase in the number of households with physical disabilities is forecast between now and 2020 in the South East London sub-region comprising the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark, both of older people and working age households. Currently it is estimated that around 2,500 households have unmet wheelchair accessible accommodation requirements and some 32% of household's currently needing wheelchair accommodation require 3 bed or larger homes (SE London Strategic Housing Market Assessment 2014).

#### **Gender (and Gender reassignment)**

- 50.5% of Southwark's population is female.
- The comparison of employment statistics between genders reveals that the
  proportion of females in employment is consistently less than males, either as
  employees or self employed. For example, 75% of economically active males in
  Southwark are in employment, compared with 66% of females. In 2012, of Income
  Support claimants in Southwark, 31% were male and 69% female.

#### Marriage and Civil partnership

• In terms of marital and civil partnership status, Southwark has a relatively high percentage of single persons (54.7%) compared to London 44.1% (16 years and

over). There are 28.5% married couples and 0.9% are in a registered same sex civil partnership.

#### **Religion and Belief**

The majority of residents in Southwark who stated their religion in the 2011 Census were of Christian faith (52.5%) with the second highest category being 'No religion' (26.7%). Muslim faith was the third highest (8.5%). By comparison 48% were of Christian faith in London and 59% nationally, with 21% of London residents expressing no religion and 24.7% nationally.

#### Race

- Southwark is a very diverse borough with over 45% of residents coming from Black and Ethnic Minority (BaEM) communities according to the 2011 Census.
- Compared to the population as a whole, a very high proportion of Black households (70%) are housed in the social/affordable rented sector and a small proportion of this group (17%) is in owner-occupation. A greater proportion of White households in Southwark are in the 64+ age group compared to the other ethnic groups in the borough.
- 36.5% of Southwark's residents were born outside the UK. This is 2.9% lower than inner London as a whole, and 0.7% higher than London as a whole. The largest migrant population in Southwark is Nigerian, representing 4.7% of the population. The second largest is immigrant population is Jamaican, at 2.0%. Third are Irish, at 1.7%.

#### **Pregnancy and maternity**

- In 2012 there were 5,030 live births.
- In 2012/13, 0.6% of women giving birth in this area were under 18 years of age. This is similar to the regional average.
- 89.6% of mothers in this area initiate breastfeeding when their baby is born. This area has a similar percentage of babies who have ever been breastfed compared with the European average of 89.1%.

#### **Sexual Orientation (local data not available)**

• In 2013, 1.6% of UK adults identified their sexual identity as gay, lesbian or bisexual. London had the highest percentage of adults identifying themselves as gay, lesbian or bisexual at 3.2%. Twice as many males (1.6%) as females (0.8%) were likely to state their sexual identity as gay or lesbian. (ONS Integrated household survey).

The primary aim of the Draft Development Viability SPD is to provide clear guidance on when a viability appraisal is required, what methodology should be followed and the basis on which viability appraisals will be assessed by the council. This will ensure all applications are dealt with efficiently, consistently and transparently.

The Draft Development Viability SPD will be used to inform decisions on all planning applications where there is a policy requirement to provide affordable housing (there is a policy requirement to provide affordable homes when any scheme results in the creation of 10 or more homes or 30 or more student bed-spaces). This includes applications for new build, change of use, conversions and mixed use developments. The principles of this Draft Development Viability SPD will also apply to development proposals which otherwise seek to depart from the development plan for reasons of viability.

The Council is required by the National Planning Policy Framework (NPPF) (paragraph 47) to plan to meet our objectively assessed housing needs through our Local Plan. Our Strategic Housing Market Assessment shows that Southwark has a net additional housing

requirement of 1,472 to 1,824 units per year over the period 2013-2031 and approximately half of that need is for affordable housing. On 31 March 2015 there were 12,597 households on Southwark's housing register. Inflation in house prices and private rents could exacerbate the need over the coming years. In order to meet out housing needs there is a pressing need to maximise the provision of new affordable homes wherever possible.

The Council define affordable housing in the Core Strategy as housing that meets the 'needs of households whose incomes are insufficient to allow them to buy or rent decent and appropriate housing'. This definition is consistent with the London Plan (2015) definition (Policy 3.10). The Core Strategy identified two types of affordable housing; social rented housing and intermediate affordable housing.

The Draft Development Viability SPD also aims to help deliver the policies and objectives of the Core Strategy (2011) alongside other local plans and promote development that is sustainable in economic, social and environmental terms.

The Draft Development Viability SPD itself does not have a direct impact on any groups with protected characteristics. By providing guidance on the requirements for viability appraisals and the basis on which these will be assessed the Draft Development Viability SPD aims to ensure that the council can meet our overall objectively assessed housing needs while also ensuring that sufficient affordable housing can be delivered meeting current needs and future demands of the borough's diverse residents, visitors and workers

#### **Equalities Analysis**

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

#### Potential impacts (positive and negative) of proposed policy guidance

Positive impact

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed, the council will be able to better meet our overall objectively assessed housing needs by ensuring that more affordable housing can be delivered as part of new development. The proposed guidance is likely to have a positive impact on all age groups in need of affordable housing provision in the borough (due to having insufficient incomes to allow them to buy or rent decent and appropriate housing) as the range of affordable housing products that will be delivered will be suitable for different aged people with a diversity of housing requirements, including young people, families and pensioners.

No unintended consequences were identified.

# Equality information on which above analysis is based

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

# Mitigating actions to be taken

The above analysis highlights that the Draft SPD will largely give rise to a positive impact. No specific impacts have been identified that would affect people differently as a result of their age.

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

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

#### Positive impact

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed, the council will be able to better meet our overall objectively assessed housing needs by ensuring that sufficient affordable housing can be delivered as part of new development. By enabling the delivery of more affordable housing, and in combination with policies requiring the delivery of housing to meet the needs of all including those with disabilities, the proposed guidance is likely to have a positive impact on those living with disability who have insufficient income to allow them to buy or rent decent and appropriate housing.

No unintended consequences were identified.

#### Equality information on which above analysis is based

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

#### Mitigating actions to be taken

The above analysis highlights that the Draft SPD will largely give rise to a positive impact. No specific impacts have been identified that would affect people differently as a result of disability.

**Gender reassignment -** The process of transitioning from one gender to another.

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

#### Positive impact

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed the council will be able to better meet our overall objectively assessed housing needs while also ensuring that sufficient affordable housing can be delivered, meeting current needs and future demands of the borough's diverse residents, visitors and workers. This is likely to have a positive impact on all groups in need of affordable housing.

No unintended consequences were identified.

#### Equality information on which above analysis is based.

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

#### Mitigating actions to be taken

The above analysis highlights that the implementation of the Draft SPD will largely give rise to positive impacts. No specific impacts have been identified that would affect people differently as a result of their gender reassignment.

Marriage and civil partnership - Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.

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

#### Positive impact

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed the council will be able to better meet our overall objectively assessed housing needs while also ensuring that sufficient affordable housing can be delivered, meeting current needs and future demands of the borough's diverse residents, visitors and workers. This is likely to have a positive impact on all groups in need of affordable housing.

No unintended consequences were identified.

#### Equality information on which above analysis is based

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

#### Mitigating actions to be taken

The above analysis highlights that the implementation of the Draft SPD will largely give

rise to positive impacts. No specific impacts have been identified that would affect people differently as a result of their marriage or civil partnership.

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

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

#### Positive impact

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed the council will be able to better meet our overall objectively assessed housing needs while also ensuring that sufficient affordable housing can be delivered, meeting current needs and future demands of the borough's diverse residents, visitors and workers. This is likely to have a positive impact on all groups in need of affordable housing.

No unintended consequences were identified.

#### Equality information on which above analysis is based

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

#### Mitigating actions to be taken

The above analysis highlights that the implementation of the Draft SPD will largely give rise to positive impacts. No specific impacts have been identified that would affect people differently as a result of pregnancy and maternity.

**Race -** Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

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

#### Positive impact

Unemployment levels are generally higher across the borough for Black and Ethnic Minority (BME) communities. Furthermore, evidence from the 2011 Census shows that BME residents are more likely to be in need of affordable housing and are amongst

households with issues of overcrowding.

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed the council will be able to better meet our overall objectively assessed housing needs while also ensuring that sufficient affordable housing can be delivered, meeting current needs and future demands of the borough's diverse residents, visitors and workers. This is likely to have a positive impact for Black and Ethnic Minority communities.

No unintended consequences were identified.

#### Equality information on which above analysis is based

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise. Information from the 2011 Census has also been reviewed.

#### Mitigating actions to be taken

The above analysis highlights that the implementation of the Draft SPD will largely give rise to positive impacts. No specific impacts have been identified that would affect people differently as a result of their race.

We will ensure there is adequate engagement with BME groups regarding the SPD. Accessibility to translation services will be available if required.

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

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

#### Positive impacts

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed the council will be able to better meet our overall objectively assessed housing needs while also ensuring that sufficient affordable housing can be delivered, meeting current needs and future demands of the borough's diverse residents, visitors and workers. The Draft SPD does not directly address religious belief, however, it is likely that people of all faiths, or none, will benefit from the council's improved ability to deliver affordable housing.

No unintended consequences were identified.

#### Equality information on which above analysis is based

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

#### Mitigating actions to be taken

The above analysis highlights that the implementation of the Draft SPD will largely give rise to positive impacts. No specific impacts have been identified that would affect people differently as a result of religion and belief.

#### Sex - A man or a woman.

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

#### Positive impacts

Approximately half of the Borough's population are female (50.5%). The comparison of employment statistics between genders reveals that the proportion of females in employment is consistently less than males, either as employees or self-employed. For example, 75% of economically active males in Southwark are in employment compared with 66% if females. In 2012, of Income Support claimants in Southwark, 31% were male and 69% female. As such it is more likely that women are in need of affordable housing provision.

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed the council will be able to better meet our overall objectively assessed housing needs while also ensuring that sufficient affordable housing can be delivered, meeting current needs and future demands of the borough's diverse residents, visitors and workers including men and women.

No unintended consequences were identified.

#### Equality information on which above analysis is based

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

#### Mitigating actions to be taken

The above analysis highlights that the implementation of the Draft SPD will largely give rise to positive impacts.

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

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

Positive impacts

By providing clear guidance on the information requirements for viability appraisals and the basis on which these will be assessed the council will be able to better meet our overall objectively assessed housing needs while also ensuring that sufficient affordable housing can be delivered, meeting current needs and future demands of the borough's diverse residents, visitors and workers including those of all sexual orientations. The Draft SPD does not directly address sexual orientation as the objective is to ensure that sufficient affordable housing can be delivered for all of the borough's future and existing residents.

No unintended consequences were identified.

#### Equality information on which above analysis is based

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

#### Mitigating actions to be taken

The above analysis highlights that the implementation of the Draft SPD will largely give rise to positive impacts. No specific impacts have been identified that would affect people differently as a result of their sexual orientation.

#### **Human Rights**

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

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

Positive impact

Information on which above analysis is based

Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights (ECHR). Various Convention rights may be engaged in the process of making and considering the Article 4 Direction, including under Articles 1 and 8 of the First Protocol. The European Court has recognised that "regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole". Both public and private interests are to be taken into account in the exercise of the council's powers and duties as a local planning authority. Any interference with a Convention Right must be necessary and proportionate.

## Mitigating actions to be taken

N/A

Section 5: Further actions and objectives

#### 5. Further actions

Based on the analysis above, areas are identified as requiring more detailed analysis or key mitigating actions.

Number	Description of Issue	Action	Timeframe
1	Ensure that the SPD is adopted within the shortest possible timeframe by the council to ensure development viability can be assessed and affordable housing appropriately secured from developments in the context of national and regional government policy.	Progress the SPD towards formal adoption at Cabinet and Council Assembly.	Cabinet approval of final SPD in March 2016
2	Ensure that the implementation of the Draft SPD is monitored following adoption for potential actual effects on different groups.	The outcomes of implementing the guidance in the SPD will be monitored through the Authority Monitoring Report (AMR). Equality analysis is an on-going process that does not end once the Draft SPD is implemented	The monitoring arrangements will be undertaken annually.