Affordable Housing SPD Equality Impact Assessment

Directorate: Place, Protection and Prosperity **Service Area:** Strategic Planning	**Lead Officer**: Jane Robinson, Local Plans and Infrastructure Manager **Date completed:** March 2026
Service / Function / Policy / Procedure to be assessed: Affordable Housing Supplementary Planning Document	
Is this: New / Proposed ☑ Existing/Review ☐ Changing ☐	**Review date:**

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this service, function, policy or procedure?

- The Affordable Housing Supplementary Planning Document (SPD) provides detailed guidance to support the delivery of affordable housing within the borough and to support the effective implementation of the Spelthorne Local Plan 2024-2039/40. Supports the Council in meeting its Public Sector Equality Duty by ensuring affordable housing delivery considers the diverse needs of residents.

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment		✓
Advancing equality of opportunity	✓	

Fostering good community relations	✓	

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to Group Head Commissioning and Transformation. **If relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	The Affordable Housing SPD seeks to provide guidance on delivering affordable housing across different site and development types, including thresholds, tenure mix, dwelling types, sizes, and standards. The document aims to ensure more high-quality and genuinely affordable homes that meet Spelthorne's evidenced housing need. It also aims to support households on the Housing Register, those in significant housing need, and middle-income households unable to access market housing. The SPD outcomes include securing higher levels of Social Rent, providing suitable homes for families, older people, and people with disabilities and helping the Council and Registered Providers secure high-quality, mixed and well-integrated affordable homes. Outcomes also include offering guidance to developers through clear thresholds, viability processes, and financial contribution methods and ensuring Registered Providers can effectively deliver and manage affordable homes. These outcomes are especially relevant for protected groups who are more likely to experience housing need, affordability barriers, overcrowding or limited access to suitable accommodation.
Are there any associated policies, functions, services or procedures?	The Affordable Housing SPD is associated with a range of existing policies, functions, services and procedures, including interpreting and relying on national viability guidance, definitions of affordable housing and national frameworks, including the National Planning Policy Framework (NPPF) (2025) The SPD also directly supports and provides further guidance on the Spelthorne Local Plan 2024-2039/40 (particularly Policies H1 and H2 and their supporting evidence). There

	are also associated evidence documents such as the Strategic Housing Market Assessment (SHMA), the forthcoming Housing and Economic Needs Assessment (HEDNA), the Council's Housing Register and the Spelthorne Design Code. Related procedures include those for viability assessments, viability review mechanisms, the application of Vacant Building Credit, , as well as processes for calculating financial contributions in lieu of on-site or off-site provision. In addition, the SPD aligns with Council functions around housing delivery, CIL regulations, engagement with Registered Providers, securing grant funding and managing Section 106 obligations to ensure affordable housing is delivered effectively. The SPD also supports compliance with the Equality Act 2010 by ensuring that affordability, tenure and housing mix considerations reflect the needs of diverse communities.
If partners (including external partners) are involved in delivering the service, who are they?	External consultants JJ Viability Consulting have supported the Council in preparing the Affordable Housing SPD. Partners may also provide equalities-related insight, including Registered Providers through anonymised lettings and demographic data. Delivery of affordable housing also involves key partners such as Registered Providers, developers, landowners and external viability consultants, alongside relevant charitable or specialist housing organisations where appropriate. A range of statutory consultees contributed evidence during preparation of the SPD, including Surrey County Council, neighbouring authorities, utility providers and community groups. A full consultee list is available from the Strategic Planning Team

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e. race, disability, gender, gender identity, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

A range of evidence already exists to inform the Affordable Housing SPD and to help understand the characteristics and needs of households who rely on affordable housing services. The SPD draws on several key datasets, including the Council's Housing Register, the SHMA, evidence prepared for the Local Plan, and the forthcoming HEDNA 2026, as well as population and affordability data, and ONS datasets referenced in the SPD. Collectively, these sources provide detailed information about local housing need, including the scale of need, the preferred tenure types, and the required mix of dwelling sizes. They particularly identify needs for Social Rent, family-sized homes and wheelchair-accessible dwellings, as well as demonstrating high levels of overcrowding, medical needs and homelessness risk.

The Housing Register provides direct and up-to-date insight into households actively seeking affordable housing. This includes data on income levels, household size and composition and the need for different bedroom numbers. It is reasonable to infer that this dataset captures a significant number of households who fall within protected equality groups e.g. older people, families with children, single-parent households, and disabled households requiring adapted or accessible accommodation. This includes a high proportion of households from protected groups such as disabled residents, older people, lone-parent families and low-income households.

The SHMA identifies a large disabled population (28.5% of households include someone with a long-term illness or disability), a growing older population, and affordability barriers that affect younger adults. Together, the SHMA and the Local Plan evidence provide a wider assessment of housing market pressures and the kinds of affordable housing products most needed in the Borough. These documents underpin the SPD's guidance on tenure mix and bedroom size mix, with the evidence showing a notable demand for social rent or affordable rent homes, particularly family-sized dwellings. These findings are relevant to equality considerations, as certain demographics of residents are more likely to require affordable family housing.

The forthcoming HEDNA 2026 is expected to provide updated, comprehensive data on housing need, including demographic trends and likely future demand. However, until that assessment is completed, the SPD relies on current evidence.

While the evidence base is strong overall, it contains limited equalities specific data, meaning some protected groups may be underrepresented in the analysis. Existing evidence provides a strong understanding of general housing needs, though detailed data for some protected groups (e.g. ethnic minorities, LGBTQ+ residents, Gypsy & Traveller communities) is limited. Future updates, such as HEDNA 2026, will help close these gaps.

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

The draft Affordable Housing SPD has been developed using existing evidence sources but has not yet been formally consulted on. The Council are intending to run a statutory public consultation on the draft SPD for 4 weeks, starting from the 8 May 2026 (8.10.26), subject to

approval at committee E&S Committee on 19 March 2026. This will enable all stakeholders to provide comment, before the final version of the SPD. The forthcoming consultation will provide valuable insight into any unintentional impacts on protected groups and will be incorporated into the updated analysis.

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

There have been no complaints, compliments, satisfaction surveys or direct customer feedback relating to affordable housing services or the development of the Affordable Housing SPD. There is a statutory consultation scheduled to run for 4 weeks, starting from the 8 May 2026 which may help inform this assessment in the future.

Step 3 – Identifying the negative impact.

a. **Is there any negative impact on individuals or groups in the community?**

Equality Themes	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Age (including children, young people and older people)	The SPD relies on general housing needs evidence (SHMA, Housing Register, Local Plan evidence, and forthcoming HEDNA) but does not include age-specific analysis. This creates a potential risk that the needs of groups such as older people and younger adults may not be fully addressed. The potential accessibility requirements of older people and affordability barriers potentially facing younger people could be overlooked. Older residents may require step-free, accessible or	The impact could be mitigated through: • Incorporating age-specific housing needs into future evidence gathering • Ensuring consultation during the SPD process captures the needs of older residents and younger people

	adapted homes; young adults may face disproportionate affordability challenges These impacts are indirect as the SPD provides guidance rather than policy but may still influence how protected groups access affordable housing.	• Reviewing affordability criteria in light of lower fixed incomes for older residents and lower earning capacity for younger adults.
Disability (including carers)	The Affordable Housing SPD does not include detailed disability-specific evidence but does identify a high prevalence of disability in the Borough. While the SPD sets out guidance on tenure mix, bedroom size mix and affordability criteria, it does not identify the need for adapted homes or more space, which may negatively affect disabled people who require these. Additionally, income-based eligibility thresholds may disadvantage disabled people who face higher living costs or rely on benefits, potentially limiting access to some tenures. These impacts are indirect as the SPD provides guidance rather than policy but may still influence how protected groups access affordable housing.	The impact could be mitigated through: • Incorporating disability-specific housing needs into future evidence gathering • Considering how to encourage or secure accessible and adaptable housing within mixed-tenure schemes • Reviewing affordability criteria in light of additional living costs often experienced by disabled people • Ensuring consultation during the SPD process captures the needs of disabled residents and carers • Explicit reference to M4(2) and M4(3) accessible housing standards should be considered where Local Plan policy supports them
Gender (men and women)	The Affordable Housing SPD does not include detailed gender-specific evidence, thus creating a potential risk that different challenges faced by men and women may not be fully understood or addressed. Women may face increased need for affordable, secure and appropriately sized homes. Men may face more barriers linked to accessing shared or	The impact could be mitigated through: • Incorporating gender-specific housing needs into future evidence gathering • Ensuring consultation during the SPD process captures the needs of all genders

	intermediate accommodation due to income thresholds. Therefore, gender-specific challenges may be overlooked and eligibility rules may not fully reflect the differing experiences of men and women in accessing affordable housing. These impacts are indirect as the SPD provides guidance rather than policy but may still influence how protected groups access affordable housing.	• Reviewing affordability criteria in light of differing household patterns and needs for men and women
Race (including Gypsies &Travellers and Asylum Seekers)	The Affordable Housing SPD does not include detailed race-specific evidence, which creates a potential risk that the needs of ethnic minority households, Gypsy and Traveller and Travelling Showpeople communities and asylum seekers may not be fully captured. Therefore, issues experienced by some ethnic minority families, cultural housing needs or barriers faced by asylum seekers and refugees, such as those linked to affordability and eligibility, may be overlooked. Ethnic minority households nationally experience higher rates of overcrowding and lower incomes, which may affect access to suitable affordable housing. These impacts are indirect as the SPD provides guidance rather than policy, but may still influence how protected groups access affordable housing	The impact could be mitigated through: • Incorporating race-specific housing needs into future evidence gathering • Ensuring consultation during the SPD process captures needs of ethnic minority communities, Gypsy and Traveller and Travelling Showpeople, asylum seeker and refugee groups • Reviewing affordability criteria in light of households who experience lower incomes and have cultural housing needs.
Religion or belief (including people of no religion or belief)	The Affordable Housing SPD does not include detailed faith-specific evidence, which creates a potential risk that the particular housing needs of	The impact could be mitigated through:

	different religious communities may not be fully understood. Therefore, faith-specific challenges may be overlooked and eligibility rules may not fully reflect the differing experiences and needs of different religious groups or those with no religion or belief. Multigenerational living patterns may create additional space requirements for some faith groups. These impacts are indirect as the SPD provides guidance rather than policy but may still influence how protected groups access affordable housing.	• Incorporating faith-specific housing needs into future evidence gathering • Ensuring consultation during the SPD process captures needs of different faith-type groups • Considering the impacts of the tenure approach on cultural housing needs.
Gender Re-assignment (those that are going through transition: male to female or female to male)	The Affordable Housing SPD does not include detailed evidence on transgender housing needs, which creates a potential risk that the particular housing needs of residents who are going through transition/have gone through transition may not be fully understood. Therefore, specific challenges for transgender individuals may be overlooked and eligibility-based criteria may not fully reflect the employment and financial experiences and housing needs of transgender groups. These impacts are indirect as the SPD provides guidance rather than policy, but may still influence how protected groups access affordable housing.	The impact could be mitigated through: • Incorporating the specific housing needs of residents who are going through transition/have gone through transition into future evidence gathering • Ensuring consultation during the SPD process captures needs of different transgender residents • Considering the impacts of the tenure approach on transgender housing needs
Pregnancy and Maternity	The Affordable Housing SPD does not include detailed pregnancy/maternity-specific evidence, which creates a potential risk that the particular housing needs of these residents are not fully considered.	The impact could be mitigated through:

	Affordability-based criteria could also create barriers for single parents, particularly if they rely on maternity pay or reduced income during early parenthood. Therefore, specific challenges for pregnant individuals or residents with infants, may be overlooked and eligibility-based criteria may not fully reflect experiences and housing needs of these residents, such as those relating to family housing.	• Incorporating the specific pregnancy/maternity-based housing needs of into future evidence gathering • Ensuring consultation during the SPD process captures needs of expecting parents and those with an infant • Reviewing affordability criteria in light of households who experience maternity-related income challenges
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	The Affordable Housing SPD does not include detailed evidence on LGBTQ+ housing needs, which creates a potential risk that the particular housing needs of these residents are not fully considered. Therefore, specific challenges for individuals of differing sexual orientations may be overlooked and eligibility-based criteria may not fully reflect the experiences and housing needs of these group.	The impact could be mitigated through: • Incorporating the specific LGBTQ+-based housing needs of into future evidence gathering • Ensuring consultation during the SPD process captures needs of gay, lesbian, bisexual, heterosexual etc. residents • Considering the impacts of the tenure approach, housing mix and eligibility-criteria on LGBTQ+ housing needs

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

The assessment indicates that some changes or mitigating actions may be needed. The draft SPD relies on strong housing evidence but there are some gaps identified in terms of data for specific protected groups, so future analysis could incorporate analysis of these groups. When the statutory consultation takes place, the needs of protected groups should be captured. Further strengthening safeguards within viability processes could ensure that reductions in affordable housing do not disproportionately affect vulnerable households. The final SPD should explicitly reference inclusive design principles, accessibility expectations, and the need for equitable access to affordable housing across all

protected groups. Consultation responses from protected groups will be specifically evaluated and incorporated into the updated Consultation Statement (Reg 12).

Step 5 – Monitoring

How are you going to monitor the existing service, function, policy or procedure ?

Monitoring of the Affordable Housing SPD will rely on existing planning and housing processes. This includes through the Council's Local Plan monitoring, Housing Register data, HEDNA updates, annual Infrastructure Funding Statement (for financial contributions) and S106 monitoring of affordable housing delivery. The operation of viability assessments, review mechanisms, and the application of financial contributions at early, mid and late stages will also provide regular checkpoints to ensure affordable housing delivery is maximised. Engagement with Registered Providers, ongoing assessment of accessible home provision and the review of S106 agreements will help track how well schemes comply with the SPD. Together, these mechanisms will allow the Council to monitor whether the policy is delivering the intended outcomes and identify any impacts on households, including those within protected groups. Monitoring will include reviewing any disproportionate impacts on protected groups by using anonymised equalities data where available, and liaising with Registered Providers to identify emerging patterns.

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
n/a	n/a	n/a	n/a

Equality Analysis approved by:

Group Head:	Date:

Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team and ensure the document is uploaded to the EA Register which will be available to the public:

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