

## Annex 3

### Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk) or phone 01223 457046.

Once you have drafted the EqIA please send this to [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk) for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, ([graham.saint@cambridge.gov.uk](mailto:graham.saint@cambridge.gov.uk) or 01223 457044).

<b>1. Title of strategy, policy, plan, project, contract or major change to your service</b>
Proposed development of 72 Council rented homes to Passivhaus standards at Aylesborough Close.
<b>2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)</b>
<a href="https://www.cambridge.gov.uk/housing-development">https://www.cambridge.gov.uk/housing-development</a>
<a href="https://www.cambridge.gov.uk/affordable-housing-programme">https://www.cambridge.gov.uk/affordable-housing-programme</a>
<b>3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?</b>
Proposed delivery of 72 new council homes at Aylesborough Close, providing 39 net new council homes to Passivhaus standard, and including 3(three) M(4)(3) accessible homes.
The aims of the Council in providing new housing directly itself are as follows;

1. Provide additional social housing to help meet the shortfall in Cambridge and to replace the loss of social housing through the Right to Buy.
2. Replace some of the Council's existing housing which no longer meets present-day standards, and which are becoming less popular with residents.
3. To build new house types which will better meet the overall mix of social housing needed in the future.
4. To improve the energy efficiency of the Council's housing stock, reducing the cost of utility bills for residents and improving the environmental sustainability of the housing.

New housing is planned to ensure that it fits with the local community and adds to the range of housing available locally, including any specialist housing.

#### 4. Responsible service

Cambridge City Council Housing Development Agency (HDA)

#### 5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?

(Please tick all that apply)

- Residents
- Visitors
- Staff

Please state any specific client group or groups (e.g. City Council tenants, tourists, people who work in the city but do not live here):

The plan to develop new council housing in the city impacts on:

- Housing applicants registered on Home-Link (the Council's choice-based lettings system) i.e. households who need to find somewhere to live
- Transfer applicants registered on Home-Link whose circumstances have changed and who may need to find somewhere alternative to live (a single person under-occupying a three bedroom family house for example).
- Existing council tenants (33) and leaseholders (2) at the existing estate, which will be required to be rehoused to alternative accommodation. Tenants decant and rehousing is undertaken in line with the Council's approved Lettings policy and updated regeneration policy. All rehousing is subject to fair disturbance compensation and right to return following redevelopment.

Home-link prioritises applicants based on needs criteria. The priority bandings also take into account housing needs related to related to abuse, medical circumstances and disability, pregnancy and maternity.

The 1996 Housing Act as amended by the 2017 Homelessness Reduction Act determines the categories of homeless applicants which the council owes a 'main' statutory housing duty to. The council must make suitable accommodation available to applicants it owes a 'main' housing duty to. These categories include 16/17 year olds, young people leaving care, older people, those with physical or learning disabilities, mental health issues, victims of domestic abuse.

In relation to the Equalities impact, many of those on the housing register (particularly those on the highest banding for need) will have a level of vulnerability. Although not all vulnerabilities are captured under the Equality Act 2010, many will be such as disability including mental health, age, pregnancy and maternity. For those residents who are existing tenants or leaseholders, many of them will also have a protected characteristic as it will be the reason they are able to access social housing. This will be considered in more detail under the following sections which look at each of protected characteristics.

By adding to the general housing stock within the City, housing opportunities are also increased for staff seeking to relocate.

**6. What type of strategy, policy, plan, project, contract or major change to your service is this?**

- New  
 Major change  
 Minor change

**7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)**

- Yes  
 No

If 'Yes' please provide details below:

- Housing Management- managing the new homes
- Estates & Facilities- maintaining the new homes
- Property Services- advice on land issues, valuations, disturbance costs, commercial leases etc in connection with new developments
- Housing strategy – informing the need for tenure mix and specialist or adapted housing
- Finance Team- to provide funding for every aspect of developing the new homes from initial surveys to construction, all in line with projected cash flow
- Streets and Open Spaces- advice and input on the design of new open spaces and equipment provided as part of the new homes, subsequent maintenance of same
- Safer communities – providing advice on the design of the new schemes and homes from a community safety and designing out crime perspective
- Health & safety – commentary on the design of new schemes and homes from a personal safety, fire safety and usability perspective
- 3Cs Legal Services- dealing with land title and transfer to facilitate putting together the sites on which to build the new homes, subsequent issue of leases
- CCC parking services – collaboration in re-provision of parking facilities where affected by the development of new homes
- Cambridge Investment Partnership (CIP) - a joint venture partnership between CCC and Hill Homes to assist in the delivery of the Councils Affordable home goals.

**8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?**

The report on the proposed development at Aylesborough Close is to be presented to the Housing Scrutiny Committee meeting of 23 September, Item 7, Appendix 1

**9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?**

The HD A has undertaken a detailed internal review process toward identifying council stock which has known shortcomings, and which may most appropriately be redeveloped to provide new energy efficient housing. The work conducted to date is to be detailed in a report to the Housing Scrutiny committee meeting of 23 September 2021, Item 7.

Officers from Housing Service and Housing strategy have additionally been consulted to identify a target unit delivery mix for the overall housing programme which best serves forecast demand across the city. Individual consultation with Housing is further conducted on a scheme by scheme basis and up to date is included by the HDA for scheme reports to the Strategy and Resources or Housing Scrutiny Committees. The data records the numbers of those on CCC waiting list as provided quarterly by Housing strategy. Further information on housing need and strategy can be found as follows: [www.cambridge.gov.uk/housing-research](http://www.cambridge.gov.uk/housing-research)

Consultation is currently being undertaken with affected residents prior to planning applications being submitted. To date consultation has taken the form of letter-drop notifications and in-person door knocking to introduce the proposal to all residents. Assisted by internal council services, consultation methods are tailored to the resident requirements, ie use of translation services where required, use of digital and non-digital materials, in person and/or telephonic or written correspondence as most appropriate to the consultee.

The 2011 Census provides information on the demographics of the Cambridge City population to assist strategic planning by CCC.

Census Data has been supplemented by a 2020 HDA Needs Analysis report compiled by CCC staff which accompanies and informs the New Development Programme planning.

[Albert Kennedy institute \(2014\), LGBT Youth Homelessness: A UK scoping of cause, prevalence, response, and outcome](#)

[Runnymede Trust \(2020\), The Colour of Money](#)

[Social Metrics Commission \(2020\), Measuring Poverty](#)

[Stonewall \(2016\), Building Safe Choices: LGBT housing futures](#)

[Stonewall \(2018\), LGBT in Britain: Trans Report](#)

## 10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

### (a) Age - Please also consider any safeguarding issues for children and adults at risk

#### Housing Register and Homelessness

The 1996 Housing Act as amended by the 2017 Homelessness Reduction Act determines the categories of people that are considered as priority need for social housing including because of their age, including older people, those with children, people aged 16 or 17, and care leavers aged 18 to 20. Further provision of social housing in Cambridge will have a positive impact for these groups.

#### Older People

The units to be delivered in this scheme proposal are made up of general needs accommodation and 3 no adapted homes suitable for wheelchair users. All general needs housing is adaptable m(4)2 standard.

The provision of new homes which are accessible for household members who are wheelchair users will mean these homes will be suitable for older people with reduced mobility as long as their needs require this type of home.

The provision of housing for older people in the city is generally good, and housing for older people is not generally in short supply. An older applicant on the housing needs register can apply both for specialist housing, which excludes other types of applicant, and for general needs housing as not all older people want to live in specialist housing.

The Council has recently completed over-55 schemes in Colville Road and at Anstey Way that in part replaced small one bedroom one person bungalows with modern day one and two bedroom flats that meet current day aspirations in terms of space; accessibility; warmth and energy efficiency.

#### Younger people

The homes on these proposed schemes will be a mix of 1, 2 and 3 bedroom homes. Young people with a need for this type of accommodation will be eligible to bid for these homes

In our Housing Strategy consultation in 2015 the most common concerns raised amongst younger people were in relation affordability and condition of the private rented sector, homelessness issues and the need to support vulnerable people. The provision of more affordable housing will enable the Council to house more people who are in need of housing. This will also aid to alleviating the pressure on the private rented sector.

Cambridge has a relatively young population compared to the rest of Cambridgeshire and many other parts of the country. Around 35% of the population is aged 20-34.

Younger people are finding it increasingly difficult to get on the housing ladder, having to remain longer with parents or in expensive private rented accommodation. For example, England as a whole has seen a significant increase in the proportion of younger households in the private rented sector over the last ten years. In 2004/05, 24% of those aged 25-34 lived in the private rented sector; by 2014-15 this had increased to 46%. (English Housing Survey 2014-15)

Affordability issues are particularly acute in Cambridge, with the price of even the cheapest 25% (the lowest quartile) of homes now standing at over £350k – more than nineteen times lower quartile lower earnings. Private rents are also significantly higher than most other parts of the country, with the average rent for just a one bedroom currently around £800 a month.

Increasing the supply of general needs Council housing through this programme will:

- Increase the supply of genuinely affordable homes in the city of Cambridge, enabling the council to provide a competitive accommodation option for younger people on low incomes;
- Ensure that the Council can provide accommodation to young people in acute housing need caused by homelessness or economic deprivation.

#### **Fuel Poverty**

The Council is committed to providing high quality homes which greatly supersede the energy efficiency of current housing stock. This pilot scheme proposes the delivery into council stock flats meeting Passivhaus design standards. These will provide low running costs and greater alleviation to residents affected by fuel poverty.

#### **(b) Disability**

The units to be delivered in this scheme proposal are made up of general needs accommodation and 3no adapted homes suitable for wheelchair users. All general needs housing is adaptable m(4)2 standard.

The HD A will remain actively engaged with Adaptations Officers, the Housing Advice Coordinator and other relevant partners to ensure that the new schemes deliver housing that is suitable adapted or adaptable.

Demarcated disabled parking will be provided at an appropriate location to serve tenants, in line with planning guidance.

Almost one in five people in the UK have a disability, with mobility being the most common impairment. At the same time there is a nationally recognised shortage of housing for people with disabilities. For example: around 2% of the UK population are wheelchair users, yet 84% of homes in England do not allow someone using a wheelchair to enter their home through their front door

without difficulty. Around 15% of households containing at least one wheelchair user feel that their current home is not suitable for their needs, and so requires adaptations.

Around 22% of individuals living in social housing in Cambridge have a long-term health problem or disability.

Disabled people tend to have lower incomes, and are twice as likely as non-disabled people to be social housing tenants.

Around 16% of the national population has a common mental health disorder, and professionals nationally and locally are reporting an increase in the number of service users with mental health issues. For example: increasing numbers of rough sleepers with mental health problems, many of whom also have alcohol and substance misuse issues; and an increase in numbers of older people with dementia.

We will make information in the proposals available to residents in other formats where it's needed.

### **Fuel Poverty**

The Council is committed to providing high quality homes which greatly supersede the energy efficiency of current housing stock. This pilot scheme proposes the delivery into council stock flats meeting Passivhaus design standards. These will provide low running costs and greater alleviation to residents affected by fuel poverty.

## **(c) Gender reassignment**

Increasing the supply of affordable housing in Cambridge is expected to have a positive impact on those members of the community with the protected characteristic of gender reassignment.

According to research undertaken by LGBT+ charity Stonewall for their 2018 publication [LGBT in Britain - Trans Report](#), trans people commonly face a range of barriers to housing. One in four trans people have experienced homelessness at some point in their lives, with a similar proportion having also faced discrimination when searching for housing in the preceding year. One in five non-binary people has also faced discrimination when looking for a new home.

By providing more general needs housing, the Council is in a stronger position to ensure that any residents, trans, non-binary or otherwise, who are facing homelessness will be able to find affordable accommodation through the Council. Similarly, applicants who are facing abuse in their current home environment will be able to apply for a wider range of housing options for the council. As with other equality groups, an increase of the Council housing supply will provide more Cambridge residents with the option of applying to the Council rather than relying on inconsistent practices within the private sector.

#### **(d) Marriage and civil partnership**

We have not identified any equalities issues specific to this protected characteristic in relation to need in the affordable housing development programme

#### **(e) Pregnancy and maternity**

54% of homes on the proposed development are 2 - 3 bedroom homes. These will be available to bid on by women who are pregnant or who have recently had children meaning they need to move to larger accommodation.

National policy dictates that certain groups of people are considered as priority need for social housing because they are more likely to be vulnerable, including women who are pregnant. Extra support from Council officers will be offered to those that are affected by the redevelopment. Further provision of social housing in Cambridge will have a positive impact for these groups.

As with other protected characteristics, an increase of the Council housing supply will provide more Cambridge residents with the option of applying to the Council rather than relying on high rents in the private sector, which impact families with young children particularly severely.

#### **(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.**

Increasing the supply of affordable housing in Cambridge is expected to have a positive impact on those members of the community who are classified as Black and Minority Ethnic (BAME).

According to the annual Measuring Poverty report published by the Social Metrics Commission, 46% households in the UK where the head of the household is BAME are classified as living in poverty, compared with 19% where the head of the household is white. People in BAME families are also between 2-3 times more likely to be living in persistent poverty than white families. According to The Colour of Money (2020) for Indians the rate of poverty is 22%, for Mixed its 28%; Chinese 29%; Bangladeshi 45% and Pakistani 46%. This is due to lower wages, higher unemployment, higher rates of part-time working, higher housing costs, and slightly larger household size. It follows that BAME households are likely to have a greater need overall for a range of affordable housing options in the site though the need varies by ethnic group. In Cambridge, anecdotally according to voluntary and community sector groups, Bangladeshi people are especially likely to experience poverty.

Increasing the supply of general needs housing in Cambridge should therefore have a proportionate impact on housing options for BAME families in the city. As with other protected characteristics, an increase of the Council housing supply will provide more Cambridge residents with the option of applying to the Council rather than relying solely on high rents in the private sector.

We will make information available to residents in other languages where it's needed.

### **(g) Religion or belief**

We have not identified any equalities issues specific to this protected characteristic in relation to the affordable housing development programme. Designs and specifications can however be enhanced to accommodate cultural preferences if instructed to do so by the relevant Housing Authority (for example facilitating spray taps adjacent WCs).

### **(h) Sex**

No specific issues have been identified in relation to sex, although it is worth noting that most of those fleeing domestic abuse for whom we have a statutory responsibility will be women. This accounted for 3% of lettings last year. In domestic abuse cases the location where people are housed can be an important factor, for example away from the perpetrator or near to a family support network.

### **(i) Sexual orientation**

Increasing the supply of affordable housing in Cambridge is expected to have a positive impact on LGBT+ members of the community.

LGBT people face unique pressures within the housing system at present. [Current research](#) from the Albert Kennedy institute indicates that within the youth homeless population, LGBT people are greatly over-represented. Young LGBT people who are homeless are likely to have a reduced support network as a high proportion (62-69%) have become homeless due to parental rejection or family abuse.

Comparable conditions prevail among older LGBT people according to [research undertaken](#) by Stonewall Housing, with many older persons having a history of homelessness and a smaller family support network than non-LGBT older people. Older LGBT people are also more likely to live alone.

Overall there is a similar trend among the LGBT population where the limited options of Cambridge residents more generally are likely to be further reduced or placed under greater pressure by sexual orientation.

As with other protected characteristics, an increase of the Council housing supply will provide more Cambridge residents with the option of applying to the Council rather than relying on high rents in the private sector, which is likely to have a higher impact on LGBT people.

**(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on low income groups or those experiencing the impacts of poverty**

**Homelessness – positive impact**

The 1996 Housing Act as amended by the 2017 Homelessness Reduction Act provides that the council has a duty to agree reasonable steps to try and prevent or relieve the homelessness of the those that are threatened with homelessness or homeless. A reasonable step under the Act could include advice and assistance with applying for social housing.

The development of new family sized homes on these schemes will allow homeless families currently living in temporary accommodation to have the opportunity to bid on the homes and secure a move to permanent accommodation.

**Low-income groups or those experiencing the impacts of poverty– positive impact**

Households living on low incomes come under greater housing pressure than those on higher incomes due to a range of factors. This has been discussed at length elsewhere in the document, but the primary driver behind the affordable housing programme remains the strictly limited housing options to which Cambridge residents on low incomes have access. Cambridge remains one of the most expensive places in the UK to live and an increase in the Council housing supply will provide more options for residents who choose to live in the city and will ensure that it is easier to build a mixed and balanced community within the city,

As can be seen elsewhere in this EQIA, the inequality in the housing market affects some groups more than others, but in all circumstances an increase in general needs Council housing will improve housing options across the board.

**Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage – positive impact**

Home-link prioritises applicants based on a variety needs criteria as set out in the council lettings policy and inclusive of consideration of protected characteristics. Priority banding within which prospective tenants will be informed by the full number of protected characteristics of the bidder, prioritising successful housing of the most at-risk groups. While the lettings policy does not specifically note prioritisation of need based on more than one protected characteristic, it does make allowance for the movement of applicants with multiple needs into higher priority banding for housing.

**Fuel Poverty**

The Council is committed to providing high quality homes which greatly supersede the energy efficiency of current housing stock. This pilot scheme proposes the delivery into council stock flats meeting Passivhaus design standards. These will provide low running costs and greater alleviation to residents affected by fuel poverty.

**11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqlA accordingly.)**

A Housing Advice Coordinator, Adaptations Officer and other relevant partners will be consulted through design and building process to ensure the needs of those applicants in need on the housing register, in particular applicants that have disabilities, are considered.

This EqlA will be updated to reflect any additionally identified equalities implications on existing residents following further consultation activities. Detailed resident consultation will be assisted by internal council services, with methods tailored to the resident requirements, ie use of translation services where required, use of digital and non-digital materials, in person and/or telephonic or written correspondence as most appropriate to the consultee.

**12. Do you have any additional comments?**

None

**13. Sign off**

Name and job title of lead officer for this equality impact assessment: Jaques van der Vyver, Development Officer

Names and job titles of other assessment team members and people consulted: Helen Crowther

Date of EqlA sign off: Click here to enter text.

Date of next review of the equalities impact assessment: : EqlAs are carried out for individual development schemes as such schemes progress toward approval

Date to be published on Cambridge City Council website: Click here to enter text.

**All EqlAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer. Ctrl + click on the button below to send this (you will need to attach the form to the email):**

**Send form**