



Greater Cambridge Shared Planning Equality Impact Assessment (EqIA)

Introduction – Please read

Equality Impact Assessments (EqIAs) allow the Council to:

- Show that the Council are meeting its legal duty, demonstrating due regard for the provisions of the [Public Sector Equality Duty](#) as below:
 - Eliminate unlawful discrimination, harassment, and victimisation
 - Advance equality of opportunity between those who share a protected characteristic and those who do not
 - Foster good relations between those who share a relevant protected characteristic and those who do not
- Methodically consider and assess the impacts of proposals across the [nine protected characteristics](#)
- Allow the Council to develop and implement high quality proposals that maximise positive outcomes for all.

EqIAs should be completed during the development and review of all Council policies, strategies, procedures, projects or functions. Where there is any doubt, the completion of an EqIA is always recommended.



Equality Impact Assessment Complete Form

Section 1: Identifying Details

- 1.1 Officer completing EqIA:
Lauren Wilkinson
- 1.2 Team and Service:
Planning Policy Team, Greater Cambridge Shared Planning
- 1.3 Title of proposal:
Non-Immediate Article 4 Direction for Houses of Multiple Occupancy
- 1.4 EqIA start date:
16/09/2026
- 1.5 Proposal implementation date:
03/01/2028
- 1.6 Who will be responsible for implementing this proposal (Officer and/or Team):
Greater Cambridge Shared Planning

Section 2: Proposal to be Assessed

- 2.1 Type of proposal:
Policy
If other, please specify
N/A
- 2.2 Is the proposal:
New
- 2.3 State the date of any previous equality impact assessment completed in relation to this proposal (if applicable):
Consultation in late 2026, implementation a year on publication of order.
- 2.4 What are the headline aims of the proposal and the objectives that will help to accomplish these aims? (Max 250 words)



The proposal for the introduction of a non-immediate Article 4 Direction would remove the permitted development rights for smaller HMOs and require that these need planning permission and will be assessed against the policies in the Local Plan. The proposed Non-Immediate Article 4 Direction to remove permitted development rights to change dwellings (planning use class C3) into small HMO (planning use class C4) without planning permission, to cover the urban area of Cambridge would mean that the impact of proposals for small HMOs (up to 6 unrelated persons) as well as large can be considered through the planning process.

2.7 Which of the Council's equality objectives (as detailed in the Council's Equality Scheme) does this proposal link to or help to achieve?

- ☒ Identify, prioritise and deliver actions that will narrow the gap in outcomes between disadvantaged groups and the wider community
- ☐ SCDC is an employer that values difference and recognises the strength that a diverse workforce brings.
- ☐ Protected characteristic groups have a voice and are represented in forming the future shape of the district.
- ☐ None.

2.8 Which groups or individuals will the proposal affect:

- | | |
|---|---|
| ☐ Service Users | ☐ Councillors |
| ☒ External Stakeholders | ☒ Other |
| ☐ Employees | |

If other, please specify [Local residents](#), [businesses](#), and [landlords](#).

2.9 Broadly speaking, how will these groups or individuals be affected? (you will be asked to provide more detail on the specific impacts on different protected characteristic groups later in the form) (max 250 words)



Generally, landlords or those owning or proposing HMOs will be impacted by requiring planning permission where they previously would not have done. Local resident will be positively impacted on the improved quality of approved smaller HMOs available to them in Greater Cambridge.

- 2.11 If any part of the proposal is being undertaken by external partners, please specify how the Council will ensure that they will meet equality standards?
(Max 250 words)

The proposal is all being undertaken by the Councils'.

Section 3: Evidence and Data

- 3.1 Describe any research (this could include consultation) and analysis you have undertaken to understand any effects on groups of people, including those within [9 protected characteristic groups?](#) Please list any key sources that you used to obtain this Information.

(Max 250 words)

The Article 4 Direction for HMOs will be consulted on in line with the statutory processes for undertaking a Non-Immediate Article 4 Direction.

- 3.2 If you have not undertaken any consultation, please detail why not, or when consultation is planned to take place.

(Max 250)

The Article 4 Direction for HMOs will be consulted in line with the statutory processes for undertaking a Non-Immediate Article 4 Direction.

Section 4: Impact of proposal on those with protected characteristics

4.1 Please select all characteristics that may or will be impacted (positive or negative). When providing details of the impact please consider the following questions

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. (both the number of persons affected and the severity of the impact)
- you will be asked to set out actions to manage these impacts in the following question (4.2)

☒ All - general to all protected Characteristics.

Details: The impact is positive for all protected characteristics. The introduction of an Article 4 Direction for smaller HMOs will ensure that all HMOs require planning permission where there is a material change and use and therefore be held to the standards in the Local Plan. There is a minor risk that the introduction of an Article 4 Direction may reduce the supply of HMOs as HMOs are required to be of a higher minimum standard. But for residents it is important that the quality of housing is appropriate, and therefore the proposal is overall considered to have positive impacts.

☒ Age

Details: The age of those living in HMOs is predominately young people, including students and professionals. In Cambridge, students make up an estimated 41% of HMO residents and 44% of those living in HMOs are 24 years and younger. Therefore, young people will be benefitted by the proposed changes to improve the quality of the HMOs being consented. There is a minor risk that may be more affected if the proposals impact on the supply of HMOs.

☒ Disability



Details: The Article 4 Direction – means that assessed Local Plan – using Local Plan policies?

☒ Gender reassignment

Details: There is currently insufficient evidence to determine whether this proposal would have a differential impact on people with this protected characteristic. No specific impact has been identified from the evidence available, but this should not be taken to mean that there is no impact. Where proportionate, opportunities to improve the evidence base and any relevant consultation feedback will be considered as the proposal progresses.

☒ Marriage and Civil Partnership

Details: There is currently insufficient evidence to determine whether this proposal would have a differential impact on people with this protected characteristic. No specific impact has been identified from the evidence available, but this should not be taken to mean that there is no impact. Where proportionate, opportunities to improve the evidence base and any relevant consultation feedback will be considered as the proposal progresses.

☒ Pregnancy and maternity

Details: The HMO Study (2026) prepare to inform the emerging Local Plan identifies that the conversion of family homes to HMOs in Cambridge City has the potential to exacerbate a shortfall in family housing supply. However, the net loss of family-sized homes has been relatively modest in recent years. Therefore there is potential for an impact on supply of family housing that may affect those who are pregnant or with children.

☒ Race

Details: There may be some ethnicities that are more likely to work in healthcare professions, be international students or be more likely to need lower cost accommodation. The HMO Study (2026) (See Appendix 2 of the Cabinet Report) sets out that there is also significant demand for HMOs from staff at Addenbrooke's Hospital, often in lower-paid roles (e.g. healthcare assistants, porters, and cleaners), who tend to occupy the more affordable end of the private rented sector (PRS).

These groups will be positively impacted by the change, as the provision of the quality of HMOs will be improved.

☒ Religion and belief

Details: There may be some people with religions and beliefs that are more likely to be living in HMOs as people on lower incomes, students including international students and professionals tend to be the main occupiers of HMOs as set out in the HMO Study (2026). Therefore they may be more likely to be impacted by changes to HMOs.

☒ Sex

Details: There are not considered to be any specific impacts on those with this protected characteristic. However, there may be some genders that are more likely to work in healthcare professions and therefore be impacted to a greater extent. The HMO Study (2026) (See Appendix 2 of the Cabinet Report) sets out that there is also significant demand for HMOs from staff at Addenbrooke's Hospital, often in lower-paid roles (e.g. healthcare assistants, porters, and cleaners), who tend to occupy the more affordable end of the private rented sector (PRS). These groups will be positively impacted by the change, as the provision of the quality of HMOs will be improved.

☒ Sexual orientation

Details: There is currently insufficient evidence to determine whether this proposal would have a differential impact on people with this protected characteristic. No specific impact has been identified from the evidence available, but this should not be taken to mean that there is no impact. Where proportionate, opportunities to improve the evidence base and any relevant consultation feedback will be considered as the proposal progresses.

☒ Other - Socio - Economic Background

Details There are especially positive impacts on those who are from a lower socio-economic background. The HMO Study (2026) (See Appendix 2 of the Cabinet Report) sets out that the average private rent in Cambridge was £1,797 per calendar month (PCM) in the year to January 2026. The average for a HMO is £700- £1,000



for a room in Central Cambridge with £600 - £800 for a room in the suburbs of Cambridge. HMOs are therefore providing more affordable housing alternatives to students, professionals and also those who have found themselves homeless and are being rehomed. Therefore the use of an Article 4 Direction to require smaller HMOs to also be assessed against Local Plan policy to improve the quality of HMOs is a benefit to all of these groups. There are likely to be impacts on women, those from different ethnicities, and those with disabilities are more likely to be on lower incomes and may be impacted by this more.

4.2 Other characteristics

Some characteristics are not yet protected in law, but the Council has made declarations it will consider them in policy making.

With regard to Digital inclusion, Care Experience, and rurality there is currently insufficient evidence to determine whether this proposal would have a differential impact on people with this protected characteristic. No specific impact has been identified from the evidence available, but this should not be taken to mean that there is no impact. Where proportionate, opportunities to improve the evidence base and any relevant consultation feedback will be considered as the proposal progresses.

4.3 Considering the above impacts you have identified above, please detail any actions (specific or general) which may help to enhance or mitigate impacts. Please include the timescale for completing the action.

Action and timescale	Officer
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To consider the impacts of the Article 4 Direction as raised during the consultation in the decision whether to agree the order or not.	Lauren Wilkinson

4.4 How will you monitor that the above actions have been completed and that this proposal, once implemented, is impacting fairly on everyone it affects? In answering this question, please include information about feedback you will seek and/or data you will collect and analyse, and how often you will do this

The consultation comments received during the consultation will be assessed and reported on to Cabinet to inform the final decision of the adoption of the Article 4 Direction.

Section 5: Summary

5.1 Briefly summarise the key findings of the EqlA and any significant equality

considerations that should be taken into account when deciding how to proceed with the proposal (this section can be included within the 'equality implications' section of any committee reports). (Max. 250 words)

There are positive implications for all residents because the standard of smaller HMOs being consented in the district will be improved. This will reduce the impacts of HMOs on wider residential amenity both for occupants and neighbours of HMOs. There are no specific impacts on specific protected characteristics, but those who may be of a lower socio-economic background may be more likely to rely on HMOs for housing, therefore there would be specific benefits to these groups, benefitting from better quality HMOs. There is a minor risk that the Article 4 Direction restricts the supply of HMOs in the City. However, there is a need to manage the impacts of HMOs on residential amenity and ensure HMOs are of a high standard.

5.2 Confirm the recommendation of the officer completing the EqlA:

☒ Proceed with the proposal (with any actions identified as required within Section 4 of the EqlA). Analysis demonstrates that the proposal is robust, we have taken all appropriate opportunities to advance equality and foster good relations between groups.

☐ Reject the proposal: Analysis demonstrates that the proposal will cause unlawful discrimination and it must be removed or changed

Section 6: Sign Off

6.1 Signature of individual completing EqlA:

[lpwilkinson](#)

6.2 Date of completion:

[21/09/2026](#)

6.3 When will this proposal next be reviewed and who will this be?

[January 2027](#)

6.4 Approving officer signature, this should be your Head of Service, Service Area Manager, or Project Sponsor:

[Jonathan Dixon](#)

6.5 Date of approval:

[25.09.2026](#)