



Equality Impact Assessment (EqIA): Clustering and Distribution of Affordable Housing – Annexe to the Housing Strategy

Introduction – Please read

The Public Sector Equality Duty, introduced under the Equality Act 2010, requires all public bodies, including local authorities, to have due regard to the need to:

- 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

Equality Impact Assessments (EqIAs) allow the Council to:

- Show that we are meeting this legal duty by demonstrating due regard for the provisions of the Public Sector Equality Duty
- Identify possible negative impacts on individuals and groups with protected characteristics, plan mitigating action and seek to maximise opportunities to advance equality within our activities.

EqIAs provide a methodical approach to the assessment of impacts across the [nine protected characteristics](#) and 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.



Throughout the course of this form, please hover over the [📖] symbol for guidance in relation to specific questions. When the form is completed, please send an electronic copy to equality.schemes@scambs.gov.uk and equalities@cambridge.gov.uk. If you require any additional support completing the form, please email the above address.

Equality Impact Assessment Complete Form

Section 1: Identifying Details

1.1 Officer completing EqIA:

Julie Fletcher – Head of Housing Strategy

1.2 Team and Service:

Housing Strategy within the Housing Service on behalf of both South Cambridgeshire District Council and Cambridge City Council.

1.3 Title of proposal:

Clustering & Distribution of Affordable Housing Policy – Annexe to the Housing Strategy

1.4 EqIA completion date:

03/02/2021

1.5 Proposal implementation date:



Following consultation and approval by both South Cambridgeshire District Council's Cabinet and Cambridge City's Executive Councillor for Housing

1.6 Who will be responsible for implementing this proposal:

The Housing Strategy service for both South Cambridgeshire District Council and Cambridge City Council, working alongside the Greater Cambridge Planning Service

Section 2: Proposal to be Assessed

2.1 Type of proposal:

Revised policy to be added as an annexe to the Greater Cambridge Housing Strategy 2019-2023.

If other, please specify

2.2 Is the proposal (New; Review of existing; Change to an established):

Revised policy to supersede the Cambridge City Council Affordable Housing SPD 2008 and South Cambridgeshire District Council Affordable Housing SPD 2010 regarding clustering.

2.3 State the date of any previous equality impact assessment completed in relation to this proposal (if applicable):

An overall Equality Impact Assessment for the Greater Cambridge Housing Strategy 2019-2023 was completed in February 2019.



2.4 What are the headline aims of the proposal and the objectives that will help to accomplish these aims? (Approximately 250 words):

The aim of the policy is to set out the objectives for both South Cambridgeshire District Council and Cambridge City Council with regards to promoting health and wellbeing and tackling inequality through the creation of mixed, balanced and inclusive communities. The policy seeks to provide integrated mixed tenure housing schemes with support given to acceptable levels of clustering and ensuring that the affordable housing is dispersed appropriately across the whole development.

2.5 Which of [South Cambridgeshire District Council's business plan](#) priorities does this proposal link to?

- Building homes that are truly affordable to live in - ✓

2.6 Which of [Cambridge City Council's 2019 to 2022 Corporate Plan objectives](#) does this help meet?

- Helping people in Cambridge who have the greatest need ✓
- Planning for growth and ensuring our new communities are successful ✓

2.7 Which of South Cambridgeshire District Council's equality objectives (as detailed in [SCDC's Equality Scheme](#)) does this proposal link to or help to achieve?

- Understand the diversity that exists within the South Cambridgeshire population and identify, prioritise and deliver actions that will narrow the gap in outcomes between disadvantaged groups and the wider community- ✓



2.8 Which of Cambridge City Council's equality objectives (as detailed in [CCC's Equality Scheme](#)) does this proposal link to or help to achieve?

- To further increase our understanding of the needs of Cambridge's growing and increasingly diverse communities so that we can target our services effectively - ✓
- To continue to work to improve access to and take-up of Council services from all residents and communities - ✓
- To tackle discrimination, harassment and victimisation and ensure that people from different backgrounds living in the City continue to get on well together. ✓

2.9 Which groups or individuals will the proposal affect:

- Service Users – housing register applicants and social housing tenants ✓
- External Stakeholders ✓
- Employees
- Councillors
- Other –

If other, please specify

2.10 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 on in the form) (approximately 250 words).

The policy aims to ensure that new developments provide an integrated mixed tenure scheme to ensure the creation of mixed, balanced and inclusive communities. It promotes social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other.

2.11 How many people will this proposal affect? (Approximately): It will impact all residents living on new developments.



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

N/A.

- 2.13 The consultation will follow the [City's guidance on undertaking consultations](#) in relation to accessibility and inclusiveness.
- 2.14 All documents have been prepared following [Cambridge City Council Accessibility Statement](#) and [South Cambridgeshire District Council Accessibility Statement](#).
- 2.15 Through the City Council's interpretation and translation service, the consultation and policy documents can be made available in different languages upon request.

Section 3: Evidence and Data

- 3.1 Describe any research (this could include consultation) and analysis you have undertaken to understand how [protected characteristic groups](#) are likely to be affected? Please list any key sources that you used to obtain this information. 

The evidence considered as part of the development of the policy includes the Cambridgeshire Horizons Guide – Balanced and Mixed Communities – A Good Practice Guide. The guide states '*A wide range of house types is a better way of creating mixed communities than focussing on affordability.*' '*Schemes should aim for a critical mass of people at different life stages: children, working age population and the elderly, so that each group can develop their own social networks and facilities*'.



The following pieces of research have also been taken into consideration in the completion of the Equality Impact Assessment and the draft Policy:

- [Joseph Rowntree Foundation – UK Poverty 2019/20](#)
- [English Housing Survey 2017-18 social housing report](#)

(Approximately 250 words)

- 3.2** Describe any research (this could include consultation) and analysis you have undertaken to understand any effects on any other groups of people not mentioned in the nine [protected characteristic groups](#) (for example people who live in rural areas, who live in areas of high growth, or from low income backgrounds).

As part of our research we have also undertaken a survey with Registered Providers who have stock in the areas of Cambridge City and South Cambridgeshire. The responses were very clear that they preferred to have clusters that are easy to manage and distributed across sites. They preferred a mix of tenures and house types within a cluster to ensure a mix of single person households, couples and families. They preferred that larger properties were not grouped together since this will lead to high child densities which can result in high cases of anti-social behaviour.

The draft policy will be advertised for public consultation via both Cambridge City and South Cambs website. As the impacts of this policy will affect registered housing providers and developers, they will also be consulted separately as part of the public consultation.

The Equality Impact Assessment will be updated following the results of the public consultation before final approval of the Policy.

(Approximately 250 words)

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

Member and Officer briefings have been undertaken as part of the development of the draft Policy, with key officers inputting into the final draft. Member approval of the draft policy has been sought before public consultation. It is anticipated that the public consultation will take effect from early February 2021, which will also involve specific consultation with key stakeholders, such as registered housing providers and developers operating in the area.

(Approximately 250 words)

Section 4: Impact of proposal on those with protected characteristics

4.1 Age:

- 4.1.1** Has your research identified that the proposal will have an impact on this protected characteristic?

Yes – the policy is likely to have a positive impact on older people as it acknowledges that there may be occasions where splitting the tenure type would be detrimental to the wellbeing of residents. One such instance would be a number of units designated for over 55's, which may benefit being sited together to ensure interconnected similar lifestyles and more efficient provision of any necessary care and/or support.



If you have selected no – please move forward to question 4.2 Disability

If you have selected yes – please continue below (4.1.2)

4.1.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

The proposal has a medium positive impact for the reasons stated above.

4.1.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
For the consultation process - all documents produced will follow the Councils' Accessibility Statement - Cambridge City Accessibility Statement South Cambridgeshire District Council	Julie Fletcher – Head of Housing Strategy Helen Reed – Housing Strategy Manager	March 2021	Documents will be checked using the accessibility tool.



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<u>Accessibility Statement</u>			
The consultation will be targeted at all those on the housing register, which will include older people	Julie Fletcher – Head of Housing Strategy Helen Reed – Housing Strategy Manager	March 2021	Assurance check that emails have been sent out to individuals on the housing register
The consultation will be targeted at housing providers who provide homes for older people.	Julie Fletcher – Head of Housing Strategy Helen Reed – Housing Strategy Manager	March 2021	Briefing session to be held with housing providers. Comments to feed into the consultation responses.
Following the end of the consultation period the Equality Impact Assessment will be updated to take into account any comments received.	Julie Fletcher – Head of Housing Strategy Helen Reed – Housing Strategy Manager	May 2021	Review of consultation responses
Once the policy is adopted, to ensure the policy is followed as part of any new	Housing Development Officer	To be completed as part of approval of housing schemes in accordance with the S.106	As part of the planning compliance of the development of a scheme.



housing development		Agreement obligations.	
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4.2 Disability:

4.2.1 Has your research identified that the proposal will have an impact on this protected characteristic?

Yes - the policy is likely to have a positive impact on people with a disability as it acknowledges that there may be occasions where splitting the tenure type would be detrimental to the wellbeing of residents. This could include specialist accommodate for disabled people to ensure efficient provision of any necessary care and/or support, as well as ensuring interconnected similar lifestyles. Those with a disability are more likely to experience poverty than able bodied people, and may be more likely to require social housing/ [source: [Joseph Rowntree Foundation – UK Poverty 2019/20](#)]

[The English Housing Survey 2017-18 social housing report](#) states that 54% of households in the social rented sector had at least one household member who had a disability or long-term illness, compared to 31% of owner occupiers and 23% of private renters.

The Joseph Rowntree Foundation and English Housing Survey findings both suggest that this policy could have a positive impact on disabled people in terms of determining the location and scale of any specialist accommodation.

If you have selected no – please move forward to question 4.3 Gender Reassignment

If you have selected yes – please continue below (4.2.2)



- 4.2.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including
- whether each impact is positive, neutral or negative
 - whether it is a high, medium or low impact. 
 - approximately 250 words per impact

This would have a low positive impact.

- 4.2.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
For the consultation process - all documents produced will follow the Councils' Accessibility Statement - Cambridge City Accessibility Statement South Cambridgeshire District Council Accessibility Statement	Julie Fletcher – Head of Housing Strategy Helen Reed – Housing Strategy Manager	10/02/2021	Documents will be checked using the accessibility tool.



<p>The consultation will be targeted at all those on the housing register, which will include those identified as disabled.</p>	<p>Julie Fletcher – Head of Housing Strategy</p> <p>Helen Reed – Housing Strategy Manager</p>	<p>10/02/2021</p>	<p>Assurance check that emails have been sent out to individuals on the housing register</p>
<p>The consultation will be targeted at housing providers who provide specialist accommodation for people with disabilities.</p>	<p>Julie Fletcher – Head of Housing Strategy</p> <p>Helen Reed – Housing Strategy Manager</p>	<p>March 2021</p>	<p>Briefing session to be held with housing providers. Comments to feed into the consultation responses.</p>
<p>Following the end of the consultation period the Equality Impact Assessment will be updated to take into account any comments received.</p>	<p>Julie Fletcher – Head of Housing Strategy</p> <p>Helen Reed – Housing Strategy Manager</p>	<p>May 2021</p>	<p>Review of consultation responses</p>
<p>Once the policy is adopted, to ensure the policy is followed as part of any new housing development</p>	<p>Housing Development Officer</p>	<p>To be completed as part of approval of housing schemes in accordance with the S.106 Agreement obligations.</p>	<p>As part of the planning compliance of the development of a scheme.</p>



4.3 Gender Reassignment:

4.3.1 Has your research identified that the proposal will have an impact on this protected characteristic? No.

If you have selected no – please move forward to question 4.4 Marriage and Civil Partnership

If you have selected yes – please continue below (4.3.2)

4.3.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

4.3.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

4.4 Marriage and Civil Partnership:

4.4.1 Has your research identified that the proposal will have an impact on this protected characteristic? No.



If you have selected no – please move forward to question 4.5

Pregnancy and Maternity

If you have selected yes – please continue below (4.4.2)

4.4.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

4.4.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

4.5 Pregnancy and Maternity:

4.5.1 Has your research identified that the proposal will have an impact on this protected characteristic? No.

If you have selected no – please move forward to question 4.6 Race

If you have selected yes – please continue below (4.5.2)

4.5.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 



- approximately 250 words per impact

4.5.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

4.6 Race:

4.6.1 Has your research identified that the proposal will have an impact on this protected characteristic?

Yes. The Joseph Rowntree Foundation research mentioned above also states that BME workers are more at risk of poverty than the general population and therefore it is likely that this policy will have a positive impact on BME households to create mixed and inclusive communities.

If you have selected no – please move forward to question 4.7 Religion or Belief

If you have selected yes – please continue below (4.6.2)

4.6.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. [📖](#)
- [approximately 250 words per impact](#)

The policy is likely to have a low positive impact on BME households.

4.6.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Through the City Council's interpretation and translation service, the consultation and policy documents can be made available in different languages upon request.	Helen Reed – Housing Strategy Manager Julie Fletcher – Head of Housing Strategy	Open ended – upon request	A record will be kept of any requests for the documents in a different language.
Following the end of the consultation period the Equality Impact Assessment will be updated to take into account any comments received	Julie Fletcher – Head of Housing Strategy Helen Reed – Housing Strategy Manager	May 2021	Review of consultation responses



4.7 Religion or Belief:

4.7.1 Has your research identified that the proposal will have an impact on this protected characteristic?

No.

If you have selected no – please move forward to question 4.8 Sex

If you have selected yes – please continue below (4.7.2)

4.7.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

4.7.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

4.8 Sex:

4.8.1 Has your research identified that the proposal will have an impact on this protected characteristic? No.



If you have selected no – please move forward to question 4.9 (Sexual Orientation)

If you have selected yes – please continue below (4.8.2)

4.8.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

4.8.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

4.9 Sexual Orientation:

4.9.1 Has your research identified that the proposal will have an impact on this protected characteristic? No.

If you have selected no – please move forward to question 4.10 (Other)

If you have selected yes – please continue below (4.9.2)

4.9.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including



- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

4.9.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

4.10 Other: (e.g. rurality, growth, socio-economic status etc.).

4.10.1 Has your research identified that the proposal will have an impact on this characteristic group? Yes.

If you have selected no – please move forward to question 5.1

If you have selected yes – please continue below (4.10.2)

4.10.2 Describe the impacts of the proposal on this characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

This will have a high positive impact on new developments, especially larger, higher density schemes that are attributed to the growth of the area. The policy aims to ensure that new developments provide an integrated mixed tenure scheme to ensure the creation of mixed, balanced and inclusive communities. It promotes social interaction, including opportunities for



meetings between people who might not otherwise come into contact with each other

4.10.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
The consultation will be targeted at housing providers and developers who will deliver new homes.	Julie Fletcher – Head of Housing Strategy Helen Reed – Housing Strategy Manager	March 2021	Briefing session to be held with housing providers and developers. Comments to feed into the consultation responses.
Following the end of the consultation period the Equality Impact Assessment will be updated to take into account any comments received.	Julie Fletcher – Head of Housing Strategy Helen Reed – Housing Strategy Manager	May 2021	Review of consultation responses
Once the policy is adopted, to ensure the policy is followed as part of any new	Housing Development Officer	To be completed as part of approval of housing schemes in accordance with the S.106	As part of the planning compliance of the development of a scheme.



housing development		Agreement obligations.	
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Section 5: Summary

5.1 Briefly summarise the key findings of the EqIA and any significant equality considerations that should be taken into account when deciding whether or not to proceed with the proposal (this section can be included within the 'equality implications' section of any committee reports). (Approximately 250 words) The policy looks to ensure that the clustering and distribution of affordable homes is appropriate to each new development and promotes sustainable and well balanced communities. It has a positive impact for all protected characteristics that will live on new developments, especially those that live in social housing.

5.2 Confirm the recommendation of the officer completing the EqIA:

- Approved (No major change): Your analysis demonstrates that the policy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.

5.3 Signature of individual completing EqIA: *Lukie Fletcher*

5.4 Date of completion: 22/02/2021

Section 6: Sign Off

6.1 Approving officer EqIA review outcome: (delete as appropriate):



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- Approved (No major change): Your analysis demonstrates that the policy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.

6.2 Do you give permission to publish this EqlA on SCDC and Cambridge City websites (delete as appropriate)? If no, please state reason

Yes

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

The EQIA will be reviewed following the close of the public consultation in March 2021.

6.4 Approving officer signature:

Peter Campbell – Head of Housing Services
South Cambridgeshire District Council

Helen Reed – Housing Strategy Manager – Cambridge City Council

6.5 Date of approval: 22/02/2021

Please send a copy to Equality.Schemes@scambs.gov.uk and equalities@cambridge.gov.uk