



Equality Impact Assessment (EqIA):

Build to Rent Policy – Annexe to the Greater Cambridge Housing Strategy

Introduction

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.



Equality Impact Assessment Complete Form

Section 1: Identifying Details

1.1 Officer completing EqlA:

Helen Reed, Housing Strategy Manager, Cambridge City Council

1.2 Team and Service:

South Cambridgeshire District Council, Housing Strategy, Affordable Homes
Cambridge City Council, Housing Strategy, Housing Services.

1.3 Title of proposal:

Build to Rent Policy – Annexe to Greater Cambridge Housing Strategy 2019-2023

1.4 EqlA completion date:

22nd February 2021

1.5 Proposal implementation date:



To seek approval of policy through South Cambridgeshire District Council's Cabinet and Cambridge City's Executive Councillor for Housing.
Implementation expected June/July 2021.

1.6 Who will be responsible for implementing this proposal:

The Greater Cambridge Planning Service, and South Cambridgeshire & Cambridge City Councils' Housing Strategy services.

Section 2: Proposal to be Assessed

2.1 Type of proposal:

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

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

New policy

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 policy sets out how South Cambridgeshire District Council and Cambridge City Council expects new private sector Build to Rent schemes to come forward on new developments. It covers purpose-built housing that is typically 100% rented out. Schemes are expected to be professionally managed, and offer tenancy agreements of three years or more (i.e. longer than in the general private rented sector). Some homes at below market rents will normally be expected to be provided on-site as Affordable Private Rent homes.

The policy aims to encourage the development of good quality Build to Rent Homes where there is an identified need, whilst at the same time ensuring the development of mixed, balanced, inclusive communities which can remain successful in the long-term.

It lays out what the councils expect around issues such as: providing evidence of need and demand; the mix of homes to be provided; the quality and design of schemes; how schemes should be managed; how rents should be set and reviewed; tenancy arrangements; and what should happen if schemes were to stop being used as Build to Rent in the future.

It requires affordable housing to be provided for those unable to afford to buy or rent on the open market, and to maximise the amount of affordable housing which can be provided across wider multi-tenure developments.

2.5 Which of South Cambridgeshire District Council's business plan priorities does this proposal link to?

- Helping Businesses to grow - YES
- Building homes that are truly affordable to live in - YES
- Being green to our core - YES



- A modern and caring council - YES

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 NO
- Planning for growth and ensuring our new communities are successful YES
- Protecting our environment and tackling climate change YES
- Delivering quality services within financial constraints NO
- Developing effective partnerships and an innovative and dynamic organisation YES

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- NO
- SCDC is an employer that values difference and recognises the strength that a diverse workforce brings - NO
- Protected characteristic groups are included and have their voices heard in discussions about the future shape of the district have a voice and are represented in forming the future shape of the district - NO

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 continue to work to improve access to and take-up of Council services from all residents and communities - NO



- To work towards a situation where all residents have equal access to public activities and spaces in Cambridge and are able to participate fully in the community- NO
- To tackle discrimination, harassment and victimisation and ensure that people from different backgrounds living in the city continue to get on well together -YES
- To ensure that the City Council's employment and procurement policies and practices are non-discriminatory and to work towards a more representative workforce within the City Council -NO

2.9 Which groups or individuals will the proposal affect:

- Service Users - YES
- External Stakeholders - YES
- Council employees - NO
- Councillors - NO
- Other - YES

If other, please specify:

- People seeking private rented housing in Cambridge City and South Cambridgeshire, including those wanting to live close to their place of work.
- Residents of new developments, including people moving into Build to Rent schemes and those living in other homes on the development and in the wider community.

2.10 How will these groups or individuals be affected? (approximately 250 words).

It aims to ensure that Build to Rent tenants can live in high quality, energy efficient homes, in well managed schemes, with access to appropriate communal areas and facilities, as part of wider mixed and balanced communities. They will have the choice of a longer term tenancy than



currently available in the private rented sector, and be able to renew their tenancy at the end of the tenancy period. They will also have some certainty from the start on how rent levels might change over time.

It will ensure affordable housing is provided for people who are unable to afford to rent or buy homes on the open market.

Ensuring that homes are tenure-blind should help to prevent residents of the Affordable Rent homes from being stigmatised. Claiming state benefits should not be a reason for being excluded, and support should be available if tenants fall into financial difficulties.

Applicants for housing through the councils' housing register will benefit from the requirements around maximising provision of affordable housing on larger sites, and from the potential for some Affordable Private Rent homes to be available to them.

Ensuring schemes on large developments are part of rather than separate to the wider community, and that schemes can contribute to communities that remain sustainable, should also benefit other local residents.

For Build to Rent developers and investors it provides guidance on what the councils will expect from new schemes and from planning applications.

The policy supports provision of homes specifically for local workers, which will benefit people who want to live close to their place of work as well as helping employers to recruit and retain staff.

2.11 How many people will this proposal affect? (Approximately)



It could affect some thousands of people over time, including Build to Rent tenants, local residents, employers, and those involved in bringing schemes forward.

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)

Developers and housing providers will be expected to comply with the policy in designing and developing Build to Rent schemes and submitting planning applications. Compliance with equality standards is expected to be dealt with as part of the existing planning process for each council.

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. 



(Approximately 250 words)

Sources include:

- Research carried out for the council by Savills on the Build to Rent Market in Greater Cambridge and West Suffolk .
- National Adobe Impact survey data on housing issues experience by wheelchair users
- Public consultation to include a question on equalities impacts on protected characteristic groups.

Details and how information has been used are under relevant paragraphs below.

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).

(Approximately 250 words)

- Housing affordability and income data from Cambridge sub-regional data sources available through Cambridgeshire Insight. Details available in paragraphs below.
- [The Equality Impact Assessment will be updated following the results of the public consultation before final approval of the Policy.](#)

3.3 If you have not undertaken any consultation, please detail why not, or when consultation is planned to take place. (Approximately 250 words)



Public consultation is due to take place from early February 2021, which will include a question on potential impact on equalities groups.

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

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

POSITIVE MEDIUM IMPACT.

Younger people of working age are likely to form the main group of people forming the market for Build to Rent Housing¹

¹ Savills, The Build to Rent Market in Grater Cambridge and West Suffolk 2020.



The policy also explicitly recognises the potential demand for rented housing for older people.

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?
None identified			

4.2 [Disability:](#)

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

YES

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

POSITIVE LOW IMPACT



A recent national survey identified that 4 out of 5 wheelchair users are currently living in a home that fails to fully meet their needs as a wheelchair user, and 91% have experienced barriers to accessing the private rented. ²

The policy requires Build to Rent developments to meet Accessibility standards as required in the councils' Local Plans.

For developments in Cambridge City this means that 5% of the affordable housing component of every housing development providing or capable of acceptably providing 20 or more self-contained affordable homes, should meet Building Regulations requirement M4 (3) 'wheelchair user dwellings' to be wheelchair accessible, or be easily adapted for residents who are wheelchair users. For developments in South Cambridgeshire these standards will be expected as part of the affordable housing element of new developments where need is identified.

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	Helen Reed – Housing Strategy Manager	March 2021	Documents will be checked using the accessibility tool.

² [Accessibility is the Key, Adobe Impact 2018, summary](#)

<p>Councils' Accessibility Statement - Cambridge City Accessibility Statement South Cambridgeshire District Council Accessibility Statement</p>	<p>Julie Fletcher – Head of Housing Strategy</p>		
<p>Seek to ensure Local Plan accessibility requirements are met on new developments</p>	<p>Relevant Planning Officer</p>	<p>As applications are dealt with</p>	<p>Process for monitoring affordable housing delivery includes monitoring of wheelchair accessible housing delivery</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>Helen Reed – Housing Strategy Manager Julie Fletcher – Head of Housing Strategy</p>	<p>May 2021</p>	<p>Review of consultation responses</p>
<p>Ensure that occupation of Affordable Private Rent wheelchair</p>	<p>Helen Reed</p>	<p>Monitoring template to be agreed – timescales tbc</p>	<p>Monitoring of compliance with s106 requirements on each development.</p>

<p>accessible homes is monitored to assess whether they are being occupied by those requiring wheelchair accessibility.</p>			
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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

N/A



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?
n/a			

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**

N/A



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?
n/a			

4.5 Pregnancy and Maternity:

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

NO

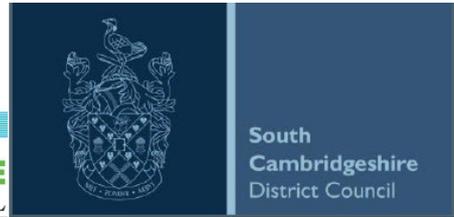
**If you have selected no – please move forward to question 4.6 Race
If you have selected yes – please continue below (4.5.2)**

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**

N/A

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?
n/a			

4.6 Race:

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

YES

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

POSITIVE LOW IMPACT

A Race Equality Foundation Briefing, Ethnicity, Health and the Private Rented Sector 2014, highlights that BAME households and recent migrants are more likely to be living in the private rented sector compared with white households, and as such are more likely to be living in poor housing conditions. Using the Hills definition of fuel



poverty (which takes into account housing costs and the ‘fuel poverty gap’ i.e. the difference between a household’s required fuel costs and what these costs would need to be for them not to be in fuel poverty) , minority ethnic households are also more likely to be living in fuel poverty than white households.

The English Housing Survey identifies that 11.4% of BAME households report feeling unsafe in their home, compared with 5.4% of white households.

Ensuring an element of affordable housing, and requiring the councils’ policy approach to Affordable Rents to be taken into account in setting Affordable Private Rents, could help to ensure that Build to Rent homes offer ethnic minority households an alternative housing option to living in the wider private rented sector.

The policy also aims to ensure that Build to Rent schemes are professionally managed and of good quality and design, which should help residents to feel safer in their homes than they may in the broader private rented sector.

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?
Ensure that monitoring of occupation of Affordable Private	Helen Reed	Monitoring template to be agreed – timescales tbc	Monitoring of compliance with s106 agreements on each development.



Rent homes includes monitoring of ethnicity			
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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

N/A

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?
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n/a			
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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

N/A

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?
n/a			



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**

N/A

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?
n/a			

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?



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)

POSITIVE MEDIUM IMPACT on people with low to middle incomes.

Housing costs are high in Greater Cambridge compared with the rest of the sub-region and England as a whole. ³

There are over 3,000 applicants on the two councils' housing registers, the majority of whom are on low incomes.

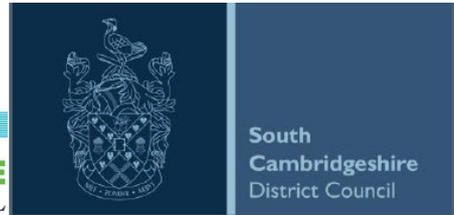
Research by Savills in 2017 showed a lack of affordable new housing supply for those on incomes below £45,000 in Greater Cambridge. ⁴

Further local research found that people with incomes of around £30k to £50k are likely to find it difficult to access Social or Affordable Rent housing through the councils' housing registers, but also to afford to rent or buy on the open market.⁵

³ [Cambridge sub-region Housing Market Bulletin September 2020](#)

⁴ [Savills Detailed affordability analysis, Cambridge & South Cambridgeshire 2017](#)

⁵ [Cambridge sub-region Diamond Affordability Analysis 2018](#)

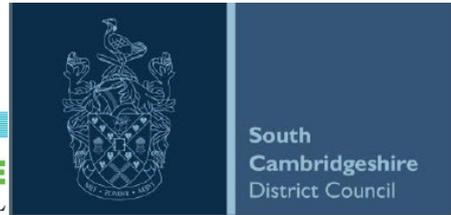


The policy requires the provision of affordable housing in the form of Affordable Private Rent or an off-site contribution to meet the needs of those who would find it difficult to rent or buy on the open market.

Although national guidance uses 20% affordable housing as the benchmark for affordable housing provision, our policy states that on larger sites 40% affordable housing will be required across the whole development, in line with the council's Local Plans, with the Affordable Private Rent contributing towards the overall requirement.

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?
Ensure planning applications include appropriate provision of affordable housing	Planning Officer dealing with each application	Based on timetable for each application	Housing Service monitoring of affordable housing delivery. Improvements planned to monitoring of delivery through Greater Cambridge Planning Service



<p>Following the end of the consultation period the Equality Impact Assessment will be updated to take into account any comments received.</p>	<p>Helen Reed – Housing Strategy Manager</p> <p>Julie Fletcher – Head of Housing Strategy</p>	<p>May 2021</p>	<p>Review of consultation responses.</p>
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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 is expected to have a positive impact on younger people of working age, older people and people with physical disabilities in that it promotes Build to Rent provision for these groups. Requirements around provision of affordable housing mean there is also a positive impact on people with low to medium incomes.

The main equalities impact of any decision not to go ahead with the policy would be a potential reduction in the amount of affordable housing provided as part of a Build to Rent scheme, or across wider developments within which a Build to Rent scheme is to be provided.

5.2 Confirm the recommendation of the officer completing the EqIA (delete as appropriate):



- **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 EqlA:

Helen Reed, Housing Strategy Manager, Cambridge City Council

5.4 Date of completion: 22nd February 2021

Section 6: Sign Off

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

- 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.

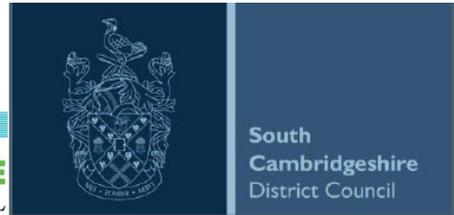
6.2 Do you give permission to publish this EqlA on South Cambridgeshire District and Cambridge City websites (delete as appropriate)? If no, please state reason

Yes

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

If it is found not to be working effectively, or when the Greater Housing Strategy is reviewed in 2023, whichever is sooner.

6.4 Approving officer signature:



Peter Campbell – Head of Housing Services
South Cambridgeshire District Council

Helen Reed – Housing Strategy Manager, Cambridge City Council Anywhere

6.5 Date of approval:

22nd February 2021

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