

## STAGE 2 – Full Equality Impact Assessment

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### 1. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

#### a. Research and evidence

List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

When designing the First Homes TAN, the council reviewed the Government's published [First Homes Equality Impact Assessment](#), which assesses the equality impacts of the majority of protected characteristics affected by the First Homes tenure. The council is largely maintaining the majority of First Homes characteristics, with the exception of setting specific local connection criteria and encouraging key worker occupations to purchase First Homes.

When drafting the First Homes TAN, we have reviewed data from the latest [2020 Gloucestershire Local Housing Needs Assessment \(LHNA\)](#) to try and understand the level of demand for First Homes, however, this document did not provide a specific breakdown of need by affordable home ownership model, and therefore it is difficult to understand the equality implications in terms of the preferred approach from a needs-led perspective.

To better understand the purchase price of new-build homes in Cheltenham for first-time buyers, the council undertook research into [HM Land Registry data \(the UK House Price Index\)](#) to collate data on the market value of homes purchased by first-time buyers in Cheltenham. The latest statistics indicate that the average value of properties purchased by first-time buyers was £285,000, however, these statistics do not provide any insight into the protected characteristics or incomes of the purchasers, nor does this data make any distinction between the cost and first-time buyer characteristics associated with new-build and existing properties.

Officers also reviewed data published by the [Office of National Statistics \(ONS\) regarding local \(Cheltenham Borough\) median and lower quartile incomes](#) covering the 2023/24 financial year. However, the data produced by ONS doesn't distinguish between first-time buyers and all subsequent purchasers, and therefore is of comparatively limited value in terms of aiding our understanding of the equality impacts of the proposals outlined within the First Homes TAN on residents with protected characteristics.

To inform our approach to 'key worker occupations', officers reviewed the [now withdrawn Government guidance](#) around children of workers operating in 'critical occupations'. This document illustrated that the list of households (who are likely to possess some level of protected characteristics) is, by any definition, likely to be extremely wide and difficult to define in a fair and objective manner.

#### b. Consultation

Has any consultation been conducted?

Yes

Describe the consultation or engagement you have conducted or are intending to conduct. Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.

If no consultation or engagement is planned, please explain why.

Consultation has been undertaken with a number of officers within CBC to shape the draft First Homes Technical Advice Note. First, engagement was undertaken with CBC's Planning Policy team, former Head of Planning and current Director of Planning to gauge the planning implications and preferred approach to designing the First Homes TAN. The outcome of this consultation was that planning colleagues advised that the document should be significantly shortened to aid usability for readers, and that the document should take the form of a First Homes Technical Advice Note, rather than producing a Supplementary Planning Document (SPD) to support this objective. In response to this feedback, CBC's Housing Enabling team has significantly shortened the First Homes TAN to make it more accessible to a range of readers.

No public consultation has been undertaken on this document, as CBC's approach largely reflects national guidance (especially around the First Homes flexibilities).

## **2. Assessment**

### **a. Assessment of impacts**

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
<b>AGE</b>	Older people (60+)	Low negative	The English Housing Survey data identifies that 78.4% of surveyed households were owner occupiers, and therefore would be ineligible for purchasing First Homes, which are ring-fenced exclusively for local First Time Buyers (buyers with a local connection to Cheltenham Borough). Whilst the delivery of First Homes in Cheltenham Borough is anticipated to be modest, Statistics around first time-buyers with a local connection (and their age makeup) are not readily available, and therefore it is reasonable to assume that whilst the provision of First Homes to households with a local connection may have some minor negative impact, this is difficult to quantify at a local level.	The First Homes TAN outlines that CBC will prioritise the delivery of Shared Ownership homes on new developments- moving away from the Government's expectation that 25% of First Homes delivered through Section 106 should be First Homes. The First Homes EIA indicates that 8% of total households over the age of 55 purchased Shared Ownership homes. By prioritising the delivery of Shared Ownership over First Homes (the latter of which may exclude older buyers due to ring-fencing provision exclusively for first-time buyers), CBC can mitigate the impacts of delivering First Homes on older age demographics.
	Younger People (16-25)	Neutral	Adopting the First Homes TAN will have no significant impact on younger people aged 16-25.	No mitigating actions required, as the impact of adopting the First Homes TAN upon younger people (16-25) is anticipated to be neutral.
	Children (0-16)	Neutral	Adopting the First Homes TAN will have no significant impact anticipated on children 0-16.	No mitigating actions required, as the impact of adopting the First Homes TAN upon children (0-16) is anticipated to be neutral.
<b>DISABILITY</b> A definition of disability under the Equality Act 2010 is available <a href="#">here</a> .  <i>See also carer responsibilities under other considerations.</i>	Physical disability	Positive and negative	The First Homes Equality Impact Assessment indicates that, in the event that First Homes provision displaces Shared Ownership, Affordable or Social Rented provision, this would have a net negative impact on housing provision available to households with a physical	Taken altogether, the prioritisation of Shared Ownership homes over First Homes, combined with the Council's decision to move away from the Government's 25% First Homes delivery requirement (and the slightly preferential viability impact of

			disability. On a local level, broadly speaking, First Homes have a marginally larger viability impact than the provision of equivalent Shared Ownership homes, which, in turn, could have a minor indirect impact on the provision of accessible homes across all affordable tenures. However, this is counteracted by evidence provided within the Government's First Homes Equality Impact Assessment, which indicates that up to 16% of First Homes purchasers were anticipated to have a long-term illness or disability, compared to only 4% of purchasers acquiring Shared Ownership homes. Accordingly, First Homes are anticipated to have both positive and negative impacts on households with physical disabilities.	Shared Ownership) will help to significantly mitigate the slightly negative impact of First Homes delivery on households with physical disabilities.
	Sensory Impairment (sight, hearing)	Neutral	Adopting the First Homes TAN will have a neutral impact on those households with sensory impairments.	No mitigating actions required.
	Mental health	Neutral	Adopting the First Homes TAN will have a neutral impact on households with mental health needs.	No mitigating actions required.
	Learning Disability	Neutral	Adopting the First Homes TAN will have a neutral impact on those households with learning disabilities.	No mitigating actions required.
<b>GENDER REASSIGNMENT</b>		Neutral	Adopting the First Homes TAN will have a neutral impact on people who are in the process of, or who have completed gender reassignment.	No mitigating actions required.

<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	Women	Neutral	Adopting the First Homes TAN will have a neutral impact on women in marriages or civil partnerships.	No mitigating actions required.
	Men	Neutral	Adopting the First Homes TAN will have a neutral impact on men in marriages or civil partnerships.	No mitigating actions required.
	Lesbians	Neutral	Adopting the First Homes TAN will have a neutral impact on lesbians in marriages or civil partnerships.	No mitigating actions required.
	Gay Men	Neutral	Adopting the First Homes TAN will have a neutral impact on gay men in marriages or civil partnerships.	No mitigating actions required.
<b>PREGNANCY &amp; MATERNITY</b>	Women	Neutral	From the perspective of pregnancy and maternity, adopting the First Homes TAN will have a neutral impact on women.	No mitigating actions required.
<b>RACE*</b> Further information on the breakdown below each of these headings, is available <a href="#">here</a> . For example Asian, includes Chinese, Pakistani and Indian etc	White	Low negative	The Government's First Homes Equality Impact Assessment estimates that 81% of household representatives buying First Homes are likely to be white. This figure is notably lower than the number of household representatives buying Shared Ownership homes, which stands at 96% of all purchasers. Accordingly, whilst the Council is prioritising the delivery of Shared Ownership over First Homes, the modest delivery of First Homes is likely to have a low negative impact on white households.	The Council's Technical Advice Note prioritises the delivery of Shared Ownership homes in the majority of circumstances, with First Homes only being chosen for delivery in certain specific scenarios. This focus on delivering Shared Ownership homes will help to mitigate any modest impact that the adoption of the First Homes TAN may have on white households.

	Mixed or multiple ethnic groups	Positive	<p>Evidence published within the First Homes Equality Impact Assessment reflects that, collectively, Black, Indian, Pakistani, Bangladeshi, or 'other' groups falling under the Government's 'BAME' categorisation are proportionately significantly more likely to purchase First Homes (19% of households) than Shared Ownership properties (4% of households). These figures are founded on the premise that First Homes will not displace rented (affordable) products, which act as an important and disproportionate source of accommodation for housing mixed or multiple ethnic groups. Accordingly, the Council's focus on protecting rented provision within the First Homes TAN will ensure that mixed or multiple ethnic groups are not negatively impacted by the modest First Homes delivery anticipated across Cheltenham Borough. In summary, then, mixed or multiple ethnic groups are likely to be positively impacted by the delivery of First Homes, even at modest levels.</p>	No mitigating actions required.
	Asian	Positive	<p>As covered above, the Government's First Homes Equality Impact Assessment reflects that 'BAME' households are more likely to purchase First Homes than Shared Ownership properties. Delivering First Homes in Cheltenham Borough, even in small numbers, will stand to positively benefit Asian households.</p>	No mitigating actions required.

	African	Positive	As covered above, the Government's First Homes Equality Impact Assessment reflects that 'BAME' households are more likely to purchase First Homes than Shared Ownership properties. Delivering First Homes in Cheltenham Borough, even in small numbers, will stand to positively benefit African households.	No mitigating actions required.
	Caribbean or Black	Neutral	As covered above, the Government's First Homes Equality Impact Assessment reflects that 'BAME' households are more likely to purchase First Homes than Shared Ownership properties. Delivering First Homes in Cheltenham Borough, even in small numbers, will stand to positively benefit Caribbean or Black households	No mitigating actions required.
		Neutral		
<b>RELIGION &amp; BELIEF**</b> A list of religions used in the census is available <a href="#">here</a>	See note	Neutral	Adopting the First Homes TAN will have a neutral impact on people of all beliefs and religions.	No mitigating actions required.
<b>SEX (GENDER)</b>	Men	Neutral	Adopting the First Homes TAN will have a neutral impact on men. Whilst the Council are prioritising the delivery of Shared Ownership homes over First Homes, the Government's First Homes Equality Impact Assessment indicates that both Shared Ownership and First Homes have almost identical levels of male buyers (51% for First Homes, and 50% for Shared Ownership). In practice,	No mitigating actions required.

	Women	Neutral	<p>the adoption of the First Homes TAN will likely have a neutral impact on men.</p> <p>Adopting the First Homes TAN will have a neutral impact on women. Whilst the Council are prioritising the delivery of Shared Ownership homes over First Homes provision, the First Homes Equality Impact Assessment indicates that both Shared Ownership and First Homes have almost identical levels of female buyers (49% for First Homes, and 50% for Shared Ownership). In practice, the adoption of the First Homes TAN will likely have a neutral impact on women.</p>	No mitigating actions required.
	Trans Men	Neutral	<p>The Council does not currently possess data, nor is aware of any publicly available data that can be used to measure the impact of adopting the First Homes TAN on Trans Men. Accordingly, it is assumed that adopting the First Homes TAN will have a neutral impact on Trans Men.</p>	No mitigating actions required.
	Trans Women	Neutral	<p>The Council does not currently possess data, nor is aware of any publicly available data that can be used to measure the impact of adopting the First Homes TAN on Trans Women. Accordingly, it is assumed that adopting the First Homes TAN will have a neutral impact on Trans Women.</p>	No mitigating actions required.
	<b>SEXUAL ORIENTATION</b>	Heterosexual	Neutral	<p>The Council does not currently possess data, nor is aware of any publicly available data that can be used to measure the impact of adopting the First Homes TAN on heterosexual people.</p>



			Accordingly, it is assumed that adopting the First Homes TAN will have a neutral impact on heterosexual people.	
	Lesbian	Neutral	The Council does not currently possess data, nor is aware of any publicly available data that can be used to measure the impact of adopting the First Homes TAN on lesbians. Accordingly, it is assumed that adopting the First Homes TAN will have a neutral impact on lesbians.	No mitigating actions required.
	Gay	Neutral	The Council does not currently possess data, nor is aware of any publicly available data that can be used to measure the impact of adopting the First Homes TAN on gay people. Accordingly, it is assumed that adopting the First Homes TAN will have a neutral impact on gay people.	No mitigating actions required.
	Bisexual/Pansexual	Neutral	The Council does not currently possess data, nor is aware of any publicly available data that can be used to measure the impact of adopting the First Homes TAN on bisexual or pansexual people. Accordingly, it is assumed that adopting the First Homes TAN will have a neutral impact on these groups.	No mitigating actions required.
<b>Other considerations</b>				
<b>Socio-economic factors</b> (income, education, employment, community safety & social support)		Neutral	The adoption of the First Homes TAN is likely to have neutral socio-economic impacts.	No mitigating actions required.
<b>Rurality</b>		Neutral	The First Homes TAN provides guidance around how the Council wish for the First Homes tenure to be delivered in	No mitigating actions required.

i.e. access to services; transport; education; employment; broadband			Cheltenham Borough. As Cheltenham is primarily an urban borough (with the vast majority of sites located within the Borough's administrative boundaries). Therefore it is not anticipated that upon adoption, the First Homes TAN will have any impact upon access to services, transport, or education.	
<b>Other (e.g. caring responsibilities)</b>		Neutral	Adopting the First Homes TAN will have neutral impact on people of with caring responsibilities.	No mitigating actions required.

\* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

\*\* There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available [here](#)

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### 3. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer
Publication of the First Homes TAN	End December 2024	Martin Stacy, Housing Strategy & Partnership's Manager

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

### 4. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

### 5. Change log

Name	Date	Version	Change