

Equality Impact Analysis

This equality impact analysis establishes the effects both positive and negative and potential unintended consequences that decisions, policies, projects, and practices can have on people at risk of discrimination, harassment and victimisation. The analysis considers documentary evidence, data, and information from stakeholder engagement/consultation to manage risk and to understand the actual or potential effect of activity, including both positive and adverse impacts, on those affected by the activity being considered.

To support completion of this analysis tool, please refer to the equality impact analysis guidance.

Section 1 – Analysis Details (Page 5 of the guidance document)

Name of Policy/Project/Decision	Redevelopment of The Elms, Whitefield
Lead Officer (SRO or Assistant Director/Director)	Roz Catlow-Patterson, Head of Housing Growth & Development
Department/Team	Housing Growth & Development Team (Place Directorate)
Proposed Implementation Date	TBC
Author of the EqIA	Jackie Summerscales, Strategic Housing Delivery Manager
Date of the EqIA	30.07.26

1.1 What is the main purpose of the proposed policy/project/decision and intended outcomes?
The Cabinet report seeks approval for the Council to determine the feasibility and deliverability of an independent living scheme at The Elms, Whitefield. The proposed scheme, if viable, would comprise approximately 16 one-bedroom social rented homes, specifically designed to support older residents aged 55 and over. Older residents are under no obligation to live in these properties. Therefore, this proposal is not detrimental to the human rights of any individual affected by the decision being sought.

Section 2 – Impact Assessment (Pages 6 to 10 of the guidance document)

2.1 Who could the proposed policy/project/decision likely have an impact on?
Employees: Yes. (state reasons for answering 'no').

Community/Residents: Yes **(state reasons for answering ‘no’)**.
 Third parties such as suppliers, providers, and voluntary organisations: Yes **(state reasons for answering ‘no’)**.
 If the answer to all three questions is ‘no’ there is no need to continue with this analysis.

2.2 Evidence to support the analysis. Include documentary evidence, data, and stakeholder information/consultation

Documentary Evidence:

Bury’s Housing Need and Demand Assessment 2025 highlights the need to meet the housing requirements of older people and those with disabilities through the provision of accessible and adaptable homes.

Demographic projections indicate that:

- Bury's population is ageing, with the number of residents aged 75-84 projected to increase by 31.2% between 2022 and 2043, while the population aged 85 and over is projected to increase by 65.3%, compared with overall population growth of approximately 7.1%. This will result in a significant increase in demand for age appropriate housing and support services.
- By 2043, residents aged 75 and over will comprise a larger proportion of the borough's population, increasing the need for accessible, adaptable and specialist accommodation that enables people to maintain their independence for longer.
- Current housing patterns indicate that many older residents are living in larger family homes. More than a third (35.6%) of households aged 65 and over occupy three-bedroom houses, while 18.2% occupy homes with four or more bedrooms. This suggests a mismatch between existing housing stock and the needs of an ageing population.
- The assessment identifies a need for a greater supply of smaller, accessible homes to support downsizing, reduce under-occupation and provide suitable accommodation for older residents whose housing needs change over time.
- Older residents express a strong preference to remain living independently. Over 75% of households aged 65 and over would like to remain in their current home with support where needed, increasing to 87.5% among those aged 85 and over. This highlights the importance of providing independent living accommodation that enables people to age well within their community.

Increasing housing choice for older people is a strategic objective across Greater Manchester. The Greater Manchester Age Friendly Strategy specifically seeks to increase housing choice to promote independence in later life.

The proposed scheme would contribute towards meeting identified housing needs for older people, providing accessible, affordable accommodation designed to support independence, reduce social isolation, and improve health and wellbeing outcomes.

There is a wider shortage of affordable housing across the borough. The provision of social rented independent living accommodation would not only respond to age related housing need but also contribute to meeting identified affordable housing needs across the borough.

Stakeholder information/consultation:

Early engagement has been undertaken with:

- Senior and other Council officers.
- Director of Housing.
- Housing Services and Adult Social Care.
- Housing Growth Sub Group.
- Regeneration Board.
- Portfolio holder.
- Homes England.

If the scheme is viable, consultation will be undertaken with local residents and ward councillors. Initial discussions held with local residents in 2024 were positive.

2.3 Consider the following questions in terms of who the policy/project/decision could potentially have an impact on. Detail these in the impact assessment table (2.4) and the potential impact this could have.

- Could the proposal prevent the promotion of equality of opportunity or good relations between different equality groups?
- Could the proposal create barriers to accessing a service or obtaining employment because of a protected characteristic?
- Could the proposal affect the usage or experience of a service because of a protected characteristic?
- Could a protected characteristic be disproportionately advantaged or disadvantaged by the proposal?
- Could the proposal make it more or less likely that a protected characteristic will be at risk of harassment or victimisation?
- Could the proposal affect public attitudes towards a protected characteristic (e.g. by increasing or reducing their presence in the community)?
- Could the proposal prevent or limit a protected characteristic contributing to the democratic running of the council?

2.4 Characteristic	Potential Impacts	Evidence (from 2.2) to demonstrate this impact	Mitigations to reduce negative impact	Impact level with mitigations Positive, Neutral, Negative
Age	The proposed scheme is intended for residents aged 55+; however, it does not reduce existing housing provision or opportunities available to other age groups.	The proposal is expected to have a positive impact on older people by increasing the supply of affordable, accessible, and age appropriate accommodation designed to support independent living. The scheme responds to identified demographic growth in older age groups and recognised shortages of specialist older persons' housing within the borough. While occupation of the homes would be restricted to people aged	N/A	Positive.

		55 and over, this is considered a proportionate and justified response to a clearly evidenced housing need and therefore does not constitute unlawful age discrimination.		
Disability	The proposed scheme will increase the supply of accessible, adaptable and specialist accommodation in the borough, enabling people to maintain their independence for longer.	All homes would be designed in accordance with Nationally Described Space Standards (NDSS). Approximately 15% of the units would meet M4(3) wheelchair user standards, with the remaining homes meeting M4(2) accessible and adaptable dwelling standards, ensuring they can accommodate people with limited mobility.	N/A	Positive
Gender Reassignment	No impact.		N/A	Neutral
Marriage and Civil Partnership	No impact.		N/A	Neutral
Pregnancy and Maternity	The scheme is specifically designed to meet the housing needs of older		N/A	Neutral

	residents and is not expected to have a direct positive or negative impact on people who are pregnant or on maternity leave.			
Race	No impact.		N/A	Neutral
Religion and Belief	No impact.		N/A	Neutral
Sex	No impact.		N/A	Neutral
Sexual Orientation	No impact.		N/A	Neutral
Carers	The proposed scheme is not specifically targeted at carers and does not directly affect this group differently from other residents, although eligible carers aged 55+ may benefit from the additional housing choice provided.		N/A	Neutral

Looked After Children and Care Leavers	The scheme is intended for residents aged 55+ and is therefore not aimed at this cohort; however, it does not reduce existing housing provision or opportunities available to looked after children and care leavers.		N/A	Neutral
Socio-economically vulnerable	The proposed scheme will increase the supply of affordable housing across the borough, to meet the needs of people on low incomes and those in receipt of Housing	The provision of social rented accommodation increases access to affordable, secure, and suitable housing for older residents who may be on low incomes or financially vulnerable.	N/A	Positive

	Benefit/Universal Credit.			
Veterans	The proposed scheme is not specifically targeted at veterans and does not directly affect this group differently from other residents, although eligible veterans aged 55+ may benefit from the additional housing choice provided.	The Council gives priority for social housing to Armed Forces personnel including veterans through the Allocations Policy.	N/A	Neutral

Actions required to mitigate/reduce/eliminate negative impacts or to complete the analysis

2.5 Characteristics	Action	Action Owner	Completion Date
	No additional actions required.		

Section 3 - Impact Risk

Establish the level of risk to people and organisations arising from identified impacts, with additional actions completed to mitigate/reduce/eliminate negative impacts.

3.1 Identifying risk level (Pages 10 - 12 of the guidance document)

Impact x Likelihood = Score			Likelihood			
			1	2	3	4
			Unlikely	Possible	Likely	Very likely
Impact	4	Very High	4	8	12	16
	3	High	3	6	9	12
	2	Medium	2	4	6	8
	1	Low	1	2	3	4
	0	Positive / No impact	0	0	0	0

Risk Level	No Risk = 0	Low Risk = 1 - 4	Medium Risk = 5 – 7	High Risk = 8 - 16
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3.2 Level of risk identified	0 - no risk.
3.3 Reasons for risk level calculation	No negative impact identified.

Section 4 - Analysis Decision (Page 11 of the guidance document)

4.1 Analysis Decision	X	Reasons for This Decision
There is no negative impact therefore the activity will proceed	X	
There are low impacts or risks identified which can be mitigated or managed to reduce the risks and activity will proceed		
There are medium to high risks identified which cannot be mitigated following careful and thorough consideration. The activity will proceed with caution and this risk recorded on the risk register, ensuring continual review		

Section 5 – Sign Off and Revisions (Page 11 of the guidance document)

5.1 Sign Off	Name	Date	Comments
Lead Officer/SRO/Project Manager	Roz Catlow Patterson	03/08/26	Signed off – no revisions required.
Responsible Asst Director/Director	Rob Summerfield, Director of Regeneration and Project Delivery	03/08/26	Signed off – no revisions required.
EDI	Lee Cawley, Equality Diversity and Inclusion Manager	31/07/2026	QA Complete: The analysis has highlighted the need for positive action to support the housing needs of some of our older residents who may also have additional needs. This proposal delivers positive action and impacts for these groups of people without causing disadvantage to other groups.

EqIA Revision Log

5.2 Revision Date	Revision By	Revision Details
N/A.		
