

Equality Impact Assessment / Equality Analysis

(Version 4)

Item name	Details
Title of service or policy	Co-living Position Statement
Name of directorate and service	Planning Policy
Name and role of officers completing the EqlA	Alice Nunn, Principal Planning Officer
Date of assessment	09.04.25

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website following relevant service lead approval.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes 	<p>Publication of a position statement relating to co-living schemes, which sets out the Council's interim position on this type of development. It clarifies the which Local Plan policies the Council will consider when assessing planning applications for co-living proposals, and how they will be applied, with regards to amenity and space standards, occupancy, affordable housing contribution, and Community Infrastructure Levy (CIL) liability.</p> <p>Responsibility for its implementation is shared between Planning Policy and Development Management.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? • Is it a national requirement?). • How much room for review is there? 	<p>Co-living is a relatively new model of housing with no standard definition in national policy. The Council does not have a policy relating to co-living schemes in the adopted B&NES Local Plan. It is acknowledged that there is currently the potential for an inconsistent approach to Co-Living planning applications without formal, visible guidance on the issue. Therefore, we have produced an interim Position Statement which will clarify the Local Plan policies the Council will consider when assessing planning applications for co-living proposals, and how they will be applied.</p>

1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	No current co-living policy.
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2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?	Planning policy officers have undertaken internal equalities training delivered by B&NES.
2.2 What is the equality profile of service users?	<p>The position statement will mainly be used by the development industry to inform submission of planning applications relating to co-living schemes.</p> <p>Co-living schemes are often marketed towards young professionals seeking all-inclusive rental packages, and sociable living arrangements. However, co-living is not typically restricted to any particular user group. It can serve various demographics, with examples of schemes in the UK where intergenerational living is observed.</p> <p>As such, the profile of service users could include all residents and service users of B&NES. Details regarding the profile of the district's population can be found in the Strategic Evidence Base report, at https://beta.bathnes.gov.uk/strategic-evidence</p>
2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	None applicable.

<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>A formal consultation was undertaken for four weeks on the Draft Co-living Position Statement, between 4th February and 4th March 2025.</p> <p>The consultation was published on the Council's website and was advertised via a press release and social media.</p> <p>14 responses were received, summaries of which are set out in the Consultation Statement which will be available to review on the Council's website.</p> <p>The general results of the consultation were:</p> <ul style="list-style-type: none"> • Overall, the Position Statement's support for co-living was generally welcomed and representors generally supported the approach taken. • There were some objections from the development industry to technical details regarding amenity and space standards, occupancy, affordable housing contribution, and Community Infrastructure Levy (CIL) liability. However, responses from officers in the Consultation Statement have justified retaining these positions in the final position statement with some amendments to the space standards and occupation sections. • The content of the Position Statement largely remains the same, with a few minor amendments which are not considered to result in any additional negative impacts for any of the equality groups. For example, respondents suggested that the requirement to provide laundry and drying facilities as part of an inclusive charge should be removed. Officers consider this to not be a planning matter, and this text was removed. Text has also been amended to clarify that the Council will accept dual occupancy co-living units, but in order to be suitable for dual occupancy, these units will be expected to be larger than the minimum requirement for single occupancy units. <p>3 equalities related comments were received, stating that:</p>
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	<ul style="list-style-type: none"> • The co-living model can have an over-reliance on shared living space and an insufficient provision of private defensible space, at a suitable space standard, for residents. • Co-living spaces should not be encouraged or permitted, as they are not appropriate for working-age adults. • If a student wants to rent a co-living studio and they can afford it, why is it necessary or reasonable for BANES to prevent this?
2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?	It is proposed to take forward co-living policy within the new local plan. In the interim, specific equalities considerations relating to publication of the position statement are set out in section 3 below.

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	Content of the position statement	Content of the position statement

	<p>The position statement sets the Council's position on various issues relating to co-living schemes, most of which relate to meeting the needs of some equality groups. These include:</p> <ul style="list-style-type: none"> - Setting out a calculation to ensure a contribution towards affordable housing is provided by all co-living developments. - Setting out amenity and space standards to ensure high quality development is provided for users. <p>Consultation</p> <p>The consultation was primarily aimed at the development industry as the main user of the position statement. However, the consultation was open to all groups, in order to ensure that anyone who might live in a co-living scheme had the opportunity to provide comments.</p>	A potential negative impact is described under 3.6 below, with regards to restricting student occupiers.
3.2 Sex – identify the impact/potential impact of the policy on women and men.	As in 3.1 above.	No known impacts identified.
3.3 Pregnancy and maternity	As in 3.1 above.	No known impacts identified.

<p>3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people</p>	<p>As in 3.1 above.</p>	<p>Authors of documents will ensure that gender neutral language is used throughout.</p> <p>During discussions with any party involved in the preparation of position statement, officers will seek to not use titles and / or to assume gender identity when speaking to people.</p>
<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<p>The position statement sets out that Local Plan policy H7 will apply to all co-living schemes, requiring provision of 5.6% of dwellings to be built to Building Regulation M4(3)(2a) standard (wheelchair adaptable housing) and 48% of the remainder to M4(2) accessible and adaptable dwellings standard.</p>	<p>If any videos are used for information, updates will include captions.</p> <p>Officers will be available to respond to email / written queries throughout the preparation of the position statement.</p> <p>For those with learning disabilities who are unable to communicate through writing, officers will be available to speak on the telephone.</p> <p>For those with vision impairment, the position statement will be made screen reader friendly. Interpretation services will be provided on request or where a need is already known.</p>
<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>As in 3.1 above.</p>	<p>The position statement discourages the occupation of co-living schemes by students, as the Council have a specific</p>

	<p>As co-living schemes are often occupied by younger people, the position statement seeks to set amenity and space standards which provide a high quality of accommodation for these users, resulting in a positive impact on the quality of schemes being provided in the District.</p>	<p>policy (H2A) relating to provision of purpose-built student accommodation (PBSA). Off-campus PBSA developments must meet the requirements of students that would usually reside in HMOs. Students generally have a preference to live as a household with friends, at a cost level similar to renting a HMO. Such accommodation is likely to comprise cluster flats with shared facilities, whereas studio accommodation is considered to be too expensive for students, and is not therefore supported by policy H2A. As co-living schemes are mostly provided as studios, at a price point significantly higher than student cluster flats and HMOs within the city, provision of co-living accommodation for student occupiers is not considered to align with policy H2A. However, the position statement sets out that some flexibility may be considered appropriate on a case-by-case basis, for example to provide accommodation for those in part-time or post-graduate education.</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>As in 3.1 above.</p>	<p>Individuals from ethnic minority backgrounds may be less familiar with written or spoken English. Where requested, summarised translations of the position statement will be provided,</p>

		<p>as will officer support in contributing responses to the consultation.</p> <p>Certain groups such as ethnic minorities are more likely to be on lower incomes so may seek to live in shared accommodation, such as co-living, noting however, that the type of schemes currently coming forward in Bath are not considered by the council to be an affordable rented tenure option due to high rental costs.</p> <p>Certain ethnic minority groups may seek accommodation which allows for extended family to live together. Co-living may be able to provide opportunity for this.</p>
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people	As in 3.1 above.	No known impacts identified.
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	As in 3.1 above.	No known impacts identified.
3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	As in 3.1 above.	No known impacts identified.

<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>As in 3.1 above.</p> <p>The position statement confirms that the Council consider it appropriate that co-living accommodation contributes to affordable housing provision within the District, in the form of an off-site contribution. Policy officers have worked with housing officers to set out the calculation to be used to calculate the contribution.</p>	<p>Those on lower incomes may seek to live in shared accommodation, such as co-living, noting however, that the type of schemes currently coming forward in Bath are not considered by the council to be an affordable rented tenure option due to high rental costs.</p>
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>As in 3.1 above.</p>	<p>Co-living schemes are encouraged by the council in areas well-connected to local services and employment by walking, cycling and public transport. As such, co-living schemes are less likely to be encouraged in more rural locations.</p>
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>As in 3.1 above.</p>	<p>No known impacts identified.</p>
<p>3.14 Care Experienced ***</p>	<p>As in 3.1 above.</p>	<p>Social networks and family guidance often play a vital role in an individual's</p>

<p>This working definition is currently under review and therefore subject to change:</p> <p>In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>		<p>ability to access services or support. Care experienced individuals might lack these networks and guidance, which can make navigating systems, such as securing housing options more challenging. Those with care-experience may seek to live in shared accommodation, such as co-living, noting however, that the type of schemes currently coming forward in Bath are not considered by the council to be an affordable rented tenure option due to high rental costs. B&NES officers in both the planning and housing services will be available over telephone, email or in-person, to discuss housing typologies with those in need of extra support. Those in the planning service will likely sign-post individuals to colleagues in the housing service when contacted.</p>
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Gender neutral language required in documents and correspondence.	Authors of documents will ensure that gender neutral language is used throughout. During discussions with any party involved in the preparation of position statement, officers will seek to not use titles and / or to assume gender identity when speaking to people.	Ongoing	Policy officers	During preparation of position statement.
Accessible document.	Authors of the position statement will ensure that it is screen reader friendly prior to publication.	Ongoing	Policy officers	During preparation of position statement.

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by: Richard Daone, Deputy Head of Planning (Divisional Director or nominated senior officer)
Date: 24th April 2025