

Equality Impact Assessment

Denehurst House Public Consultation

Section One: Information about the proposal

Officer completing the EIA: Stuart Morris & Ruth Worden

Department and service: Strategic Housing (Property)

Date of assessment: 19th June 2026

Overview:

In 1932 Denehurst House and Park were gifted by the Turner Family to the Mayor, Alderman and Burgesses of the Borough of Rochdale (aka ‘the Corporation of Rochdale’). Rochdale Borough Council subsequently became the legal trustee of Denehurst House and Park.

Since 1932 the House and Park have been used for a variety of purposes, including the well-used parklands which are open to the public still. The house has formerly been used as council offices but has been vacant for several years.

The original 1932 Conveyance directs that the House and Land are to be used for any of the following purposes:

- A public park
- Museum
- Art Gallery
- Similar municipal institution [or some building or other erection incidental thereof]

The Council will continue to maintain the public park in the same manner as it has done previously. There is the potential however to create additional uses within the House which are in line with the original 1932 Conveyance.

A former delivery model for this was in direct legal partnership with the charity Groundwork Greater Manchester (Groundwork GM). It has now been decided that whilst Groundwork GM will likely continue to be involved with the project it will not be through a formal legal agreement. The Council therefore is suggesting completing the following:

1. Residential Accommodation for Veterans: Only for veterans meeting the eligibility requirements of the Council's Housing Register meaning that they are in housing need. The accommodations would be let via a third party, with 100% exclusive rights to the Council to nominate prospective tenants to a private-let style tenancy. This provision would be limited to veterans in perpetuity, i.e. could not be changed to other groups in the future and would not be subject to the statutory 'Right to Buy' (see further information below).

2. Changing Places Disabled Bathroom: This is a larger, fully equipped accessible toilet for people with profound and multiple disabilities who cannot use standard disabled toilets, featuring a height-adjustable adult-sized changing bench, a tracking hoist, ample space for carers and a peninsula toilet allowing dignified access to public spaces. These essential facilities will provide space and equipment (like hoists) missing from typical accessible toilets, enabling people with complex needs to enjoy the park alongside everyone else.

3. A Park Café: The operator would be selected from a tender process to deliver a public café facility in Denehurst House. The café would operate within hours set within the terms of the lease and would include a requirement that the toilet facilities are made available to non-customers during opening hours.

Veteran's Accommodation

It is recognised that there is a national and local housing crisis, of which specialist housing has proven to be in even shorter supply (Local Housing Needs Assessment).

Across Rochdale there are around 5,455 households where at least one person has previously served in HM Forces, with a total population of at least 5,617 veterans. Of these veterans:

- 69.2% own, 19.0% are social renters and 11.7% are private renters
- 33.7% are disabled under the Equality Act 2010 and 17.2% of all veterans were disabled under the Equality Act and their day-to-day activities were limited.
- 44.8% are in employment. 2.1% unemployed and 53.1% not economically active.
- 20.3% were aged under 44, 33.1% aged 45 to under 65 and 46.6% were aged 65 and over.

The proposal is to have 5 apartments designed exclusively for local armed forces veterans in housing need. This is in line with Rochdale Council's Armed Forces Community Covenant pledges, which encourage the integration of armed forces personnel back into civilian life. The creation of disabled and adapted living within a park-style therapeutic setting would achieve these aims.

The proposed use of part of the building is considered to sit comfortably within the broad spirit and general requirements of the 1932 Conveyance, as providing accommodation for veterans is a clear municipal and community focused purpose, delivering public benefit, social value and welfare support to a recognised group within the community.

Café for the Park

It is hoped that, as with other cafes in parks, the ability to create one at Denehurst in line with the original 1932 Conveyance will bring significant benefits including but not limited to:

- Creating a vibrant community hub
- Enhancing social connection
- Supporting the local economy
- Boosting wellbeing through nature access
- Providing convenient amenities for park users (including the disabled, parents and dog walkers)
- Increasing accessibility

Section Two: Equality Impact Assessment Screening

[The answers to the questions in section two should be discussed and agreed with your Departmental EIA Lead Officer before the EIA is approved. This is to make sure the decisions made are not taken in isolation by one officer and that all the potential impacts are considered via a critical friend challenge.]

1.	Are there any aspects / activities of the proposal, policy, plan or project that are particularly relevant to equality, socio-economic disadvantage, or human rights? At this stage, you do not have to list possible impacts, just identify the areas.
The recommendations will relate to legal compliance. The potential short-term impacts would be through the creation of accommodation ring-fenced in perpetuity to veterans whom have a recognised housing need. The positive impacts will be for i) veterans who are a disadvantaged cohort in terms of obtaining social housing ii) who have recognised levels of social isolation higher than the national average and iii) who are identified [amongst other cohorts] of requiring affordable housing. The impacts on human rights are deemed to be neutral, as there is no activity limiting them.	
2.	What existing sources of information will you use to help you identify the likely impact on different groups of people? (For example, statistics, JSNA's, stakeholder evidence, survey results, complaints analysis, consultation documents, customer feedback, existing briefings, comparative data from local or national external sources).
Local Housing Needs Assessment Local Authority housing data HM Government Local Authority Housing Data (LAHS) Housing LIN Public consultation stakeholder data (quantitative and qualitative) Qualitative information provided by consultation engagements	

3.	Are there gaps in information that make it difficult or impossible to form an opinion on how your proposals might affect different groups of people? If so, what are the gaps, and how and when do you plan to collect additional information to address this? (This information will help you to identify potential equality stakeholders and specific issues that affect them - essential information if you are planning to consult as you can raise specific issues with particular groups as part of the consultation process. EIAs often pause at this stage while additional information is obtained)
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Additional information being the opinions of the beneficiaries of the Trust is being directly sought through the public consultation.

4.	How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision
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Consultation has been framed to ensure the views of individuals with certain protected characteristics can be identified, and post-consultation work will be undertaken to consider any issues arising from this, which will then be identified within the equality section of any related report.

5.	Potential external impacts: Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?
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The proposal of itself will not immediately impact at all on service users. The potential later decision to execute the usage of the land and park is anticipated to have the following impacts:

1. **Accommodation for Veterans:** There will be no physical impact on service users, given the property has not been in use for many years and any subsequent occupation, should it occur, will be within the private proximity of the building itself. The only potential negative impact would be the restriction to veterans only, who typically are far more likely to be male. However, this does not limit any potential females applying, nor any female partners being able to reside in the accommodation. There is a strong case for positive discrimination should this issue arise. Provision has been made for 1 of the 5 units to be fully disabled compliant to directly meet the potential needs of disabled users.

2. **Changing Places Bathroom:** There are no detrimental impacts as additional toilet provision is being provided for all, and the Changing Places facility is an adapted inclusion to fully meet the needs of those with complex physical needs.

3. **Community Café:**

There are no detrimental impacts, as the provision will be creating a vibrant community hub which will be:

- Enhancing social connection
- Supporting the local economy
- Boosting wellbeing through nature access
- Providing convenient amenities for park users (including the disabled, parents and dog walkers)
- Increasing accessibility

6.	Potential internal impacts: Does the proposal have the potential to negatively impact Rochdale Council employees?
No	

7.	Is a full Equality Impact Assessment required?
Yes	

8.	If you do not agree that a full equality impact assessment is required, please set out your justification for why not. A full EIA will need to be done in the vast majority of cases. Where evidence demonstrates there are no impacts at all, officers will not need to fill one out. This will be in a very small minority of cases.
Not applicable	

Lead officer approving the EIA screening (this must be an Assistant Director or Director): Donna Bowler – Assistant Director

Date of approval: 25th June 2026

Section Three: Full Equality Impact Assessment

Protected characteristics	Evidence and information	Impact	Mitigation activities and actions	Timescale and responsible department
Age	There is a bias in numbers of veterans requiring social housing towards older persons aged 55+ (approximately 48%). The lettings policy will not discriminate on the basis of age, but the need for adapted accommodations for older person is evidenced (RBC Housing Needs data). According to the NHS Health Survey for England 2021 (online) 43% of adults stated they experienced a level of social isolation. The proportion of adults feeling lonely some of the time or more often varied with area deprivation. In the most deprived IMD quintile, 32% of adults reported feeling lonely at least some of the time compared with between 19% and 24% in other areas.	The provision of accommodation, whilst being open to veterans of all ages, will fulfil a need for those in the older age group as well. There is a direct correlation with disability, whereby older veterans typically have more complex physical needs. (See disability section below for intersectional relevance). The Café will enable a potential reduction in social isolation and a space for mixed community interactions. Age combines intersectionality with economic status in terms of social isolation, and the provision of community hub facilities will seek to provide a positive impact.	The formation of the lettings policy will deal with the issue of age and ensuring it is not discriminatory.	Ongoing

Protected characteristics	Evidence and information	Impact	Mitigation activities and actions	Timescale and responsible department
Disability	Of the 112 veterans requiring social housing on the RBC Housing Register 25 applicants have physical and/or mental health disabilities. HM Government Survey 2022: Just under half (48.7%) of veterans were disabled (a much higher proportion than identified in Census 2021 or that we expect among the actual UK veteran population) and just under a third of veterans across the UK said they felt lonely always, often or some of the time (31.3%). Loneliness and disability status were associated and, among disabled veterans, 39.4% felt lonely always, often or some of the time, compared with 22.9% of veterans who were not disabled.	The provision of specialist veteran's accommodation (including 1 fully adapted apartment) will have a positive impact on the provision of disabled-friendly accommodation for a cohort which typically struggles to find suitable accommodation. The ring-fencing of accommodation to this cohort is proportionate following the statistical evidence of the barriers disabled veterans have in accessing accommodation.	The Lettings Policy will be based on an intersectional approach to this issue.	Ongoing
Gender reassignment	Neutral	Neutral	Neutral	Ongoing
Marriage and civil partnership	Neutral	Neutral	Neutral	Ongoing
Pregnancy and maternity	Neutral	Neutral	Neutral	Ongoing

Protected characteristics	Evidence and information	Impact	Mitigation activities and actions	Timescale and responsible department
Race	Only 16 out of 112 Housing Register applicants from the armed services are from a non-White UK background. (RBC Housing Register).	Statistically there are less veterans from ethnic minority backgrounds, therefore the ring-fencing to this cohort might be held to be disproportionate.	The mitigations are based on the proportionality of the intended lettings policy, considering the need for veterans as a specialist cohort to access accommodations. Access to all other social housing within the Borough does not affect ethnic minorities, with some relevant programmes (for example through the Council's Refugee Resettlement & Asylum Seeker Support Team which prioritises certain racial cohorts based on need, such as Afghan and Ukrainian programmes).	Ongoing
Religion or belief	Neutral	Neutral	Neutral	Ongoing
Sex	69 of 112 Housing Register applicants from the armed services are male (although may have female partners who would also be housed with them). (RBC Housing Register) Women's Aid Annual Audit 2021: Details that over 97% of hostel users [fleeing domestic abuse] are female.	Whilst the accommodation is not ring-fenced by gender the majority of applicants from a veteran's background will be male. The purpose of ring-fencing to the veteran's cohort is dealt with above, but it may indirectly discriminate against women who require specialist housing, for example domestic violence-based housing/hostels.	The location is deemed to be unsuitable as it is within an isolated dark park, which is in one sense vulnerable from a safety perspective whilst being highly visible as standing within a public park. The number of accommodations (being 6) are too small for specialist supported housing for domestic abuse victims, as it does not allow for adequate safety and support services. On their own they do not lend themselves to dispersed	Ongoing

Protected characteristics	Evidence and information	Impact	Mitigation activities and actions	Timescale and responsible department
	Petrus alone provides 21 female-only specialist domestic abuse accommodations (www.petrus.org). Across the Borough there are a number of other providers of this type of accommodation. The Council's Domestic Abuse Strategy outlines how this cohort are prioritised and catered for. Domestic Abuse Strategy		accommodation for the above reasons. The need for specialist Domestic Abuse accommodation is met within the Borough through alternate providers including, but not necessarily limited to, those in the 'evidence section'.	
Sexual orientation	Neutral	Neutral	Neutral	Ongoing
Armed services and ex-armed services/ Veteran	The Veteran's Access to Housing Briefing (HM Government) provides a detailed outline of the need for this type of accommodation throughout the country. HM Government Research Briefing Improving access to social housing for members of the Armed Forces: consultation (HM Government) outlined the need for (and subsequent implementation of) statutory categories to improve housing for veterans as being a disadvantaged group requiring housing assistance. Veterans Access to Housing Consultation Of the 112 veterans on the Housing Register 35 of them have been seeking accommodation through the Housing Register for more than 12 months.	The provision of accommodation for armed services will be a positive step as outlined above.	As a positive measure for this cohort no mitigation is required.	Ongoing

Protected characteristics	Evidence and information	Impact	Mitigation activities and actions	Timescale and responsible department
Care experience / Care Leaver	74 care leavers re-housed through the Council's Housing Register between 1st January 2024 and 17th February 2026. In the same time period only 33 veterans were housed through the same system (RBC Housing Register). The RBC Care Leaver's Strategy identifies other pathways not open to veterans. Care Leavers Strategy	The purpose of ring-fencing to the veteran's cohort is dealt with above, but it may indirectly discriminate against care leavers who require specialist housing.	The Council's Leaving Care Team is a specialist service which includes locating accommodation for this cohort and the impact of ring-fencing this accommodation to veteran's is not significant in numerical terms. Care Leavers are given the highest band priority (Band A) on the Council's Housing Register and therefore are able to access accommodation at a higher priority than veterans in any event.	Ongoing
Carers	The State of Caring Survey 2023 - The impact of caring on: health Carers UK outlines the social isolation and medical indices relevant to this cohort. It is clear from the data that carers require additional support for themselves and the person for whom they care, especially whilst in public where standard provision of facilities can create a social barrier.	Support for disabled persons' accommodation (see above) and through the introduction of a specialist 'Changing Places' toilet will improve both disabled service users experience and access to the park, and also that of their carers. In the same measure the provision of a community café will allow carers additional facilities to combat isolation and enhance their own well-being.	As a positive measure for this cohort no mitigation is required.	Ongoing
Socio-economic	Based on 2022 survey data, the median gross personal income for UK veterans falls within the £10,400 to £31,099 range, with over 43% in this bracket, suggesting	Homeless individuals, including veterans in housing need are often excluded or	As a positive measure for this cohort no mitigation is needed.	Ongoing

Protected characteristics	Evidence and information	Impact	Mitigation activities and actions	Timescale and responsible department
	it is often lower than or comparable to national averages, depending on the specific demographic. Veterans with disabilities report lower incomes compared to those without. Finance and housing, UK armed forces Veterans: Veterans' survey 2022, UK https://www.centreforevidence.org/article/20250110-finance-and-housing-uk-armed-forces-veterans-veterans-survey-2022-uk The likelihood of veterans requiring socio-economic assistance and as relate to this potential project based on the above survey is considerably higher than other cohorts, particularly when linked with health and/or disability.	limited by socio-economic disadvantage and/or reliance on benefits, including housing benefit and the need for accommodation suitable for this intersectional cohort.		

Summary of the impact and effects

1	Please describe the overall impacts your proposal will have on protected groups (where applicable)
There will be an overall positive impact on those with protected characteristics (age/veteran status/disability/socio-economic). The only potentially negative impact will be the ring-fencing of accommodation to veterans however there is a legitimate and proportionate rationale for this and evidence which supports such provision.	
2	In some cases, there may potentially be discriminatory effects to a protected group, but your proposal is still deemed necessary for another reason. If this is the situation with your proposal, please explain the rationale (for example, due to budget constraints, the council cannot deliver existing service standards for non-statutory provision, therefore reductions are being made)
The only potentially negative impact will be the ring-fencing of accommodation to veterans however there is a legitimate and proportionate rationale for this and evidence which supports such provision.	

Alternative options considered

1	Please explain the alternatives you have considered to the proposal that has been outlined
1. Doing Nothing: The previous use of Denehurst House (as office space) was held to be incompatible with existing needs and therefore use as a municipal building as a whole or leaving it empty is not in line with the original Deed of Gift. 2. Use House for legally compliant purpose: The only other purposes legally compliant would be as a museum or art gallery. There are no available public funds identified which would make this a viable proposal. The use of accommodation can be sustained by the Trust through the charging of rents.	

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| 3. Not to provide a Changing Places bathroom facility would continue a negative impact on disabled people and reduce the overall capacity within the Borough for its residents, visitors and other ‘connected persons’ |
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2	Outline why the alternative options have been discounted
The alternate options have been discounted as either reducing or limiting services to beneficiaries of the Trust (i.e. the local residents), or being unfunded and not financially viable, or potentially in conflict with the original Deed of Gift and trust law.	

Human Rights Implications

1	Are the human rights of individuals in Rochdale Borough potentially affected by this proposal? This includes all residents, as well as those with any protected characteristics. (Considerations about human rights are likely to be more relevant to some services and proposals than others).
There are no direct restrictions on fundamental human rights as set out in the Human Rights Act 1998 and the European Convention on Human Rights.	

2	If the human rights of any individuals, including those with protected characteristics, are restricted or limited, is your proposal still considered to be proportionate? [Human rights can be legitimately restricted in some circumstances if there is justification for doing so. This could be because the council has legitimate reasons]
An indirect effect of ring-fencing accommodation to veterans will potentially indirectly discriminate against females on the basis of their sex. The proposal is determined to be proportionate however as this relates to a small provision of accommodation for veterans who are directly identified as a protected cohort who require specialist and additional affordable housing, where alternate provision is not being met within the Borough.	

Monitoring

1	Who will be responsible for the monitoring?
The subject land and property are currently part of a trust, and it will therefore fall to Cabinet, as part of ongoing trust maintenance, delivery and governance to review these matters/direct officers to do so.	
2	What the type of data needed is and how often it will be analysed?
Please see mitigations above.	
3	When the policy will be reviewed and what evidence could trigger an early revision?
The recommendations do not deliver a policy, however the effects of the consultation and subsequent report will be further reviewed internally in line with the Council's Constitution.	

SECTION FOUR: Approval of the full Equality Impact Assessment

Lead officer approving the full EIA assessment (this must be an Assistant Director or Director): **Donna Bowler – Assistant Director**

Date of approval: 25th June 2026