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| **Equality Impact Assessment Report** | **Please enter responses below in the right hand columns** |
| **Date** | 27th August 2015 |
| **Sign-off path for EIA** (please add/delete as applicable) | Corporate EIA Panel 3rd September 2015  Cabinet 12th October 2015 |
| **Title of Project, business area, policy/strategy** | **South Lambeth Estate Regeneration project** |
| **Author** | **Marcus Shukla/Lucia Deere** |
| **Job title, division and department** | **MS: Housing Projects Officer, Estate Regeneration Team, Business Growth and Regeneration**  **LD: Estate Regeneration Team Manager** |
| **Contact email and telephone** | [**mshukla@lambeth.gov.uk**](mailto:mshukla@lambeth.gov.uk) |
| **Strategic Director Sponsor** | **Sue Foster** |

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| **London Borough of Lambeth**  **Full Equality Impact Assessment Report** | | | **Please enter responses below in the right hand columns.** |
| **1.0 Introduction** | | | |
| **1.1 Business activity aims and intentions**  *In brief explain the aims of your proposal/project/service, why is it needed? Who is it aimed at? What is the intended outcome? What are the links to the political vision, and outcomes?*    **What are the aims of your proposal?**  Our ambition is to ensure that every resident in Lambeth has the opportunity to live in a good quality home that is affordable and suitable for their needs.  The Council is committed to delivering 1,000 extra homes at council rent levels to deliver a new generation of homes for Lambeth’s residents. These new homes will be delivered over the next 4 years through a combination of initiatives, including estate regeneration, small sites development and specific housing projects. The Council also needs to look forward to future demand beyond this time horizon, where it is predicted that the Council will need to enable and deliver more than 1,559 new homes per annum until 2025.  South Lambeth estate was included in the Estates Regeneration Programme in December 2014.  The principal reason for inclusion of the estate in the programme is that represents an opportunity to build a significant number of additional homes and because the condition and design of the estate means that a more comprehensive solution beyond the Lambeth Housing standard investment programme is required. Given its location and public transport accessibility levels, there is scope for a significant increase in the number of homes.”     * the current poor condition of a number of properties * the costs of delivering the Lambeth Housing Standard means it is unaffordable * refurbishment works themselves would not resolve the main problems with the condition of the properties; and * there is the potential for wider regeneration benefits, including delivery of additional new homes.   South Lambeth currently has 205 properties; these include 142 tenanted and 63 leasehold.  *Note that there are 3 regeneration scenarios for South Lambeth estate regeneration. Two of which include retaining the 12 storey Wimborne House (104 households) whilst one includes redevelopment of the entire estate. The current preferred option is to retain Wimborne House which will significantly reduce the number of people directly affected.*  **Why is it needed?**  Lambeth, similar to other London boroughs, continues to face massive housing challenges, and a shortage of housing has resulted in an increase in house prices and rent levels. Over the last decade house prices have more than doubled - in 2005, the average house price in the borough was £256,000, today it is over £500,000. The average rent for a two bed Lambeth flat is now around £345 per week. This level of rent compares with gross monthly incomes (based on 40 hour working weeks) of around £260 per week at the national minimum wage and about £360 on the London Living Wage.  All this leads to huge demands being placed on the Council for affordable housing – there are currently in excess of 21,000 households on the housing register. Nearly 2,000 join the register each year and Lambeth rehoused fewer than 1200 from that list in 2014/15. There are approximately 2,000 households currently residing in temporary accommodation.  In addition to increasing the supply of genuinely affordable housing, the condition of many of the homes on the estate is poor and there is not funding available through the Housing Revenue Account to bring the homes up to the Lambeth Housing Standard.  **What is the intended outcome?**  Following the estate regeneration programme, South Lambeth will be a mixed tenure estate. All the new homes will be built to modern design and energy efficiency standards and a number of these[[1]](#footnote-1) will be at Council rent levels.   * The existing homes will be replaced, with existing tenants re-housed in homes provided at council rents and existing resident homeowners will be offered options to enable them to remain on the estate including shared equity, shared ownership (or other) offers. The difference between shared equity and shared ownership is that with shared ownership you pay rent on the proportion of the home that you do not own. With shared equity there is no rent to pay.   Options are being provided to ensure that all residents that want to can continue living on the estate. A summary of the ‘Offers’ made to tenants and leaseholders is below:-  **Council Tenants**   * Council tenants on South Lambeth who have to move because of a decision to demolish and rebuild will be offered a new lifetime home on the estate at Council rent levels * Residents choosing to move elsewhere will be given Band A , which is the highest priority to bid for an alternative property under the Council’s Allocations Scheme * If the Council pursues building new homes through a Special Purpose Vehicle the affected homes will be rented at Council rent levels, but with a lifetime assured tenancy, rather than a secure tenancy. A key difference between the two forms of tenancy is that the Right to Buy is not available with a lifetime assured tenancy * Homes will meet housing needs – overcrowded households will move into larger properties. and those who need a smaller home will move to one   **Homeowners (both Freeholders and Leaseholders)**   * Resident homeowners wishing to sell their property would be offered market value plus 10% homeloss (the latter capped at £53,000 in line with Government guidance) and reasonable disturbance costs * Non-resident homeowners would be offered market value + 7.5% (capped at £75,000 in line with Government guidance). These are the legal requirements set by government when undertaking compulsory purchase and are based on the principle of ‘equivalence’. That is, compensated parties should be no better or worse off after the purchase. * Going beyond the Council’s legal requirements, resident homeowners wishing to stay on the estate would also be offered shared equity of a new home on South Lambeth subject to their ability to port their mortgage and having suitable equity. Those with less than 50% equity can carry on living on the estate on a shared ownership basis. At the time of writing, there are 41 homeowners in blocks that would be demolished.   The Council will work with all affected residents individually (tenants and homeowners), and in particular with those who are vulnerable. All residents living on the estate will have access to individual independent advice throughout the process, funded by the Council and sufficient to enable them to make informed choices regarding the offers available. Lastly the Council will give those tenants who will be moving to alternative new build properties within the regeneration area opportunities to be involved in the design of their properties and offer individual choices in relation to the finishes in their properties where this is feasible.  The redevelopment of South Lambeth forms part of a wider estates regeneration programme in Lambeth comprising of the following estates: Central Hill, Fenwick, Knight’s Walk, Westbury and Cressingham Gardens. | | | |
| **2.0 Analysing your equalities evidence** | | | |
| **2.1 Evidence**  *Any proposed business activity, new policy or strategy, service change, or procurement must be informed by carrying out an assessment of the likely impact that it may have. In this section please include both data and analysis which shows that you understand how this decision is likely to affect residents that fall under the protected characteristics enshrined in law and the local characteristics which we consider to be important in Lambeth (language, health and socio-economic factors).* ***Please check the council's equality and monitoring policy and your division’s self assessment. Each division in 2012 reviewed its equality data and completed a self assessment about what equality data is relevant and available.*** | | | |
| **Protected characteristics and local equality characteristics** | **Impact analysis**  **For each characteristic please indicate the type of impact (i.e. positive, negative, positive and negative, none, or unknown), and:**  *Please explain how you justify your claims around impacts.*  *Please include any data and evidence that you have collected including from surveys, performance data or complaints to support your proposed changes.*  *Please indicate sources of data and the date it relates to/was produced (e.g. ‘Residents Survey, wave 10, April 12‘ or ‘Lambeth Business Survey 2012’ etc)* | | |
| **Race** | **Impact: Both**   |  |  |  |  |  | | --- | --- | --- | --- | --- | |  | **South Lambeth tenants** | **South Lambeth leaseholders / sub lessees** | **Overall Lambeth Tenant Population** | **London Borough of Lambeth** | | **Black** | **46%** | 22% | 46% | **26%** | | **Asian** | **4%** | 3% | 3% | **7%** | | **Other** | **10%** | 0% | 7% | **2%** | | **Mixed Race** | **1%** | 3% | 2% | **8%** | | **White** | **29% (10.5% white other)** | 64%:  33% White British, 31% White Other | 33% | **57%** | | **Not known** | **10%** | **8%** | **9%** | **0** |   *Data source – Northgate June 2015, South Lambeth Household Needs Survey June 2015. State of the Borough Report 2014*  **Impact on Existing Tenants**  The majority of South Lambeth Estate’s tenants are of black background (46%) of which approximately 50% of these are of Black African background. This reflects the percentage of Black tenants in Lambeth’s stock as a whole and there are a number of Somali and Eritrean households on the estate.  There are 66 tenants and 13 leaseholders who describe themselves as either Black, Black African, Black Carribbean or Black Other. This comprises 32% and 6% of the estate population as a whole. As a diverse estate, South Lambeth also has a significant other white population which includes a number of Portguese households (South Lambeth Estate is located between Stockwell, Clapham North and Vauxhall, an area with a large concentration of Portuguese residents).  The impact is predicted to be largely positive given the high levels of BME households currently residing on the estate with a better designed environment, a warm and dry home that would be beneficial in reducing fuel poverty, reduction in overcrowding, and generally improving the quality of life of residents in the long term.  There are a number of overcrowded households on the estate. A Household Needs Survey undertaken in March 2015 identified 33 households that stated they are currently living in overcrowded accommodation. 90% of these are from BME backgrounds; 60% of overcrowded families are Black African households. Given that one of the intentions of regeneration is to address overcrowding and ensuring that an adequate number of larger homes are provided across the progamme, regeneration will have a positive impact on these groups.  In the short term it is likely that there will be a negative impact on BME households due to the disruption caused by the estate regeneration programme. To mitigate this, the Council will provide a comprehensive package of rehousing assistance and support to minimise the disturbance experienced by residents including compensation of £5,300 in addition to any moving costs to cover any inconvenience. There will be an enhanced package of assistance available for all residents – including help with removals, disconnection and reconnection of services etc - throughout the moving process and wherever possible, the Council will minimise the number of times that people need to move (with the majority of tenants only having to move once). The Council will potentially need to input extra resources into making sure that the nature of the proposals are understood by BME households and to ensure that they receive adequate support through the re-housing process; this will be monitored as the project progresses to ensure that suitable support is being provided. We have also identified interpreter support for Portuguese, Spanish and Tigrinya (Eritrean) residents to help them through the process.  **Impact on New Tenants**  Whilst overcrowding is experienced by all races, according to the Housing Register, BME households make up over two thirds of all overcrowded households. 66% of new tenants come from BME background and will be the main beneficiaries of the new social housing being provided.  Priority for housing is based mainly on housing need and because BME households tend to have higher levels of housing need, a disproportionate amount of social housing is allocated to these groups. 59% of those allocated housing are from Black British: Caribbean and African households, and only 10% to White British. The over-representation of BME groups is a national trend and may be due to a number of social-economic factors, including lower incomes, higher unemployment and poor health, which increase dependence on social housing.  **Impact on Leaseholders**  Equality data on leaseholders is far sparser than for tenants. When properties are re-sold, equality questions are not asked as part of the conveyancing process. Some limited information is available from the Household Needs Survey carried out on the estate. It shows that White British people are more likely to be homeowners.  **Impact on Sub-Lessees**  The council’s stock database (Northgate) indicates that 22 out of the 63 leaseholders on the estate currently sub-let their properties although this data is not very robust and relies on leaseholders voluntarily telling the Council as homeowners are not required to inform the Council. The Council does not hold any equality information on residents who sub-let from leaseholders; this is a private contract between the leaseholder and their tenant that the council is not party to.  The needs survey on South Lambeth identified 11 of the 22 sublet households who identified as being private tenants of whom there were:   * 1 Black Carribbean * 1 Chinese * 3 White British * 6 White Other (including 4 Portuguese and 1 South American, nationality not stated)   Although a small sample size, the data suggests different ethnicities being affected disproportionally. Private renters may be able to rent one of the new properties from the regeneration or will be supported by the council with advice to access private rented accommodation elsewhere in the borough.  **Summary**  Whilst all households on the estate will be impacted, the largest group to be impacted is BME as they are the larger proportion of tenants on the estate. Because there is a greater representation of BME across the estate than other ethnicities, then the outcome of the proposals would positively benefit a larger number and proportion of households falling within the BME category. | | |
| **Gender** | **Impact: Positive**   |  |  |  |  |  | | --- | --- | --- | --- | --- | |  | South Lambeth tenants | South Lambeth leaseholders | Lambeth social tenants | Lambeth population | | Male | 43% | 55% | 37% | 49% | | Female | 57% | 45% | 63% | 51% |   *Data source – Northgate June 2015, South Lambeth Household Needs Survey March 2015. State of the Borough 2014*  **Impact on Tenants**  The gender split on South Lambeth Estate has a slightly lower proportion of female headed households in this type of tenure. However, there are more female headed households than male headed households (57% : 43%).  We recognise that there will be a short-term negative impact during the rehousing and construction periods for this project due to the inevitable disruption it will cause. The council is therefore developing a detailed rehousing policy as well as the formal offers to tenants and homeowners to help reduce uncertainty. The phasing of the construction and site management will also consider safe access across the estate and to local facilities.  Improving the condition and standard and supply of the Council housing stock through the estate regeneration programme is a key outcome of this project. The impact of the estate regeneration programme at South Lambeth will be positive as there will be improvement of the level of decency for both male and female residents.  The estate regeneration programme aims to not only improve the condition of housing for existing residents but to provide additional homes at Council rent and generally affordable levels that will house the people of Lambeth. Increasing the number of homes at council rent levels in equality terms will mean that those in housing need on the Housing Register (the majority of whom are women) are key beneficiaries of the programme.   |  |  | | --- | --- | |  | Households housed in 2014/15 | | Male | 38% | | Female | 62% |   *Data Source - Northgate April 2015*  **Impact on Leaseholders and Future Homeowners**  The gender records of leaseholds from the household survey show a marginally higher proportion of male headed leasehold properties. | | |
| **Gender re-assignment** | **Impact: None**   |  |  |  |  |  | | --- | --- | --- | --- | --- | |  | | South Lambeth | Lambeth Tenants | Lambeth Population | | Born different gender | Yes | Not known | 0 % | Not known | |  | No | Not known | 7% | Not known | | Not recorded | | **Not known** | **93%** | **N/A** |   **Data source – Northgate June 2015 State of the Borough 2014 South Lambeth Housing Needs**  Although very limited data there is no disproportionate impact identified.  Equality and Human Rights Commission guidance on this protected characteristic is to collect data where relevant. Gender re-assignment is not relevant to the majority of housing services, with the exception of tackling harassment. The new place will be secure by design to improve safety and reduce opportunities for crime. | | |
| **Disability** | **Impact: Both**  The most recent and reliable information on this characteristic was recorded in the South Lambeth Estate Household Needs Survey, undertaken in March 2015. A total of 29 tenants stated that they or a household member had a disability or impairment. A breakdown of this information is provided as follows:   |  |  | | --- | --- | | **Identified disability** | **Number of residents affected (of 146)** | | General mobility problems | 9 | | Autism | 3 | | Mental health issues/learning difficulties | 2 | | Arthritis/Osteoarthritis | 2 | | Kidney problems | 2 | | Asthma/Eczema | 2 | | High blood pressure/diabetic | 3 | | Chronic Fatigue Syndrome | 1 | | Sciatica/back problems | 4 | | Lupus | 1 | | Heart problems | 4 | | Cancer | 2 | | **TOTAL** | **33** |   *(Please note that some households listed more than one disability or physical impairment)*  The Household Needs survey highlighted that a significant number (20%)  of tenant respondents reported that they or a member of their household have a disability or medical conditions that is affected by the size, location or design of the home they live in.  For leaseholders the figure was approximately 8%.  For both of these headline figures some caution needs to be taken, many of the responses, particularly those where conditions are ‘unspecified’ in that they may not be relevant to their housing need.  The survey also indicated that 8 tenanted households had the need for a full time carer although details on current care arrangement were very sparse and does not suggest that 8 households are currently receiving full time care. Also, 7 households stated they required a carer but not on a full-time basis.  According to the  “State of the Borough 2014” report about 37,000 people, 11.9% of the population of Lambeth, say their day-to-day activities are limited by a long term illness or disability of which around  46% (17,000) people stated that their activities are limited a lot and 56% (20,000) limited a little. This figure is substantially lower that than suggested above for South Lambeth tenants.  **Impact on Existing Tenants**  The estate regeneration programme overall will have a positive impact on disabled tenants living in South Lambeth as all new homes will meet the Lifetime Homes standard, which will make their new homes more accessible than the existing homes on the estate, and over time will allow residents to stay in their own homes for longer, reduce the need for home adaptations and give greater choice to disabled people who cannot achieve independent living due to lack of suitable housing in our housing stock.    However in the short term, tenants with disabilities may be adversely affected due to the disturbance of moving home. As part of the estate regeneration programme, a comprehensive package of assistance will be provided to assist this group in preparing to move and moving to their new home with intensive, personalised support provided to ensure that medical and disability needs are carefully addressed and support networks maintained. The Rehousing team will work closely with Adult Services and will either use Council Occuptational Therapy services, or appoint an independent OT to ensure the service is available when required, as well as access to mental health services as required.  Tenants who require adaptations will have them provided in their new homes with rehousing officers working closely with the occupational therapy team to carry out assessments as required and provide advice on the design, layout and adaptation of new homes as appropriate. A budget will be made available for aids and adaptations so that these can be carried out in a timely manner.  The new buildings and spaces will comply with current standards of accessibility to improve accessibility for wheelchair users, people with visual impairment etc.  This group will be prioritised for one move only.  **Impact on Existing Leaseholders**  Albeit there is a much smaller proportion of leaseholders who may be disabled, the Council will extend the same package of measures to these leaseholders to help them remain on the estate, should they wish to do so, and to help ensure that their future homes are adequately adapted to meet their needs.  **Impact on New tenants**  The impact for new tenants with disabilities will be positive. The proposals for the development of new homes on South Lambeth are intended to increase the options for people with disabilities, both for existing and new residents.  There are 194 households currently registered on the Housing Register with a known disability, with a severe shortage of accessible housing in Lambeth. All properties on South Lambeth will be built to the Lifetime Homes design standards – the main features include a level approach/entrance and wider doorways. Many existing homes in Lambeth housing stock are not wheelchair accessible and often have to go through expensive adaptations to ensure accessibility. | | |
| **Age** | **Impact: Both**   |  |  |  | | --- | --- | --- | |  | **South Lambeth tenants** | **Lambeth Council tenants** | | **Under 25** | **1%** | **2%** | | **25-44** | **36%** | **32%** | | **45-64** | **44%** | **44%** | | **65+** | **19%** | **22%** |   *Source: Northgate August 2015*  **Household Composition**   |  |  | | --- | --- | | 2 parent family (one child under 16) | 8.5% | | 2 adults (no children under 16) | 10.3% | | 3 adults (no children under 16) | 7.9% | | Single adult (no child under 16) | 11.5% | | 1 parent family (at least one child under 19) | 5% | | 1 parent family (at least one child under 16) | 14% | |  |  |   **Data source – South Lambeth Estate Household Needs Survey (March 2015)**  **Impact on Existing Tenants**  The proportion of older people living on South Lambeth is broadly the same as the borough tenant average. The positives, negative and mitigating actions are broadly the same as those described above under the disability section.  Older people have generally been living on the estate for a longer period of time than other residents, likely to be more settled and require more support when moving.  The regeneration project provides an opportunity to increase the supply of Lifetime Homes which are designed to be easily adapted as people’s needs change.  The number of children and young people is likely to increase with the provision of new and additional homes and a number of issues need to be considered in order to mitigate the impact of the project on this group. For existing residents, an amount of play and amenity space should be maintained throughout the construction period. New, high-quality spaces that cater for all age groups will be required as part of the masterplanning brief. Children and young people should also be encouraged to participate in consultation as the project develops to ensure they have the opportunity to shape the detailed proposals.  We recognise that there may be disruption to accessing exisiting services and agencies such as school, childcare, etc for various ages during the decant and construction programme. The decant programme will mean residents moving once only into their new home wherever possible. If a tenant chooses to move permanently elsewhere, we will work with them to minimise the impact.  Access around the estate and to childcare, nurseries, crèches and schools will also be considered during the masterplanning stage of the project on order to keep disruption to attendance to a minimum.  **Impact on Future Tenants**  Lambeth’s older population (aged 60+) is projected to grow by 27% by 2024, compared to an 11% growth across the whole population. However, there are substantial differences between ethnic groups. For example, whilst the 60+ population is projected to grow by 27% overall, the black Caribbean 60+ populations are projected to grow by 38%, from around 5,000 to 6,700. This is compared to an all-age decrease in the black Caribbean population of 4.6%, from 28,600 to 27,000. However, the number of people identifying themselves as ‘Black British’ is increasing  Similarly, the black African population is projected to grow by 10.9% overall, but the 60+ population is projected to increase by 82% (albeit from a smaller base line – from 2,400 to 4,500). The white population is projected to grow less.  The supply of additional homes will benefit an ageing future population.  **Impact on Existing Homeowners**  Fewer residents in leasehold properties are over 65 (14%) with just under half aged between 35-65 and a third aged under 35.  Older leaseholders are less likely to be in work or be able to take on new mortgages. However, they are also more likely to have a higher level of equity in their properties and will be more able to take a shared equity arrangement to continue living on the estate at no additional cost.  As the project proceeds, the Council will need carefully to monitor how the proposals affect this older leaseholders. The range of options available to leaseholders (shared equity, shared ownership, rental properties) should ensure that anyone wishing to remain on the estate, regardless of age, would be able to continue to do so.  **Impact on Future Homeowners and Private Tenants**  It is not possible to determine at this time the potential differential impact across ages, beyond stating that the provision of new housing should benefit all age groups. | | |
| **Sexual orientation** | **Impact: Positive**  Although very limited data there is no disproportionate impact identified.  Equality and Human Rights Commission guidance on this protected characteristic is to collect data where relevant. Sexuality is not relevant to the majority of housing services, with the exception of tackling harassment.  The design of the new homes and spaces will create a place which is secure by design and can be policed more easily. The public realm will offer a greater level of security to all which may be relevant to LGBT residents who are more likely to be subject to hate crime and harrassment. | | |
| **Religion and belief** | **Impact: None**  Four-fifths of residents follow a religious faith - Christian (66%) and Muslim (10%) being the commonly observed faiths. Just less than one in seven residents do not follow a religion (13%) and 5% preferred not to say. (Source: Housing Need Survey, South Lambeth Estate, March 2015).  4 Buddhists – 3%  90 Christians – 66%  13 Muslim – 10%  1 Hindu - <1%  17 No religion – 13%  7 Prefer not to say – 5%  2 Any other religion (unspecified) – 1%  The Council will give consideration to people’s ability to practice their faith through the different stages of the project. The rehousng team will ask people about their use of places of worship to see the extent to which disruption to their lives can be minimised. | | |
| **Pregnancy and maternity** | **Impact: Both**  There will be disruption during the construction period and the council will consider access across the estate during this time.  The design and layout of the new homes will consider access, lift and stairs so that larger family homes are either accessible by lift or not above four storeys high without a lift. The design of the public realm will consider accessibility for people moving around the estate, pushing buggies etc.  Any affected tenants who are pregnant at the time of re-housing may be entitled to a larger property as per our allocations policy.  The design will meet modern space standards with provision for buggy storage at ground floor level in blocks with no lift. | | |
| **Marriage and civil partnership** | **Impact: None**  There is no specific / indirect impact. | | |
| **Socio-economic factors** | **Impact: Positive and Negative**  The number of housing benefit claiming tenants in South Lambeth Estate can be used to provide an indication of the socio-economic profile of the area.   |  |  |  | | --- | --- | --- | |  | South Lambeth Estate | Lambeth | | Those in receipt of full HB | 26.3% | 34.8% | | Those in receipt of partial HB | 38.2 % | 27.8% | | Not receiving HB | 35.5% | 32.4% |   *Source: Northgate August 2015*  This shows that South Lambeth Estate has a high number of lower income households. Approximately 1/3 do not receive any Housing Benefit, roughly in line with the borough average. However a greater number are in receipt of partial Housing Benefit than the borough as a whole with fewer claiming full Housing Benefit.  36% of South Lambeth Estate’s total respondents stated that they are in full time employment. This is set against a borough average of 46.5% (source: Census, 2011). The levels of employment are higher in leasehold properties – 50% - than tenanted (30%). There is also a relatively high number of retired residents in both tenures; 20% of respondent are retired set against a borough average of 5.6%.  Employment status (%)   |  |  |  |  | | --- | --- | --- | --- | |  | *Tenants* | *Leaseholders* | *Total residents* | | Full time employed | 30 | 50 | 36 | | Part time employed | 21 | 11 | 18 | | Retired | 17 | 26 | 20 | | Long term sick | 14 | 5 | 12 | | Unemployed | 6 | 3 | 5 | | Full time education | 6 | 3 | 5 | | Self employed | 5 | 3 | 4 | |  | 100 | 100 | 100 |   *(Source: Household Needs Survey – South Lambeth Estate, March 2015)*  36% of South Lambeth Estate’s total respondents stated that they are in full time employment. This is set against a borough average of 46.5% (source: Census, 2011). The levels of employment are higher in leasehold properties – 50% - than tenanted (30%). There is also a relatively high number of retired residents in both tenures; 20% of respondent are retired set against a borough average of 5.6%.  **Impact on tenants in the borough**  The acute shortage of homes and rising population is adding extra pressure on the need to provide affordable and social rented homes in the Borough. Private sector rents and house prices are going beyond the means of many Lambeth residents. The map below shows the average cost of a 2 bedroom household in the borough (with Stockwell Ward highlighted). Regeneration of an estate and increasing supply of council housing stock will benefit the increasing number of Lambeth’s residents who cannot afford to buy or rent in the private sector.  Source: GLA ([www.london.gov.uk](http://www.london.gov.uk) – accessed August 2015)  However in the short term, the existing estate residents would be affected through some negative impacts due to having to move home. The council will provide compensation to residents if their homes are demolished as part of the regeneration proposal. The statutory amount currently stands at £5,300.  **Impact on Existing Tenants**  All the current council tenants that are affected by the demolition proposal would be guaranteed a new home and financially compensated through a statutory home loss payment and payment of removal and other disturbance costs. The new home guarantee would enable them, if they wish, to remain on the estate or to move elsewhere in the Borough. Whilst it may lead to short-term disruption, it also provides choices and opportunities for them that they would not otherwise have had (for example, being able to move closer to work).  Council rent levels are set using a Government formula. The value of the home makes up part of this calculation and can mean that rents for new homes are higher than current council rent. To lessen the impact it is proposed that any rent increases will be done gradually and phased over five years.  Council Tax is calculated with reference to the value of the new home and may increase due to the regeneration project. Currently the Council Tax bands for the Estate are as follows:   * Broadstone House – C * Sturminster House – C * Osmington House – C * Swanage House – C * Verwood House – A * Wimborne House B and C (approximately 10% of Wimborne House’s properties are in Band C)   An increase from Council Tax Band A to B would mean a rise of approximately £140 per year. There would be a similar annual increase if moving from Band B to Band C.  Service charges could increase with improved provision of services such as lifts etc. The Council will assess service charge costs in parallel with developing the design etc of the new homes so that service charges remain affordable. In contrast, utilities bills can be expected to reduce.  As designs for the redeveloped estate are progressed, the Council will need to pay close attention to the future overall cost of living on the estate to make sure that this remains as affordable as possible for tenants.  Tenants wishing to move to a new home on the estate will not have the Right to Buy under the assured lifetime tenancy. However, thinking about income levels and benefit take up on South Lambeth, the cost of new properties are likely to be unattainable even with the substantial discount now prescribed by government. Tenants wishing to keep the Right to Buy can choose to move to a Council home elsewhere and retain a secure tenancy.  **Impact on homeowners**  So that resident homeowners whose homes would be demolished can stay on the estate, the Council will offer options as follows:   * Open market purchase * Leasehold swap – or swap from freehold to leasehold * Leasehold swap with shared equity * Shared ownership   Resident homeowners would be compensated by offering market value plus 10% home loss for their current home. Disturbance costs including reasonable legal and valuation costs will also be paid.  For resident homeowners wishing to remain on the estate, it is recognised that the value of similar size new homes would be more than their current home and therefore it could be difficult for them to buy a new home on the estate outright.  It is important to note that all costs come from the same pot of money – a more generous settlement to relatively affluent and more likely to be white leaseholders in this position would be to the detriment of other equality groups, i.e. there would be a reduced amount / quality of social rented homes for those in a lower income bracket who may be BME tenants. This is difficult to justify and depending on the details is contrary to the Council’s general fiduciary duties.  The council is offering a shared equity scheme, where the homeowner can purchase a share of the equity in a new home and is not required to pay any rent on the share they do not own, enabling the existing homeowner to remain on the estate. There is also recognition that a homeowner may have difficulty in securing a new mortgage and the council will need to work with the homeowner and lenders to help secure a new mortgage should they wish to remain on the estate as described previously.  It is recognised that there may be some leaseholders who may have remortgaged their homes, spent the money from equity release and may also be unemployed. In these circumstances it may be difficult for leaseholders to either remain on the estate or buy elsewhere. The shared ownership option should cater for these circumstances, but if not the Council will provide support to these households to access private rented accommodation following the purchase of their home at market value plus 10%.  As described above, the Council will need carefully to monitor how the proposals affect this older leaseholders.  For non-resident homeowners, the council will offer market value plus 7.5%. Tenants of private landlords on the estate are not the responsibility of the Council and will not be compensated for loss of their home but support will be provided to find alternative accommodation. As part of its estate regeneration programme and direct housing delivery, the Council is building council owned market rent housing that could provide opportunities for the tenants of private landlords.  Homeowners will have access to independent advice and the council will fund reasonable costs for this service.  Service charges will be carefully considered by the Council as above to mitigate the impact of any increase.  It is not possible to determine the exact effect on individual homeowners at this stage. Their outcomes will depend on their current financial situation, how much equity they have in the property, and whether they wish to continue living on the estate.  As described above, all leaseholders are provided with options to allow them to stay on the estate and, whilst the Council is unable to make absolute guarantees to leaseholders (in the manner given to tenants), the Council will work towards making sure that those who wish to remain on the estate have the opportunity to do so.  **Impact on Future Homeowners and Private Tenants**  Whilst the Council has ambitions towards creating council-owned market rent housing, the current Viability Report suggests that a significant proportion of the additional new homes (up to 60%) would need to be made available for sale.  There are positive socio-economic impacts as any development will provide employment and training opportunities for residents as part of the construction programme and to be delivered by Council agencies. The project will meet the council’s procurement and local plan targets as appropriate.  The new population, including private renters and home owners, will change the employment profile of the estate and increase the number of economically active people. | | |
| **Language** | **Impact: Both**  The number of tenants who speak / do not speak English as their main language at home is almost evenly split. 51% respondents stated that they do speak English as their main language compared to 49% who spoke another language; other commonly spoken languages on the estate are Portuguese, Spanish, Polish and Tigrinya (Eritrean).  For Leasehold properties the number of English speakers is considerably higher – 74% that speak English as opposed to 26% that do not.  For those residents where English is not their main language, the Council will ensure that literature and information about the programmes is available in the appropriate formats and languages where required. We have already engaged with community based organisations who have provided interpretation at public events including the provision of Portuguese and Spanish translators. We are also hoping to work closely with the Eritrean Community Centre in providing language support where necessary.  *(Source: Household Needs Survey, South Lambeth Estate, March 2015)* | | |
| **Health** | **Impact: Both**  **SEE ALSO DISABILITY**  The regeneration project is likely to have both positive and negative implications for people’s health and wellbeing. This will affect households equally across the estate.  There are likely to be some negative health and wellbeing impacts in the short-term associated with the disruption of moving home and uncertainty about the future. The Council will need to work closely with residents to help provide as much clarity as possible about the future of the estate and about the process involved in regeneration, to give people as much certainty as possible to mitigate potential stress about moving home, etc.  In the longer term, positive impacts can be expected from providing much better quality homes and reducing overcrowding. It means more homes will become available for those households that need them. The project would provide the opportunity to build better quality homes designed according to best practice in urban design, producing a high quality home and urban environment and a safe and secure new neighbourhood, contributing positively to quality of life.  Overcrowding is one of several aspects of housing conditions that studies have been found to be related to poor outcomes in health, education and childhood growth and development *(DCLG, 2004).*  Negative health and well-being outcomes would be associated with disruptions to existing households on the estate and the inevitable stress this causes.  Care will be undertaken when managing the rehousing process to ensure that residents are supported. Medical Needs Assessments will be carried out where required and dedicated rehousing support provided by the Council including access to mental health support.  Furthermore the construction programme should be effectively managed so that disturbance can be kept to a minimum. | | |
| **2.2 Gaps in evidence base**  *What gaps in information have you identified from your analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are unable to fill in the gaps please state this clearly with justification.* | The data provided so far, from the Council’s Housing IT system and the South Lambeth Housing Needs Survey provides an overview of equality information.  There is little data currently for homeowners and their sub-lessees.  As the project progresses, the Council will build up a much more detailed picture of the circumstances of all the households across the estate and this will enable the Council to begin to develop bespoke solutions to cater for the needs for different households and the people within this. This information will then enable more detail to be layered onto the development strategy for the estate, such as the detailed design and configuration of the new homes, the proportion of homes requiring adaptation for disabilities, etc. and the type of assistance that will be required to help people to move and settle into their new homes. | | |
| **3.0 Consultation, Involvement and Coproduction** | | | |
| **3.1 Coproduction, involvement and consultation**  *Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?* | As of August 20th 2015, approximately 163 households on the estate have been engaged with the consultation process. This figure constitutes 80% of the total households on South Lambeth Estate.  The Council established a Resident Engagement Panel which includes a number of representatives from the 6 blocks on the estate (which meets monthly); assisted with re-establishing Wimborne House TRA; conducted a number of visits to properties across the estate (visited 35 households in total); undertaken 3 rounds of drop-in sessions at a nearby community centre which is fully accessible; provided interpretation or translation when requested (Portuguese, Bengali and Spanish).  Lambeth will also be looking to appoint an independent resident advisor to work with the resident engagement group and support them through the process. Weekly surgeries shall be commencing on the estate in September 2015.  *What difference did this make?*  More people have been able to share their concerns about the estate as is and what they would like to see as part of the regeneration programme. Building up a good working relationship with a core of residents has also enabled us to visit homes to examine the internal condition. Many of the residents that we spoke to have reaffirmed our decision to identify South Lambeth for regeneration.  The consultation reaffirmed the fact that many households on this estate are living in poor quality homes. This has been due to the historical underinvestment in the stock and there is an urgent need to respond to this.  Residents have been involved in the development of the draft offer documents for tenants and homeowners, particularly to secure confirmation that the Council will provide options for all residents to remain on the estate. The draft offer documents have provided clarity on how individual residents will be affected by the proposal.  Generally, residents are quite supportive of the Key Guarantees provided by the Council as part of the regeneration proposal and these have been further developed in response to consultation to improve for example the offer to homeowners to better reflect the current leasehold terms, and to request that play opportunities are provided through the construction programme. However there are strong vocal groups who are against change and would only want to see refurbishment of the estate which is not feasible due to lack of funding available and does nothing to increase the supply of much needed homes. | | |
| **3.2 Gaps in coproduction, consultation and involvement**  *What gaps in consultation and involvement and coproduction have you identified (set out any gaps as they relate to specific equality groups)? Please describe where more consultation, involvement and/or coproduction is required and set out how you intend to undertake it. If you do not intend to undertake it, please set out your justification.* | The consultation with residents will be on-going and support will be provided to residents to fully participate in the process. The Key Guarantees to residents will be further promoted and discussed.  The notes and outputs from the engagement activities will continue to be published on the dedicated blog and posted on notice boards, newsletters by the Regeneration Team and consultant team to allow all residents to have access to information.  The next stage of the project is the detailed masterplanning to allow a planning application to be made for the project. The Resident Engagement Panel will continue to operate throughout this period alongside a programme of consultation activities to develop a masterplan for the estate. We recognise that involvement in a formal resident engagement panel will not appeal or be appropriate to some groups of residents and so this will happen alongside more targeted and nuanced involvement mechanisms.  Training and capacity building for residents will be provided as required to enable full participation. The Council will continue to fund the independent resident adviser.  The Council will continue to offer accessible information and events to encourage wide participation. The Council will also ensure that the roles of local organisations and the project steering group are clear so that residents can engage fully. There will be dedicated council officers available to respond to resident issues. | | |
| **4.0 Conclusions, justification and action** | | | |
| **4.1 Conclusions and justification**  *What are the main conclusions of this EIA? What, if any, disproportionate negative or positive equality impacts did you identify at 2.1? On what grounds do you justify them and how will they be mitigated?* | The impact of the estate regeneration project at South Lambeth will be positive overall in the long term with no disproportionate negative impacts on particular protected groups, although officers recognise that there are risks around socio-economic equality for existing homeowners if due regard is not paid as the project is delivered.  There is negative impact for many vulnerable groups during the construction process due mainly to the decant process.  We have a number of actions in place to mitigate this impact | | |
| **4.2 Equality Action plan**  *Please list the equality issue/s identified through the evidence and the mitigating action to be taken. Please also detail the date when the action will be taken and the name and job title of the responsible officer. LIKEWISE WITH THE ACTION PLAN* | | | |
| **Equality Issue** | | **Mitigating actions** | |
| Disruption caused by major redevelopment programme | | * Dedicated rehousing support to be provided. Decant Policy to be agreed and implemented. Compensation to be provided to tenants and homeowners through Home Loss and disturbance payments, with up to £1,000 payable early to allow residents to prepare to move. Single move direct to new home to be made wherever possible, and single move to be prioritised for disabled, older and other vulnerable resident groups. Options for all Council tenants and homeowners to remain on South Lambeth if they wish. * Rehousing team to understand equalities issues for individual households (access to place of worship, schools, nurseries, day centres, support groups, health etc.), so that as far as possible these can be supported through the move process. * Effective management of phased construction programme to ensure safe places and routes on the estate while building work takes place. Considerate Contractors Scheme to be adopted. Areas of play and amenity space to be maintained where possible during construction. * Bespoke support to be developed and private to particularly vulnerable and less engaged individuals and households. * Communication with residents will seek to reduce stress and provide as much certainty as possible about both the process of regeneration and the final outcome, with access to appropriate advice and support. | |
| Engaging all groups through the development of proposals | | Consultation with residents will be on-going and support will be provided to residents to fully participate in the process. The notes and outputs from the engagement activities will continue to be published on the dedicated blog and posted on notice boards, newsletters by the Regeneration Team and consultant team to allow all residents to have access to information.  The next stage of the project is the detailed masterplanning to allow a planning application to be made for the project.  The Resident Engagement Panel will continue to operate throughout this period alongside a programme of consultation activities to develop a masterplan for the estate. We recognise that involvement in a formal resident engagement panel will not appeal or be appropriate to some groups of residents and so this will happen alongside more targeted and nuanced involvement mechanisms.  Training and capacity building for residents will be provided as required to enable full participation. The Council will continue to fund the independent resident adviser.  There will be dedicated council officers available to respond to resident issues. | |
| Homeowners having difficulty in accessing finance  (Elderly and low income households) | | * Formal offer to Homeowners sets out Council commitments to homeowners affected by redevelopment, including options to remain on South Lambeth. * Council to facilitate access to independent advice. Rehousing team to ensure early engagement with homeowners to identify those households that may have difficulty with funding the purchase or part-purchase of a new home. * Council to advocate for homeowners with lending institutions where necessary. * Rehousing team to support homeowners as required to find a private rented home or apply for social housing. * Council to consider further whether it might need to help broker lending to homeowners, if lending institutions prove unsupportive of the circumstances of leaseholders. | |
| Decant Process – addressing medical and disability needs | | * Further detailed Housing Needs Assessments will be made of all tenanted households in line with Council policy. The Rehousing team will arrange for Occupational Therapy and Medical Needs Assessments as necessary and in advance so that the new home can be designed and allocated to meet the needs of the household. | |
| Potential for increased housing costs | | * If the Council rent (set according to Government formula) for a new home is higher than the current rent for a tenant, the Council will implement the rent increase gradually over 5 years. * Service charges will be considered throughout design development and respond to resident priorities so that they remain as affordable as possible. * New homes to be designed to good modern standards of energy efficiency to enable reduced costs in use for residents. * Council Tax is calculated with reference to the value of the new home and may increase due to the regeneration project. The impact on Council Tax liability will be kept under review and officers will work with the Valuation Office to mitigate increases where possible. * As designs for the redeveloped estate are progressed, the Council will need to pay close attention to the future overall cost of living on the estate to make sure that this remains as affordable as possible for tenants. | |
| Analysising the impact | | * It will only be possible to analyse the actual effect on different group once the regeneration is underway and residents make their choices. This will happen at regular intervals as information becomes available and will be part of the July 2016 review. | |
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| **5.0 Publishing your results** | |  | |
| The results of your EIA must be published. Once the business activity has been implemented the EIA must be periodically reviewed to ensure your decision/change had the anticipated impact and the actions set out at 4.2 are still appropriate. | | | |
| **EIA publishing date** | | August 2015 | |
| **EIA review date** | | August 2016 | |
| Word did not find any entries for your table of contents.**Assessment sign off (name/job title):** | | Rachel Sharpe Commissioning Director August 2015 | |

All completed and signed-off EIAs must be submitted to for publication on Lambeth’s website. Where possible, please anonymise your EIAs prior to submission (i.e. please remove any references to an officers’ name, email and phone number).

1. Figure yet to be confirmed and is dependent on scheme viability. [↑](#footnote-ref-1)