

<b>Equality Impact Assessment Report</b>	<b>Please enter responses below in the right hand columns</b>
<b>Date</b>	30th June 2015
<b>Sign-off path for EIA (please add/delete as applicable)</b>	Corporate EIA Panel 6 <sup>th</sup> July 2015 Cabinet 13 <sup>th</sup> July 2015
<b>Title of Project, business area, policy/strategy</b>	<b>Cressingham Gardens Estates Regeneration project</b>
<b>Author</b>	<b>Bashir Miah Tom Tyson</b>
<b>Job title, division and department</b>	<b>Housing Project Officer, Estate Regeneration Team, Business Growth and Regeneration Strategy Team Leader, Partnerships and Commissioning</b>
<b>Contact email and telephone</b>	<a href="mailto:bmiah@lambeth.gov.uk">bmiah@lambeth.gov.uk</a>
<b>Strategic Director Sponsor</b>	<b>Sue Foster</b>

# 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.

Cressingham Gardens estate has been included within the Council's estate regeneration programme because

- 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.

Cressingham Gardens currently has 209 tenanted properties and 97 in private ownership.

#### **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 over 1,800 households currently residing in temporary accommodation.

In addition to increasing the supply of genuinely affordable housing, the condition of the homes on Cressingham Gardens 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, Cressingham Gardens will be a mixed tenure estate with a minimum of 464 properties – an increase of over 158 homes. On the current viability analysis, 23 of these additional homes would be at Council rents. All the new homes will be built to modern design and energy efficiency standards.

- 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.

Of the new homes, initial viability analysis indicates that at the current modelled design of 158 new homes, the Council's aspirational target of 60% at council rent and 40% at private rent would not be met. Rather the additional new homes would need to be 60% private sale and 40% provided in accordance with the Council's Tenancy Strategy (where 1 and 2 bed homes are provided at Local Housing Allowance rates and family homes (3 and 4 bed) provided at council rent).

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 Cressingham Gardens 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 these 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.

#### **Homeowners (both Freeholders and Leaseholders)**

- Resident homeowners wishing to sell their property would be offered market value plus 10% homeloss and reasonable disturbance costs
- Non-resident homeowners would be offered market value + 7.5%. 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 Cressingham Gardens 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. With both options, as long as residents can port their mortgage, they should not have to pay more to service the loan

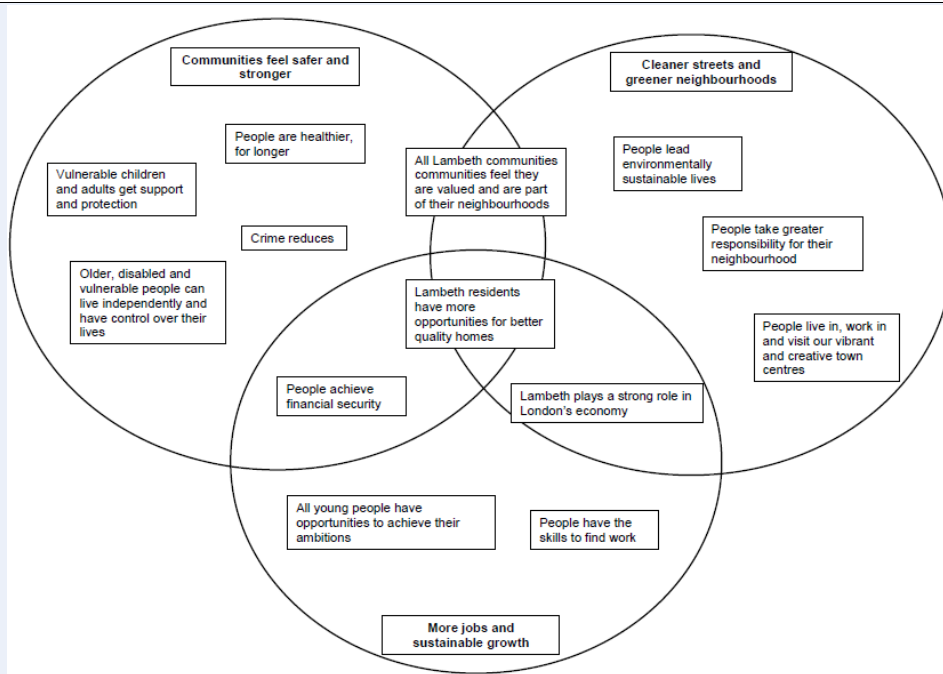
The Council will work with all affected residents individually (tenants and homeowners), and in particular with those who are vulnerable. All residents living on the estate will have access to individual independent advice throughout the process, funded by the Council and sufficient to enable them to 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 Cressingham Gardens forms part of a wider estates regeneration programme in Lambeth comprising of the following estates: Central Hill, Fenwick, Knight's Walk, Westbury and South Lambeth Estate.

#### **What are the links to the political vision and outcomes?**

Lambeth is committed to building 1,000 extra homes at Council rent levels in the next four years. This will not be achievable without estate regeneration; most affordable housing being built in Lambeth is at an 'affordable' rent, rather than council, or 'target' rents.

The regeneration of Cressingham Gardens clearly reflects the corporate priority that Lambeth residents "have more opportunities for better quality homes", but delivers on a number of other corporate outcomes such as "people live sustainable lives" through high quality design and specification with attention to energy efficiency, water conservation, amenity space etc and "more jobs and sustainable growth" through employment and training opportunities.



The Community Plan with [more] better quality homes at the centre

## 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**

	<b>Cressingham Gardens Tenants</b>	<b>Cressingham Gardens Leaseholders / sub-lessees</b>	<b>Overall Lambeth Tenant Population</b>	<b>London Borough of Lambeth</b>
<b>Black</b>	<b>44%</b>	23%	46%	<b>26%</b>
<b>Asian</b>	<b>3%</b>	5%	3%	<b>7%</b>
<b>Other</b>	<b>10%</b>	5%	7%	<b>2%</b>
<b>Mixed Race</b>	<b>10%</b>	0	2%	<b>8%</b>
<b>White</b>	<b>32%</b>	67% (26% white other)	33%	<b>57%</b>
<b>Not known</b>	<b>8%</b>	<b>0</b>	<b>9%</b>	<b>0</b>

*Data source – Northgate June 2015, Cressingham Gardens Household Needs Survey March 2015. State of the Borough Report 2014*

**Impact on Existing Tenants**

Although the estate regeneration programme at Cressingham Gardens will affect all households on the estate, the current tenant profile shows a greater representation of BME groups with approximately 65% of tenants from BME households. This closely reflects the overall Lambeth tenant population. 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.

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 £4,900 in addition to any moving costs to cover any inconvenience. There will be an enhanced package of assistance available for all residents 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.

**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 Cressingham. It shows that the mix on Cressingham is broadly in line with the overall borough population.

#### **Impact on Sub-Lessees**

The council's stock database (Northgate) indicates that 28 out of the 84 leaseholders on the estate currently sub-let out their properties although this data is not very robust and relies on leaseholders voluntarily telling the Council as homeowners they 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 Cressingham identified 14 households who identified as being private tenants of whom:

- 2 African
- 7 white other (Romanian, American, South American, Greek, Polish, Spanish)
- 1 White British
- 1 Arab
- 2 Caribbean
- 1 Indian.

Although a small sample size, the data suggests a wide ranging group with no particular 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 at Cressingham Gardens. 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.

The new housing being built would positively benefit all categories of race.



**Gender****Impact: Positive**

	Cressingham Gardens tenants	Cressingham Gardens leaseholders	Lambeth social tenants	Lambeth population
Male	44%	50%	37%	49%
Female	56%	50%	63%	51%

*Data source – Northgate June 2015, Cressingham Gardens Household Needs Survey March 2015. State of the Borough 2014*

**Impact on Tenants**

The gender split in Cressingham Gardens differs from that of the wider Lambeth social housing population, showing a lower proportion of female headed households in this type of tenure. However, there are 12% more female headed households than male headed households.

We recognise that there will be a short-term negative impact during the decant 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 Cressingham Gardens 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 50:50 split between men and women.

<b>Gender re-assignment</b>	<b>Impact: None</b>				
		Cressingham Gardens	Lambeth Tenants	Lambeth Population	
	Born different gender	Yes	0%	0 %	Not known
		No	6%	7%	Not known
	Not recorded	<b>94%</b>	<b>93%</b>	<b>N/A</b>	
<b>Data source – Northgate June 2015 State of the Borough 2014 Cressingham Gardens Housing Needs</b>					
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.					
<b>Disability</b>	<b>Impact: Both</b>				
	Cressingham Housing Needs Survey March 2015				
	<b>Identified disability</b>		<b>Number of residents affected (of 146)</b>		
	General mobility problems		6		
	Autism		5		
	Mental health issues/learning difficulties		3		
	Arthritis/Osteoarthritis		3		
	Joint problems		3		
	Kidney problems		2		
	Dementia		2		
	Asthma/Eczema		2		
	High blood pressure/diabetic		2		
	Bipolar		1		
	Chronic Fatigue Syndrome		1		

Sciatica/back problems	2
Lupus	1
Bowel disease	1
Multiple sclerosis	1
Heart problems	1
Blind	1
HIV	1
Cervical muscular disorder	1
Downs Syndrome	1
Panic attacks/severe anxiety	1
Prefer not to say	2
Unspecified	22

The Household Needs survey highlighted that a significant number (45%) of tenants 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 less than 10%.

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 13 households had the need for a full time carer although details on current care arrangement were very sparse and does not suggest that 13 households are currently receiving full time care.

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 far lower than suggested above for Cressingham Garden tenants.

#### **Impact on Existing Tenants**

The estate regeneration programme overall will have a positive impact on disabled tenants living in Cressingham Gardens 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,

	<p>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.</p> <p>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 Social Services and will either use Council Occupational Therapy services, or appoint an independent OT to ensure the service is available when required.</p> <p>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.</p> <p>The new buildings and spaces will comply with current standards of accessibility to improve accessibility for wheelchair users, people with visual impairment etc.</p> <p><b>Impact on Existing Leaseholders</b></p> <p>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.</p> <p><b>Impact on New tenants</b></p> <p>The impact for new tenants with disabilities will be positive. The proposals for the development of new homes on Cressingham Gardens 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 Cressingham Gardens 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.</p>
<b>Age</b>	<b>Impact: Both</b>

	Cressingham Gardens	Lambeth council tenants
<b>Under 25</b>	<b>1%</b>	<b>2.3%</b>
<b>25-44</b>	<b>31%</b>	<b>31.8%</b>
<b>45-64</b>	<b>40.9%</b>	<b>43.6%</b>
<b>65+</b>	<b>27.1%</b>	<b>21.5%</b>

Source: Northgate June 2015

### Household Composition

Household Group	All residents (Base 165)
Single adults	45%
Two adults without children	14%
Three or more adults, 16 or over	8%
1 parent family with child/ren at least one under 16	16%
2 adult family with child/ren at least one under 16	17%

Data source – Cressingham Needs Survey 2015

### Impact on Existing Tenants

There is an over representation of older tenants who will be affected by the regeneration. 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 existing 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.

### **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.

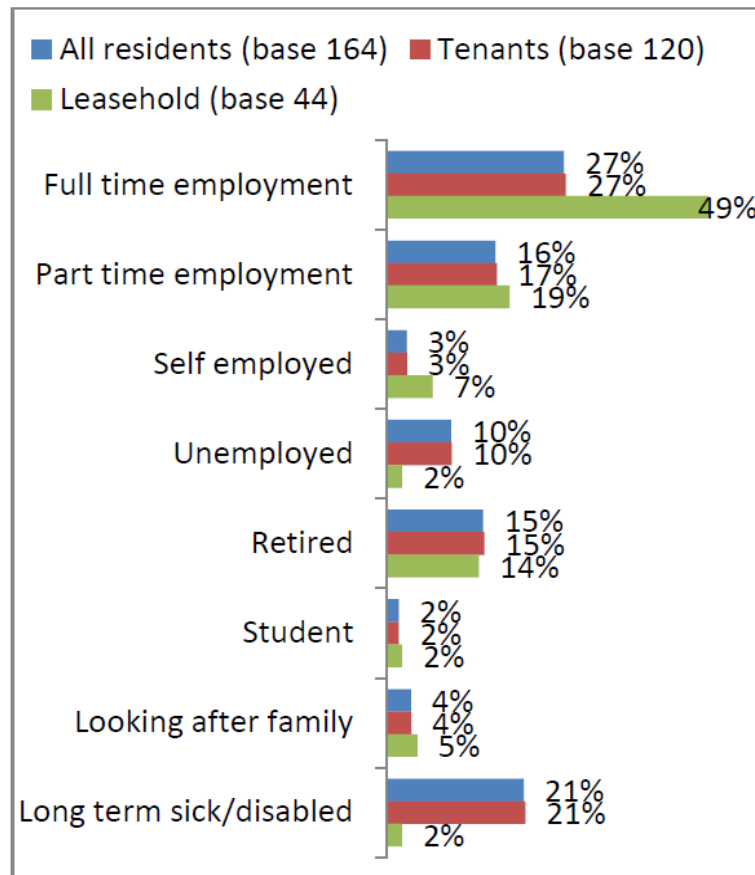
Older leaseholders are less likely to be in work or be able to take on new mortgages. However, they are also very likely to have a higher level of equity in their properties and will be more able to take a shared equity arrangement to continue living on the estate at no additional cost.

As the project proceeds, the Council will need carefully to monitor how the proposals affect this older leaseholder minority to make sure that they are not affected by, for example, possible restrictions on renewing or porting mortgages. If problems do become apparent, then the Council will need to put in place measures to deal with this. In the first instance, however, 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.

	<p><b>Impact on Future Homeowners and Private Tenants</b></p> <p>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.</p>
<p><b>Sexual orientation</b></p>	<p><b>Impact: Positive</b></p> <p>Although very limited data there is no disproportionate impact identified.</p> <p>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.</p> <p>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 is relevant to gender and transgender residents.</p>
<p><b>Religion and belief</b></p>	<p><b>Impact: None</b></p> <p>Two-thirds of residents follow a religious faith - Christian (58%), Muslim (8%) or Other (12%). One in seven residents do not follow a religion (15%) and 8% preferred not to say. (Source: Housing Need Survey, Cressingham Garden estate, March 2015).</p> <p>However, religion and belief have no direct or indirect implications for the estate regeneration programme.</p>
<p><b>Pregnancy and maternity</b></p>	<p><b>Impact: Both</b></p> <p>There will be disruption during the construction period and the council will consider access across the estate during this time.</p> <p>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.</p> <p>Any affected tenants who are pregnant at the time of re-housing may be entitled to a larger property as per our allocations policy.</p>



	The design will meet modern space standards with provision for buggy storage at ground floor level in blocks with no lift.												
<b>Marriage and civil partnership</b>	<p><b>Impact: None</b></p> <p>There is no specific / indirect impact.</p>												
<b>Socio-economic factors</b>	<p><b>Impact: Positive and Negative</b></p> <p>The number of housing benefit claiming tenants in Cressingham Gardens can be used to provide an indication of the socio-economic profile of the area.</p> <table border="1" data-bbox="533 626 1766 776"> <thead> <tr> <th></th> <th>Cressingham Gardens</th> <th>Lambeth</th> </tr> </thead> <tbody> <tr> <td>Those in receipt of full HB</td> <td>43.8%</td> <td>33.8%</td> </tr> <tr> <td>Those in receipt of partial HB</td> <td>21.2%</td> <td>27.8%</td> </tr> <tr> <td>Not receiving HB</td> <td>35%</td> <td>32.4%</td> </tr> </tbody> </table> <p><i>Source: Northgate June 2015</i></p> <p>The economic status of residents on Cressingham Gardens is that 46% are in employment, (27% full-time. 16% part-time and 3% self employed). The remaining 15% are retired, 21% are classed as long term sick, 2% are in full time education and 4% are at home looking after family. Economic status varies with different tenures as shown in the figure below:</p>		Cressingham Gardens	Lambeth	Those in receipt of full HB	43.8%	33.8%	Those in receipt of partial HB	21.2%	27.8%	Not receiving HB	35%	32.4%
	Cressingham Gardens	Lambeth											
Those in receipt of full HB	43.8%	33.8%											
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(Source: Household Needs Survey – Cressingham Gardens, March 2015)

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. 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.

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 adequate compensation to residents if their homes are demolished as part of the regeneration proposal.

### **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.

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.

Council Tax is calculated with reference to the value of the new home and may increase due to the regeneration project.

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 affordable to 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 at Cressingham Gardens, 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
- Renting at market or discount rent (according to income)

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 the project proceeds, the Council will need carefully to monitor how the proposals affect this older leaseholder minority to make sure that they are not affected by, for example, possible restrictions on renewing or porting mortgages. If problems do become apparent, then the Council will need to put in place measures to deal with this. In the first instance, however, 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.

For non-resident homeowners, the council will offer market value plus 7.5%. Tenants of private landlords on the

	<p>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.</p> <p>Homeowners will have access to independent advice and the council will fund reasonable costs for this service.</p> <p>Service charges will be carefully considered by the Council as above to mitigate the impact of any increase.</p> <p>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.</p> <p>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.</p> <p><b>Impact on Future Homeowners and Private Tenants</b></p> <p>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. In making such properties available for sale, the Council will need to consider stipulations for marketing these properties that ensure that they benefit local populations, rather than being sold to overseas investors. Regardless of who buys such properties, experience from elsewhere suggests that a significant proportion would be purchased on a buy-to-let basis and in this way would provide additional housing to the local population (albeit at market rents). These types of properties would clearly benefit those with either higher capital assets or higher incomes.</p> <p>There are also 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.</p> <p>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.</p>
<b>Language</b>	<b>Impact: None</b>

	<p>91% of Cressingham Gardens residents use English as the main spoken language in the household. The remaining households speak a variety of different European or African languages. 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.</p> <p><i>(Source: Household Needs Survey, Interim Report – Cressingham Gardens, March 2015)</i></p>
<p><b>Health</b></p>	<p><b>Impact: Both</b></p> <p><b>SEE ALSO DISABILITY</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 <i>(DCLG, 2004)</i>.</p> <p>Negative health and well-being outcomes would be associated with disruptions to existing households on the estate and the inevitable stress this causes.</p> <p>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. Furthermore the construction programme should be effectively managed so that disturbance can be kept to a minimum.</p>

<p><b>2.2 Gaps in evidence base</b>  <i>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.</i></p>	<p>The data provided so far, from the Council’s Housing IT system and the Cressingham Gardens needs survey provides an overview of equality information.</p> <p>There is little data currently for homeowners and their sub-lessees.</p> <p>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.</p>
<p><b>3.0 Consultation, Involvement and Coproduction</b></p>	
<p><b>3.1 Coproduction, involvement and consultation</b>  <i>Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?</i></p>	<p>At Cressingham Gardens, an extensive consultation has been undertaken to develop a regeneration option for the estate, since 2012. Numerous workshops and events have been held, which has helped the Council to understand residents’ perceptions of the estate. The events have been held for specific and for all tenure groups. Architects were selected with residents and appointed, and capacity studies produced to aid the discussion with residents.</p> <p>The Cressingham Gardens project steering group has been established. It comprises Council officers, ward members, four resident representatives (2 tenants, a leaseholder and a freeholder) and an independent resident advisor, appointed by the resident group, to oversee the project. The lead member and ward councillors are actively involved in the scheme and in regular communication with the residents.</p> <p>The appointment of the independent resident advisor has been funded by the council to ensure residents are independently advised and able to fully participate in the process. The independent resident advisor runs a monthly surgery to provide independent advice to residents and attends project meetings and events.</p> <p><i>What difference did this make?</i></p> <p>The consultation reaffirmed the fact that many households on this estate are living in a poor standard home. This has been due to the historical underinvestment in the stock and there is an urgent need to respond to this.</p> <p>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.</p>

	<p>The draft offer documents have provided clarity on how individual residents will be affected by the proposal.</p> <p>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 furthermore does nothing to increase the supply of much needed homes.</p> <p>Views on consultation programme to date:</p> <ul style="list-style-type: none"> <li>• 96% of residents are aware that the Council has been talking with residents about the future of the estate</li> <li>• 88% are familiar with options prepared to explore the future of the estate</li> <li>• 49% felt they had been provided with enough information to formulate a view on the future of the estate</li> <li>• 38% advised that they had spoken to and sought advice from the Independent Residents’ Advisor</li> <li>• 44% had found it helpful to have an Independent Residents’ Advisor</li> <li>• 68% had attended one or more events held by the Council in the last twelve months</li> <li>• 78% had received a copy of the information documents “Information for Tenants and “Information for Homeowners”</li> <li>• 56% understand the KH from the Council for Tenants/Homeowners</li> </ul> <p>The council is developing a Rehousing Policy to ensure that equalities continue to be considered and responded to throughout the rehousing process.</p> <p>The design of the new homes and spaces will also reflect the diverse population of Cressingham Gardens now and in future.</p>
<p><b>3.2 Gaps in coproduction, consultation and involvement</b>  <i>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</i></p>	<p>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 to improve understanding among residents.</p> <p>The next stage of the project is the detailed masterplanning to allow a planning application to be made for the project. The project steering group will continue to operate throughout this period alongside a programme of consultation activities to develop a masterplan for Cressingham Gardens.</p>



<p><i>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.</i></p>	<p>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.</p> <p>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 deal with resident issues.</p>
<b>4.0 Conclusions, justification and action</b>	
<p><b>4.1 Conclusions and justification</b>  <i>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?</i></p>	<p>The overall impact of the estate regeneration project at Cressingham Gardens will be positive.</p> <p>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 reduce this impact which are acceptable and appropriate.</p> <p>The project reaffirms Council policies and is interlinked with the delivery of all Council services.</p>
<p><b>4.2 Equality Action plan</b>  <i>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</i></p>	
<p><b>Equality Issue</b></p>	<p><b>Mitigating actions</b></p>
<p>Disruption caused by major redevelopment programme</p>	<ul style="list-style-type: none"> <li>• 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. Options for all Council tenants and homeowners to remain at Cressingham Gardens if they wish.</li> <li>• 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.</li> <li>• Bespoke support to be developed and private to particularly vulnerable and hard-to-reach individuals and households.</li> <li>• Communication with residents will seek to reduce stress and provide as much certainty as</li> </ul>

	possible about both the process of regeneration and the final outcome.
Homeowners having difficulty in accessing finance (Elderly and low income households)	<ul style="list-style-type: none"> <li>• Formal offer to Homeowners sets out Council commitments to homeowners affected by redevelopment, including options to remain at Cressingham Gardens.</li> <li>• 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.</li> <li>• Council to advocate for homeowners with lending institutions where necessary.</li> <li>• Rehousing team to support homeowners as required to find a private rented home or apply for social housing.</li> <li>• Council to consider further whether it might need to help broker lending to homeowners, if lending institutions prove unsupportive of the circumstances of leaseholders.</li> </ul>
Decant Process – addressing medical and disability needs	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
Potential for increased housing costs	<ul style="list-style-type: none"> <li>• 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. Service charges will be considered throughout design development and respond to resident priorities so that they remain affordable. New homes to be designed to good modern standards of energy efficiency to enable reduced costs in use for residents.</li> </ul>
Analysing the impact	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>5.0 Publishing your results</b>	
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.	
<b>EIA publishing date</b>	13 <sup>th</sup> July 2015
<b>EIA review date</b>	13 <sup>th</sup> July 2016
<b>Assessment sign off (name/job title):</b>	Rachel Sharpe Commissioning Director <span style="float: right;">2<sup>nd</sup> July 2015</span>

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).