

Equality Impact Assessment Report	Please enter responses below in the right hand columns
Date	30 June 2016
Sign-off path for EIA (please add/delete as applicable)	Corporate EIA Panel – 7 July 2016 Cabinet - 11 July 2016
Title of Project, business area, policy/strategy	Fenwick Estates Regeneration project
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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. This is in line with one of the Council's Community Plan 2013 -16 objective – "Lambeth residents have more opportunities for better quality homes"

The Council's Estate Regeneration programme focusses on estates where:

- the current condition of a number of properties is poor
- 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.

Fenwick Estate was included in the Council's estate regeneration programme in December 2014 because there is considerable potential for the provision of additional new homes. An update was provided in July 2015 Cabinet report, where it was confirmed

that feasibility consultation on the future of the Fenwick Estate will commence in September 2015; this subsequently started in November 2015.

Given its location and Public Transport Accessibility Levels (PTAL), there is scope for a significant up-lift in the number of homes. The PTAL rating for Fenwick Estate suggest a maximum density of circa 1100 units and currently the estate has 408 homes (which excludes 23 houses on Willington Road). The proposal is for a full redevelopment of the Fenwick Estate, which would directly affect 259 tenants, 5 voids, 133 leaseholders and 11 freeholders homes.

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 approximately 21,000 households on the housing waiting list; over 1,800 families in temporary accommodation, overwhelmingly families with children; and 1,300 families are severely overcrowded.

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 a limit on the funding available through the Housing Revenue Account to bring the homes up to the Lambeth Housing Standard. The Council has to make difficult decisions about which estates can be refurbished from within the Housing Revenue Account and where other measures, such as redevelopment are required.

The new housing development, as part of an offsite Section 106 Agreement on the three opportunity sites at the southern end of the estate (along the railway line), provide an opportunity to enable wide regeneration/redevelopment of the estate.

What is the intended outcome?

Following the estate regeneration programme, Fenwick Estate will be a mixed tenure estate with an increased capacity of a minimum of 300 additional homes¹. All the new homes will be built to modern design and energy efficiency standards and a number of these² will be at Council rent levels.

The existing homes will be replaced, with existing tenants re-housed in homes provided at Council rents and meeting their housing needs; existing resident homeowners will be offered options to enable them to remain on the estate including offers involving equity sharing arrangements. 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 homeowners is below. A further review is being undertaken to improve the offer to residents.

Council Tenants

- Council tenants living on Fenwick Estate who have to move because of a decision to demolish their homes will be paid a statutory home loss payment, this figure is currently £5,300, plus reasonable costs of removal and disturbance
- Council tenants will be offered a new lifetime home on the estate at Council rent levels
- Council tenants 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 tenancies, 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 in line with the Council's Allocation Scheme – overcrowded households will move into larger properties and those who need a smaller home will move to one, with the option of an extra bedroom above their need

Homeowners (both Freeholders and Leaseholders)

- Resident homeowners wishing to sell their property would be offered market value plus 10% home loss (the latter capped at £53,000 in line with Government guidance) and reasonable disturbance costs
- Non-resident homeowners would be offered market value plus 7.5%, which is 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.

¹ Figure is yet to be confirmed and is dependent on scheme viability and planning issues to be explored through the Masterplanning process in consultation with residents.

² Figure yet to be confirmed and is dependent on scheme viability and planning issues to be expected through the Masterplanning process in consultation with residents.

- Going beyond the Council’s legal requirements, resident homeowners wishing to stay on the estate would be offered equity sharing arrangements in a new home on Fenwick Estate. At the time of writing, there are 144 homeowners of which 91 are resident homeowners and 53 are non-resident 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 Fenwick Estate forms part of a wider estates regeneration programme in Lambeth comprising of the following estates; Central Hill, Cressingham Gardens, Knight’s Walk, South Lambeth and Westbury.

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.

<p>Protected characteristics and local equality characteristics</p>	<p>Impact analysis For each characteristic please indicate the type of impact (i.e. positive, negative, positive and negative, none, or unknown), and: <i>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.)</i></p>
<p>Race</p>	<p>Impact: Both <u>Race Data for Fenwick Estate</u></p>

	Fenwick Estate Tenants	Fenwick Estate Leaseholders / sub-lessees (Data from Household Needs Survey, sample Size: 58 Cases)	Overall Lambeth Tenant Population	London Borough of Lambeth
Black	47.9%	19%	46.3%	30.4%
Asian	1.9%	8.6%	2.6%	8.4%
Other	8.4%	1.7%	6.8%	5.3%
Mixed Race	3.4%	1.7%	2.2%	
White	29.5%	67% (22.4 %Other white background)	32.6%	55.9%
Not known	8.8%	1.70%	9.4%	0

Table 1

Data source – Northgate June 2016, Fenwick Estate Household Needs Survey 2015. State of the Borough Report 2016

Impact on Existing Tenants

The majority of Fenwick Estate’s tenants are of black background (47.9%) of which approximately 60% of these are of Black African and Black Caribbean background. This reflects the percentage of Black tenants in Lambeth’s stock as a whole and there is a small number of Asian and other minority ethnic communities. Fenwick also has a fair number of other non-white population.

The impact is predicted to be largely positive given the high levels of BME households currently residing on the estate. The new homes will provide 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 2015 identified 38 households that stated they are currently living in overcrowded accommodation. Approximately 70% of these are from BME backgrounds; 32% of overcrowded families are Black African/Black Caribbean 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 programme, 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). Vulnerable residents will be prioritised for only having to move once.

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 53 out of the 144 homeowners 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 or freeholders; this is a private contract between the homeowner and their tenant that the council is not party to.

The recent Household Needs survey on Fenwick Estate identified 24 of the 53 sublet households who identified as being private tenants of whom there were:

- 6 Black Caribbean/African
- 12 White British
- 1 Indian
- 1 Pakistani
- 6 White Other (including 3 Polish and 1 South American, 1 Australian, 1 Spanish)

Although a small sample size, the data suggests different ethnicities will be affected disproportionately. 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 are BME households as they are the larger proportion of tenants on the estate. The outcome of the proposals would positively benefit these households.

Gender**Impact: Positive****Gender data comparison**

	Fenwick Estate tenants	Fenwick leaseholders and subleases	Lambeth Council tenants	Lambeth population
Female	60.2%	50%	63.4%	50%%
Male	39.8%	50%	36.6%	50.%

Table 2

Data source – Northgate June 2016, Household Needs Survey 2015, State of the Borough 2016

Impact on Tenants

The gender split in Fenwick Estate is broadly similar to the wider Lambeth social housing population, showing a slightly lower proportion of female headed households in this type of tenure. There are approximately 20% more female headed households than male headed households on Fenwick Estate.

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 Fenwick Estate 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 as illustrated in table 3 below, are key beneficiaries of the programme.

Households housed from the waiting list

	Households housed in 2014/15
Female	62%
Male	38%

Table 3

Data Source - Northgate April 2015

Impact on Leaseholders and Future Homeowners

The gender records for homeowners from the Household Needs survey show a 50:50 split between men and women.

There is likely to be a short term impact upon those who have to move as part of redevelopment proposals. It is also likely that there may be a gap in existing valuation and future values however the Council is offering the opportunity of Shared Ownership on the ‘equity gap’.

Gender re-assignment

Impact: None

Gender re-assignment for Fenwick Estate

		Fenwick Estate	Lambeth Tenants	Lambeth Population
Born different gender	Yes	0%	0.1%	Not known
	No	7.7%	6.6%	Not known
Not recorded		92.3%	93.4%	N/A

Table 4

Data source – Northgate June 2016, State of the Borough 2016

	<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. Gender re-assignment is not relevant to the majority of housing services, with the exception of tackling harassment. The new homes will be secured by design to improve safety and reduce opportunities for crime.</p>										
<p>Disability</p>	<p>Impact: Both</p> <p>The most recent and reliable information on this characteristic was recorded in the Fenwick Estate Household Needs Survey, undertaken in 2015.</p> <p>The data extracted from the Household Needs Survey's data files shows that 35 tenants and 1 leaseholder reported that they or a member of their family have some form of disability or medical conditions. The survey also indicates that 13 households have adapted homes. Two households received paid full time support and 6 households received informal care from family members.</p> <p>When asked for brief details of the disability/medical condition and how this impacted on the household's current home and future housing needs the responses covered a variety of medical conditions. A breakdown of this information is provided as follows:</p> <p>Residents on Fenwick with a disability/medical condition</p> <table border="1" data-bbox="554 1073 1146 1416"> <thead> <tr> <th colspan="2">Identified disability</th> </tr> </thead> <tbody> <tr> <td>ADHD/Autism/Asperger</td> <td>4</td> </tr> <tr> <td>Mobility issues (arthritis/heart disease/other medical)</td> <td>5</td> </tr> <tr> <td>Mental health issues (learning difficulties/depression/anxiety)</td> <td>3</td> </tr> <tr> <td>Asthma/Eczema</td> <td>2</td> </tr> </tbody> </table>	Identified disability		ADHD/Autism/Asperger	4	Mobility issues (arthritis/heart disease/other medical)	5	Mental health issues (learning difficulties/depression/anxiety)	3	Asthma/Eczema	2
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Asthma/Eczema	2										

Diabetes and associated problems	3
Epilepsy	1
Heart failure	2
Asthma	1
Unspecified/other medical condition	15

Table 5

Data source – Fenwick Household Needs Survey 2015

Some caution needs to be taken on these headline figures, many of the responses, particularly those where conditions are ‘unspecified’ in that they may not be relevant to their housing need.

According to the “State of the Borough 2016” report about 37,000 people reported their day-to-day activities are limited by a long term illness or disability, about 17,000 people stated that their activities are limited a lot and 20,000 limited a little.

Impact on Existing Tenants

The estate regeneration programme overall will have a positive impact on disabled tenants living in Fenwick Estate as all new homes will meet the Lifetime Homes standard (and the recent improvements made to the Building Regulations), 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 Decant team will work closely with Adult Services and will either use the Council’s Occupational Therapy (OT) services, or appoint an independent OT to ensure the service is available when required, as well as access to mental health services as required.

	<p>Tenants who require adaptations will have them provided in their new homes with Decant 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>This group will be prioritised for one move only.</p> <p>Impact on Existing Leaseholders</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>Impact on New tenants</p> <p>The impact for new tenants with disabilities will be positive. The proposals for the development of new homes on Fenwick Estate are intended to increase the options for people with disabilities, both for existing and new residents. All properties on Fenwick Estate 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>								
Age	<p>Impact: Both</p> <p>Age profile</p> <table border="1" data-bbox="537 1364 1917 1445"> <thead> <tr> <th data-bbox="537 1364 1003 1404"></th> <th data-bbox="1003 1364 1461 1404">Fenwick Estate</th> <th data-bbox="1461 1364 1917 1404">Lambeth Council tenants</th> </tr> </thead> <tbody> <tr> <td data-bbox="537 1404 1003 1445">Under 25</td> <td data-bbox="1003 1404 1461 1445">1.9%</td> <td data-bbox="1461 1404 1917 1445">1.9%</td> </tr> </tbody> </table>				Fenwick Estate	Lambeth Council tenants	Under 25	1.9%	1.9%
	Fenwick Estate	Lambeth Council tenants							
Under 25	1.9%	1.9%							

25-44	43.3%	31.4%
45-64	39.8%	44.7%
65+	14.9%	21.6%
Age not known	0%	0.3%

Table 6

Data Source - Northgate June 2016

Fenwick Estate Household Composition

Household Group	All residents (Base 216)
Single adults	48%
Two adults without children	26%
Three or more adults, 16 or over	11%
1 parent family with child/ren at least one under 16	26%
2 adult family with child/ren at least one under 16	17%

Table 7

Data source - Fenwick Household Needs Survey 2015

Impact on Existing Tenants

The age profile of residents on the estate is broadly similar to that for Lambeth as a whole. For older residents the positives, negatives 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, they are 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 in order to keep disruption to attendance to a minimum.

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.

From officers' experience of meeting residents on the estate through home visits, door knocking and exhibitions it has been found 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 on a shared ownership 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 (such as an equity sharing arrangement or 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

	<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>The 60+ population is projected to increase by 82% (albeit from a smaller base line – from 2,400 to 4,500).</p> <p>The supply of additional homes will benefit an ageing future population.</p>												
Sexual orientation	<p>Impact: Positive</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 estate will offer a greater level of security to all which may be relevant to Lesbian, Gay, Bisexual and Transgender (LGBT) residents who are more likely to be subject to hate crime and harassment.</p>												
Religion and belief	<p>Impact: None</p> <p>The Household Needs survey found three-fifths of respondents advised that they were of a Christian faith (60%), with around a quarter not following any religion (23%) and some preferring not to say (8%). A small number were of the Muslim faith (9%).</p> <p>Fenwick Estate residents' religion or belief</p> <table border="1" data-bbox="554 1211 1146 1451"> <thead> <tr> <th><i>Religion/belief</i></th> <th><i>Base 210</i></th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>127</td> </tr> <tr> <td>Muslim</td> <td>18</td> </tr> <tr> <td>Sikh</td> <td>1</td> </tr> <tr> <td>No religion</td> <td>48</td> </tr> <tr> <td>Prefer not to say</td> <td>16</td> </tr> </tbody> </table>	<i>Religion/belief</i>	<i>Base 210</i>	Christian	127	Muslim	18	Sikh	1	No religion	48	Prefer not to say	16
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	<p>Table 7 Data source – Fenwick Estate Housing Need survey 2015</p> <p>The Council will give consideration to people’s ability to practice their faith through the different stages of the project. The rehousing team will ask people about their use of places of worship to see the extent to which disruption to their lives can be minimised.</p>		
<p>Pregnancy and maternity</p>	<p>Impact: Both 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 estate layout 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> <p>The design will meet modern space standards with provision for buggy storage at ground floor level in blocks with no lift.</p>		
<p>Marriage and civil partnership</p>	<p>Impact: None There is no specific / indirect impact.</p>		
<p>Socio-economic factors</p>	<p>Impact: Positive and Negative</p> <p>The number of housing benefit claiming tenants on Fenwick Estate can be used to provide an indication of the socio-economic profile of the area.</p> <p>Fenwick Estate tenants on Housing Benefit</p> <table border="1" data-bbox="947 1373 1766 1414"> <tr> <td data-bbox="947 1373 1356 1414">Fenwick Estate</td> <td data-bbox="1356 1373 1766 1414">Lambeth Council tenants</td> </tr> </table>	Fenwick Estate	Lambeth Council tenants
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Those in receipt of full HB	31%	33.1%
Those in receipt of partial HB	21%	26.6%
Not receiving HB	48%	40.3%

Table 9

Data source – Northgate June 2016

This shows that Fenwick Estate has a high number of lower income households as there are more than 52% of the households in receipt of full or partial Housing Benefit. This is in comparison to 59.7% of Lambeth’s Council tenants that are in receipt of Housing Benefit, which indicates Fenwick Estate tenant is below average in claiming Housing Benefit. It is to be noted approximately 48% do not receive any Housing Benefit, which is also slightly less than the Lambeth Council’s average of approximately 40%.

Fenwick Estate residents’ Employment status

	<i>Tenants (162)</i>	<i>Leaseholders (base 55)</i>	<i>all residents (base 217)</i>
Full time employed	27%	64%	36%
Part time employed	21%	20%	21%
Retired	19%	7%	16%
Long term sick	7%	0	6%
Unemployed	18%	2%	14%
Full time education	3%	2%	3%
Self employed	4%	7%	5%
	100	100	100

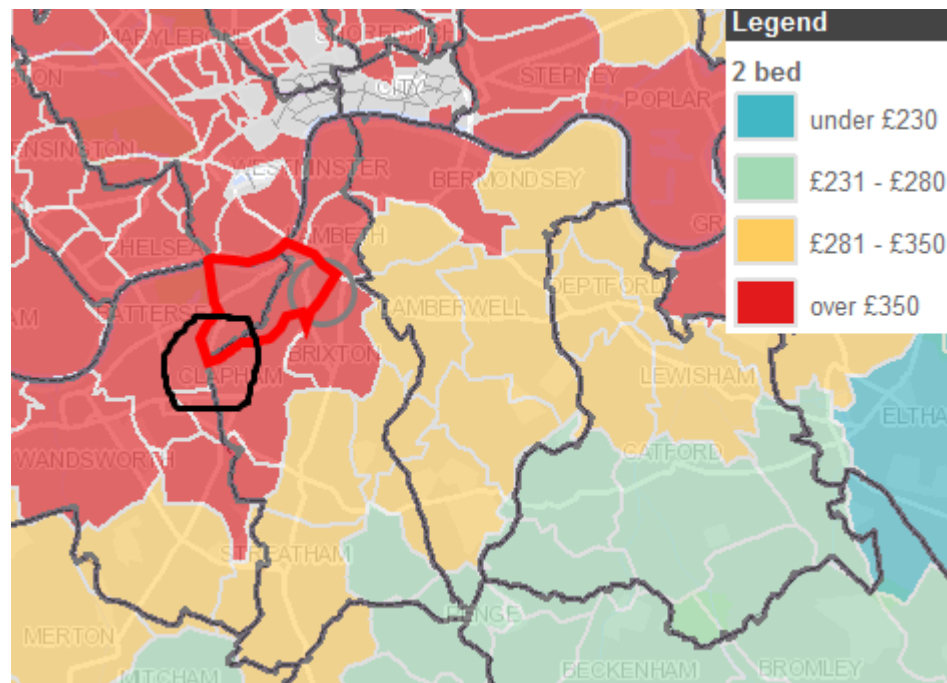
Table 8

Data source - Household Needs Survey – Fenwick Estate, 2015

The Household Needs survey found that 36% of Fenwick 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 – 64% - than tenanted (27%). There is also a relatively high number of retired and unemployed residents in the tenants’ group. There are 16% of respondents that 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. The 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 – 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 adequate compensation to residents if their homes are demolished as part of the regeneration proposal.

Impact on Existing Tenants

All the current Council tenants who 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.

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. The Housing Regeneration team will be reviewing this issue and will benchmark with other schemes across London.

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 Fenwick Estate, 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
- An equity sharing arrangement
- Renting at market or discount rent (according to income)

Resident homeowners would be compensated by offering market value plus 10% home loss (capped to £53,000) 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 the opportunity for resident homeowners to acquire an equity share of a new home, 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 re-mortgaged their homes, spent the money from equity release and may also be unemployed. In these circumstances it may be difficult for homeowners 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% (which is capped to £53,000).

As the project proceeds, the Council will need carefully to monitor how the proposals affect older homeowners 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 homeowners (equity share arrangement and 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 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 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 homeowners are provided with options to allow them to stay on the estate and, whilst the Council is unable to make absolute guarantees to homeowners (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. 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.

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.

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: Negative

The Household Needs survey found that 77% of residents use English as the main spoken language in the household. The remaining households speak a variety of different languages as shown below:

Main language spoken in household

<i>All residents</i>	<i>Number</i>
Albanian	2
Amharic & Tigrinya	1
Arabic	1

Chinese	1
Eritrean	1
French	2
Ghanaian	2
Guajarati	1
Kurdish	1
Polish	3
Portuguese	13
Somali	1
Spanish	5
Tagalog	1
Tigrinya	1
Turkish	1
Twi	2
Yoruba	3

Table 9

Data source - Household Needs Survey – Fenwick Estate, 2015

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.

Health

Impact: Both

See also DISABILITY heading

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.

The Council is currently in negotiations with South London and Maudsley (SLAM) NHS Foundation Trust with the view of SLAM carrying out an initial mental well-being impact assessment to identify the key issues for residents going through the regeneration process. Following the assessment an action plan will be provided to the Council to assist in developing strategies to address the needs of residents through the estate regeneration of their homes and surrounding areas. This is going to be trialled on one estate (probably not Fenwick) before being considered for application to the Fenwick Estate.

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 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. The Housing Regeneration team will be working in close liaison with the Council's Adult Community Services and the Community Mental Health teams in order to provide bespoke support for residents.

Furthermore the construction programme should be effectively managed so that disturbance can be kept to a minimum.

<p>2.2 Gaps in evidence base <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 Fenwick Estate Household 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>3.0 Consultation, Involvement and Coproduction</p>	
<p>3.1 Coproduction, involvement and consultation <i>Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?</i></p>	<p>Following the July 2015 Cabinet decision where authorisation was given to commence a feasibility study for the Fenwick Estate, the Council commenced a programme of consultation and engagement with residents from November 2015, at which point all residents were notified of the start of this work in writing. An overview of community engagement programme is highlighted below:</p> <p>The work was carried out by make:good ltd on behalf of, and in partnership with, the Lambeth Council Housing Regeneration Team and Karakusevic Carson Architects between November 2015 and April 2016.</p> <p>The community engagement work has been undertaken in line with Lambeth’s Community Engagement Toolkit.</p> <p>The aim of the resident engagement during the feasibility stage was three fold:</p> <ul style="list-style-type: none"> • Ensure that as many residents as possible are INFORMED about the regeneration programme. • Once informed facilitate a range of opportunities for people to be INVOLVED in the process. • Collect feedback from residents who are involved in the process so that their views can INFLUENCE how regeneration happens.

From the outset of the feasibility stage it was communicated that the aim would be to produce a resident's brief to capture priorities for how regeneration might happen and contribute towards a recommended scenario.

Recognising that not everybody would respond to the same type of communication multiple channels were used to ensure residents were informed. These are listed below;

- 7 newsletters
- 4 rounds door knocks (carried out during the evenings)
- 1 pop up
- Website updates

Activities for people to be involved:

- Site walkabout
- Series of 5 workshops to build knowledge about the themes designers consider and how these develop into designs
- 3 exhibitions sharing insight and design development
- 1 study trip as an opportunity for residents to show and articulate buildings, ideas and designs they like and do not like

Activities to encourage influence:

- Took feedback at each workshop, exhibition, pop up and one to one conversation.
- Recruiting and launching a Residents Engagement Panel
- Residents' Brief developed

What difference did it make?

84% of all households on the Fenwick Estate confirmed their awareness of the project through the Feasibility Stage. This is 355 households, made up of 221 tenants, 121 leaseholders and 13 freeholders. These figures are based on confirmed project awareness through door-knocking, direct correspondence or

	<p>event attendance. Given the level of awareness raising done it is likely that the actual number of project aware households is higher.</p> <p>The Council has established a Resident Engagement Panel (REP) which is chaired by resident representatives and will be meeting every six weeks. Also an Independent Advisor has been appointed by the REP to advise and support residents through the regeneration process. The Independent Advisor will be doing outreach work and holding regular surgery on the estate.</p>
<p>3.2 Gaps in coproduction, consultation and involvement <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 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>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.</p> <p>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.</p> <p>In the event that the Council’s Cabinet approves the project in July 2016 the next stage of the project is the detailed Masterplanning. This is 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. This will include website updates, videos, info graphics, emails, newsletters, door knocking, home visits and themed exhibitions.</p> <p>A review of the residents that have not as yet engaged is ongoing and officers along with the Independent Advisors will undertake more pro-active outreach work and more targeted support to keep them informed and involved.</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 Advisor.</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 Resident Engagement Panel are clear so that residents can engage fully. There will be dedicated council officers available to respond to resident issues.</p>
<p>4.0 Conclusions, justification and action</p>	
<p>4.1 Conclusions and justification <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 impact of the estate regeneration project at Fenwick Estate 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.</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 mitigate this impact.</p> <p>The project reaffirms Council policies and is interlinked with the delivery of all Council services.</p>
<p>4.2 Equality Action plan <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>Equality Issue</p>	<p>Mitigating actions</p>
<p>Disruption caused by major redevelopment programme</p>	<ul style="list-style-type: none"> • 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 Fenwick Estate if they wish. • The Housing Regeneration 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

	<p>move process. The team will receive equalities training in order to manage this effectively.</p> <ul style="list-style-type: none"> • 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 for individual households, 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.
<p>Engaging all groups through the development of proposals</p>	<ul style="list-style-type: none"> • 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 Housing Regeneration Team and consultant team to allow all residents to have access to information. • In the event that the Council’s Cabinet approves the project in July 2016, the next stage of the project is the detailed Masterplanning. This process is 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. The Housing Regeneration team 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. This will include website updates, videos, info graphics, emails, newsletters, door knocking, home visits and themed exhibitions.

	<ul style="list-style-type: none"> • Training and capacity building for residents will be provided as required to enable full participation. The Council will continue to fund the Independent Resident Advisor. • There will be dedicated Council officers available to respond to resident issues. A review of the residents that have not as yet engaged is ongoing and officers along with the Independent Advisors will undertake more pro-active outreach work and more targeted support to keep them informed and involved.
<p>Homeowners having difficulty in accessing finance (Elderly and low income households)</p>	<ul style="list-style-type: none"> • Formal offer to Homeowners sets out Council commitments to homeowners affected by redevelopment, including options to remain on Fenwick Estate. • Homeowners will have access to independent advice and the Council will fund reasonable costs for this service. • The Housing Regeneration team will 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. • The Housing Regeneration team will 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.
<p>Decant Process – addressing medical and disability needs</p>	<ul style="list-style-type: none"> • Further detailed Housing Needs Assessments will be made of all households in line with Council policy. The Decant 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	<ul style="list-style-type: none"> • 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 residents 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.
Analysing the impact	<ul style="list-style-type: none"> • 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.
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	Xxx
EIA review date	xx
Assessment sign off (name/job title):	Rachel Sharpe – Director Strategic Housing, Regeneration & Communities

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).

