



Deptford Southern Housing sites

Equalities Analysis Assessment

August 2013

Background and context

In the summer of 2007 Council Officers prepared a Business Case to demonstrate the commercial and financial viability of the proposed regeneration programme for Deptford Town Centre and identifying the commercial approach to its development.

A key element of the Business Case was the delivery of a housing scheme on the old Tidemill school site. This element was programmed in the latter stages of the overall timetable, due to the fact that it required vacant possession of a school site currently in use. Between 2007 and 2011, programme resources were focused on other projects and work was recommenced on this project in 2011 when the delivery programme for Deptford Lounge and the new Tidemill School were confirmed. In September 2012, a project review was instigated at the point between development and procurement stages.

There remain other elements of the overall Deptford master plan that are still to be delivered including Deptford RISE and the Albany. The Deptford Town Centre Masterplan forms part of a wider regeneration initiative across the North of the Borough which includes Convoys Wharf, the Surrey Canal Triangle and several other key schemes.

Work to date on the Southern Housing Sites project as part of the wider programme has focused on the design elements of the scheme. There are still a range of tasks relating to the commercial and technical elements of the project that need to be completed prior to procuring a development partner.

Management of the Equalities Impact Assessment

The assessment was undertaken by Eleanor Hoyle, Project Manager, supported by Cathy Rooney, xxxx, and Rachel George, Housing Regeneration & Projects Manager.

Identification of the aims/objectives

The aims of the Deptford Southern Housing sites project are;

- A fully specified scheme for procurement
- The successful conclusion of the statutory consultation
- Procurement of a development partner / registered social landlord who understands the Council's aims for the regeneration of Deptford, as set out in the programme business plan.
- Delivery of the finally agreed scope in accordance with the time, cost and quality constraints established and agreed.

These aims can have potential positive equalities benefits; equally, we need to ensure that in working towards their achievement we do not discriminate against or exclude any group

The aim of this assessment is to check whether the delivery of the Deptford Southern Housing sites project, including the decant of tenants in Reginald Road, is likely to have a positive or negative impact on different groups within our diverse community and having made this assessment to set out the action to be taken to ensure due regard is given to equalities issues and to seek to **prevent** direct and indirect discrimination and **positively promote** harmonious community relations.

This equality impact assessment was undertaken using the methodology and approach set out in Lewisham's Equality Analysis Assessment Toolkit.

Deptford Southern Housing sites project scope

Scheme proposals

- Giffin Street blocks will remain in situ and residents would not be re-housed
- 2-30a Reginald Road would be demolished
- Old Tidemill School buildings to be converted into residential properties
- Frankham Street parking boulevard to remain in situ

The Giffin Street blocks would receive further works as part of the Lewisham Homes' programme of external decorations work. Further details of this works will be provided to residents prior to further required survey work being undertaken on the buildings, which are likely to be undertaken in 2015/16. The works will focus on ensuring that all Lewisham Homes properties meet an agreed standard, which is outlined in the attached document.

The Reginald Road properties would be demolished in a later phase of the development, to allow the opportunity for residents in those properties to move into the new development or elsewhere in the borough as they wish.

The process for selecting a developer to build the scheme is being advertised at the moment and is to start over the summer. This would mean that we would expect to appoint a developer in Spring/Summer 2014 and that work on the scheme would commence on site in late 2014/early 2015. The developer will also be required to demonstrate how they will involve and inform residents throughout the process.

A masterplan for the scheme is attached to this letter; this is a general proposal at present and the detail of where different types of housing would be located will be agreed as part of the detailed design process with a developer. In general it is currently proposed that the new blocks have the following housing types;

A/B, C/D, E/F, K/L – units for sale or private rent
J, G/H – units for affordable rented or shared ownership

Scope/focus of the Equality Impact Assessment and assessment of relevance

Proportionally the assessment needs to concentrate on areas with highest potential impact. Key issues for consideration include:-

- Do we have accurate profiles of our tenants and residents to inform our communication/consultation strategies for the scheme?
- How we communicate and engage with tenants is a key part of how the re-housing project is delivered, both the reality and perception. It is critical that we engage with hard to reach groups particularly BME and excluded groups. We need to ensure our communication strategies adequately take into account the range of groups who need to be engaged and involved.
- How do we ensure the immediate needs of elderly, people with disabilities, parents with young children are met during re-housing?

The scoping grids at appendix A look to determine whether the delivery of this project;

- could affect some groups in society differently
- can/will promote equal opportunities

Sources of information

The key data needed for this EqlA is the profile of the current tenants of the Reginald Road and Giffin Street housing blocks.

Lewisham Homes monitoring data

As the housing management organisation, Lewisham Homes collect information from tenants via monitoring forms, telephone surveys and contact with tenants for some repairs and maintenance issues. This data is collected on a voluntary basis and therefore will not be given by all tenants. Moreover some tenants may come under more than one category within the monitoring groups. Whilst this means that the data is unlikely to present a complete picture of the equalities groups represented within the housing blocks, it is a set of data on which to base some initial assumptions.

The tables below give data on access requirements, race, religion, sexual orientation and employment status.

INSERT

Ward profiles

The ward profile documents (attached) provide information on key census data for the local area and refer to several of the protected characteristics. They are also supported by ONS data sets available online. Some of the key considerations in Evelyn/New Cross wards, where the project site is located, are;

- Both wards have a lower than average percentage of older residents – 5.85% compared to 9.3% across the borough
- Both wards have a higher than average BME population with over 50% of residents from a BME background (compared to around 35% across the borough), particularly Black and Chinese residents.
- High affordable percentage of housing in the area; in New Cross and Evelyn wards, there is currently an average of 48.5% social rented housing, compared to 31% on average in Lewisham. Owner occupation is at an average of 21% across the two wards, whereas the borough average is 42%.

Housing needs assessment – June 2012

An assessment of the needs of residents was carried out in June 2012. Most of the residents interviewed supported the new development and many were keen to move because they are overcrowded, disabled or elderly and either wanted more appropriate accommodation or in some cases saw this as an opportunity to move to other parts of the borough. However most residents wanted to remain in Deptford and were pleased that provision was being made within the scheme for decant properties.

Leaseholders are worried that the value of their property might be less than what they paid which will put them into negative equity. After the sale, they could be left with a mortgage still to pay. Therefore some leaseholders have expressed a preference to be bought out but others expressed an interest in being rehoused within the new development.

The data from the needs assessment is held confidentially by the project team so that it can be utilised to inform future engagement and liaison with the project development partner.

Consultation & communication

The Council previously consulted residents in June 2012 about the Council's proposals to build a new housing development on the site of the old Tidemill School and surrounding sites of Reginald Road, Frankham Street and Giffin Street. The scheme proposed (known as the enhanced scheme) included the demolition of all the properties listed above and the option for secure tenants to be re-housed within the new development. A letter was sent to all residents as formal consultation under Section 105 of the Housing Act 1985, dated 1st June 2012. As part of this consultation process drop in sessions were held in the Deptford Lounge to collect views. Representations about these proposals received by Friday 29th June (the publicised closing date for consultation) were considered by Mayor and Cabinet on Wednesday 11 July 2012.

Following the consultation and approval of the scheme by the Mayor & Cabinet, the Council were in the process of carrying out the initial stages of a process to find a developer to deliver the scheme. However, several issues arose that led to a decision to halt the process and review the scheme before a partner was appointed. The main reasons for this decision included the need to carry out further technical surveys on the buildings that would form part of the scheme to ensure the proposals could be delivered, information being available on Lewisham Homes' programme of works for the blocks and new sales information about housing schemes in the area which suggested that the scheme as previously proposed might not be financially viable.

The project team have attended and hosted local meetings throughout the development of the project and have issued written updates to residents on a number of occasions. This work has formed part of the overall communication strategy for the Deptford Town Centre programme.

A notification flyer was sent to all residents in December 2012 informing them of the decision to halt the process that was underway to find a development partner. Since then, the project team have;

- Been working with Lewisham Homes to ensure that future external works investment into existing blocks is maintained
- Ensured that there is a full set of technical information for the scheme, including carrying out further surveys in the Giffin Street and Reginald Road blocks
- Gathered further information on the financial implications of the scheme
- Worked with PTEa, the architects who have been involved in the design of the scheme previously, to develop a new design option (I think this should be last as otherwise it looks as though we looked at design first – when really it is the result of the other aspects)

Section 105 of Part IV of the Housing Act 1985 makes it a requirement for a landlord authority to consult with those of its secure tenants who are likely to be substantially affected by a matter of housing management. The Act specifically identifies a new programme of improvement or demolition to be a matter of housing management to which Section 105 applies.

The most recent Section 105 consultation was carried out in Summer 2013. On 29 May 2013, a letter was sent to all secure tenants in Reginald Road and Giffin Street informing them of the revised scheme proposals and inviting their comments as part of the statutory Section 105 consultation. The letter, which detailed the proposals, provided a masterplan image of the scheme and gave information on the Lewisham Homes Major Works standard, is attached as appendix 1. Letters were also sent to leaseholders informing them of the proposed changes and inviting comments.

The letters invited all residents to respond with comments via email, in writing or by attending one of 2 drop in sessions held at Deptford Lounge. The sessions were organised to accommodate all residents with a day time and early evening time slot being available in the local library, which is fully accessible. A Frequently Asked Questions (FAQs) document was produced to give to residents at these events. The project team met 4 tenants and 1 leaseholder at these events.

3 email and 6 written responses were received during the initial consultation period, including a letter written on behalf of the residents of the Reginald Road block dated 14 June that requested further information was provided to enable residents to make informed responses to the consultation. This letter did not have signatures from all residents and was rather written as a group letter. This letter was not received by the project team until 28 June. A response was sent via email to the author of the letter including a copy of the FAQs document. The individual responses received were generally in support of the proposals and raised some individual housing issues.

Further to the extension of the deadline a petition with 108 signatures was received on 11 July. This petition, which is attached here for reference, included signatures from 11 residents in the Reginald Road block affected by the scheme and 33 Giffin Street residents with the remainder of the signatures being from other local residents.

Overall assessment

Most equalities groups are over-represented in Lewisham Council housing for a range of social and economic reasons and therefore the needs of these groups are more likely to need to be addressed by a housing decant project.

The key aim of a re-development scheme is to improve the town centre environment for existing and future residents. This is to benefit all, regardless of ethnic background, main language spoken, gender, employment status, health and well being, or sexual orientation. However, different groups within the community will have different needs or require varying and different levels of support in taking part in the processes involved. This assessment has provided a place where this information can be recorded so that throughout the programme the Council and its partners can ensure that differing needs are monitored and met.

The analysis of the data highlights the diversity which exists both within the local community and amongst residents living in the block that will be most directly affected by the redevelopment. Groups within the community will have different needs or require varying and different levels of support in taking part in the processes involved, most particularly their decant from current properties into new ones. This assessment has provided a place where this information can be recorded so that throughout the scheme the Council and its partners can ensure that differing needs are monitored and met where feasible and has also identified the key impacts and actions.

This assessment demonstrates that the Deptford Southern Housing sites project is likely to have some shorter term negative impacts, but that there are actions that can be taken as part of the project to mitigate these impacts. There are also wider and longer term positive impacts, such as the transfer from poor quality existing housing to new properties and the wider benefits which are the result of the wider regeneration of Deptford Town Centre.

Some of the key areas to note are;

Ethnicity

Data gathered during the needs assessment shows that there is a large number of residents from BME backgrounds, the ward profiles demonstrate that this is in line with the ethnicity profile of both the New Cross and Evelyn wards. The data indicates that language may be one of the key communication barriers however as yet there has been no data collected on the first language spoken by tenants. An assessment will need to be undertaken to ensure that any individual language or literacy barriers are addressed to ensure communication with residents and the local community can be accessed by all.

Medical conditions / disability

Approximately 10% of residents in the existing blocks have stated that they have medical issues or disabilities. Their specific needs e.g. reduced mobility, will need to be considered when allocating them a new property. In addition, officers carrying out consultation will have to ensure that they are supported where necessary to enable them to participate fully in the consultation process.

Religion

A number of households have identified themselves as having specific religious beliefs. The project team will therefore need to ensure that they are aware of religious customs when considering housing needs, for example, resident feedback has indicated that religious beliefs in relation to the preparation of food will need to be considered when designing the kitchen, dining and living spaces. In addition, the project team should be mindful of religious customs when consulting and communicating with residents and the wider community.

Leaseholders

Another group on which there is currently a lack of data is leaseholders. The fact that they own their property means that the council doesn't necessarily have a duty to re-house them, but rather to meet the requirements to make a fair market offer for the property, which is enhanced by 10% (or 7.5% for absentee leaseholders) to reflect the homelessness and disturbance payments that all residents are entitled to. There are however some specific equalities issues to consider:

Support needs – some leaseholders may have needs that haven't been identified and will therefore need additional assistance to understand and organise a purchase agreement and move.

Let properties – absentee landlords may have tenants occupying their property. Whilst these are not council tenants, it is possible that by seeking vacant possession of the estate, they will have a housing need due to the comparatively low levels of rent in Reginald Road and Giffin Street, which may mean they are unable to find suitable alternative accommodation without support.

Action plan and timetable

The activities laid out below will provide the project team with opportunities to further assess and address tenants' specific needs and to ensure that any negative equalities impacts are being mitigated.

Activity	Details	Timescale
Communications plan	Details of all communication methods to be utilised, including; <ul style="list-style-type: none"> ▪ Letters ▪ Decant Interviews ▪ Online information ▪ Meetings/drop in sessions 	On-going
Section 105 consultation	Statutory consultation to ensure that all residents are given the opportunity to comment on the changes to their housing management. Ensure language and literacy issues are addressed.	Development phase
Resident steering group	No resident steering group currently exists for these housing blocks. However the project team should continue to reiterate the offer to support such a group.	Ongoing
Decant interviews	Detailed assessment of households, to look at specific	Ongoing from

	needs, communications issues and to establish a relationship with the tenant.	commencement of programme.
Considerate Contractors' scheme	All contractors on site will be expected to sign up to a Considerate Contractors scheme and to ensure that their sites meet all relevant standards including DDA compliance.	Development phase

Publication of Results

The results of this Equalities Analysis will be reported on the Council's web pages as part of wider equalities data reporting.

Monitoring

The EAA will be monitored through the project reporting structures.

Equalities Category	Potential Impact	Assessment of impact	Actions
All	Move from known community if chose not to live in new development. Move to better housing stock Move to more suitable housing stock Lack of understanding of decant options available Lack of trust in decant team New properties do not meet housing need	Negative Positive Positive Negative Negative Negative	Investigate and publicise social networking opportunities across the borough. Ensure offer property meets housing need of tenant Detailed and continued support and advice provided to tenants by decant team. Establishment of on site presence and development of working relationships between decant team and tenants. Requirement placed on project development partner to provide units that meeting housing need at time of development.
Gender	Social networks harder to maintain Security concerns for women Single parents may not be able to attend information events due to primary caring responsibilities. 20% of Lewisham tenants are lone parent families.	Negative Negative Negative	Investigate and publicise social networking opportunities across the borough. Possible use of property guardians to ensure estate isn't squatted. Decant team to organise appointments/meetings during
Gender re-assignment	Support networks harder to maintain if not remaining in the area or moved to different parts of new development.	Negative	Affordable units located in proximity to each other within development to facilitate existing networks. Work with tenants to ensure there is public transport access in new locations.
Pregnancy & maternity	Bed size need may change during decant Stress related illness Families with increasing bed size need may have to wait longer for units if their priority is less than a decant tenant from Reginald Road.	Negative Negative Negative	Ensure medical records are kept updated and that tenant is aware of potential issue with unit size.
Race	Language barriers Ethnic community ties weakened/strengthened depending on location of decant property BME residents are nearly twice as likely to live in homes that do not meet decent homes standards and are overcrowded - potential moves to other housing stock could improve chances of decent homes.	Negative Negative/Positive Positive	Use of interpreters and translated materials Assessment of possible community ties during decant interview process, team to assist tenant with bidding for properties via specialist RSLs where appropriate.
Disability	Access routes altered during decant if some routes are altered during development period. Have to move out of area to find suitable accommodation options. Difficulty accessing meetings and/or information relating to the decant Current properties may have been adapted to meet specific needs, decant properties won't have these as standard Some specific needs highlighted by decant process	Negative Negative Negative/positive Positive	Work with contractors on site to ensure that DDA compliant routes are maintained. Scheme designs include affordable wheelchair unit provision. Hold meetings in DDA compliant venues. Decant officers need to ensure adaptations can be matched or improved upon in decant property. Decant officers to refer vulnerable tenants to providers of specialist services.
Age	Pensioners income might not be able to meet higher rental levels in other socially rented properties. Older leaseholders from original community may not be able to afford to buy elsewhere. Social networks formed within estate harder to maintain Opportunity to provide support where need hasn't previously been identified Young people in single households given opportunity to make transition to private rented or shared ownership property with financial support. Journeys to school shortened/lengthened depending on new location	Negative Negative Negative Positive Positive Positive/negative	Decant team to work with households to ensure benefit levels are correct and that rental level is manageable. Work with RSLs to find shared ownership solutions Investigate and publicise social networking opportunities across the borough. Decant officers can identify suitable properties and/or refer the tenant to support services within the council Work with RSLs to find shared ownership solutions Work with tenants to look at public transport connections.
Religion & belief	Change of parish could affect social networks Move could be closer to place of worship Gender considerations for specific religions may mean some households can only be interviewed by female staff. Decant timetable could mean that key dates fall during religious festivals	Negative Positive Neutral Negative	Assessment of possible community ties during decant interview process, team to assist tenants with bidding for properties via specialist RSLs where appropriate. Ensure record is kept of households where a female member of staff is required so that there are no unnecessary delays in interviewing or contact with the tenant. Decant team to ensure that religious beliefs and tenets are taken into account when arranging meetings and moves.
Sexual orientation	May be same sex households in the block	Neutral	Where tenant is moving to an ALMO or RSL property, this organisation will need to meet or exceed current standards and support on tackling harassment and discrimination.
Marital status/civil partnership	Co-habiting couples who haven't registered their partner could be treated differently from those who are married/in a civil partnership	Negative	Review housing policy on placement of couples and ensure tenants are aware of what tenancy rights any partner living at the address may have.