

Equality Analysis Assessment (EAA)

1. Name of proposal

Housing Strategy 2015-20

2. Lead Officer

Molly Gavriel (Housing Policy and Programmes Officer)

3. Start Date of EAA

April 2015

4. End Date of EAA

April 2021

5. Purpose of the Equality Analysis

Lewisham's housing strategy for 2015-20 will be in place from April 2015 and replaces the previous housing strategy, 'Homes for the Future'.

The housing strategy provides a strategic framework for the delivery of housing services by Lewisham Council.

Local Authorities have a statutory duty to deliver a Housing Strategy. Section 87 of the Local Government Act 2003 requires local housing authorities to produce and adopt Housing Strategies. The local Housing Strategy must be adopted at a meeting of the Authority's Full Council. The London Borough of Lewisham's Constitution, at paragraph 4.2 of Article 4 confirms the fact that the Housing Strategy is one of a number of plans and strategies "...which make up the Council's policy framework". The local Housing Strategy, pursuant to section 28 of the Greater London Authority Act 2007, should 'be in general conformity with the London Housing Strategy' prepared by the Mayor of London.

Meeting the Council's statutory housing obligations is reflected in the objectives of the housing strategy: statutory homelessness duty; provision of housing advice and landlord responsibilities. The 2015-20 Housing Strategy sets out Lewisham's response to the current housing climate and proposes outline measures and policies that the Council will adopt for the delivery of housing services.

Advancing equality of opportunity and supporting sustainable communities lies at the core of the Housing Strategy, which sets out our commitment to support Lewisham's citizens in accessing and living in good quality housing that improves their opportunities for employment, education, health and wellbeing. Many of our services focus on providing additional support for residents with additional vulnerabilities.

Proposals included in the Housing Strategy will impact on the strategic delivery of Housing services by London Borough of Lewisham. In consequence, an outline EAA has been carried out in order to ensure that our strategic objectives show due regard to the need to:

- i. Eliminate unlawful discrimination, harassment, victimisation;
- ii. Advance equality of opportunity; and
- iii. Foster good relations

This EAA provides an overview of the key objectives and priorities set out by the Housing Strategy, and their potential impact in relation to protected characteristics.

This Equalities Analysis Assessment has been undertaken using the methodology and approach set out in Lewisham's EAA toolkit. Every new or revised strategy requires the undertaking of such an assessment, to ensure that the proposals address equalities and that the strategy and its implementation meet both aspirations set out in the Council's equalities policies and statutory requirements.

A full EAA will be carried out in the event of future service review, restructure or other significant change.

6. Identify the changes to your service

The Housing Strategy examines the overall housing situation in Lewisham and sets out the strategic vision for addressing housing need over a five year period, from April 2015 to April 2021. The strategy responds to the changing political, economic and social situation in Lewisham since the publication of the previous Housing Strategy in 2009.

Four key objectives are set out in the Housing Strategy:

- Helping residents at times of severe and urgent housing need
- Building the homes our residents need
- Greater security and quality for private renters
- Promoting health and wellbeing by improving our residents' homes

These objectives are accompanied by our aims for each key objective. These aims form the backbone of the action plan which will inform the delivery of the strategy, as shown below:

Helping residents at times of severe and urgent housing need

Our aims:

- To reduce all forms of homelessness, including rough sleeping, across Lewisham
- To reduce the number of households living in temporary accommodation
- To mitigate the adverse impacts of welfare reform
- To be able to offer relevant housing options, including supported housing, to vulnerable households in order to maintain or improve their health and wellbeing

Building the homes our residents need

Our aims:

- To work with our communities and partners in order to maximize our ability to deliver well designed and affordable new homes for Lewisham
- To support the development of new homes that meet high standards of design, sustainability, accessibility and energy efficiency to meet the long-term needs of our residents
- To develop modern specialised or supported housing for specific client groups, including both single people and families with support needs
- To innovate and create new models of affordable and sustainable housing, for example Council owner re-deployable housing

Greater security and quality for private renters

Our aims:

- To improve security and affordability for households living in the private rental sector
- To improve conditions in the private rental sector in order to support the health and wellbeing of tenants
- To reduce evictions from the private rental sector
- To work together with our partners to improve conditions in the sector and target rogue landlords and the most dangerous properties

Promoting health and wellbeing by improving our residents' homes

Our aims:

- To work with Lewisham Homes and our Housing Association partners in order to enable further improvements to residents homes and the local environment
- Contribute to improving the energy efficiency of our homes and reducing carbon emissions to support warm, healthy homes and protect the environment
- To support independent living and reduce risks for vulnerable residents, including excess cold, flood risk and overheating
- To take a strategic approach to securing the future of our homes, looking to re-provide homes where this is the most feasible way of improving standards

7. Impact Scoping Grid

As part of the EAA process, a scoping exercise was undertaken to capture the initial assessment of the impact each proposed key objective and aim may potentially have on the eight relevant protected characteristics (age, disability, gender, ethnicity, sexual orientation, religion or belief, gender reassignment and pregnancy & maternity). The outcome is summarised on the grid below:

Proposal	Age	Disability	Gender reassignment	Pregnancy and maternity	Ethnicity	Religion or belief	Gender	Sexual orientation
Helping residents at times of severe and urgent housing need	=	+ve	=	+ve	=	=	+ve	=
To reduce all forms of homelessness, including rough sleeping, across Lewisham	=	=	=	+ve	=	=	+ve	=
To reduce the number of households living in temporary accommodation	=	=	=	+ve	=	=	+ve	=
To mitigate the adverse impacts of welfare reform	+ve	+ve	=	+ve	=	=	+ve	=
To be able to offer relevant housing options, including supported housing, to vulnerable households in order to maintain or improve their health and wellbeing	+ve	+ve	=	=	=	=	=	=
Building the homes our residents need	=	=	=	=	=	=	=	=

To work with our communities and partners in order to maximise our ability to deliver well designed and affordable new homes for Lewisham	+ve	+ve	=	=	=	=	=	=
To support the development of new homes that meet high standards of design, sustainability, accessibility and energy efficiency to meet the long-term needs of our residents	+ve	+ve	=	+ve	=	=	=	=
To develop modern specialised or supported housing for specific client groups, including both single people and families with support needs	+ve	+ve	=	+ve	=	=	=	=
To innovate and create new models of affordable and sustainable housing, for example Council owned re-deployable housing	=	+ve	=	+ve	=	=	=	=
Greater security and quality for private renters	=	+ve	=	+ve	=	=	=	=
To improve	=	+ve	=	+ve	=	=	=	=

security and affordability for households living in the private rental sector								
To improve conditions in the private rental sector in order to support the health and wellbeing of tenants	=	+ve	=	+ve	=	=	=	=
To reduce evictions from the private rental sector	=	+ve	=	+ve	=	=	=	=
To work together with our partners to improve conditions in the sector and target rogue landlords and the most dangerous properties	=	+ve	=	+ve	=	=	=	=
Promoting health and wellbeing by improving our residents' homes	=	+ve	=	+ve	=	=	=	=
To work with Lewisham Homes and our Housing Association partners in order to enable further improvements to residents homes and the local environment	=	+ve	=	+ve	=	=	=	=
Contribute to improving the	=	+ve	=	+ve	=	=	=	=

energy efficiency of our homes and reducing carbon emissions to support warm, healthy homes and protect the environment								
To support independent living and reduce risks for vulnerable residents including excess cold, flood risk and overheating	+ve	+ve	=	+ve	=	=	=	=
To take a strategic approach to securing the future of our homes, looking to re-provide homes where this is the most feasible way of improving standards	+ve	+ve	=	+ve	=	=	=	=

8. Consultation

As part of the development process for the new Housing Strategy, a formal consultation exercise was conducted over December 2014 and January 2015. Consultation consisted of three main strands of activity:

- Online public consultation
- Presentations to various groups, including Lewisham Affordable Housing Group (LewAHG) and Lewisham Homelessness Forum
- Lewisham Housing Summit, an event attended by over 80 representatives of residents associations, local community groups, housing organisations and developers. The event was supported and funded by the Lewisham Tenant's Fund.

Profile of respondents

80 representatives from over 40 organisations, including residents associations and community groups attended Lewisham Housing Summit on 22nd January. Members of Lewisham Affordable

Housing Group, Lewisham Homelessness Forum and the Lewisham Homes Board were amongst key groups represented at the event.

There were 51 respondents to the online survey, of whom 4 stated that they were responding on behalf of a Housing Association and 3 stated that they were responding on behalf of a voluntary organisation or community group.

- The majority of respondents lived in the private sector. 31.4% were owner occupiers, and 23.5% private tenants. Housing association (including Lewisham Homes) tenants were underrepresented, with approximately 10% of respondents stating that they lived in a Lewisham Homes or housing association rented property.
- Most respondents identified themselves as White British [45.1%]. A total of 13.7% stated that they were from a black or minority ethnic background. 19.6% responded that they'd 'rather not say' and 3.9% left no response to this question.
- Respondents tended to be of working age, with 80.4% between the age of 18 and 60. There were no respondents under the age of 18, however a response was submitted by the Youth Offending Service (YOS).
- 78.4% of respondents stated that they did not consider themselves to have a disability.
- Of those who provided information about their sexual orientation, 54.9% stated that they were straight or heterosexual. 9.8% identified as gay or lesbian, and 5.9% as bisexual. 23.5% did not disclose any information in response to this question.

Key findings

Online consultation

The online consultation asked respondents about the extent to which they agreed or disagreed with our draft objectives and aims. Respondents were also able to propose additional aims and objectives and highlight areas for the strategy to take into consideration.

Areas highlighted by respondents as in need of further development included:

- Affordability – what is meant by 'affordable' and the relationship between housing costs and the cost of living?
- Sustainability, energy and climate change – what is the council doing in relation to sustainability and how does housing support this?
- Involving communities – involving residents in decision making processes

The table below provides an overview of the level of agreement expressed by respondents about the four key objectives consulted on. The clear majority of respondents agreed with all the proposed principles.

Key objective	% Agree
Helping residents at times of severe and urgent housing need	90.2
Building the homes our residents need	94.1
Greater security and quality for private renters	84.3
Promoting health and wellbeing by improving our residents' homes	94.1

Lewisham Housing Summit

At the Housing Summit, there were eight tables for group discussion. Each table had a key topic for facilitated discussion

- New build and regeneration (x2)
- Private rental sector
- Affordability
- Housing tenures
- Homelessness and temporary accommodation (x2)
- Housing conditions and standards.

Some examples of the key issues were:

- New build and regeneration: there should be a levy on empty land and support innovative models of development
- Affordability: defining 'affordability'. It was strongly felt that there needed to be a distinction between the 'affordable rent' model of 80% market rent and what could be classified as 'truly affordable'; more solutions are needed for those in the 'middle'.
- Homelessness and Temporary accommodation: emphasis on prevention, including through outreach to schools and young people; fighting zero-hour contracts and ensuring a living wage; ensuring services can be flexible to be accessible.

Other

Written feedback to the consultation was also received from the Lewisham Green Party, Lewisham Affordable Housing Group (LEWAHG), Public Health and the Youth Offending Service.

- **Lewisham Green Party** requested more specific, deliverable objectives
- **LewAHG** stressed that the Council and housing association partners are able to work jointly to deliver new build development and make best use of existing homes.
- **Affinity Sutton** housing association highlighted their commitment to affordability and stressing the importance of sustainability and energy efficiency.
- **Public Health** identified children and families as a priority. Overcrowding is a key issue, and affordability links to fuel poverty and food poverty.
- **Youth Offending Service** highlighted the need to ensure that housing advice is accessible and easy to understand. YOS welcome accreditation and incentives for landlords and highlight the additional barriers faced by young people.
- Both public health and YOS prioritise energy efficiency improvements due to the fuel poverty situation amongst vulnerable residents.

Conclusion

Consultation highlighted minor issues around certain protected characteristics. For example, it was felt that children and young people were underrepresented. This was of particular importance as the Housing Strategy 2015-20 will incorporate both Lewisham's Homelessness and Youth Homelessness Strategies, at times of severe under **Key Objective 1: Helping residents and urgent housing need**. This has subsequently been amended, and feedback from public consultation has been incorporated into the final draft strategy.

The four key themes that emerged throughout the consultation period, where respondents felt we should build in to, or strengthen in, the final strategy, were as follows:

- Affordability
- Sustainability, energy and climate change
- Involving communities
- Delivering the Housing Strategy

9. Decision/Result

The analysis of relevant data and consultation results identified some minor potential problems or missed opportunities in the draft strategy. The draft was subsequently amended to reflect feedback from consultation and to better promote equality.

A section on the delivery of the strategy has also been added following feedback from consultation.

The delivery of the housing strategy will be subject to monitoring and review with annual updates made and reflected in the action plans for each of the four key objectives. The strategy is supported by a number of policies and service delivery plans. Lewisham's *Sustainable Communities Strategy* continues to provide the overarching vision for the borough, and the housing strategy supports the core principles identified in this strategy

An action plan will be developed as part of the implementation process (aligned with the overall action plan) which will closely monitor the impact of the strategy during its delivery, with action being taken as required to mitigate any negative impacts wherever possible.

Monitoring will ensure continued relevance in light of potential changes to national, regional or local policy and ensure that the strategy is able to respond to such changes. Action plans and service delivery plans will support the overarching vision of the housing strategy, and will ensure that delivery is timely, relevant and measurable in terms of making real progress on delivering the vision and aims set out in the strategy.

10. Sign off

As part of the report process for Mayor and Cabinet, this EAA will be reviewed and signed-off by Mayor and Cabinet