

LB WALTHAM FOREST  
EQUALITY IMPACT  
ASSESSMENT  
AVENUE ROAD ESTATE  
REGENERATION PROGRAMME

**June 2021**



**LB Waltham Forest  
Equality Impact Assessment  
Avenue Road Estate Regeneration Programme**

**Independently Reported by Ottaway Strategic Management Ltd  
June 2021**

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# **1 Executive Summary**

## **Introduction and context**

- 1.1 Regeneration, particularly in environments where people live, is likely to have impacts and ramifications that are both positive and negative, and that will have diverse impacts for different groups of people. In any process of change, some people or groups are likely to gain more benefit than others. To this end, regeneration programmes need to be managed to ensure that the positive impacts of the regeneration are maximised and correspondingly to ensure that the negative impacts are minimised. It is with this context in mind that the regeneration of the Avenue Road Estate has undergone an Equality Impact Assessment (EQIA).
- 1.2 This independently commissioned Equality Impact Assessment incorporates a review of the local and national policy backdrop, the focus of the regeneration programme and undertakes an assessment and analysis of key data sources, particularly where they relate to the people most likely to be affected by the regeneration programme. Waltham Forest have commissioned this EQIA at an early juncture in this regeneration scheme's developing proposals and as such the assessment has sought to set the equalities baseline for the scheme being proposed for Avenue Road Estate and will enable future, more discrete assessments to take place going forward.
- 1.3 Specifically, it seeks to understand how this regeneration programme will impact on different equality groups and protected characteristics represented on the estate in terms of residents and parties that use the estate for services. Central to this EQIA is the need to distinguish between those impacts which are/could be a result of the regeneration proposals and those impacts which are equality group/protected characteristic specific.
- 1.4 This EQIA has reviewed the equality impacts of:
  - The proposals and master plan for the Estate
  - The proposed development options.
  - The engagement and future decision-making process for residents
  - Regeneration activity including resident engagement, design, planning and phasing.
  - Key offers for tenants, leaseholders and private tenants of non-resident leaseholder properties (still in development)

## **Approach and methods**

- 1.5 This EQIA has included a comprehensive desktop review of core legislation, policy and council papers. This included recent housing needs assessments and resident

surveys. Some of this data addressed the equality characteristics of age, gender, ethnicity and disability. However, the bulk of this information related only to the head of each household surveyed as opposed to all those living in each household.

- 1.6 On this basis, it was agreed with the Regeneration Team that this EQIA would be supplemented with a targeted EQIA household surveys. This survey was completed in September 2020 and has elicited more robust and definitive equality data to support this EQIA.

### Equality Monitoring

- 1.7 Equality analysis has concentrated on Census data for the borough and for Cathall Ward and data collected during the Housing Needs Assessment survey in 2019 (HNA) and the EQIA Household survey completed in September 2020. The EQIA household survey captured responses from 69% of households on the Estate. The headline data from this survey is set out below:
- The gender profile of the estate is 54% female and 46% male.
  - 11% of respondents on the estate stated they have a disability.
  - 4.1% of households hold a Blue Badge parking permit.
  - 77 responses identified residents with these special needs. There were 4 stated cases of residents who were frail elderly, 29 with physical disabilities, 9 with mental health needs, 18 with life limiting health conditions and 12 with severe long-term illnesses.
  - There were 94 cases of specific health conditions on the estate. In some cases, one person could have had more than one of these conditions. This will need to be reviewed in more detail by the council when discussing options for people in these households.
  - There are a significant proportion of children and young people under 16 within the estate representing 32.3% of the population.
  - The over 65 population on the estate accounted for 5.6%.
  - 33.9% of households described themselves as a single parent household.
  - The ethnic minority<sup>1</sup> proportion of responding households was 90.5% and the BAME<sup>2</sup> profile of respondents and their households was 70.4%. In both cases is higher than Cathall and the Borough with 79.7% ethnic minority in Cathall and 64% ethnic minority for the borough and 61% BAME in Cathall and 47.9% BAME in the borough. It is clear that the ethnic profile is a

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<sup>1</sup> Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British

<sup>2</sup> The acronym **BAME** stands for Black, Asian and Minority Ethnic and is **defined** as all ethnic groups except White ethnic groups.

significant factor to this estate and clearly a significant factor to the regeneration of the estate.

- No respondents stated they were gay, lesbian or bisexual. It is unlikely that this represents the true profile of sexual orientation on the estate.
- There are a high proportion of residents that practice a religion with only 16.4% with no religion. Christian with 38.5% is the largest faith group closely followed by the Muslim faith with 36.4%
- 3% of respondents stated there was someone in their household that is either pregnant or undergoing a period of post birth care or maternity/paternity leave.
- In terms of marriage and civil partnership it is worth noting that in some of these cases the legal status does have an impact when tenure and leaseholder status come into play. 42% have never married or registered a civil partnership, 37% are married, 5% separated, 7% divorced and 5% are widowed.
- English is spoken as a main language in 61.7% of responding households. There is a wide range of other languages spoken as main languages on the estate including Turkish 4.2%, Somali 4.2%, Bengali 2.4%, and Arabic 1.8%. 26.9% stated other languages including Albanian 3.6%, Tamil 1.8%, Urdu 1.8% and Twi (Akan) 1.8%.
- Households, who had stated that English was not spoken in their home, were asked to rate their spoken and written English out of five. The average responses were strong with 4.79 out of 5 for spoken English and 4.76 out of 5 for written English. There were some households that had a limited level of written English (6) and spoken English (5). These will need support through the regeneration process.
- 26% of household members over 16 were in full-time employment, 15% in part-time, 32% were in full-time education, 6% retired, 7% unemployed and 6% looking after the home.
- 56% stated that there was someone in their household on a means tested benefit, 39% stated they did not, 3% were not sure and 2% preferred not to say.
- With regards to household income, 98 households (58% of the sample) preferred not to engage in this question. Nonetheless of the remaining, 42%, 60 (35.5%) stated that their household income was less than £15,000 per annum, which suggests a high level of poverty.
- 45% of households did not have the requirement to park a car. 44% had one car, 10% had two cars and 2% had more than two cars.
- Residents were asked whether they agreed or disagreed with the option to demolish the estate and redevelop. 4.2% disagreed with this option, 7.8% neither agreed nor disagreed and 87.9% agreed with this option.



- 57% were concerned at being adequately consulted and informed about the scheme and 16% were concerned about the uncertainty about the scheme/proposals.
- 89.3% perceived the benefits from the promise of a new home with new fittings.
- 87.6 % perceived the benefits of a safer better designed estate.
- 87.0 % perceived the benefits of Getting the right unit to fit my/my family's needs.
- 84.0% perceived the benefits from improvements to energy efficiency and reduced fuel bills.
- 80.5% perceived the benefits from greater sense of community with a fresh new start.
- 83.4% perceived the benefits from better layout and design of new units.
- 78.1% perceived the benefits from More people being housed.
- 73% of respondents felt there would be a positive impact on the health and wellbeing needs of their household.
- 20% felt there would be a positive impact on the childcare school provision of members of their household.
- 59% felt there would be no impact on the employment and skill needs of members of their households.
- 63% felt there would be no impacts on the elderly care and support received by members of their households.
- 43% felt there would be positive impacts on the cost and expense to their households.
- 75% felt there would be positive impacts on Anti-Social Behaviour on the estate.

1.8 What is likely from this data is that the Avenue Road Estate will have a diverse population with a significant population of young people, women, potentially with high levels of single parent households. Disability profiles are likely to have been under stated and there was no data on many protected characteristics and no data relating to health and socio-economic status.

1.9 The concerns raised by residents regarding their perceptions of the impact of the regeneration proposals are highlighted below:

### **Council Tenants.**

- There were a number of people who did not want to have to move from the estate. This was their home which they liked living in *"I' not sure about moving from a place that I know", "We've lived here a long time and at our age we're not keen to move", "We don't want it demolished, I like it, nice area, no problems, why not refurb", "We're a bit concerned as we don't know where we'd be relocated to".*

- Others were concerned at the loss of what was important to them currently such as neighbours who they were close to, their proximity to the places they valued *"I'm used to this place", "Want to keep ground floor as child is hyperactive, need a house so not to disturb neighbours"*.
- Linked to a reluctance to move were concerns about the upheaval that moving would entail. *'Make improvement not demolish.'*
- People are concerned about the investment that they have made, often recently, in their property *"Spent a lot of money making the flat nice"*, that the building is adequate *'Spent £4000 on flat so upset. Rehousing 5 times bad for mental health'*
- People wanted to know more about the plans. These focused on:
  - 'Not knowing where I'll be relocated.'
  - 'When will it be done.'
- There were many who said they were happy for the demolition,
  - 'Long overdue'
  - 'Repair problems'
  - 'Concerns around the leaks'.
  - 'Whole building leaks and shakes ASB sleeping in corridor'.
  - 'Can't wait demolish'.

### **Leaseholders**

- None of the leaseholders raised any concerns in the survey.

1.10 The positive aspects raised by residents regarding their perceptions of the impact of the regeneration proposals are highlighted below:

### **Council Tenants.**

- Council tenant respondents felt that there were many benefits including:
  - 'New place new homes'
  - 'A decent place to live.'
  - 'More accessible, better living conditions'.
  - 'Addressing the immediate problems of leaking homes'.
  - 'the new scheme will improve community safety'.
  - The regeneration will improve the water problems and install lifts'. 'The regeneration will address overcrowding'
  - 'When's it starting? Can't wait.'

**Leaseholders.** There were a small number of comments from leaseholders who focused on:

- Need more information.
- Can't wait.
- New place

- Property rented to council.
- More space

### **Positive impacts of the Regeneration proposals**

1.11 The regeneration programme is seeking to deliver a range of **positive impacts**. A summary of these positive impacts, specifically equality impacts are set out below:

- New and better housing that responds to the needs of a wider range of protected characteristics will be provided.
- There will be more homes designed to Part M of Building Regulations (lifetime homes or equivalent standards) and with disability access.
- Improving the housing stock will provide more homes for more people, to higher standards and in turn, improve the quality of accommodation for residents currently on the estate.
- Waltham Forest's environmental commitment will secure an approach that will provide better insulated homes and use sustainable forms of energy such as centralized heating and hot water, and photovoltaics to generate electricity. This should mean lower running costs and reduce fuel poverty.
- There will be an expansion of housing offer (with some additional units) for those on the waiting list, many of whom come from protected characteristics.
- The needs of older people and those with disabilities will be enhanced by the development of properties built to Part M of Building Regulations (lifetime homes or equivalent standards) and by improving the accessibility of the local urban environment.
- Families will have units that are in much better condition than they are currently and have better access to amenity and play space.

1.12 The major findings of the household survey, supplemented by the reports from the interview team, have prioritised equality issues against the protected characteristics of age (young and old), disability, health, socio economic inequality and language.

## Summary of EQIA findings

### Race

- Very high levels of racial diversity
- Critical that regeneration plans are consistent / fair and not influenced by someone's race.
- Regeneration plans positive from a race perspective and seen as so by the population researched
- Negative impacts of other protected characteristics will be experienced by BAME groups given the estate's diversity
- **No identified negative impacts from a race perspective**

### Gender

- High levels of women who are secure tenants and high proportion of single parents
- Strong sense that the improvement to housing stock and the provision of new homes would be a strong positive of the regeneration process.
- Regeneration plans are broadly positive from a gender perspective
- **From the evidence gathered there are no identified negative impacts from a gender perspective**

### Trans-Gender

- No individuals reported as having undergone or are undergoing a gender transition process
- Regeneration plans are broadly positive from a gender re-assignment perspective
- **From the evidence gathered there are no identified negative impacts from a gender re-assignment perspective**

### Pregnancy/maternity

#### Negative impacts identified particularly from/for

- Disruption during the construction period may negatively impact on pregnant mothers or families with newborn children
- Efforts to address this disruption will be universal to the whole population of the estate

### Sexual Orientation

- Secure by design should afford greater levels of safety
- Design of the new homes and public realm will offer a greater level of security to all which may be relevant to LGBT residents.
- **No identified negative impacts for LGBT groups.**

### Religion/belief

- No aspects that prevent residents from practicing their religion/faith.
- The rehousing team should ask people about their use of places of worship to see the extent to which disruption to their lives can be minimised.
- **No identified negative impacts from a religion/belief perspective.**

## Disability

### Likely Negative impacts identified particularly from/for

- Disturbance of moving & quality of life particularly if disability associated with breathing conditions
- Sensory impairment, and nervous system conditions - particularly construction machinery noise
- New physical layout will be challenge to those with visual impairment
- People with learning difficulties may need separate forms of communication and engagement to enable their understanding of the reality of their situation

## Age

### Likely Negative impacts identified particularly from/for

- Older people with disability
- Older people more settled and require support when moving
- Disturbance impact particularly if on their own, frail and vulnerable
- Older homeowners may not raise mortgage on new properties
- Older population (60+) is set to grow 27% to 2024
- C&YP loss of amenity and play space during construction
- Disruption to school life & home study during & possible loss informal childcare arrangements

## Marriage/Civil Partnership

- The council recognises gay relationships and civil partnerships with respect to household composition.
- Marriage/civil partnerships status may have implications re property ownership and tenure. But this will be the case irrespective of the regeneration process.
- **There are no identified negative impacts from a marriage/civil partnership perspective.**

## Language

### Possible negative impacts identified particularly from/for

- The ability to communicate and understand the implications of the regeneration process
- Lack of written and oral English have affected some resident's awareness of the proposals and capability to negotiate outcomes for tenants and leaseholders
- Understanding may also be connected to issues of mental health, learning disability and age

## Socio-Economic

### Possible negative impacts identified particularly from/for

- Increasing cost and affordability
- Higher costs for older people with less earning capability
- Potential for older homeowners on fixed incomes to renew mortgages and thereby lose the potential to retain property owning status
- Higher proportion of estate on means tested benefit
- High proportion of households with low annual incomes in some cases below the poverty line

## Health

### Possible negative impacts identified particularly from/for

- Disruption of moving home and uncertainty about the future stress, anxiety & depression
- Construction exacerbates existing and may cause new health conditions, with impact on respiratory and circulatory disease
- High levels of Limiting Long Term Illness and Long-term conditions
- Self-declared health needs focused on ailments/pain associated their legs, feet, neck and backs suggesting physical mobility/access as priorities in design of walkways and pathways

## Mitigation Priorities

- 1.13 As part of these EQIA the following mitigation activity has been highlighted. This is set against those protected characteristics that have defined negative impacts. The pledges made by Waltham Forest and the Resident Offers are assumed as a

baseline situation that will be delivered. The mitigations identified below are required in addition to those commitments that have already been made by the council.

### **Generic mitigation activity**

- Identification of appropriate actions to mitigate identified impacts.
- An EQIA review programme to be adopted alongside predicted key milestones in the project lifetime.
- Equality training/briefings for staff undertaking one-to-one liaison with residents currently on, moving within, and onto the new estate.
- Translation and interpretation or offer of translations and interpretation for all residents who do not confidently speak or write English.

### **Disability Mitigation activity**

- Operationally it would make sense to have early engagement with those residents and households that have a member with a stated disability. This is particularly relevant to the households who identified sensory impairments and of much importance considering the challenges associated with moving disabled families. Consulting then engaging with disabled residents before, during and after to check effects, outcomes and results is a requirement under the Equality Act 2010.
- In some cases, residents may need to have suitable and affordable alternative accommodation provided during the regeneration period where the impact of that work might negatively impact on their health and wellbeing, and where they would like to return to the estate.
- In terms of formal adaptations for disability - some engaged previously sought social services assessment for adaptations and equipment. In some cases, these assessments have yet to be carried out and this would suggest a need to ensure that Adult Social Care and Children's Services are engaged to support this process. Assurances are required and resources put in place to ensure that these activities are carried out in a timely manner as part of the regeneration process.
- Retention of a dedicated regeneration based occupational therapist / social support worker may be needed to assess the disability needs of residents.
- If leaseholders are seeking to leave the estate, referrals onto other Social Care Services should be made to mitigate any possible negative impact that disabled people may experience.
- Support with adaptations in units on the new estate, designed specifically for the disabled person's needs should be a prerequisite, together with careful consideration about location of homes through the allocation process.

- Disability grants reviewed and accessed for residents in specific need, to support the funding of adaptations.

## **Age Mitigation activity**

### Children and Young People

- Secure amenity space both during and after the regeneration programme.
- C&YP should be engaged in the design of these future facilities.

### Older People

- Ensure wherever possible that tenants, particularly those who are older, only move once into their new homes.
- Support for and recognition of the financial constraints that many older people will experience; with an aim to support them to come to terms with the transition to a new home (if a tenant or leaseholder is staying on the estate) and to support older people (tenants and leaseholders) who are moving away from the estate.
- To support older leaseholders to access the right options for them and to ensure that their support is maintained through to the conclusion of the development process and the allocation of new homes.
- To work with older people from the BAME community to ensure that they are fully supported in understanding the implications of the scheme and to ensure that they have any language needs addressed.
- Social services support for any adaptations to new homes for older people, particularly those with a disability / health conditions as part of the decant process.
- Ensure that the Shared Equity option for older people will allow them to transfer the equity of their estate, should they die, to their relatives/spouses.

## **Socio-Economic Mitigation issues**

- More information and support will be provided to help leaseholders (especially resident leaseholders) understand the options available to them and to provide them with sufficient support and advice to help them make the best choice.
- The regeneration programme will have impacts on residents, tenants and leaseholders alike, which might cause greater costs and hence become a burden for those residents unable to afford these additional costs. The Council will need to monitor the potential for a consequential rise in the costs of the new properties both in term of property values and in terms of rent and living costs.
- The Council will need to carefully monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity and to

provide sufficient support and advice to ensure that they are not negatively impacted.

- Consideration needs to be given on how to make sure that failure to renew a mortgage does not automatically lead to a loss of leaseholder status.??

### **Language Mitigation**

- Ensure the availability of translation and interpretation services for residents and leaseholders when specific tenant engagement and leaseholder negotiation is being undertaken.

### **Health Mitigation issues**

- Needs Assessments will need to be carried out where required and dedicated rehousing support provided by the Council, including access to mental health support.
- Serious conditions should be prioritised, but progressive conditions may need to be addressed as well. This information via the research that has been carried out is available to the council.
- Particular conditions that are heightened by the development process will need to be reviewed including noise, dust, construction waste and construction traffic.
- OT Care assessments may need to be established to mitigate negative impacts.
- A more detailed strategy will be required in due course to provide suitable facilities (such as respite rooms) away from construction activity.

### **Intersectionality**

- When you analyse what different groups are saying, like the young and old, families, disabled people and more vulnerable groups are asking for: a key priority is to restore the communities that they value and that they are part of now. Rebuilding houses and people's lives must be accompanied by enrichment activities that place communities in control of designing their future communities with all the values and commonality they shared in the past. This needs to be an explicit part of the physical regeneration strategy.
- Whilst it is desirable to help the local community stay together and improve coherence, where there are vulnerable residents (especially elderly and disabled) who wish to use the opportunity to move away from Waltham Forest, then it is good practice under safeguarding arrangements for the Council to liaise with social services in the places to which such residents choose to move.



## Conclusions

- 1.14 The regeneration of the estate will have regeneration impacts for the whole community. However, specific equality impacts are likely to be concentrated through the protected characteristics of disability, age, health, socio-economic inequality and language.
- 1.15 Most significantly, the implications of the regeneration on older and younger people on the estate is likely to be the most significant, both in terms of health and access to amenity provision. Cost implications of the regeneration have also been highlighted and these are mainly to do with the cost of moving from the old property and resettlement in the new home.
- 1.16 Given the absolute commitment to re-house secure tenants in new homes that meet their needs, the impact of the regeneration process will likely have greater impact on leaseholders both resident and non-resident. This will require the compulsory purchase of their properties if voluntary settlements cannot be reached. In some cases, those with less disposable income may have difficulty with maintaining their leaseholder status if they decide to stay on the estate. This has been partially addressed through the Resident Offer to leaseholders. But this need, as a minimum, to be supplemented with further information and support to help leaseholders make the best choices available to them.
- 1.17 Moreover, the borough should consider how to address the housing needs of private tenants displaced by the repurchase of leaseholder properties, some of whom may be made more vulnerable and potentially homeless through the regeneration process.
- 1.18 Whilst the Council is committed to involving residents in the design process for the new estate, this should not be assumed in itself to ensure that equalities issues are addressed. An explicit on-going process is required during design development to ensure the final form of the estate will fairly address equalities issues for all existing and future residents, including but not limited to accessibility in the urban environment, car parking, open space (design, location and accessibility), distribution of tenure types and housing types (i.e. location of wheelchair homes), etc. Indeed this EqIA has been informed that an OT will be assigned to the project in the Autumn of this year and will be heavily involved in the second phase of the Housing Needs Assessment which will be carried out during the winter.
- 1.19 In considering the recommendations, officers must have due regard to the impact those decisions will have upon the Council's statutory duty regarding equalities as set out in Section 149 of the Equalities Act 2010. In summary, these legal obligations require the council and cabinet, when exercising its functions, to have 'due regard' to the need to 1) Eliminate discrimination, harassment and victimisation, and other conduct prohibited under the Act; 2) to advance equality of

opportunity between people who share a relevant protected characteristic and those who don't; 3) Foster good relations between people who share a relevant protected characteristic and those who don't (which involves tackling prejudice and promoting understanding). Under the Duty the relevant protected characteristics are Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion, Sex and Sexual orientation. In respect of the first aim only - i.e. reducing discrimination, etc. - the protected characteristic of marriage and civil partnership is also relevant.

### **Recommended Action**

- 1.20 Set out below are the key recommended mitigation actions as identified by EQIA.

### **Generic Actions**

- Establish support structures/resources to enable Leaseholders to get appropriate financial advice.
- Run EQIA briefing sessions, review training needs, and establish training where appropriate for housing and regeneration staff.
- Establish training where appropriate Equality training / briefing / workshops for housing regeneration liaising teams.
- Employ/identify dedicated Social Support /Occupational Health practitioners to work with the Regeneration team and ensure specialisms in including sensory impairments where appropriate.

### **Disability Mitigation Actions**

- Arrange relevant Occupational Therapy/Social Services assessments for residents where identified.
- Liaison with social care teams in other authorities where residents are seeking to move to.
- Highlight residents with complex disability and/or health needs and provide services accordingly.
- Support with adaptations in new units on the new estate.
- Commission handyman service to support additional fixtures and fittings.
- Ensure reasonable adaptations are implemented within the new homes in line with OT assessments in line with the Residents Offer.

### **Age Mitigation Actions**

- Engage young people in the design of the future amenity space within the new estate. Ensure existing amenity space is secure during the regeneration and construction.

- Provide opportunity for independent financial advice for any resident needing it.
- Commission handyman service to support additional fixtures and fittings.
- Support older leaseholders to access the right options.
- Ensure that the Shared Equity option for older people will allow them to transfer the equity from their property, should they die, to their relatives/spouse.

#### **Socio-Economic Mitigation Actions**

- The Council to monitor the potential for a consequential rise in the costs associated with the new properties both in terms of living costs and in terms of rent/mortgages.
- Review Regeneration policy and identify ways to support private tenants made vulnerable.
- The Council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.
- Facilitate access to independent financial advisors for all residents.

#### **Language Mitigation Actions**

- Make translation and interpretation provision available when specific tenant engagement and leaseholder negotiation is being undertaken.

#### **Health mitigation actions**

- Undertake health and medical assessment or OT assessments where required.

#### **Intersectionality Mitigation Actions**

- Develop enrichment activities for residents of the estate designed to rebuild communities.

## **2 Introduction and context**

2.1 This Equality Impact Assessment (EQIA) has been commissioned as an independent report by LB Waltham Forest Regeneration Team and it will focus on the key elements of the housing regeneration proposals for the Avenue Road Estate. It will address the equality impacts of:

- The key decisions required of Cabinet.
- The regeneration proposals including resident engagement, design, planning and phasing.
- Key Offers for tenants, leaseholders and private tenants of non-resident.
- leaseholders (living on the estate for more than 12 months)
- The proposed Compulsory Purchase Order (CPO)

### **What is an Equality Analysis for?**

2.2 The Council must have due regard to its Public Sector Equality Duty (PSED) when making decisions at member and officer level. An EA is the best method by which the Council can provide the evidential analysis to comply with the equality duty, particularly for major decisions. However, the level of analysis required should only be proportionate to the relevance of the duty to the service or decision. Some decisions will require detailed equalities consideration, e.g. a decision on adult social care provision or reduction of grants to voluntary organisations, whereas the performance of other functions will have less of an equalities impact, e.g. the appointment of committees where only a limited assessment is required. In rare cases, the Courts have said there may be no impact.

2.3 In the context of this regeneration programme a full EA and a full independent Equality Impact Assessment has been deemed appropriate.

### **Equality Act 2010**

2.4 The LB Waltham Forest - like all other public bodies must meet the public sector equality duty (s.149, Equality Act 2010) which requires the Council, when exercising its functions, to have "due regard" to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act,
- advance equality of opportunity between those who share a "protected characteristic" and those who do not share that protected characteristic and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding).

2.5 These are collectively referred to in this EqIA as the equality aims. Advancing equality (the second equality aim) involves having due regard, in particular, to the need to:

- Removing or minimising disadvantages suffered by people due to their protected characteristic.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities *and*
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

2.6 NB, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

### **Waltham Forest Equality Policy**

2.7 Waltham Forest is one of the most diverse boroughs in the country and equality is a central priority to the way the borough works for its communities. Moreover, in addition to the nine protected characteristics outlined in the Equality Act 2010. For the purpose of this EQIA the regeneration team has also requested that the assessment considers 3 additional priority characteristics of socio-economic inequality, health inequality and language, particularly English as a second language.

### **Equality Impact Assessments**

2.8 This EQIA adopts the borough's model for EQIAs set by the Council's equalities policy leads. However, like most other authorities, Waltham Forest's EQIAs are a self-assessment tool to help look at the likely positive and negative impacts of the borough's work on staff, citizens, partners and communities regarding equality of opportunity, and promoting diversity in employment and service delivery.

2.9 Waltham Forest is one of the most diverse boroughs in the country and equalities is expressed through an ambition of fairness and the guiding values of equal opportunity and social justice. The protected characteristics and Waltham Forest's priority characteristics are set out below. Each of these protected characteristics and Waltham Forest local priority characteristics will be assessed in this EQIA.

Chart 1: Protected Characteristics Equality Act 2010 + 3 additional Characteristics.



2.10 The Equalities Impact Assessment will cover the following areas in the context of the council's general duty to:

- Address identified barriers.
- Eliminate discrimination.
- Promote equality of opportunity.
- Promote good relations between different people.
- Support employment opportunities
- Secure inclusive design

2.11 From a methodological perspective, the EQIA will focus on addressing:

- Likely regeneration programme impacts.
- Likely / expected equality impacts.
- Direct equality impacts.
- Indirect equality impacts.
- Proportionality of impact across protected characteristics/local characteristics including proportion and disproportional, thereby assessing proportional positive impacts and negative impacts and/or disproportional positive and negative impacts.
- As part of this process it is critical to enable the council to assess what it will undertake to address the outcomes of these assessments.
- This analysis will enable a process of prioritising these impacts, which will enable Waltham Forest the opportunity to choose options for the mitigation of negative impacts accordingly.

2.12 The housing regeneration scheme for the Avenue Road Estate will also operate within the Council's own housing legislation and policy. To this end the EQIA has reviewed:

- London Borough of Waltham Forest Strategic Housing Market Assessment Household Survey Results May 2017
- Homelessness and Rough Sleeping Strategy 2019-2024 Draft – November 2018
- Waltham Forest's Housing Allocation Scheme (2016 – updated in 2018)

2.13 Therefore, the EQIA has sought to address the available and relevant context of the regeneration programme in Waltham Forest and the core housing policies and processes which impact on residents.

### **The regeneration proposals for the Avenue Road Estate**

2.14 The Avenue Road Estate was built in the 1960's and is located to the south of the borough in the Cathall ward. The estate is made up of 258 units across 4 blocks.

Table 1: Estate blocks, postcodes and unit numbers

Block	Postcode	Units
Blackthorn Court	E15 2DL	53 Units
Geau Court	E11 4HT	49 Units
Mulberry Court	E11 4HN	87 Units
Rosewood Court	E11 4JR	69 Units

2.15 The blocks were built using the Bison large panel system and heating and hot water is provided by a communal heating system. The Estate site covers 1.82 hectares and also includes the Nexus Dance Centre, Snowberry Nursery, three play areas and circa 60 parking spaces. An Estates Review undertaken in 2010 identified housing estates requiring investment and intervention to improve the condition and quality of the stock (beyond planned maintenance). This review identified Avenue Road Estate as one of the highest priorities in the borough.

2.16 The main issues were identified as:

- acute socio-economic factors relating to a high level of crime and being in the lowest 5% of the most deprived areas nationally.
- properties in poor condition with high levels of maintenance expenditure
- poor design, with streets being confusing to navigate and the estate being dominated by cars.

2.17 A pre-feasibility study has been completed that focused on concept designs and initial financial viability for regeneration, replacing the existing blocks with new

housing accommodation. The brief required the architects to look at the possibility of more efficient use of the site and creating additional housing units with better connectivity to the surrounding area. The study demonstrates that a potential regeneration scheme is viable for the estate having considered possible density, tenure mix and financing.

- 2.18 A structural survey has taken place to ascertain the structural integrity of the blocks at Avenue Road Estate to establish the longevity of the buildings and the maintenance liability if repair and retention was to be considered the preferred investment option. The information from both this structural survey and a more detailed design study has feed into the Council's Options Appraisal for the estate, resulting in a preferred investment approach.
- 2.19 The Council has commenced early discussion with leasehold and freehold interests in order to keep residents informed as to proposals for the estate and to ascertain the possible financial impact on the potential viability of an estate regeneration scheme.

### **Ballot**

- 2.20 Since July 2018, any London Borough wishing to carry out an estate regeneration scheme with Greater London Authority funding (GLA) will need a successful ballot of residents living on the estate.
- 2.21 All secure tenants named on the tenancy, resident leaseholders or anyone else living on the estate who has been on the housing register for the last 12 months prior to the ballot will get a vote. Only households on Avenue Road Estate can take part in the ballot. This will include all members of the household aged 16 or over. Tenants and leaseholders cannot vote unless they have been on the housing register for 12 months prior to the ballot. Non-resident leaseholders or buy-to-let landlords cannot vote.
- 2.22 In accordance with the GLA guidelines the ballot will be completed by an independent body who will be responsible for voter registration, organising the ballot and counting the results.
- 2.23 The ballot was a simple 'yes' or 'no' on Waltham Forest's offer and will include:
- Design principles of the proposed development
  - Estimated numbers of new homes.
  - Future tenure mix
  - Proposed associated social infrastructure.
  - Details of offer to leaseholders of homes to be demolished.
  - Details of right to return/remain for tenants living in homes that are to be demolished.

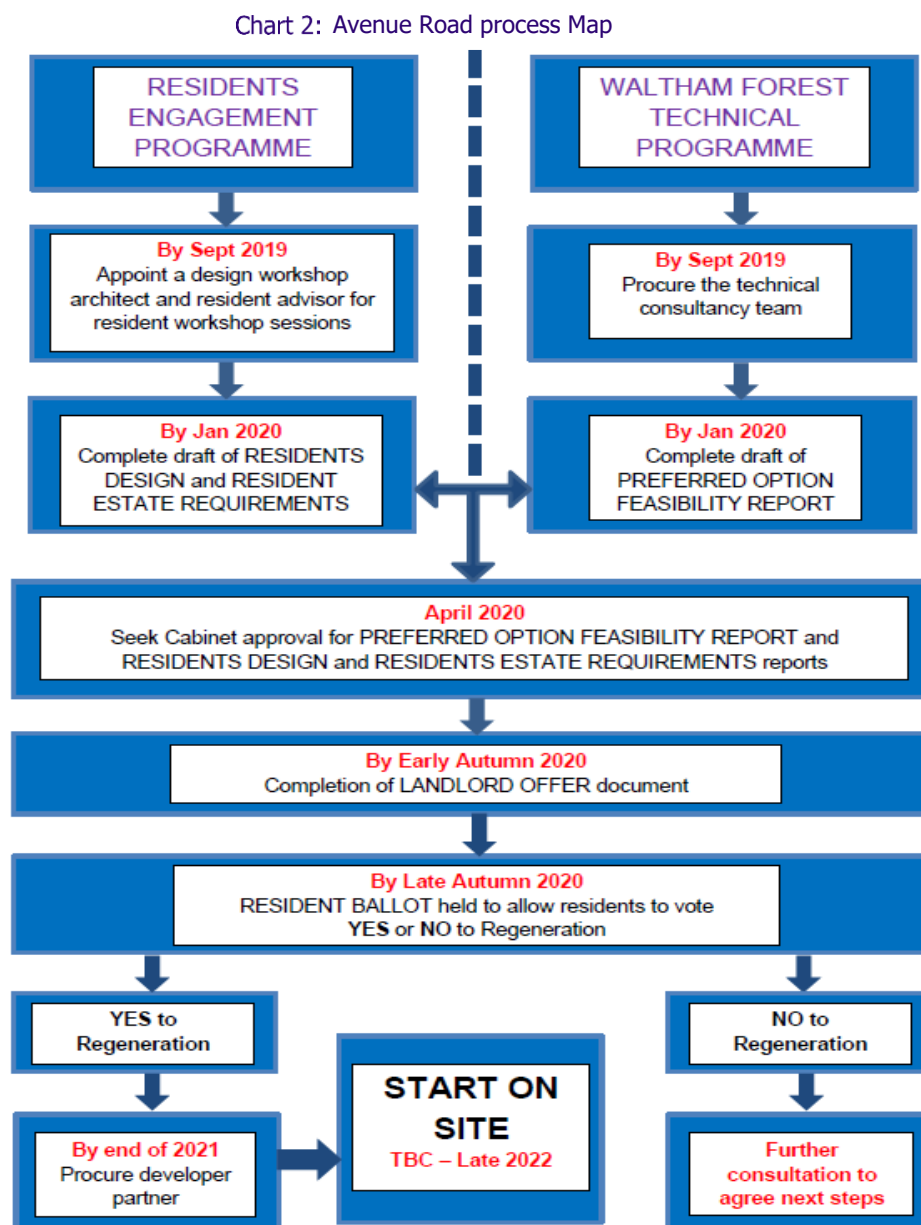


- Explain how the ballot process works and the timing of this.
- Commitments to ongoing consultation and engagement

2.24 Voting on the ballot closed on 5PM Monday 1<sup>st</sup> February 2021. Of the 269 voters eligible to vote 176 households voted representing a 65.4% turnout. Of these 161 voted yes to the proposals (91.5%) and 15 voted no (8.5%).

### Avenue Road Regeneration Process Map

2.25 This process map sets out the planned residents engagement programme and the technical programme that will be running in parallel to achieve a start on site in late 2022.



2.26 The scheme is currently at the procure a developer stage. The immediate short-term priorities for the scheme are set out below:

- Issue ITT – 22/23 April 2021 Complete
- Tender Return 10 weeks – 1 July 2021
- Evaluation / Post Tender Clarification / Presentations 8 weeks – 26 August 2021
- Cabinet Preferred Developer Partner –October 2021
- DA Signing – November 2021
- Planning Application Submitted – 1 March to 30 August 2022
- Planning Consent – September 2022
- Start on Site – September 2022

### **Summary of Offer to all Tenure Groups**

2.27 A more detailed summary of the draft Tenants Offer is set out in appendix 2. The offers are set out for secure tenants, Resident leaseholders, investor leaseholders and private tenants.

2.28 For Secure Tenants there are 9 commitments set out below

- **Commitment 1** – a new property with a secure tenancy on the estate
- **Commitment 2** – relocation to an alternate area of your choice, in the borough.
- **Commitment 3** – The Right to Return - a guaranteed right to return to the estate if you are required to relocate to
- **Commitment 4** – Your home will meet your needs.
- **Commitment 5** – Rent Guarantee, as a secure tenant
- **Commitment 6** – Compensation (Disturbance allowance and a Home Loss payment).
- **Commitment 7** – Support from the Council for people with special needs and disability to assist with your move.
- **Commitment 8** – Advice & Information to help residents make informed decisions about your future housing.
- **Commitment 9** – Involving residents in the design, choices for fixtures and fittings, how to minimise disruption during the redevelopment process.

### **Resident Leaseholders**

- Commitment to consultation and ongoing contact
- Staying on the Estate options for Outright purchase - Shared equity - Shared ownership
- Moving away from the estate sale of home to the council at market value (plus home loss and disturbance allowance compensation).

**Investor Leaseholders**

- Commitment to consultation and ongoing contact
- Property purchase subject to Ballot

**Private Tenants offer**

- The scheme proposal, based on engagement between the landlord and tenant with the Council ultimately purchasing the unit with the private tenant left with two options, to move to another of the Landlord's properties or to approach the council to get assistance with rehousing through various alternative options.

2.29 These offers are addressed in the EQIA in section 6 and are set out in detail in Appendix 2.

### **3 Equalities and regeneration policy consideration local, regional and national**

- 3.1 This section sets out the core policy position for this Equality Impact Assessment and strategic policies and planning documents that would impact on the regeneration of the Avenue Road Estate.

#### **Waltham Forest Equality Policy**

- 3.2 The borough Equality agenda seeks to create a fair and equal society and make sure we follow our tradition of tolerance and understanding between communities. The borough on its website states that:

'To help us deliver our policy and meet our duties, we are:

- promoting equal opportunity for all
- opposing all forms of discrimination, intolerance and disadvantage by reducing inequalities that limit people's life chances.
- making sure our workforce reflects the diverse communities of Waltham Forest at all levels.
- providing inclusive, accessible and excellent services to all

- 3.3 The borough's policy statement applies to all nine protected equality characteristics under the Equality Act 2010:

- age
- disability
- gender
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex and sexual orientation

- 3.4 The borough's equality objectives for 2015-18<sup>3</sup> are to:

- continue to promote and celebrate a cohesive borough ensuring that our community gets on well together.
- promote the opportunities for all members of our community to benefit from local regeneration and growth.

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<sup>3</sup> <https://democracy.walthamforest.gov.uk/documents/s48934/Cabinet%20report%20-%20Equality%20objectives%202015-2018%20-%20Final.PDF>

- use greater insight about our community to shape service delivery, including better understanding and managing the impact on protected groups.
- advance the equality of opportunity for all staff, by having a diverse workforce that reflects the community it serves.

3.5 the borough has set out a monitoring framework<sup>4</sup> that provides a strategy for monitoring the progress towards its new equality objectives and provides a baseline from which to measure the direction of travel.

### **Compulsory Purchase Order (CPO)**

3.6 Compulsory purchase powers allow Acquiring Authorities to compulsorily purchase land to carry out a function, which Parliament has decided is in the public interest. Anyone who has an interest in land acquired is generally entitled to compensation. Local authorities have CPO powers under the Acquisition of Land Act 1981, the Town and Country Planning Act 1990 and other specific Acts of Parliament in order to promote development and regeneration and for other public purposes. The CPO process comprises a number of stages, including Decision to make a CPO, Public Inquiry (if objection to the CPO), Decision, Implementation and Assessment/Payment of Compensation stages. The acquiring authority does not have the powers to implement the compulsory acquisition of land until the CPO is confirmed by the relevant Government Minister. However, they can acquire by agreement at any time and the general presumption is that they should endeavour to do so before acquiring by compulsion.

### **National Planning Policy Framework**

3.7 The National Planning Policy Framework July 2018 ("NPPF") sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in planning decisions. The NPPF confirms that the development plan continues to be the starting point for the determining the acceptability of development. There is a presumption in favour of sustainable development, which the NPPF identifies as having three overarching objectives, namely economic, social and environmental. The development of the Order land will meet the economic, social and environmental objectives and the relevant policies are:

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<http://static.walthamforest.gov.uk/sp/documents/Monitoring%20the%20equality%20objectives%20FI%20NAL.PDF>

- In relation to economic objectives the NPPF supports the building of a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- In relation to social objectives the NPPF supports strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

3.8 In terms of housing supply, Para 59 states: "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

3.9 Paragraph 119 of the NPPF states that Local Planning Authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring forward more land for meeting development needs and/or secure better development outcomes.

### **LB Waltham Forest Sustainable Community Strategy Priorities**

3.10 The regeneration programme at Avenue Road will form part of the Council's commitment to facilitate and enable the delivery 27,000 new homes of all tenures over the next 15 years, with particular emphasis on providing affordable homes for local households.

3.11 The regeneration will contribute to improving the quality of accommodation for Council tenants and also to the local environment as part of the wider masterplan for the south of the borough.

### **Shaping the Borough - Waltham Forest Draft Local Plan<sup>5</sup> (July 2019)**

- 3.12 These strategic objectives will deliver the vision for Waltham Forest 2035 by:
1. Ensure a significant increase in the supply, choice and mix of high-quality new homes, in particular delivering genuinely affordable homes to enable and encourage residents to stay in the Borough and strengthen communities.
  2. Grow, promote and diversify Waltham Forest's economy, including its dynamic, cultural, creative and digital sectors and its role in the Upper Lee Valley and wider UK Innovation Corridor, by both supporting and nurturing indigenous growth as well as attracting inward investment.
  3. Improve life chances by improving job opportunities, upskilling residents and providing access to new skills and training opportunities locally and elsewhere, creating wealth in a successful metropolis.
  4. Support Waltham Forest's network of thriving, safe and attractive town centres, maintaining the distinctive role of each and making them accessible to all.
  5. Ensure timely, strategic and local infrastructure investment and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers.
  6. Ensure that the Borough's cultural legacy and creative economy flourish and grow and investment is secured to improve life chances, quality of life and well-being for all.
  7. Improve the health and wellbeing of all who live, study and work in Waltham Forest.
  8. Improve active and sustainable transport choices across the Borough and beyond building on the success of the 'Enjoy Waltham Forest programme', encouraging wider integrated walking and cycling routes.
  9. Promote exemplary standards of design in place-making and the highest quality of development.
  10. Ensure Waltham Forest's network of cultural, inclusive and sustainable neighbourhoods are safe and diverse, celebrating their locally distinctive character and heritage. London Borough of Waltham Forest Local Plan 12 Shaping the Borough - Waltham Forest Draft Local Plan (July 2019) 3 Vision and Strategic Objectives
  11. Enhance the Borough's natural environment and develop a multifunctional network of green and blue infrastructure to deliver benefits for all, including increased public access.
  12. Waltham Forest builds its resilience through addressing sustainability, efficient waste management and the effects of climate change through all stages in the development process.

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<sup>5</sup> [https://walthamforest.gov.uk/sites/default/files/Final%20draft%20Local%20Plan\\_small%20version-compressed%20%282%29.pdf](https://walthamforest.gov.uk/sites/default/files/Final%20draft%20Local%20Plan_small%20version-compressed%20%282%29.pdf)

- 3.13 To meet this growth over the Plan period (2020-2035) significant levels of housing, employment, office and retail development will be planned for and provided. This includes net increases of:
- A. 27,000 additional homes
  - B. 46,000 sqm employment purposes
  - C. Supporting physical, social and green infrastructure provision commensurate with the scale of growth. Planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.

#### **The Waltham Forest Strategic Housing Market Assessment 2017<sup>6</sup>**

- 3.14 Cobweb Consulting was commissioned in 2016 by the London Borough of Waltham Forest to prepare a Strategic Housing Market Assessment (SHMA) to define the borough's Objectively Assessed Need for housing.
- 3.15 The SHMA sets out the estimates for LBWF current and future housing need, to inform the development of a New Local Plan and New Housing Strategy. A SHMA should identify the scale and mix of housing, the range of tenures needed to meet household and population projections. This includes affordable housing and needs of different groups (e.g. older people, families with children, people with disabilities, people wishing to build their own homes) and caters for housing demand and sale of housing supply necessary to meet this demand.
- 3.16 The Objectively Assessed Need (OAN) for Waltham Forest is 1,810 dwellings per annum over the period 2014-2039, including provision for vacant and second homes in the additional stock. The SHMA also considers the net annual requirement for affordable housing. The requirement for affordable housing is 1,258 units which representing 69% of the overall OAN for the borough.
- 3.17 National planning policy requires local authorities to base their planning policies on the full objectively assessed need (OAN) for all types of housing (market and affordable housing). SHMAs should focus on HMAs, defined in relation to evidence on house prices, migration, travel to work patterns and other factors. The National Planning Practice Guidance (PPG) sets out an approach to identifying objectively assessed need for housing which should be followed unless there are strong local circumstances which suggest an alternative approach. Constraints on provision such

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<sup>6</sup> <https://walthamforest.gov.uk/sites/default/files/Waltham%20Forest%20-%20Strategic%20Housing%20Land%20Availability%20Assessment%202017.pdf>



as land availability or infrastructure should not be considered in the OAN, although they are of course relevant in developing policies.

- 3.18 The number of households (as distinct from the population) in Waltham Forest increased by 18,000 (21%) over the 1991-2015 period, on average about 750 households per annum. This, however, was a lower rate of growth than London or England as a whole, and a lower rate than any of the borough's neighbours, especially Hackney and Newham. DCLG household projections suggest that average household size increased from 2003 to 2011, reversing previous trends, but subsequently declined again from 2011 to 2015.
- 3.19 The ONS 2014-based population projections indicate growth of 68,000 people (25%) over the period 2014-2039. This projection was used as the basis for official household projections prepared by DCLG, which show household growth of 42,000 households, a rise of 41%, or on average 1,665 households per annum. In terms of factors driving future growth, the projections assume consistent growth through a natural change of about 3,000 per annum up to 2039.
- 3.20 Throughout the period of the projections, there is net internal out-migration, averaging 3,500 per annum. International migration is projected to remain positive (average net gain of about 3,200 pa) throughout the period. In other words, more people are projected to leave Waltham Forest than are entering from the outside, but natural growth compensates for this.
- 3.21 GLA has also produced population and household projections for Waltham Forest. Its most recent 2015-based projections provide three scenarios which vary mainly in the assumptions made about migration trends. The interim Central trend scenario assumes future migration levels based on 2005-2015 trends.
- 3.22 The GLA's population projections shows growth of 66,000 over the 2014-2039 period, slightly below that for ONS, although the GLA projection shows a higher level of churn, with larger levels of net internal migration loss and net international migration gains. GLA household projections prepared from their population projections show greater differences from DCLG projections than for population, especially towards the end of the period up to 2039. Compared to the growth of 1,665 households per annum projected by DCLG, the GLA projection shows growth of 37,404 (37%), or on average 1,496 per annum.
- 3.23 GLA's most recent employment projections covering the 2014-39 period show employment growth in the borough from 80,000 jobs in 2014 to 102,000 in 2039, with the most rapid growth projected for the first and last five year periods covered by the projection. The borough is not a major centre of employment in London terms and most employment relates to the provision of services for the local

population rather than being within any of London's specialist areas of activity. It is not considered necessary to make an addition to OAN to support economic growth.

- 3.24 On this basis, the OAN for Waltham Forest before taking account of market signals is 1,810 dwellings per annum over the period 2014-2039, including provision for vacant and second homes in the additional stock. The backlog of need through homelessness and concealed households is 5,680, or 284 per annum if spread over 20 years, as in the London Plan.
- 3.25 From a housing market perspective the following trends were noted: increasing demand for sites in Outer London; steep increases in house prices in the borough in recent years compared to the London average; sharply reducing affordability, as house prices have risen much faster than the relatively low wage levels in Waltham Forest; a low supply of private rented accommodation, and indications that rents may be rising in this sector; below London Plan target dwellings completion (though forecasts indicate that the backlog and target will be met); higher levels of overcrowding and lower levels of under-occupation than national averages, and higher than London average of concealed households; significant increases in the number of homeless households placed in temporary accommodation, particularly outside the borough boundaries.
- 3.26 The assessment identified that affordable housing was critical to the borough's needs. To assess the number of these households unable to afford market housing, estimates were obtained of the distribution of household incomes in the borough, and of the incomes of the specific groups defined in Guidance as potentially in need. Household incomes were compared with the threshold entry cost for market housing to give an estimate of the number of households in need of affordable housing, broken down by bedroom requirements. The total number of households per annum who could not afford to pay the market entry threshold cost, who therefore need affordable housing, was 2,200. This assumes that households with an annual income of up to £16,465 per annum should not have to spend more than 25% of their income on housing and that those with incomes in the £16,466 to £33,080 range should not have to spend more than 30%. Those with incomes in the £33,081 to £59,201 range should not have to spend more than 35%. Those with incomes above this level should not have to spend more than 40% of their income on housing costs.
- 3.27 The assessment identified specific groups that priority should be focused on, this included:
- Older people
  - Households with disabilities and wheelchair requirements
  - Students
  - Families

- The private rented sector
- People wishing to build their own homes.
- Black and Minority Ethnic (BAME) People
- Gypsies, Travellers and Travelling Showpeople

## **London-wide policy**

### **Mayor of London's Equality, Diversity and Inclusion Strategy.**

3.28 London is not immune to the long-standing inequalities and discrimination that affect all major cities. Child poverty – already at an unacceptable level - is set to rise owing to government decisions on tax and benefit levels, and disparities in educational attainment for some black, Asian and minority ethnic (BAME) groups and lower-income children persist despite the success of London's schools. In addition, areas of the city and its transport network are inaccessible to older or disabled people with reduced mobility, and there are employment and pay gaps and glass ceilings that women, BAME groups and disabled people face. There is also the reality of knife crime, which particularly affects young black men as both victims and perpetrators.

The strategy has 39 equality, diversity and inclusion objectives establishing a strategy for change over the next four years. These objectives are set against 5 themes:

- A great place to live.
- A great place to grow up.
- A great place to work and do business.
- Getting around
- A safe, healthy, green and enjoyable city

The plan identifies the need to address the city's most significant challenges most significant challenges – such as the lack of decent, affordable homes which disproportionately affect certain groups, so wider efforts to improve London can help to reduce inequality.

A particular focus of the objectives associated with a great place to live are:

- To work with housing associations, councils, developers, investors and government to help increase the supply of homes that are genuinely affordable to buy or rent.
- help to tackle the inequalities experienced by certain groups of Londoners most affected by the city's shortage of affordable homes.
- To work with councils, landlords and government to help improve property conditions, management standards, security and affordability for private renters.

- To work with government, councils, housing associations, communities and neighbourhoods to better protect Londoners living in social housing, including those affected by estate regeneration projects.
- To work with councils, housing associations, government and communities to help improve the supply of homes available to meet Londoners' diverse housing needs, including for accessible and adapted housing, specialist and supported accommodation, and Gypsy and Traveller sites.
- To work with councils, government, the voluntary sector and communities to make preventing homelessness a priority and make sure that people who lose their home are helped into sustainable accommodation.
- To work with government, councils, the voluntary sector and communities to ensure rough sleepers are helped off the streets as quickly and sustainably as possible.
- To work with boroughs, communities, transport providers and businesses to help regenerate the most deprived parts of London in a way that supports good growth and opens up opportunities for the most disadvantaged groups.
- To work with government, boroughs, communities, businesses, schools, transport providers and others to help protect and provide the social infrastructure needed by London's diverse communities.
- To work with government, boroughs, developers, businesses and communities to promote the use of inclusive design through planning, procurement and commissioning of projects and programmes.
- To support effective ways to involve communities in the development of their neighbourhoods and the wider city.
- To work with all relevant partners to ensure actions to improve levels of air quality and mitigate the effects of air pollution are informed by an understanding of the groups most likely to experience poor air quality.
- To work with government, businesses, transport providers, voluntary groups and all relevant partners to help ensure our approach to tackling fuel poverty and improving green spaces is inclusive.

3.29 These objectives seek to support wide range of protected characteristics including BAME groups, women, low-income households, children and young people, older people, disabled people, non-UK nationals, young people, LGBT+ people, gypsies and travellers, single men, those with mental health issues, Londoners with mental ill health, refugees and asylum seekers, veterans, single people on low-incomes.

### **The London Plan**

3.30 The current London Plan was adopted with amendments in March 2016. The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within the city. A number of policies outlined in the Plan are relevant to the proposed regeneration, including tackling

deprivation, promoting equality and enabling different groups to share in the benefits of development, specifically:

#### Policy 2.9

- Inner London Strategic planning requires that Boroughs and other stakeholders should work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting there.

#### Policy 3.1

- 'Ensuring Equal Life Chances for All' requires that development proposals should protect and enhance facilities that meet the needs of particular groups and communities. The plan does not support proposals involving loss of these facilities without adequate justification or provision for replacement.

#### Policy 3.2

- 'Improving Health and Addressing Health Inequalities' is also relevant, requiring due regard to be had to the impact of development proposals on health inequalities in London.

#### Policies 3.17 - 3.19

- Concerning the provision of social infrastructure, including health and social care, education, sports and recreation facilities, are all relevant to equal opportunities.

#### Housing policies 3.3 - 3.16

- Concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities.

#### Policy 4.12

- Improving Opportunities for all requires that strategic development proposals should support local employment, skills development and training opportunities. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, with Londoners from Black, Asian and Minority

Ethnic (BAME) groups more than twice as likely to be unemployed as those from White groups.

#### Policy 7.1

- Lifetime Neighbourhoods policy for development which enables people to live healthy active lives, and maximises opportunity for community diversity and inclusion, and the design of places that meet the needs of the community at all stages of people's lives.

- 3.31 The London Plan 2016 sets out the London wide shopping hierarchy. The London Plan suggests Major Centres should have Borough-wide catchment areas and are typically smaller than metropolitan centres. These centres may have developed sizeable catchment areas and normally have over 50,000 m<sup>2</sup> of retail floor space.
- 3.32 Equal Life Chances for All, the Mayor's equality strategy revised in June 2014<sup>7</sup>, sets out priorities for achieving equality across a range of dimensions. It emphasises enabling the most vulnerable and disadvantaged people to benefit from London's success; supporting deprived communities, vulnerable people and promoting community cohesion; supporting businesses to consider social issues in their corporate planning to bring real change to people's quality of life; increasing the levels of employment of excluded groups; and decreasing the difference in income between the equality groups and others from deprived communities and the wider community.

#### **London Plan<sup>8</sup>**

- 3.33 The London Plan is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London ("the Mayor") in accordance with the Greater London Authority Act 1999 (as amended) ("the GLA Act") and associated regulations.
- 3.34 The legislation requires the London Plan to include the Mayor's general policies in respect of the development and use of land in Greater London and statements dealing with general spatial development aspects of his other strategies. The Mayor is required to have regard to the need to ensure that the London Plan is consistent

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<sup>7</sup> Mayor of London (Revised 2014) *Equal Life Chances for All* [online] available at: [https://www.london.gov.uk/sites/default/files/equal\\_life\\_chances\\_for\\_all.pdf](https://www.london.gov.uk/sites/default/files/equal_life_chances_for_all.pdf)

<sup>8</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan>

with national policies. When published in its final form the Plan will comprise part of the statutory development plan for Greater London.

3.35 The current 2016 Plan<sup>9</sup> is still the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions. The significance given to it is a matter for the decision maker, but it gains more weight as it moves through the process to adoption.

3.36 Information about the Mayor's planning functions, including the preparation and content of the London Plan, is set out in the London Planning Statement Supplementary Planning Guidance published in May 2014.

3.37 A draft new London Plan was published by the Mayor for consultation in December 2017. The Plan was published in December 2020.

3.38 The plan states:

This London Plan is different to those that have gone before it. It is more ambitious and focused than any previous London Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the London Plan and ensures that it is focused on sustainable development.

This London Plan takes a new approach. It plans for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit. It uses the opportunities of a rapidly-growing city to plan for a better future, using each planning decision to improve London, transforming the city over time. It plans not just for growth, but for Good Growth – sustainable growth that works for everyone, using London's strengths to overcome its weaknesses.

3.39 To ensure that London's growth is Good Growth, each of the policy areas in this Plan is informed by the six Good Growth policies:

- Policy GG1 Building strong and inclusive communities.
- Policy GG2 Making the best use of land.
- Policy GG3 Creating a healthy city.
- Policy GG4 Delivering the homes Londoners need.
- Policy GG5 Growing a good economy.
- Policy GG6 Increasing efficiency and resilience.

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<sup>9</sup> [The London Plan consolidated with alterations since 2011](#)

### **Estate Regeneration National Strategy**

3.40 In December 2016, the DCLG (now the MHCLG) published its Estate Regeneration National Strategy<sup>10</sup> setting out three key principles that underpin successful estate regeneration:

- Community engaged as partners.
- Support and leadership of the local authority
- Willingness to work with the private sector to access commercial skills and lever in investment.

3.41 16.19 The national strategy comprises:

- Resident engagement and protection: This set out government expectations for ensuring that residents are at the centre of re-shaping their estates, in partnership with authorities and developers, and are protected during the lifetime of an estate regeneration scheme.
- Role of the local authority sets out the importance of wider place making, strategic use of public sector land, design and effective use of the planning system.
- Financing and delivering estate regeneration: provide options for building a sound financial base, including setting out the key challenges, advice on aspects and de-mystifying the processes and terminology.
- Good practice guide: steers schemes through all the key stages, from developing the initial idea through to build out and delivery; includes checklists on process design and quality to ensure important issues or stages are not overlooked; provides a framework for overall sequencing.
- Better social outcomes: reports on Government's work with four estates on mapping public spending in estates, in the broader context of looking at how

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<sup>10</sup> Estate Regeneration National Strategy DCLG Dec 2016



estate regeneration schemes can be part of a place based approach to tackling poor life chances.

- 3.42 Alternative approaches: provides advice on community-led housing development as an effective means of putting the community at the heart of housing delivery.
- Case studies: illustrate and highlight particularly positive elements from a range of schemes, including design and quality, community engagement and strategic and innovative financing.
- 3.43 In February 2018, the Greater London Authority published 'Homes for Londoners- A Draft Good Practice Guide to Estate Regeneration'.<sup>11</sup> It defines estate regeneration as the process of physical renewal of social housing estates through various combinations of refurbishment, investment, intensification, demolition and rebuilding.
- 3.44 The Mayor believes that for estate regeneration to be a success, there must be resident support for proposals, based on full and transparent consultation. These proposals should offer full rights to return for displaced tenants and a fair deal for leaseholders, and demolition should only be followed where it does not result in a loss of social housing, or where all other options have been exhausted.

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<sup>11</sup> Homes for Londoners- A Good Practice Guide to Estate Regeneration February 2018 GLA

## **4 Summary of equalities evidence held by LB Waltham Forest**

- 4.1 This EQIA accompanies the Cabinet report, seeking to progress the regeneration of the estate to its next phase of conducting a ballot process to agree the preferred development option and start the physical development process by commissioning and appointing architects, establishing a detailed planning application based on a defined scheme and to incorporate further resident and community engagement.
- 4.2 Waltham Forest's currently held resident equality information is based on a range of data sets which will be reviewed below. This includes:
- Housing tenure and housing demand
  - Borough and Ward demographic data
  - Borough housing register data
  - Economic activity
  - Research carried out by the Community Liaison Officers working for Waltham Forest on the scheme.

### **Analysis**

- 4.3 The focus of the regeneration programme is the underlying aim to improve the housing stock on the estate, generate some more social housing in the borough and to provide private development which will support the programme mix and will enable funding to be released to the rest of the scheme. Therefore, from an impact perspective, it is important to contextualise this regeneration activity against the demand for housing in the borough.

### **Demand for Housing**

- 4.4 A critical impact of a housing regeneration scheme is the potential to support people on the housing waiting list to access new accommodation. This estate is scheduled to create new properties, some of which will be available for social rented housing. This would clearly support people that are on the borough housing waiting list.
- 4.5 In March 2019 Waltham Forest had 5,628 applicants on its housing register of which 1,328 were single person applicants, 2,172 lone parent applicants and 2,128 applications from couples.
- 4.6 Key information:
- As of 2011 census there were 91,600 households in Waltham Forest of which 32,000 were owner occupied (32.9%), 33,200 Private rented (34.0%) and 34,200 Social rented (33.1%)<sup>12</sup>.

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<sup>12</sup> Households by Tenure 1981-2011 (Source: UK Census of Population)

- In 2011 the proportion of households with an overcrowding rating was 32% compared to 8.7% across authorities in England<sup>13</sup>.
- CLG stated in their 2016-31 housing projections that household numbers in Waltham Forest will increase by around 19,900 over the 15-year period 2016-31, an average of 1,330 per year<sup>14</sup>
- This was adjusted by the GLA 2014-round long-term migration trend (2001-13) by -6673<sup>15</sup>

## **Key Borough Demographic Statistics in summary**

### **Age**

- 4.7 The 2011 census shows that Waltham Forest has a population of 258,249. Broken down by broad age group, some 26.1% of the population (67,303) were aged 0-19, 35.8% (92,392) 20-39, 28.2% (72,988) 40-64 and 10% (25,566) were aged 65+. Compared to London and England and Wales, Waltham Forest has a younger age profile with 8.1% of its population aged 0-4 and 26.1% 0-19 compared to 7.2% and 24.5% across London and 6.2% and 24% across England and Wales, respectively. Those aged 20-39 (35.8%) constitute the same percentage of the population in Waltham Forest as across London as a whole (also 35.8%) compared to only 26.9% across England and Wales. Smaller proportions of the borough population are found in the 40-64 and 65+ age groups which constitute 28.2% and 10% compared to 32.7% and 16.4% across England and Wales. (Source: 2011 Census, Office for National Statistics). Children in Care: As of December 2012, the borough had 289 children in their care. 56% were male and 44% female. Most were in the 12-16 age bracket (35%) followed by 6-11 age group (24%). Ethnic breakdown of those in care were - White: 42%; Black or Black British: 28%; Mixed race: 19%; Asian or Asian British: 6%; Other: 4%.

### **Disability**

- 4.8 Data from the 2011/2012 Annual Population survey suggests there are 31,000 disabled people of working age (16-64) living in Waltham Forest of which around 16,000 are female and 15,000 males. This represents around 1 in 5 (20%) of the working age population, a higher rate than found across London (16.9%) though lower than that found in England (20.5%). 2012 data finds that across the borough

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<sup>13</sup> UK Census of Population

<sup>14</sup> OAN Department for Communities and Local Government (CLG Projections 2016-31)

<sup>15</sup> GLA 2014-round long-term migration trend (2001-13) London Borough of Waltham Forest Strategic Housing Market Assessment 2016

some 10,350 residents claim disability living allowance with rates tending to be higher in the southern and middle wards of the borough.

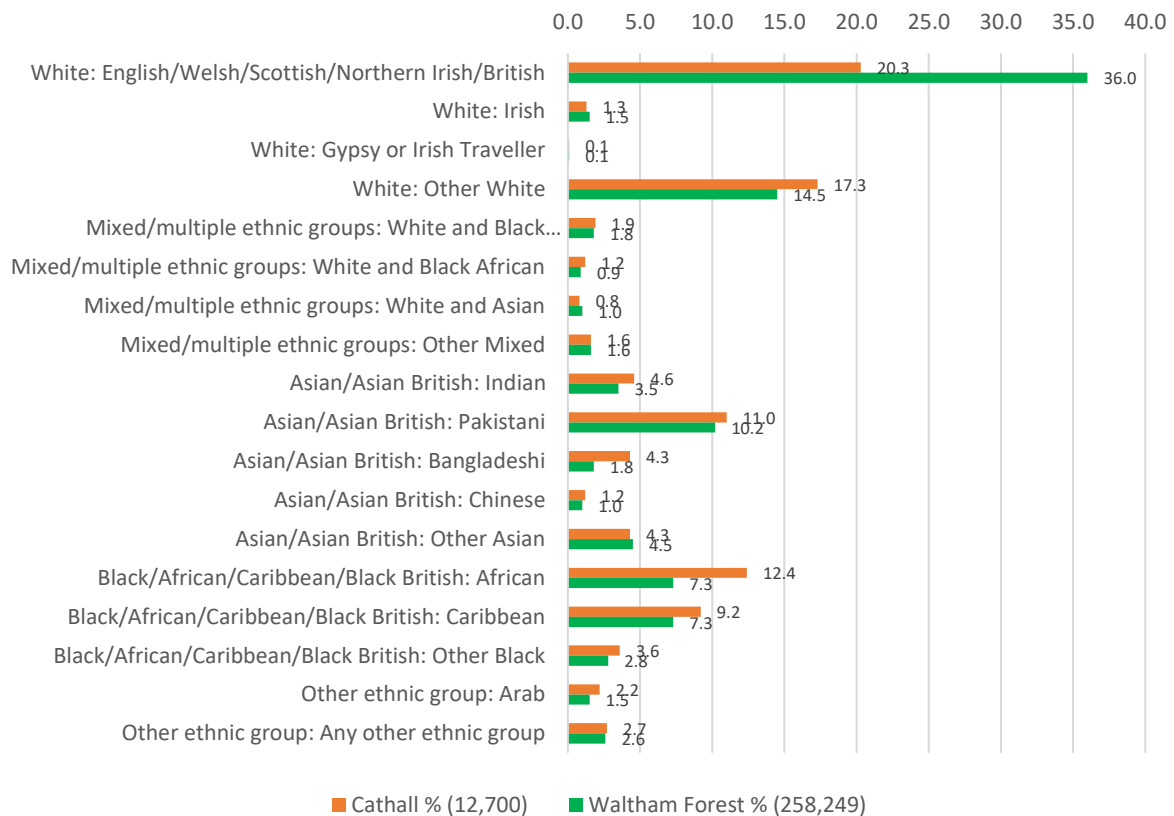
### **Pregnancy and Maternity**

- 4.9 According to the 2011 census, 8.1% (20,839) of the Waltham Forest population is aged 0-4 compared to 7.2% across London and 6.2% across England and Wales. For those aged 0-1 these percentages are respectively 3.3% (Waltham Forest), 3% (London) and 2.5% (England & Wales).
- 4.10 The Total Fertility rate for Waltham Forest in 2011 is 2.69 (3<sup>rd</sup> highest across London) compared to a London and England figure of 1.99. The teenage pregnancy rate in Waltham Forest (2010) is 45.7 per 1,000 of the female population aged 15-17 compared with 37.1 across London and 35.5 across England and Wales.

### **Race**

- 4.11 According to 2011 census data Waltham Forest's White British population is 92,999, 36% of the total borough population. All other ethnic groups constitute 64% of the population (165,250). Broken down by specified ethnicity: White Other (37,472/14.5%), Pakistani (26,347/10.2%), Black Caribbean (18,841/7.3%), Black African (18,815/7.3%), Indian (9,134/3.5%), Other Black (7,135/2.8%), Any other ethnic group (6,728/2.6%), Bangladeshi (4,632/1.8%) and Chinese (2,579/1%). Note: The more detailed ethnicity breakdown goes into more detail and data for more recent arrivals includes Polish (6,944/2.7%), Other Eastern Europe (6,020/2.3%) and Baltic states (3,011/1.2%). Data on arrivals from other countries over the last 8 years show that Poland, Pakistan and Lithuania have supplied the greatest number of migrants. (Source: 2011 Census, Office for National Statistics, Department for Work and Pensions). The ethnic minority population of the borough is 64% and the BAME population is 47.9%. The ethnic minority population of Cathall is 79.7%. The BAME population of Cathall is 61%.

Chart 3: Cathall and Borough Ethnic Profile compared (%) 2011 Census.



## Religion or Belief

- 4.12 According to the 2011 Census the borough has 48.4% of its population stating their religion to be Christian, Muslim 21.9%, Hindu 2.3%, Jewish 0.5%, Sikh 0.5%, Buddhist 0.8% and other 0.4%. Some 18% of residents stated no religion whilst 7.3% did not state an answer. The multi-faith nature of Waltham Forest is evidenced by more recent data which shows that Waltham Forest has around 150 Christian Churches, 16 Muslim Mosques, 4 Hindu Temples, 3 Jewish Synagogues, 1 Sikh Gurdwara and 1 Tao Temple.

## Sex

- 4.13 The 2011 census put the gender split of Waltham Forest as Male: 128,970 (49.94%) and Female 129,279 (50.06%). (Source: 2011 Census, Office for National Statistics).

## Sexual Orientation and Gender Reassignment

- 4.14 National estimates of LGBT population range from 0.3% to 10% using different measures. A study commissioned by Waltham Forest Council suggested the population to be somewhere between 7,000 to 10,000 people in 2007 (this is 4-6% of the adult population). The study also suggested that there may be at least 35

transgender individuals in the borough (Source: Measuring Sexual Identity – Office for National Statistics, Waltham Forest LGBT Matters).

### **Marriage and Civil Partnerships**

4.15 The borough profile for those marriages and civil partnerships carried out in the borough between 2009 and 2012 is set out below:

- 2009 - 2010 670 marriages registered in the borough and 32 Civil Partnerships.
- 2010 - 2011 725 marriages registered in the borough and 27 Civil Partnerships.
- 2011 - 2012 812 marriages registered in the borough and 25 Civil Partnerships.

### **Cathall Ward Demographic Data summarised**

4.16 Cathall Ward Summary demographic data includes:

- 78% minority ethnic background
- Ranked 3/20 most deprived ward in Waltham Forest and 69/625 in London. 28.6% of LSOAs\* in this ward are in the 10% most deprived in England.
- Average household income £26,900 – 25% lower than London average
- 19% of households in this ward in receipt of benefits

4.17 From a housing perspective

- 44% of houses are privately rented compared to 34% in the borough as a whole.
- 1,250 Selective Licences granted
- 44 licences refused/withdrawn or a shorter licence granted due to noncompliance of licensing conditions.
- 6 investigation (tasking) days and 272 audit checks taken place, with 1,856 warning letters sent to landlords in relation to potential breaches of licensing conditions.

4.18 From a housing condition and Anti-Social Behaviour perspective

- Predicted number of private rented properties with serious hazards – 434 (21%)
- 625 ASB incidents have been reported in the Private Rented Sector since 2014

## Data captured from the Housing Needs Assessment engagement of residents.

- 4.19 In 2019 Waltham Forest Council carried out a Housing Needs Assessment Survey of residents of the Avenue Road Estate. In total 167 respondents completed the survey. This represents of the 258 units on the estate a 65% response rate. Basic demographic profiles of respondents were captured on the survey. This is currently the most up to date data held on the estate by the age, race, gender, disability language, faith of those that responded to the survey. It does not constitute a profile of residents but does capture a profile of respondents to the survey.
- 4.20 In several cases not all equality characteristics sought in the survey were responded to. This is reflected in the varying volume of responses for each equality theme questions. The tables and charts below set out the core findings of this research.

### Blocks where responses came from.

- 4.21 The highest level of responses came from Rosewood Court with a 99% completions rate, Blackthorne Court had an 85% completion rate and Mulberry Court had 43% and Gean Court 35% completions rates. In total the survey had a 65% completion rate for the households on the estate.

Table 2: Blocks where respondents came from

Block	Count	%	Units	%	% Complete
Blackthorne court	45	27%	53	21%	85%
Gean Court	17	10%	49	19%	35%
Mulberry Court	37	22%	87	34%	43%
Rosewood Court	68	41%	69	27%	99%
Total	167	100%	258	100%	65%

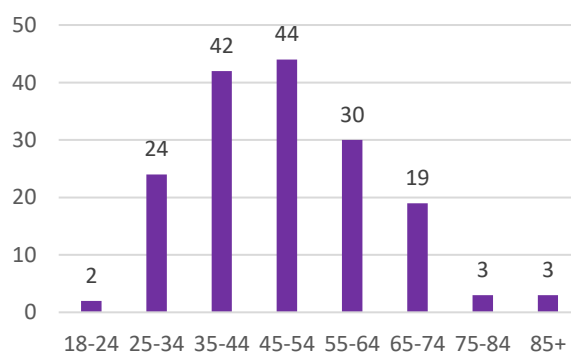
### Age profile of respondents

- 4.22 The age profile of respondents had a higher proportion of residents aged 44-54 (26%) and 35-44 (25%).

Table 3: Age of respondents HNA 2019

Age	Count	%
18-24	2	1%
25-34	24	14%
35-44	42	25%
45-54	44	26%
55-64	30	18%
65-74	19	11%
75-84	3	2%
85+	3	2%
Total	167	100%

Chart 4: Age of respondents HNA 2019



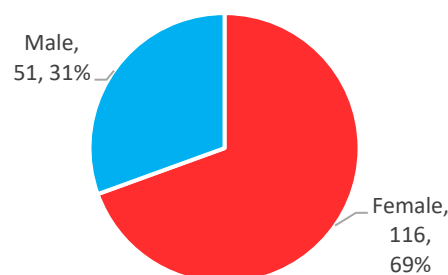
## Gender profile of HNA Respondents

- 4.23 69% of respondents to the survey were female and 31% were male. This does not suggest that the heads of household for each unit that responded to the survey reflects this response profile but it is likely that there are more female heads of households and indeed several of these units may well be single parent households. This will need to be further substantiated when the full EqIA survey is completed in the summer.

Table 4: Gender Profile of Respondents

Gender	Count	%
Female	116	69%
Male	51	31%
Total	167	100%

Chart 5: Gender Profile of respondents



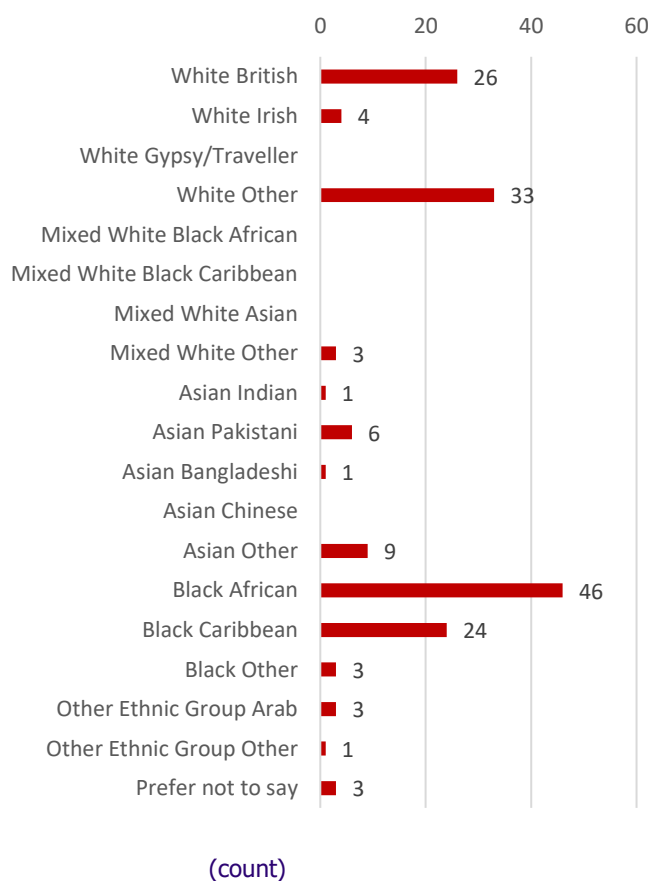
## Ethnicity

- 4.24 The ethnicity profile of respondents to the HNA survey are set out below.

Table 5: Ethnicity profile of respondents

Ethnicity of respondents	Count	%
White British	26	16%
White Irish	4	2%
White Gypsy/Traveller		0%
White Other	33	20%
Mixed White Black African		0%
Mixed White Black Caribbean		0%
Mixed White Asian		0%
Mixed White Other	3	2%
Asian Indian	1	1%
Asian Pakistani	6	4%
Asian Bangladeshi	1	1%
Asian Chinese		0%
Asian Other	9	6%
Black African	46	28%
Black Caribbean	24	15%
Black Other	3	2%
Other Ethnic Group Arab	3	2%
Other Ethnic Group Other	1	1%
Prefer not to say	3	2%
Total	163	100%

Chart 6: Ethnicity Profile of respondents





- 4.25 The data shows that the highest proportions of responses came from Black African (28%), White Other (20%), White British (16%) and Black Caribbean (15%) respondents. The BAME proportion of respondents was 62% and this compares with the BAME population of the Cathall ward which is 61%.

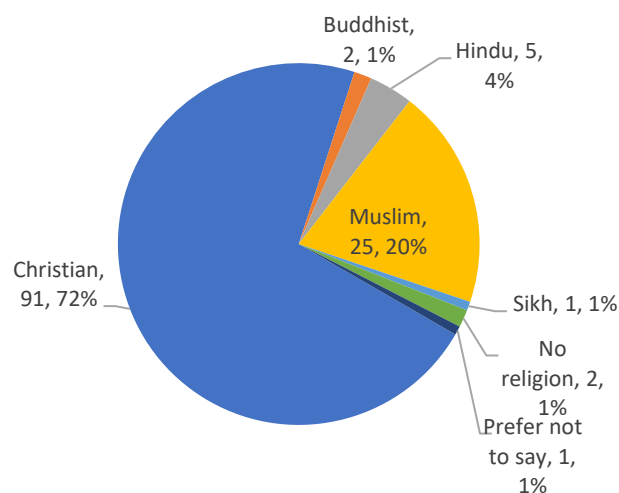
## Religion

- 4.26 The faith and religious profile of respondents to the HNA survey is set out below:

Table 6: Religion Profile of respondents

Religion	Count	%
Christian	91	72%
Buddhist	2	2%
Hindu	5	4%
Muslim	25	20%
Sikh	1	1%
No religion	2	2%
Prefer not to say	1	1%
Total	127	100%

Chart 7: Religion Profile of respondents



- 4.27 72% of respondents were Christian of various denominations, 20% of respondents were Muslim, followed by 4% Hindu.

## Disability

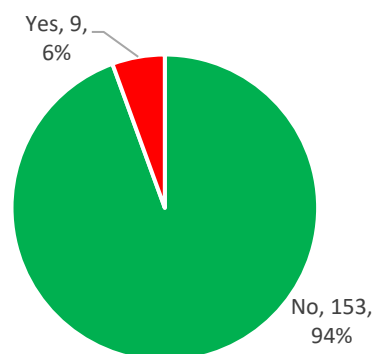
- 4.28 Those respondents that stated they had a disability is set out below. There is however no further detail about their specific impairment type and or if they have any health conditions.

Table 7: Disability profile of respondents

Disability	Count	%
No	153	94%
Yes	9	6%
Total	162	100%

Chart 8: Disability Profile of respondents

- 4.29 94% of respondents stated that they did not have a disability, however 6% did. This does not suggest that there were not more people on the estate with a disability as this related solely to those that responded to the survey.



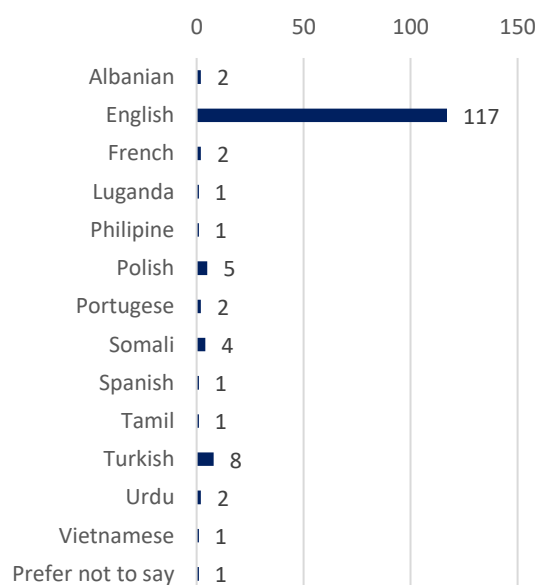
### Language

- 4.30 The languages spoken by the respondents is set out below. This is critical as much of the regeneration programme will need to be effectively communicated with residents and language is likely to be a barrier to the full understanding of what is being propose and the various negotiations required going forward.

Table 8: Languages spoken by respondents.

Language	Sum	%
Albanian	2	1%
English	117	79%
French	2	1%
Luganda	1	1%
Filipino	1	1%
Polish	5	3%
Portuguese	2	1%
Somali	4	3%
Spanish	1	1%
Tamil	1	1%
Turkish	8	5%
Urdu	2	1%
Vietnamese	1	1%
Prefer not to say	1	1%
Total	148	100%

Chart 9: Languages spoken by respondents.



- 4.31 English is spoken by 79% of respondents however 21% stated that English is not their household language. The Council will need to assess the proficiency of household English to ensure that language is not a barrier to the regeneration process and or a negative equality impact.
- 4.32 In summary the Housing Needs Assessment Survey does provide a pointer to the diversity of the estate and the likely needs that the Regeneration scheme will impact on. Nonetheless this needs to be more robust by way of effective equality monitoring in order to fully substantiate the lively equality impact going forward.

## **5 Primary Research: Household EQIA Survey September 2020**

### **Introduction and Rationale**

- 5.1 The data below sets out the findings of the Household Survey carried out in September 2020. The survey incorporated 33 questions, which were asked via telephone interviews and face-to-face doorstep interviews carried out by Ottaway's fieldwork team. The recorded data is broken down by the profiles of respondents by the whole estate, tenants and resident leaseholders. NB there were no non-residents leaseholders and private tenants captured through the research. All surveys were targeted to those within the estate boundary.
- 5.2 There were 258 properties in the sample for Avenue Road estate, although there were 14 properties that were void-units when the survey took place. In total 169 household surveys were completed by the survey team. This represented:
- 66% of the estate, and 69% of the estate including the 14 voids on the estate comprising of:
  - 160 tenants (95% of the sample and 66% of all tenants on the estate)
  - 9 leaseholders (5% of the sample and 69% of all leaseholders on the estate)
  - In addition, throughout the estate there were 14 voids and 7 refusals by residents to complete the survey.
  - The total completed from the possible sample including voids was 69% of the estate.
- 5.3 The survey was undertaken, as the previously reviewed equality data for estate residents was only available, to race, gender, disability and age. In most recent data sources, the information was based on the head of household of each property. This survey has provided a more in-depth perspective of the equality profile of all members of the household. The data that is reported here is the summative collection of the analysed data. Data for individual households will be made available to LB Waltham Forrest based on those who have given consent for this information to be shared.

### **Methodology and Approach**

- 5.4 The survey included 33 questions that profiled all 9 protected characteristics of the Equality Act 2010 as well as the characteristics of language, health and social economic equality.
- 5.5 The field work was carried out by experienced interviewers and street/household survey practitioners. Each property was contacted by telephone at least four times, where a telephone number was available. There were 65 properties with incorrect

telephone contact numbers. In mid-September, the remaining properties were visited and many were revisited at least three times to secure a completed interview. On the estate, non-responding properties were visited approximately 3 times. Residents were asked if they would like to take part in the survey and the overwhelming majority engaged were willing and able to complete interviews. It was noticeable that several properties were occupied but residents were reluctant to open their doors.

5.6 This household data is reliant on the respondents fully describing the make-up of their household. It is not an audit that is fully verifiable but it is a reliable account of the household makeup from the respondent's perspective. It is clear that in some questions responses were incomplete but this was not pushed as several questions are deemed as being sensitive to the respondent's willingness to complete the survey. Nonetheless with this note the findings of the survey are the most detailed and reliable summary of household composition and equality profile.

5.7 This data has been summarised and reported below.

### Key findings

5.8 The first question identified the **tenure** of each household.

What is the Tenure of this Household?	Frequency	Percent
Council tenancy	160	94.7
Leaseholder	9	5.3
Total	169	100.0

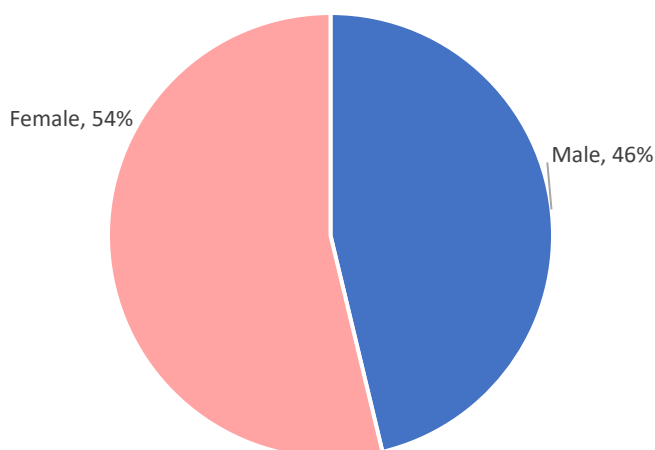
5.9 The second question sought to identify the number of people that lived in each household.

How many people live in your household?	Frequency	Percent
1	37	21.9
2	35	20.7
3	38	22.5
4	24	14.2
5	26	15.4
6	3	1.8
7	2	1.2
8	1	.6
Prefer not to say	1	.6
Total	167	98.8
Not responded	2	1.2
Total	169	100.0

5.10 The third question identified the **gender** profile of each household:

- 46% were male.
- 54% were female.

Chart 10: Gender profile of respondents



5.11 There were slight variations to this gender profile by tenants, leaseholders and those private tenants. However, these variations are not significant to this EqIA.

What is the Tenure of this Household?	Council tenancy		Leaseholder	
Gender of residents	Count	Column N %	Count	Column N %
Male	220	47%	8	38%
Female	253	53%	12	57%
Transgender	0	0%	0	0%
Prefer not to say	0	0%	1	5%
Total	473	100%	21	100%

5.12 The survey then asked if anyone in the household had a **disability**:

- 11% have a disability.
- 89% didn't
- 0.2% preferred not to say.

Table 9: Do any of your household have a disability.

Do any of your household have a disability? (Starting with yourself then the eldest to the youngest)	Total	%
Yes	54	11.1%
No	432	88.7%
Prefer not to say	1	0.2%
Total	487	100.0%

- 5.13 On review, there are proportionately more tenants with a disability than leaseholders with 11% and 6% respectively. It should be noted that there are several residents with conditions that would have a significant negative impact particularly in reaction to construction activity and noise.

Table 10: Do any of your household have a disability Tenants compared to Leaseholders.

Tenure	Council tenancy		Leaseholder	
Disability	Count	Column N %	Count	Column N %
Yes	53	11%	1	6%
No	417	89%	15	88%
Prefer not to say	0	0%	1	6%
Total	470	100%	17	100%

- 5.14 The next question sought to identify if any of the residents had any **special health and social care needs**. 77 responses identified residents with these special needs. This is set out in the table below:

Table 11: Health and social care needs

Please could you say which of the following health/care needs members of your household may have.	Total	%
Frail elderly	4	5%
Physical disability	29	38%
Learning disability	1	1%
Mental health problem	9	12%
Vulnerable young people and children/leaving care	0	0%
Sensory Disability	3	4%
Life limiting health condition	18	23%
Severe long-term illness	12	16%
Other	1	1%
Total	77	100%

- 5.15 There were 4 stated cases of residents who were frail elderly, 29 with physical disabilities, 9 with mental health needs, 18 with life limiting health conditions and 12 with severe long-term illnesses. Clearly in a number of cases these were for the same person and thus within the same household.
- 5.16 The next question undertook a more detailed question about health conditions experienced by residents. The responses show that 94 health conditions are described on the estate and are broken down in the table below.

Table 12: Health conditions

Which of the following health needs applies to members of your household? Self-Declared Health Needs?	Frequency	%
Musculoskeletal arms, hands	3	3.2%
Musculoskeletal legs, feet	12	12.8%

Which of the following health needs applies to members of your household? Self-Declared Health Needs?	Frequency	%
Musculoskeletal back, neck	11	11.7%
Difficulties in seeing	2	2.1%
Difficulties in hearing	1	1.1%
Speech impediment	1	1.1%
Skin condition, allergies		0.0%
Chest, breathing problems	10	10.6%
Heart, blood pressure, circulatory condition	10	10.6%
Stomach, liver, kidney, digestion	2	2.1%
Diabetes	6	6.4%
Depression, anxiety	4	4.3%
Epilepsy	6	6.4%
Learning difficulties	2	2.1%
Mental health, phobias, panic attacks	7	7.4%
Progressive illness/disease	12	12.8%
Other please define	5	5.3%
Total	94	100.0%

- 5.17 We then asked residents if any members of their household hold a Blue Badge. There were 7 members of households that hold a Blue Badge.

Table 13: Blue Badge holders

Do you or any members of your household hold a Blue Badge?	Frequency	Percent
Yes	7	4.1
No	159	94.1
Total	166	98.2
Missing	3	1.8
Total	169	100.0

5.18 The **age** profile of the population of the estate is set out in the table below:

What are the Ages of those in your Household?	Total	%
0-5 years	43	8.7%
6-11 years	58	11.7%
12-16 years	59	11.9%
17-24 years	62	12.5%
24-34 years	56	11.3%
35-44 years	80	16.1%
45-54 years	61	12.3%
55-64 years	48	9.7%
65-74 years	19	3.8%
75-84 years	6	1.2%
85+ years	3	0.6%
Prefer not to say	1	0.2%
Total	496	100.0%

5.19 From the responses received, the profile of under 16's on the whole estate is 32.3%. Correspondingly the over 65 population on the estate was 5.6%. This suggests a large proportion of children but a much lower proportion of older people.

5.20 Also, across the estate 6% of tenant respondents are over 65 and no leaseholder respondents are over 65, suggesting all the over 65s in the sample were council tenants.

Table 14: Age by tenant and leaseholders

Age of Household members	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	%	Count	%
0 to 5	41	9%	2	10%
6 to 11	56	12%	2	10%
12 to 16	57	12%	2	10%
17 to 24	61	13%	1	5%
25 to 34	51	11%	5	24%
35 to 44	80	17%	0	0%
45 to 54	53	11%	8	38%
55 to 64	48	10%	0	0%
65 to 74	19	4%	0	0%
75 to 84	6	1%	0	0%
85 +	3	1%	0	0%
Prefer not to say	0	0%	1	5%
Total	475	100%	21	100%

5.21 The table below sets out the **ethnic** profile of the whole estate. The ethnic minority proportion of responding households was 90.5% and the BAME profile of respondents and their households was 70.4%. In both cases is higher than Cathall and the Borough with 79.7% ethnic minority in Cathall and 64% ethnic minority for



the borough and 61% BAME in Cathall and 47.9% BAME in the borough. It is clear that the ethnic profile is a significant factor to this estate and clearly a significant factor to the regeneration of the estate.

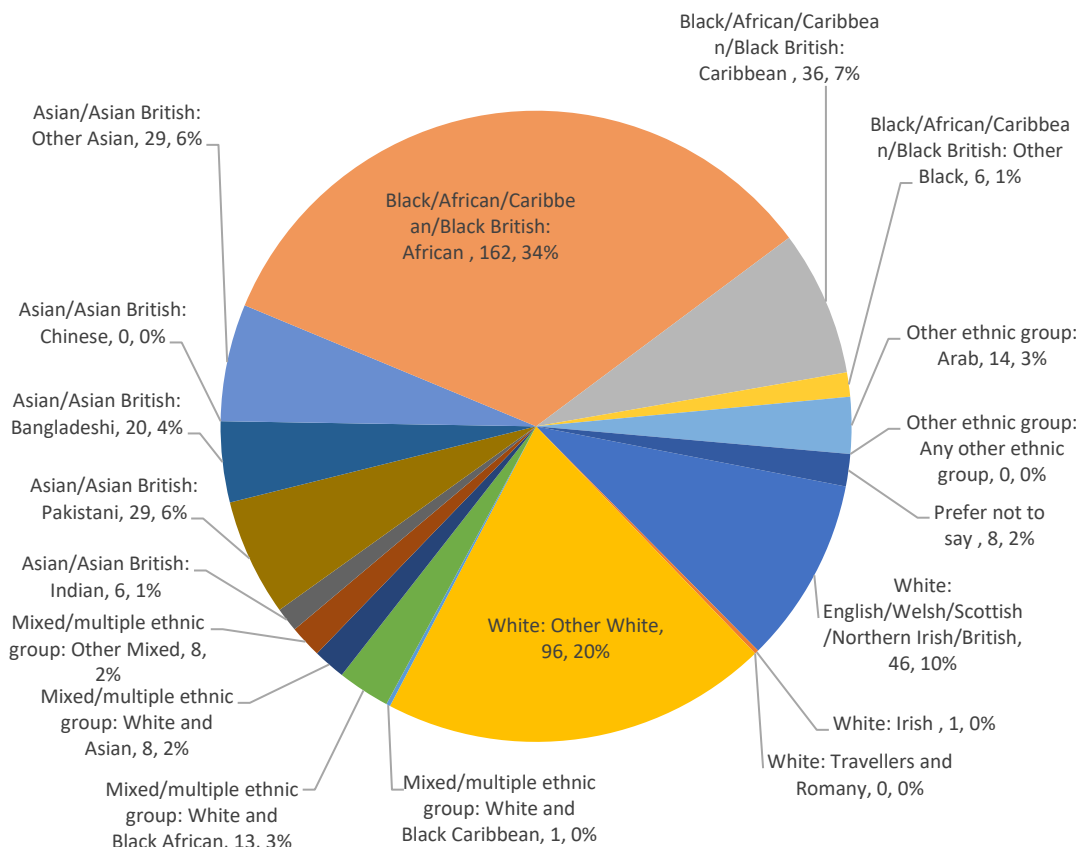
Table 15: Ethnic profile of tenants and leaseholders

Ethnic make-up of households	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	%	Count	%
White: English/Welsh/Scottish/Northern Irish/British	46	10.0%	0	0.0%
White: Irish	1	0.2%	0	0.0%
White: Travellers and Romany	0	0.0%	0	0.0%
White: Other White	90	19.5%	6	28.6%
Mixed/multiple ethnic group: White and Black Caribbean	1	0.2%	0	0.0%
Mixed/multiple ethnic group: White and Black African	10	2.2%	3	14.3%
Mixed/multiple ethnic group: White and Asian	8	1.7%	0	0.0%
Mixed/multiple ethnic group: Other Mixed	8	1.7%	0	0.0%
Asian/Asian British: Indian	6	1.3%	0	0.0%
Asian/Asian British: Pakistani	25	5.4%	4	19.0%
Asian/Asian British: Bangladeshi	20	4.3%	0	0.0%
Asian/Asian British: Chinese	0	0.0%	0	0.0%
Asian/Asian British: Other Asian	26	5.6%	3	14.3%
Black/Black British: African	160	34.6%	2	9.5%
Black/Black British: Caribbean	36	7.8%	0	0.0%
Black/Black British: Other Black	4	0.9%	2	9.5%
Other ethnic group: Arab	14	3.0%	0	0.0%
Other ethnic group: Any other ethnic group	0	0.0%	0	0.0%
Prefer not to say	7	1.5%	1	4.8%
Total	462	100.0%	21	100.0%

5.22 The BAME profile of tenant respondents is 70.5%, and leaseholders is 71.4%. It should be noted that the BAME profile of Tenants and Leaseholders is supported with high proportions of white other residents 19.5 and 28.5% respectively.

5.23 The chart below shows the ethnic profile of all responding households including both tenants and leaseholders.

Chart 11: Ethnic profile of responding households.



5.24 The **sexual orientation** profile of respondents is set out in the table below. It should be noted that this only applied to residents over 16 years of age. However, the respondents were significantly lower than the 303 residents over the age of 16. Indeed, it reflects the sensitive nature of this question and the potential lack of willingness to either respond to the question or to respond correctly. Of those that responded none stated there were household residents who were gay/lesbian, Bisexual or other.

Table 16: Sexual orientation of h=responding households

What is the Sexual Orientation of your household members? (Only applied to those over 16 years old)	Number	%
Heterosexual/Straight	258	97.7%
Gay/Lesbian	0	0.0%
Bisexual	0	0.0%
Other	0	0.0%
Prefer not to say	6	2.3%
Total	264	100.0%

- 5.25 The data seems at odds with national normative data for sexual orientation. This might suggest a real reticence to declare sexual orientation through this survey.
- 5.26 The **religion/faith** profile of the estate is set out below. It shows that there are a high proportion of residents that are from a religion with only 16.4% with no religion. Christian with 38.5% is the largest faith group closely followed by the Muslim faith with 36.4%

Table 17: Religion/faith of responding households.

What is the Religion/Faith of members of your household?	Number	%
Christian	186	38.5%
Buddhist	3	0.6%
Hindu	12	2.5%
Jewish	2	0.4%
Muslim	176	36.4%
Sikh	0	0.0%
Other	5	1.0%
No Religion	79	16.4%
Atheist	3	0.6%
Prefer not to say	17	3.5%
Total	483	100.0%

- 5.27 The profile of those who are either **pregnant or in post-natal pregnancy/paternity** care is set out below. The profile is small with 6 respondent household members 3% of the responding population, from a total cohort 191.

Table 18: Pregnancy of post birth maternity care.

Is there anyone in your household that is either pregnant or undergoing a period of post birth care or maternity/paternity leave?	Number	%
Yes	6	3%
No	165	94%
Prefer not to say	4	2%
Total	175	100%

- 5.28 The responses to the question about the **legal, marital or same sex civil partnership** status is set out below.

Table 19: What is the legal, marital or same sex civil partnerships status of those who live in your household? (Tenants and Leaseholders compared)

Marriage/Civil partnership of households	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	%	Count	%
Never married and never registered a same sex civil partnership	113	44%	3	20%
Married	94	36%	7	47%
Separated but still legally married	13	5%	1	7%
Divorced	18	7%	1	7%
Widowed	14	5%	0	0%
In a registered same-sex civil partnership	0	0%	0	0%
Separated, but still legally in a same sex civil partnership	0	0%	0	0%
Formerly in a same-sex civil partnership which is now legally dissolved	0	0%	0	0%
Surviving partner from a same-sex civil partnership	0	0%	0	0%
Prefer not to say	7	3%	3	20%
Total	259	100%	15	100%

- 5.29 The high proportion of those that have never married and never registered a same sex civil partnership will mostly be younger people. There are some differences in the marriage or civil partnership status of tenants and leaseholders. This can reflect the different stages people are at with their lives and its relationship to housing tenure. Some widowed people may have potentially higher levels of vulnerability in a regeneration environment particularly if their income and resources are limited.

5.30 The **employment/economic activity** status of respondents is set out below:

Economic Activity and or inactivity of household residents	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	Column N %	Count	Column N %
Employed full time	102	25%	8	47%
Employed part time	64	15%	1	6%
Self-employed full time	7	2%	0	0%
Self-employed part time	5	1%	0	0%
On government supported training programme	0	0%	1	6%
Full time education	135	33%	1	6%
Unemployed available for work	29	7%	3	18%
Permanently sick/disabled	15	4%	0	0%
Retired	26	6%	0	0%
Looking after home	27	7%	0	0%
Doing something else	0	0%	0	0%
Prefer not to say	3	1%	3	18%
Total	413	100%	17	100%

5.31 The range of **languages** spoken as a main language in households on the estate is set out below. English is spoken as the main household language in 61%% of responding households, however there is a wide range of other languages spoken on the estate. The table below splits this between council tenants and leaseholders.

Table 20: Main household languages spoken.

Which of the following, is the main language spoken in your household?	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	Column N %	Count	Column N %
English	99	62.3%	4	50.0%
Bengali	4	2.5%	0	.0%
Somali	6	3.8%	0	.0%
Arabic	2	1.3%	0	.0%
Chinese (Mandarin)	0	.0%	0	.0%
Turkish	6	3.8%	0	.0%
Prefer not to say	1	.6%	0	.0%
Other (Please specify)	41	25.8%	4	50.0%

5.32 The list in the table below sets out the other languages spoken on the estate.

Table 21: Other languages spoken.

Other Languages spoken	Frequency	Percent
	124	73.4
Albanian	6	3.6%
Amharic	2	1.2%
Arab	1	0.6%
French	2	1.2%
Iranian	1	0.6%
Latvian	2	1.2%
Lingala	3	1.8%
Lithuanian	2	1.2%
Persian	1	0.6%
Polish	3	1.8%
Portuguese	3	1.8%
Romanian	2	1.2%
Somali	1	0.6%
Spanish	1	0.6%
Swahili	1	0.6%
Tamil	3	1.8%
Tigrayan	2	1.2%
Turkish	1	0.6%
Twi (Akan)	3	1.8%
Urdu	3	1.8%
Yoruba	1	0.6%
Total	168	100.0%

5.33 The next question asked a supplementary question to residents who stated that their main household language was not English. To this end residents were asked to rank out of 5 with five being how their ability to converse in terms of both written and spoken English. It suggests that there are only a few households 5 for spoken English and 6 for written English where the respondent did not feel they English was sufficiently adequate. These households will need support through the regeneration process to ensure they understand what is happening and they understand what their rights are in the scheme.

Table 22: Perception of the adequacy of spoken and written English for those that English is not the main language spoken in the home.

If English is not the main language of people living in your home, please rate on a scale of 1 to 5 your household's ability to converse in English? With 1 being low and 5 being high.	1	2	3	4	5	Total	Ranking Score
Spoken English	1	1	3		58	63	4.79
Written English	1	1	4		57	63	4.76

5.34 The average responses were strong with 4.79 out of 5 for spoken English and 4.76 out of 5 for written English. There were some (5-6) households that had a limited level of written and spoken English.

5.35 From a **parking** perspective the survey asked people how many cars they have that require a parking space. 165 households responded and their findings are set out below.

Table 23: Households with cars requiring parking.

Within your household, how many cars do you have that require a parking space?	Number	%
None	74	45%
One	72	44%
Two	16	10%
More than Two	3	2%
Total	165	100%

5.36 Form a household income perspective two questions were asked of residents. Firstly, whether any residents were in receipt of a means tested benefit.

5.37 The proportion of those on the estate whereby there are members of households in receipt of **means tested benefit** is set out in the table below:

Table 24: Household members on means tested benefit.

Are there any members in your household in receipt of means tested benefit?	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	Column N %	Count	Column N %
Yes	98	60%	1	8%
No	59	36%	10	77%
Not sure	4	2%	1	8%
Prefer not to say	2	1%	1	8%
Total	163	100%	13	100%

5.38 60% of tenant households responding stated they have a household member on a means tested benefit (One, two or more than two). This was 8% in the case of leaseholders.

5.39 The second question sought to ask residents to band their annual household incomes. These are set out below:

Which of the following bandings does your annual household income fall within?	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	Column N %	Count	Column N %
Less than £10,000	55	34.6%	0	.0%
£10,000 - £15,000	4	2.5%	1	12.5%
£15,000 - £20,000	1	.6%	0	.0%
£20,000 - £25,000	3	1.9%	0	.0%
£25,000 - £30,000	0	.0%	0	.0%
£30,000 - £35,000	1	.6%	0	.0%
£35,000 - £40,000	2	1.3%	0	.0%
£40,000 - £50,000	2	1.3%	0	.0%
More than £50,000	0	.0%	0	.0%
Prefer not to say	91	57.2%	7	87.5%

5.40 Only 42.8% of tenant respondents answered this question with 57.2% preferring not to say. In the case of leaseholders 87.8% preferred not to say. Nonetheless of the remaining 36.2% of tenants (59 households), and 12.5% of leaseholders stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty. This suggests there is likely to be a sizeable number across the estate beneath the poverty line as defined by the DWP<sup>16</sup>.

### Perceptions of the regeneration scheme

5.41 Residents were asked if they agreed strongly, agreed, neither agreed nor disagreed, disagreed or disagreed strongly with the consultation findings to undertake a full demolition option for the estate.

Table 25: Perception of the full demolition option

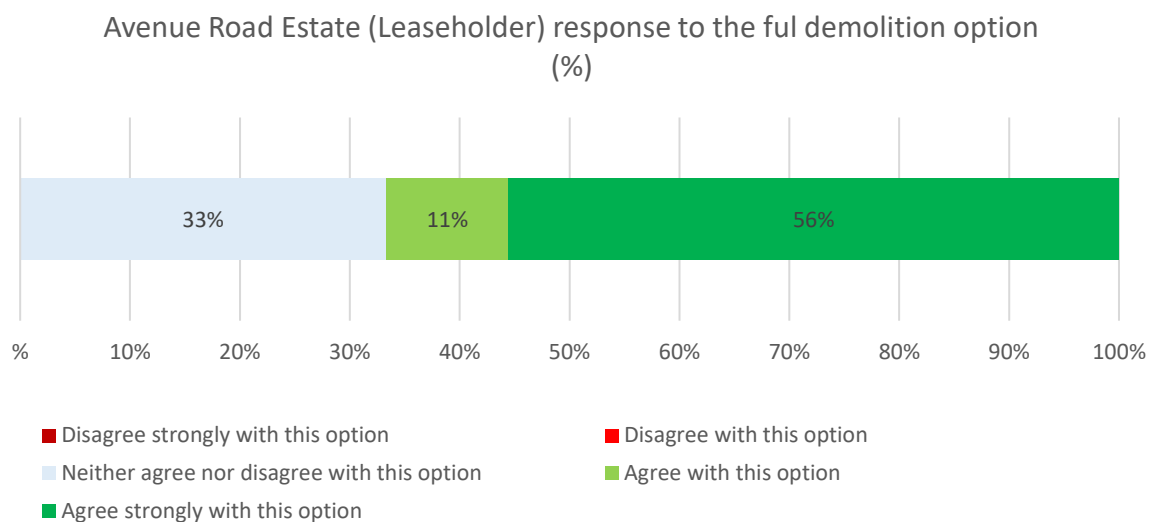
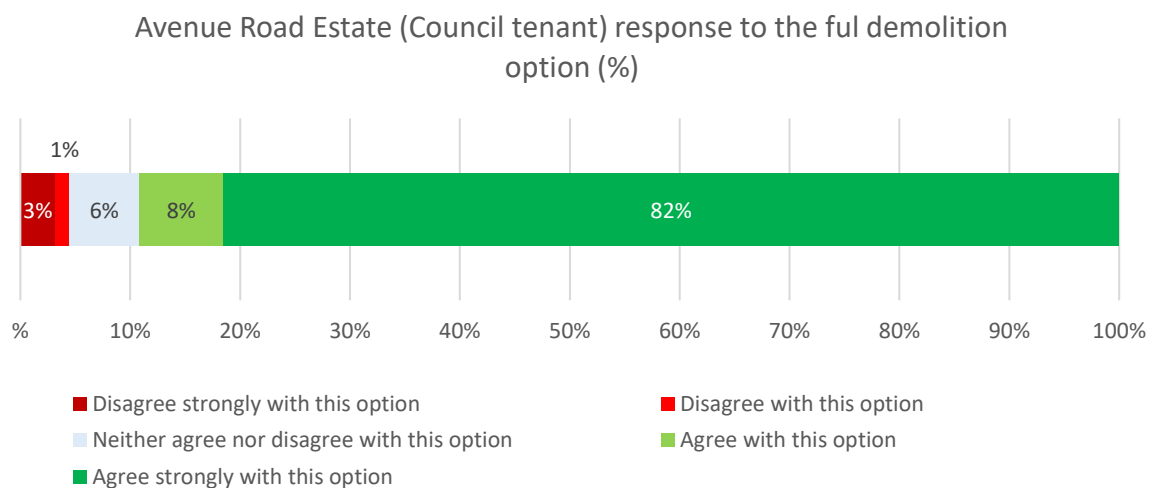
Through consultation with residents the council has a proposed the full demolition option for the redevelopment of the estate. From the following scale, do you?	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	Column N %	Count	Column N %
Disagree strongly with this option	5	3%	0	%
Disagree with this option	2	1%	0	%
Neither agree nor disagree with this option	10	6%	3	33%
Agree with this option	12	8%	1	11%
Agree strongly with this option	128	82%	5	56%

<sup>16</sup> DWP in 2017 put the level of household incomes beneath the poverty line at a weekly average of £288 per week. This equates to an annual income of £16,128. Annual incomes beneath £15,000 per annum would represent households beneath the UK poverty line.



- 5.42 Clearly in summary across all tenancies 87.9% agreed with this option, 7.8% neither agreed nor disagreed and 4.2% disagreed with this option.
- 5.43 In terms of the distinction between leaseholders and council tenants there were no Leaseholders who disagreed with this statement and 67% agreed with it.
- 5.44 This is most graphically set out in the graph below of those that disagreed/agreed with this option.

Chart 12: Agree and disagreement with the findings to complete a full demolition and redevelopment options for the regeneration of the estate.



- 5.45 From a supplementary perspective, residents were asked what they felt were the negative aspects of this demolition and redevelopment option:

### **Council Tenants.**

- There was a number of people who did not want to have to move. This was their home which they liked living in *"moving from a place that they know"*, they had lived there a long time and at their age they were not keen to move *"Don't wat it demolished I like it, nice area no problems, why not refurb"*, and they did not feel that there was any particular need to demolish their property *"Not knowing where we'd be relocated to"*. Others were concerned at the loss of what was important to them currently such as neighbours who they were close to, their proximity to the places they valued *"I'm used to this place"*, *"Want to keep ground floor as child is hyperactive, need a house so not to disturb neighbours"*.
- Linked to a reluctance to move were concerns about the upheaval that moving would entail. *'Make improvement not demolish.'*
- People are concerned about the investment that they have made, often recently, in their property *"Spent a lot of money making the flat nice"*, that the building is adequate *'Spent £4000 on flat so upset. Rehousing 5 times bad for mental health'*
- People wanted to know more about the plans These focused on:
  - Not knowing where I'll be relocated.
  - 'When will it be done.'
- There were many who said they were happy for the demolition,
  - 'Long overdue'
  - 'Regeneration problems'
  - 'Repair problem's
  - 'Concerns around the leaks'.
  - 'Whole building leaks and shakes ASB sleeping in corridor'.
  - 'Can't wait demolish'.

### **Leaseholders**

- None of the leaseholders raised any concerns.

5.46 With regard to the demolition and redevelopment options residents were asked if they or their families have any of the following potential concerns.

Table 26: Potential concerns highlighted.

With regards to the 'demolition and redevelopment' option, do you and your family have any of the following potential concerns?	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	Column N %	Count	Column N %
Uncertainty about the scheme/proposals	42	16.3%	1	8.3%
Disruption caused by the Regeneration proposals	17	6.6%	0	.0%
Loss of community and neighbours	14	5.4%	0	.0%
Possibility of increased costs because of the proposals	11	4.3%	0	.0%
The design and layout and facilities in the new property	18	7.0%	2	16.7%
Feel and design of outdoor areas	5	1.9%	0	.0%
Increased densities on the estate	5	1.9%	0	.0%
Being adequately consulted and informed about the scheme	145	56.4%	9	75.0%
Any other issues and or explanations of why you responded in the way you did.	0	.0%	0	.0%
Total	257	100.0%	12	100.0%

5.47 The most significant response was the concern that people were being adequately consulted and informed about the scheme with 56% of tenants and 75% of leaseholders. This must continue to be a high priority for the borough and its partners.

5.48 This was followed by a question asking residents if they felt there were any positive aspects to this option. The key responses are summarised by theme below:

### Council Tenants.

- Council tenant respondents felt that there were many benefits including:
  - New place new homes
  - A decent place to live.
  - More accessible, better living conditions.
  - Addressing the immediate problems of leaking homes
  - Improve safety is required. Door is open and people smoke drugs. Stinking and not cleaned for 2 days. Music and smoking in the evening, very worried.
  - Needs demolishing problem with water and lifts.
  - Address overcrowding
  - It's taken so long over 10 years.
  - When's it starting?

**Leaseholders.** There were a small number of comments from leaseholders who focused on:

- Need more information.
- Can't wait.
- New place
- Property rented to council.
- More space

5.49 The next question offered respondents some responses that identified positive outcomes to the regeneration and respondents were asked whether they or their families saw any of these benefits coming from the scheme.

Table 27: Perceptions of potential benefits Tenants and leaseholders

With regards to the 'demolition and redevelopment' option, do you and your family perceive any of the following benefits?	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	% of Tenants	Count	% of leaseholders
Promise of a new home with new fittings	142	88.8%	9	100.0%
A safer better designed estate	139	86.9%	9	100.0%
Getting the right unit to fit my/my family's needs	139	86.9%	8	88.9%
Improvements to energy efficiency and reduced fuel bills	135	84.4%	7	77.8%
Greater sense of community with a fresh new start	128	80.0%	8	88.9%
Better layout and design of new units	133	83.1%	8	88.9%
More people being housed	125	78.1%	7	77.8%

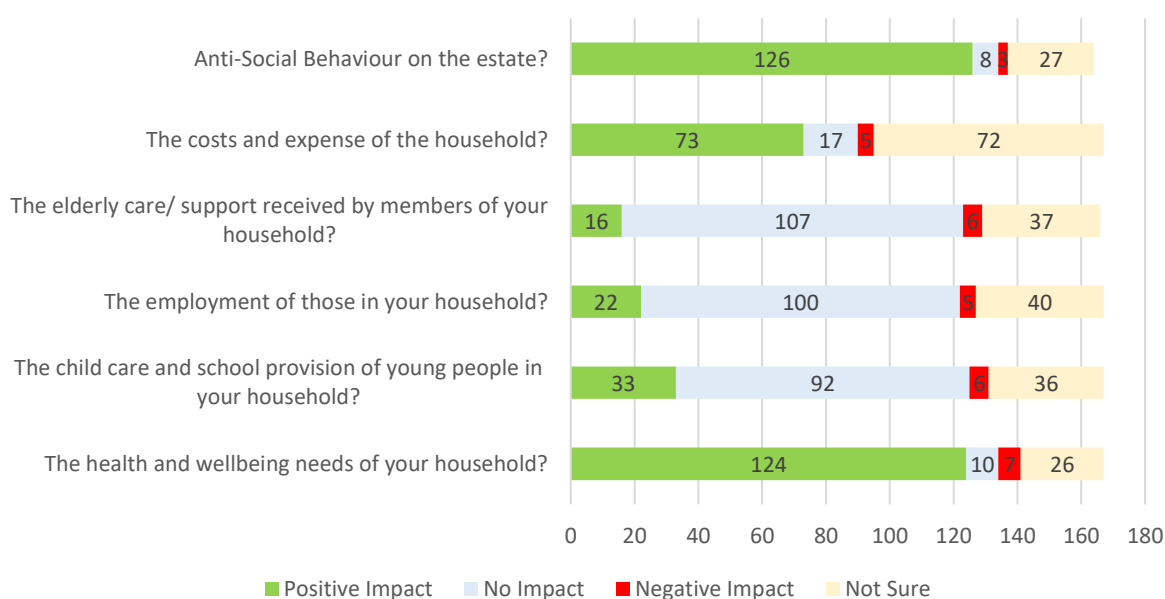
5.50 It is interesting that almost all the potential benefits, i.e. 'promise of a new home', 'a safer and better designed estate', 'getting it to fit family needs', 'improvement to energy efficiency', 'greater sense of community', 'better layout and design' and 'more people being housed', all scored more than 78%. The highest being 'promise of a new home with new fittings' at 89.3% and the lowest 'More people being housed' at 78.1%.

5.51 The next question sought to understand whether residents felt there would be positive or negative impacts as a result of different aspects of the regeneration proposals including health and wellbeing, childcare and school provision for young people, employment and skills, elderly care/support, the costs of regeneration to the household and antisocial behaviour on the estate. In part, this data would describe people's sense of hopes regarding the proposals. The highest positive scores were the positive impact on Anti-Social behavior on the estate and the health and wellbeing needs of your household. This is best illustrated in the table and chart below.

Table 28: Perceived positive and negative impacts of the regeneration of Avenue Road Tenants and Leaseholders.

We would like to gauge other possible impacts on your household and family. A list of possible impacts is set out below do you feel they will have a positive impact, no impact or negative impact?	Positive Impact	No Impact	Negative Impact	Not Sure
The health and wellbeing needs of your household?	124	10	7	26
The childcare and school provision of young people in your household?	33	92	6	36
The employment of those in your household?	22	100	5	40
The elderly care/ support received by members of your household?	16	107	6	37
The costs and expense of the household?	73	17	5	72
Anti-Social Behaviour on the estate?	126	8	3	27

Chart 13: Respondent perceptions of impact of the regeneration on their household/family



5.52 The penultimate question asked residents if they would like more information about the regeneration scheme. Overwhelmingly 97.5% of tenants and 100% of Leaseholder felt they did.

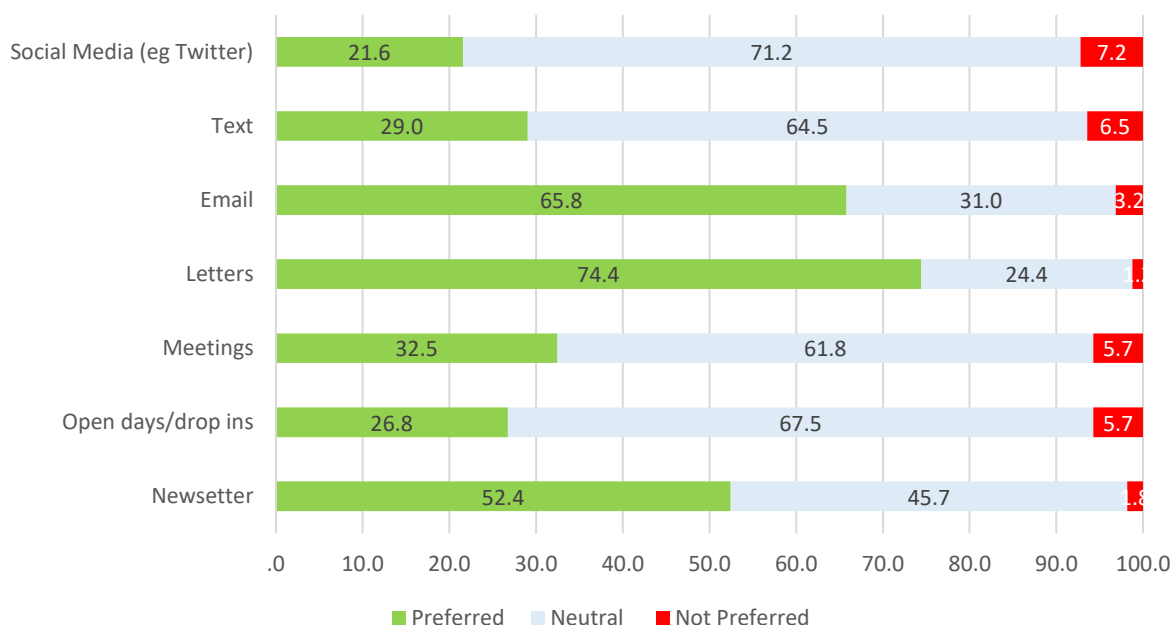
Table 29: Resident requirement for more information

Thank you for your response. Would you like to be provided with more information about the regeneration proposals?	What is the Tenure of this Household?			
	Council tenancy		Leaseholder	
	Count	Column N %	Count	Column N %
Yes	155	97.5%	9	100.0%
No	4	2.5%	0	.0%

5.53

5.54 The final question asked residents what their preferred way of accessing information about the scheme would be. Interesting the top three preferred forms of media were Letters 74.4%, Emails 65.8% and Newsletters 52.4%. All of which are quite traditional forms of communication.

Chart 14: Which of the following ways to be kept informed do you most prefer? (Valid %)



### **Perceptions of the Interview team**

5.55 Waltham Forest Council provided a database with 245 addresses covering the estate which included Mulberry Court, Gean Court, Rosewood Court and Blackthorn Court. The survey was completed over the phone for 75% of the tenants and 25% through face to face surveys. Due to Covid-19 telephone interviewing was deemed safer. Approximately 60 addresses and contacts provided were invalid and there were also ten properties that were vacant and had been boarded up. In order to reach these tenants, it was necessary to conduct two days of door knocking on the estate.

5.56 The main issues identified are as follows:

- Overcrowding- there appears to be high levels of overcrowding on the estate with 3-bedroom properties housing up to 10 people, 2-bedrooms with 5 people and one bedroom with three people. For people living in these conditions, the regeneration of the estate cannot happen soon enough.
- Maintenance:
  - Leaking was raised by several residents which was a problem that caused internal damage and damp
  - Lifts breaking down – this was mentioned by several households and was particularly difficult issue for those living on the sixth floor who maybe suffering health issues and climbing multiple flights of stairs was problematic and likewise for those who may have children in push chairs.
  - Lighting –several tenants reported that often lighting of balconies and stair/ lift areas required regular maintenance.
- Car parking
  - This was an issue raised reportedly with complaints that people who do not live on the estate are parking there, exacerbating the problem. There were claims that local taxis parked there and that some people parked there and commute into central London.
- Community safety/Drugs
  - Several residents reported drug taking on the estate by groups of young people. Often groups are congregating on stairwells and lift areas and can be intimidating.
- Overall, the impression gained was that residents are generally keen to see the estate demolished and redeveloped.

### **Headline Summary of the Primary Research completed**

5.57 Implications for the EQIA (Avenue Road)

- The gender profile of the estate is 54% female and 46% male.
- 11% of respondents on the estate stated they have a disability.
- 4.1% of households hold a Blue Badge parking permit.

- 77 responses identified residents with these special needs. There were 4 stated cases of residents who were frail elderly, 29 with physical disabilities, 9 with mental health needs, 18 with life limiting health conditions and 12 with severe long-term illnesses.
- There were 94 cases of specific health conditions on the estate. In some cases, one person could have had more than one of these conditions. This will need to be reviewed in more detail by the council when discussing options for people in these households.
- There are a significant proportion of children and young people under 16 within the estate representing 32.3% of the population.
- The over 65 population on the estate accounted for 5.6%.
- 33.9% of households described themselves as a single parent household.
- The ethnic minority proportion of responding households was 90.5% and the BAME profile of respondents and their households was 70.4%. In both cases is higher than Cathall and the Borough with 79.7% ethnic minority in Cathall and 64% ethnic minority for the borough and 61% BAME in Cathall and 47.9% BAME in the borough. It is clear that the ethnic profile is a significant factor to this estate and clearly a significant factor to the regeneration of the estate.
- No respondents stated they were gay, lesbian or bisexual. This seems very odd and may not represent the true profile of sexual orientation on the estate.
- There are a high proportion of residents that are from a religion with only 16.4% with no religion. Christian with 38.5% is the largest faith group closely followed by the Muslim faith with 36.4%
- 3% of respondents stated there was someone in their household that is either pregnant or undergoing a period of post birth care or maternity/paternity leave.
- In terms of marriage and civil partnership it is worth noting that in some of these cases the legal status does have an impact when tenure and leaseholder status come into play. 42% have never married or registered a civil partnership, 37% are married, 5% separated, 7% divorced and 5% are widowed.
- English is spoken as a main language in 61.7% of responding households. There is a wide range of other languages spoken as main languages on the estate including Turkish 4.2%, Somali 4.2%, Bengali 2.4%, and Arabic 1.8%. 26.9% stated other languages including Albanian 3.6%, Tamil 1.8%, Urdu 1.8% and TWI 1.8%.
- Households, who had stated that English was not spoken in their home, were asked to rate their spoken and written English out of five. The average responses were strong with 4.79 out of 5 for spoken English and 4.76 out of 5 for written English. There were some households that had a



limited level of written English (6) and spoken English (5). These will need support through the regeneration process.

- 26% of household members over 16 were in full-time employment, 15% in part-time, 32% were in full-time education, 6% retired, 7% unemployed and 6% looking after the home.
- 56% stated that there was someone in their household on a means tested benefit, 39% stated they did not, 3% were not sure and 2% preferred not to say.
- With regards to household income, 98 households (58% of the sample) preferred not to engage in this question. Nonetheless of the remaining, 42%, 60 (35.5%) stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty.
- 45% of households did not have the requirement to park a car. 44% had one car, 10% had two cars and 2% had more than two cars.
- Residents were asked whether they agreed or disagreed with the option to demolish the estate and redevelop. 4.2% disagreed with this option, 7.8% neither agreed nor disagreed and 87.9% agreed with this option.
- 57% were concerned at being adequately consulted and informed about the scheme and 16% were concerned about the uncertainty about the scheme/proposals.
- 89.3% perceived the benefits from the promise of a new home with new fittings.
- 87.6 % perceived the benefits of a safer better designed estate.
- 87.0 % perceived the benefits of Getting the right unit to fit my/my family's needs.
- 84.0% perceived the benefits from improvements to energy efficiency and reduced fuel bills.
- 80.5% perceived the benefits from greater sense of community with a fresh new start.
- 83.4% perceived the benefits from better layout and design of new units.
- 78.1% perceived the benefits from More people being housed.
- 73% of respondents felt there would be a positive impact on the health and wellbeing needs of their household.
- 20% felt there would be a positive impact on the childcare school provision of members of their household.
- 59% felt there would be no impact on the employment and skill needs of members of their households.
- 63% felt there would be no impacts on the elderly care and support received by members of their households.
- 43% felt there would be positive impacts on the cost and expense to their households.
- 75% felt there would be positive impacts on Anti-Social Behaviour on the estate.



## **6 Equality Impact Assessment**

- 6.1 This section incorporates both data and analysis to assess the regeneration proposals and their associated decisions in the light of the ways in which they may affect residents that fall under the protected characteristics and the local characteristics which have been agreed with Waltham Forest including language, health and socio-economic factor). This section reviews what is being proposed at this stage in the development process (October 2020).

### **Aims of the regeneration.**

- 6.2 The borough's ambition is to ensure that all residents in Waltham Forest have the opportunity to live in a good quality home that is affordable and suitable for their needs. The Council is committed to delivering good quality social rented accommodation to a new generation of Waltham Forest's residents. Regeneration proposals of which Avenue Road is part will contribute to meeting targets going forward.
- 6.3 The Avenue Road Estate currently consists of 258 units across 4 blocks, (241 tenanted properties, 17 leasehold properties including 4 privately rented by non-resident leaseholders).
- 6.4 Waltham Forest, like other London boroughs, continues to face massive housing challenges, and a shortage of housing. The Strategic Housing Market Assessment has identified the Objectively Assessed Need (OAN) of 1,810 dwelling per annum between 2014 and 2039. The requirement for affordable housing is 1,258 units which representing 69% of the overall OAN for the borough.

### **Context of this EQIA**

- 6.5 The regeneration of the Avenue Road Estate is intended to address the needs of a wide range of people with protected characteristics. Regeneration by its very nature is a disturbing period particularly for residents directly affected. Across regeneration schemes there are inevitably a range of winners and losers.
- 6.6 What is critical in this EQIA is the need to ensure that any detriment experienced by residents is not as a result of their protected characteristic. Indeed, there will be consequences of the unsettling and disturbing nature of the regeneration, which will include elements that have a direct impact on people on the estate and in some cases, these direct/indirect impacts will be felt with more force by some people rather than others.
- 6.7 A clear differentiation is the ownership of each unit, and whilst the regeneration offer for tenants is one thing, the offer for leaseholders is something quite different.

However, whether these impacts are a matter of equality and human rights is contentious - in most cases, various impacts that are a direct result of the regeneration process are universally relevant to tenants and some others are universally related to leaseholders. Nonetheless, some of these impacts may be disproportional to some tenants and to some leaseholders as a result of their respective protected characteristics. This may be subject to different interpretation; however, the EQIA will seek to identify options that the council can consider minimise/mitigating these regeneration impacts.

- 6.8 To this end the EQIA will review the regeneration proposals under consideration and seek to assess plans in terms of their:
- Likely and actual benefits for the regeneration proposals
  - Recognition of the negative impacts of the regeneration process
  - An appraisal of impacts on people with protected characteristics
  - Assessment of the direct and indirect impacts of the regeneration programme and their proportional or disproportional distribution between different protected characteristics
  - Assessment of the specific impacts placed on tenants and leaseholders and those within and outside the development red line area and where different protected characteristics of either have a likely proportional or disproportional negative impact.

### **Mapping Impacts**

- 6.9 A central process within this EQIA is to establish the proposed activity set out in the Cabinet Report and to assess the likely impacts for residents in general. It also aims to highlight, where relevant, how these impacts can be assessed as having an equality component or, at the very least, where some protected characteristics may face a differential impact from others on the estate.
- 6.10 The table below sets out the key components of the regeneration programme as described in the Cabinet Report. It seeks to describe generic impacts of the regeneration programme and to draw from that likely equality impacts.

**Regeneration activity, programme rationale, regeneration impacts and likely equality impacts.**

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Reducing the borough housing waiting lists	Council-wide commitment to increase social housing.	<ul style="list-style-type: none"> <li>Increasing opportunities for those on the housing waiting list to access social housing in the borough.</li> <li>Benefits of enabling more people to access social housing. The waiting list is highly diverse with higher levels of BAME people on the housing waiting list.</li> <li>Several residents are keen to see a new property which is built to lifetime homes standards, more energy efficient and with potentially less problems</li> </ul>	<ul style="list-style-type: none"> <li>The housing needs of people with a wider range of protected characteristics will be positively enhanced through the development of these new units.</li> <li>More homes designed to lifetime homes standards and with disability access.</li> <li>Improving the housing stock will provide homes to higher standards and hence improve the quality of accommodation for residents currently on the estate</li> </ul>
Demarcation of CPO area	Central to assembly of the development site	<ul style="list-style-type: none"> <li>Highlight which units are due to be included within the development red line area.</li> <li>Confirm those units that are due for demolition and re-build.</li> <li>Raises potential concerns for residents, particularly those with leasehold interest in their property.</li> <li>Demolition places a strain on residents within the development red line area, with the realisation of the 'clock ticking' before they need to leave their old homes</li> </ul>	<ul style="list-style-type: none"> <li>Perception that leaseholders are being 'forced' to have to sell and leave or stay and port their mortgage to a new property.</li> <li>May have disproportionately negative impact on leaseholders who are less able to afford their new home thus 'forcing' them to sell and move off the estate.</li> <li>General sense of stress, anxiety and disturbance for residents within the development red line area</li> </ul>
Design	New energy efficient homes built to Part M Building Regulations Equivalent to Lifetime homes standards	<ul style="list-style-type: none"> <li>Transferring tenants/leaseholders will have access to the specification and designs of their new homes.</li> <li>Improved housing - better insulated, more energy efficient and removing current housing maintenance shortfalls</li> </ul>	<ul style="list-style-type: none"> <li>The needs of older people and people with disabilities will be enhanced by the development of properties built to lifetime homes standards.</li> <li>Families will have units that are in much better condition than currently</li> </ul>

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Planning	Planning applications to progress the development process	<ul style="list-style-type: none"> <li>▪ The planning of the scheme sets out the project master plan, unit design and compliance with local and national planning regulations</li> </ul>	<ul style="list-style-type: none"> <li>▪ The planning process itself should be equalities positive.</li> <li>▪ Residents of new homes will have engagement in the design of elements of their new homes</li> </ul>
Development programme	The construction programme itself	<ul style="list-style-type: none"> <li>▪ Impact on residents within the development red line as well as those outside it</li> <li>▪ Impact of development for properties outside the development red line but immediately adjacent to the regeneration itself include: <ul style="list-style-type: none"> <li>- Disruption, noise, dust and construction disturbance</li> <li>- Potential parking issues on site during the period of the regeneration</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Potential negative health impacts of the construction process including noise, dust, construction debris and environmental impacts negatively impacting on health and disability.</li> <li>▪ Households with children and older people may find the regeneration process and construction harder to live with</li> </ul>

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Decant	Decanting of those in Phase one into the new homes built on open land	<ul style="list-style-type: none"> <li>▪ Aim for most people to have a single decant.</li> <li>▪ Some residents however may be required to move twice; these house moves will need to be supported and managed and equality implications will need to be addressed for these households.</li> <li>▪ House move and settling into the new unit with its associated disturbance.</li> <li>▪ People may feel they do not know what is going to happen to them.</li> <li>▪ Some residents with gardens want to retain them, yet it is unclear if this is feasible as priority for gardens may be given to those with disabilities, older people and those with children.</li> <li>▪ Some residents with gardens currently might not have them in the future.</li> <li>▪ Residents may lose near neighbours in the transfer, and some were concerned that they may be in a different location to their previous neighbours and fear the perceived need to have to start over again</li> </ul>	<ul style="list-style-type: none"> <li>▪ The decant process needs to address the equality needs of residents. Those who are most likely to be affected negatively are those who are older, disabled and or who have health conditions.</li> <li>▪ Wellbeing is a critical factor, as is the support network previously available pre-regeneration.</li> <li>▪ Some residents may lose immediate neighbours in the transfer to new accommodation which may have negative impacts on residents reliant on a local/neighbour care network, as well as their sense of immediate community.</li> <li>▪ This needs to be addressed to support households who need care/support which disproportionately is more likely to impact on older people, disabled and those with health conditions</li> </ul>

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Allocations of new housing	An amended housing allocations policy has been drafted for the regeneration scheme	<ul style="list-style-type: none"> <li>▪ Whilst effort will be made to ensure there is as close to a 'like for like' replacement of their homes, there are clearly going to be some residents that will not get what they had before.</li> <li>▪ All residents will be suitably housed. In implementing this some residents may lose amenity that they currently have but would not be entitled to under the current policy</li> <li>▪ Gardens are a point of concern, as may be the location within the new development and the proximity to their previous neighbours, all of which are concerns raised by residents that have been engaged</li> </ul>	<ul style="list-style-type: none"> <li>▪ Effort is needed to ensure that the regeneration implications do not affect certain protected characteristics disproportionately, but also and quite critically it is important that the key needs of these protected characteristics are considered in the reallocation process, and there may be need for specialist OT and support staff.</li> <li>▪ Equally those who are negotiating with leaseholders need to address the equality needs of these people and work to seek an equitable resolution to the cost of these units</li> </ul>
Transfer to new housing	Based on the allocation policy, the transfer will - wherever possible - be the new home that the resident will be moving into	<ul style="list-style-type: none"> <li>▪ New homes to high standards</li> <li>▪ Good quality homes with improved energy efficiency, design and built to lifetime homes standards.</li> <li>▪ Differential rent levels for tenants and private lets</li> <li>▪ Concerns that there may be increasing rent levels for tenants</li> </ul>	<ul style="list-style-type: none"> <li>▪ Transfers to new homes and the allocations/negotiation process needs to be set against the resident's equality needs.</li> <li>▪ Staff undertaking this work need to recognise these equality implications.</li> <li>▪ Affordability of the new homes and the offers for the relocation costs and setting up the new property will be an impact that will have greater impact on those with less disposable income than others</li> </ul>



Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Phasing	The phasing of the scheme will have impacts on residents	<ul style="list-style-type: none"> <li>▪ The development process has identified clear first phases to allow residents of future phases to move only once into new homes.</li> <li>▪ Creating opportunity to move (in a single move) residents to new properties to free up their previous unit/block to commence second and third phases of the development process.</li> <li>▪ Minimising the number of moves is part of the aims of the regeneration programme</li> </ul>	<ul style="list-style-type: none"> <li>▪ Clarity and communication of the phasing process is critical, and residents have stated their concerns, frustration and the associated stress and anxiety this causes.</li> <li>▪ Some residents may need to move more than once in the regeneration process. This needs to be mitigated where possible.</li> </ul>

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Tenants Offer	Offers set out the commitment of The Council to address the needs of tenants through the regeneration process	<ul style="list-style-type: none"> <li>▪ Transfer from secure tenant to assured lifetime tenancy.</li> <li>▪ Option to remain on your estate or to move to another Council or housing association home in Waltham Forest.</li> <li>▪ The new home meets the tenants housing needs and if applicable will meet the design requirements of people with disability.</li> <li>▪ Rent for the new properties at Avenue Road will be set in the same way as council rents are now.</li> <li>▪ Compensation for having to move. A home loss payment will be paid plus reasonable disturbance costs.</li> <li>▪ Support to enable each residents' move, with additional support if the tenant has special needs or a disability.</li> <li>▪ Provision of advice and information to help the tenant to make informed decisions about their housing.</li> <li>▪ Involvement in the design of the new homes and the estate, and influence decisions around the phasing of building new homes and the construction work</li> </ul>	<ul style="list-style-type: none"> <li>▪ Whilst these offers seem to be equality neutral; they may have slightly different impacts for people with different equality characteristics.</li> <li>▪ Many of the potential impacts will become visible once residents of all tenures are in detailed discussions with Waltham Forest teams about their own personal circumstances including financial, physical and social as they explore the options available to them.</li> <li>▪ Suitable mitigation strategies need to be determined for equality impacts that arise once the detailed discussions are underway.</li> </ul>

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Leaseholder offer	Offers set out the commitment of The Council to address the needs of Leaseholders	<ul style="list-style-type: none"> <li>▪ The CPO process forces leaseholders to have to sell but they have options to purchase an alternative unit or enter a shared ownership/equity arrangement on the estate.</li> <li>▪ Cost impact for those retired</li> <li>▪ Cost impact for those with low disposable incomes</li> <li>▪ Home loss payments impact on those who have divorced or separated.</li> <li>▪ Focus on home modifications for people with disabilities.</li> <li>▪ Focus of language and understanding the deal and the negotiations associated with it.</li> <li>▪ Difficulties experienced by families that have older children.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Some leaseholders, due to their circumstances may experience different degrees of difficulty through the regeneration proposals, especially if they speak English as a second language.</li> <li>▪ The key equality implications relate to older people, particularly those who are no longer earning, this may place a burden of financial hardships on those needing to raise further mortgage.</li> <li>▪ Some burden may arise from households where their married status has changed since the property has been purchased and this may cause legal costs to clarify ownership and to agree the way forward for that household</li> </ul>

## Equality Impact analysis in summary

### Avenue Road Estate

**Equality impact analysis of each Protected characteristics and local equality characteristics assessing Impact in terms of positive, negative, positive and negative, none, or unknown**

#### Race: EQIA Finding: None

##### Context:

- 6.11 Waltham Forest has one of the highest Ethnic minority populations in the country (64% in 2011 compared to 20% in England in 2011). The borough has an Asian British population of 21% compared to England at 8%, A Black, African/Caribbean/Black British population of 17% compared to England at 3% and a 4.1% other ethnic group compared to England at 1% and a mixed ethnic group of 5.3% compared to 2% in England. Cathall has a higher level again (78% Ethnic Minority). The BAME population of the Borough is 47.9% and the BAME population of Cathall is 61%.

##### Race profile of the estate

- 6.12 Based on the HNA research carried out the Race Profile of the estate, the Ethnic Minority profile of respondents for the whole estate is 84% and the BAME profile is 62%. Clearly the non-White British population is high and hence the racial profile of the estate shows significant levels of diversity.
- 6.13 Based on the recently completed EQIA household survey the Ethnic Minority proportion of respondents was 90.5% and the BAME proportion of respondents was 70.4%. This show an even higher level of racial diversity on the estate.

##### Assessment

- 6.14 The positive regeneration impacts for this group relate to the same impacts that secure a successful regeneration of the estate. It is Waltham Forest's plans to ensure that houses will be available to all communities in the same way and thus fulfilling their commitment to the Equality Act 2010.
- 6.15 The diversity of the estate is significant. Indeed, there is more racial diversity on the estate than in the local ward and in the borough. Nonetheless the critical factor is the need to enable those wanting to stay on the estate to do so and to work to ensure that the development process and the allocation of new properties is consistent and fair, and not influenced by someone's racial make-up.

- 6.16 From the evidence gathered to date it seems clear that if the regeneration process is equally applied to all residents and leaseholders irrespective of their race then within the scheme itself there are no stated negative impacts from a race equality perspective. The regeneration plans are therefore equality neutral from a race equality perspective.
- 6.17 Nonetheless there is a real need for the regeneration programme to take account of the diverse racial and cultural needs residents throughout the regeneration process.
- 6.18 It should be noted that there will be other protected characteristics where negative impacts will be felt, which will be proportionally higher for BAME groups given the estate's diversity.

### **Gender: EQIA Finding: None**

#### **Context**

- 6.19 Waltham Forest's gender split is 50% female and 50% male, the split in Waltham Forest's housing applicants is 66% female and 34% male.
- 6.20 Single women applying for housing are more likely to have dependent children and therefore require family-sized homes, whilst men applying for housing more likely to require studio or 1-bedroom homes. The gender split therefore correlates to the profile of different property sizes.

#### **Gender profile of the estate is a marginal majority of women.**

- 6.21 Gender profile of the estate (HNA): showed 69% female respondents and 31% male respondents.
- 6.22 The gender profile from the recently completed EQIA household survey showed 46% male and 54% female residents. Nb this survey undertook to assess the profile of all household members and not just the respondent.
- 6.23 Additionally, the EQIA household survey asked if respondents would describe their household as a household managed by a single parent. This highlighted 56 households (33.9%) that felt their household was managed by a single parent.

#### **Assessment**

- 6.24 There is a suggestion from the HNA survey that many households were single parent families. Indeed, it could be that the vast majority of these are households

headed up by women. In the EqIA survey 33.9% of households were headed up by a single parent and of these 91% (51) were female and 9% (5) were male.

- 6.25 Most households and hence most genders demonstrated a strong sense that the demolition and redevelopment option and the provision of new homes would be a strong positive of the regeneration process.
- 6.26 A critical factor is the need to enable those wanting to stay on the estate to do so and to work to ensure that the allocation of new units to residents is consistent and fair and not influenced by someone's gender.
- 6.27 Clearly the estate has a high proportion of women and girls living on the site. Moreover, there is about 1/3 of households managed by a single parent, 91% of whom are female. Gender is relevant to this regeneration scheme, although it seems unlikely in the evidence reviewed that the scheme itself negatively impact on women per se. At this point from the evidence available there are no stated negative impacts from a gender perspective and plans are most likely is applied equally to be positive from a gender perspective.

#### **Gender re-assignment: EQIA Finding: None**

##### **Context:**

- 6.28 Borough wide housing data for people going through or having gone through a transition is not available. Applicants are given priority according to the scheme criteria, not gender. Services are customer-focused and there is discretion within the proposed scheme to respond to individual circumstances if necessary.

##### **Gender re-assignment profile of the estate**

- 6.29 Based on the HNA research carried out the Gender Reassignment Profile of the estate is unknown. Within the EQIA household survey there were no respondents that stated they or members of their households were transgender or undertaking a gender reassignment transition process.

##### **Assessment**

There is no data to confirm residents that were described as having undergone or are undergoing a gender transition/reassignment process.

- 6.30 At this point in the regeneration process there are no stated negative impacts from a gender re-assignment perspective and the estate's regeneration plans are

seemingly positive to all residents and hence also from a gender re-assignment perspective.

## **Disability: EQIA Finding: Positive & Negative**

### **Context:**

- 6.31 At the time of the 2011 census 20% of Waltham Forest's working age population classed themselves as have a disability that affected their day-to-day activities either a lot or a little. Waltham Forest's Housing allocation policy gives higher priority to those who are severely overcrowded or have urgent need to move due to health or disability reasons. The regeneration scheme is committed to supporting residents with a disability and this will include a medical and OT assessments to inform adaptations needed for units prior to residents with needs that are moving in.

### **Disability profile of the estate**

- 6.32 Based on the **HNA research** carried out, the Disability Profile of the estate shows, 6% of respondents have a disability, 94% didn't.
- 6.33 The EQIA Household survey identified that 11% of household that responded stated that there were household members with a disability. This came to 54 people.
- 6.34 Other supplementary question regarding disability were asked including, a more detailed response of the types of perceived special needs of residents which drew out 77 responses (NB this may in some cases reflect residents with more than one of these health/care needs).

Please could you say which of the following health/care needs members of your household may have.	Total	%
Frail elderly	4	5%
Physical disability	29	38%
Learning disability	1	1%
Mental health problem	9	12%
Vulnerable young people and children/leaving care	0	0%
Sensory Disability	3	4%
Life limiting health condition	18	23%
Severe long-term illness	12	16%
Other	1	1%
Total	77	100%

- 6.35 What is clear from this table is that there are a range of residents who have specific health/care needs living on the estate. This is further exemplified in another question which asked people about specific health conditions that they or members of their households have. In this case 94 responses were given. (NB this may in some cases reflect residents with more than one of these conditions).

Which of the following health needs applies to members of your household? Self-Declared Health Needs?	Frequency	%
Musculoskeletal arms, hands	3	3.2%
Musculoskeletal legs, feet	12	12.8%
Musculoskeletal back, neck	11	11.7%
Difficulties in seeing	2	2.1%
Difficulties in hearing	1	1.1%
Speech impediment	1	1.1%
Skin condition, allergies		0.0%
Chest, breathing problems	10	10.6%
Heart, blood pressure, circulatory condition	10	10.6%
Stomach, liver, kidney, digestion	2	2.1%
Diabetes	6	6.4%
Depression, anxiety	4	4.3%
Epilepsy	6	6.4%
Learning difficulties	2	2.1%
Mental health, phobias, panic attacks	7	7.4%
Progressive illness/disease	12	12.8%
Other please define	5	5.3%
Total	94	100.0%



- 6.36 This table suggests that there is a range of health conditions experienced by residents on the estate. It is likely that many of these will be impacted on by the regeneration process.
- 6.37 A question was asked about resident with a Blue Badge disabled parking permit. If the 169 households engaged in this survey 7 (4.2%) stated they had a blue badge.
- 6.38 Our assessment suggests that there are some equality impacts that are both negative and positive for people with disabilities. These include:

**Potential negative impacts:**

- The disturbance of moving may have a disproportionately greater impact on disabled residents.
- Quality of life will be affected by the construction, particularly if their disability is accompanied with any respiratory condition.
- Sensory impairment will also be affected, particularly those that are affected by loud noise or construction machinery.
- Some households with a disability and nervous system health related condition are likely to experience significant negative impact through the implication of construction activity, particularly noise.
- New physical layout of the estates will be challenging to those with visual impairment, there were 3 households with a resident with a sensory impairment and 2 stated they had seeing difficulties.
- It would be important to move people with a disability only once in the process and critically into homes with adaptations already in place.
- People with learning difficulties, subject to the intensity of their condition, will also be affected by the construction process and may need separate forms of communication and engagement to enable their understanding of the reality of their situation.

**Potential Positive Impacts**

- All new homes will be built to Part M of the Building regulations (equivalent to lifetime homes standards).
- Waltham Forest are prepared to support relevant adaptations and equipment built in where recommended by assessment.
- Access and egress from the new homes will be supported with lifts and dedicated disabled parking supported by secure design principles.
- Greater choice to disabled people who cannot achieve independent living due to lack of suitable housing in the borough's housing stock.

- Application of Considerate Contractor requirements to minimise negative impact during construction period.

## Age: EQIA Finding: Positive & Negative

### Context:

- 6.39 Waltham Forest is a relatively young borough with a high percentage of residents in the 0 to 19 age categories (35% of the population).

### Age profile of the estate

- 6.40 From the responses received the EQIA Household survey, the profile of under 16's on the whole estate is 32.3%. Correspondingly the over 65 population on the estate was 5.6%. This suggests a large proportion of children but a much lower proportion of older people.
- 6.41 Across the estate 6% of tenant respondents are over 65 and no leaseholder respondents are over 65, suggesting all the over 65s in the sample were council tenants.

### Assessment

- 6.42 The assessment suggests that there are some equality impacts that are both negative and positive for different age groups particularly children and young people, and older people.

### Potential negative impacts:

- Older people have generally been living on the estate for a longer period than other residents and will be more settled and would require support when moving.
- For people of all ages quality of life will be affected by the construction and decant process, particularly older people if they are on their own, frail and vulnerable. Evidence from the health questions stated 4 frail and elderly residents.
- There is also likely to be disruption to school life particularly for young people trying to study at home during the construction and decant period itself.
- There may be an impact on childcare arrangements. particularly if there are informal arrangements with other residents who may be moving off the estate. Access to childcare, nurseries, creches and schools will need to be reviewed to minimise any disruption. This is particularly the case for any child a place at a local nursery.

### **Specific issues for older Leaseholders**

- Older leaseholders may find it difficult to raise any additional mortgage on their new properties. The Shared Equity and Shared Ownership options seek to address this but this still may cause older leaseholders to feel their aspirations of owning 100% of their own home is being undermined, although they will own an asset of the same value as that previously owned.
- All these aspects will cause leaseholders, particularly older leaseholders greater levels of anxiety, stress, even depression and possibly ill health.
- There were no leaseholders over 65 in the sample from the EQIA Household survey but there were 8 that were aged between 45 and 54.

### **Potential Positive Impacts**

- All new homes will be built to Part M of the Building regulations (equivalent to lifetime homes standards).
- Specific properties are being built for disabled people and will have relevant adaptations and equipment as per medical/OT assessment; many of these disabled people are also older people and this would benefit this protected characteristic too.
- The supply of additional homes built to Part M of the Building regulations (equivalent to lifetime homes standards) will benefit the older population on the estate and of the borough.
- The resident offer provides options to maintain both tenants and residential leaseholders to relocate into new homes on the estate.
- Application of Considerate Contractor requirements to minimise negative impact during construction period.
- Quality and design of provision for future amenity space will be positive for young people providing a variety of play opportunities to a wider age range.

## Sexual Orientation: EQIA Finding: **None**

### **Context:**

- 6.43 There is only a limited amount of information on sexual orientation available. Guidance from the Equality and Human Rights Commission states to collect it where relevant and sexual orientation is not relevant to much of housing services, with the exception of tackling harassment.

### **Sexual orientation profile of the estate:**

- 6.44 The profile of sexual orientation showed that there were no Lesbian, Gay or Bi-sexual residents from the findings of the EQIA Household survey. This seems odd and may reflect the reticence of residents to complete this part of the survey.

### **Assessment:**

- 6.45 However, from a regeneration perspective and the options for tenants and leaseholders and private residents there is unlikely to be any discernible negative impacts identified for LGBTQ people.
- 6.46 On a positive note the estate will be secure by design and this should afford greater levels of safety. The design of the new homes and spaces will create a place that is secure by design and can be policed more easily. The public realm will offer a greater level of security to all, which may be relevant to LGBTQ residents who are more likely to be subject to hate crime and harassment.

## Religion and belief: EQIA Finding: **None**

### **Context:**

- 6.47 Data for religion in Waltham Forest is sourced from the 2011 Census. This shows based on the 2011 census, 75% of the borough's population had a stated religion. According to the 2011 Census the borough has 48.4% of its population stating their religion to be Christian, Muslim 21.9%, Hindu 2.3%, Jewish 0.5%, Sikh 0.5%, Buddhist 0.8% and other 0.4%. Some 18% of residents claimed no religion whilst 7.3% did not state an answer.
- 6.48 The HNA stated that of the 72% were Christian, 20% Muslim, 4% Hindu, 2% Buddhist and 1% Sikh. Only 2% stated they had no religion and 1% preferred not to say.
- 6.49 The EQIA Household survey identified 83% of the population to have a stated religion. Of these 38.5% were Christian, 36.4% were Muslim, 16.4% had no religion, 3.5% preferred not to say and 2.5% were Hindu.

**Assessment:**

- 6.50 There were no discernible negative impacts, raised by residents in the engagement process, which were seen to be a result of their religion and beliefs. Indeed, there are few aspects of regeneration that would be negative on the grounds of religion or faith unless residents were prevented from practicing their religion/faith.
- 6.51 To this end, the council will consider people's ability to practice their faith through the different stages of the project. The rehousing team should ask people about their use of places of worship to see the extent to which disruption to their lives can be minimised.

**Pregnancy and maternity: EQIA Finding: Positive and negative****Context:**

- 6.52 Pregnancy provides new family formation and a need to secure independent self-contained housing. 5.3% of people on Waltham Forest's current housing waiting list were women in maternity.
- 6.53 The EQIA Household survey identified 6 households (3%) where there is a person who is either pregnant or undergoing a period of post birth care or maternity/paternity leave.
- 6.54 There is potential for both negative and positive impacts for expectant mothers and those who are in their first 6 months of maternity. As can be seen, there are likely to be greater positive impacts through the design that aim to mitigate any negative impacts.

## Assessment:

### Negative impacts

- There will be disruption during the construction period and the council will provide access routes through the estate during this time. This may negatively impact on pregnant mothers or families with new-born children.
- Efforts to address this disruption will be universal to the whole population of the estate.

### Positive Impacts

- New housing will have greater accessibility and will support parents of newborn babies or mothers in periods of pregnancy and maternity.
- The layout of the new homes will consider access, lift and stairs so that larger family homes are either accessible by lift or not above four storeys high without a lift. The design of the public realm will consider accessibility for people moving around the estate, pushing buggies etc.
- There is no specific **Mitigation activity** required, although Waltham Forest may wish to consider that affected tenants who are pregnant at the time of re-housing would be considered for a larger property as per the allocations policy.

## Marriage & Civil Partnership: EQIA Finding: **None**

### Context:

- 6.55 The Council recognises gay relationships and civil partnerships with respect to household composition. There are no known negative impacts on these groups.
- 6.56 The EQIA Household survey of those over 16 years of age identified that 42% have never married or registered a same sex civil partnership, 37% were married, 5% separated, 7% divorced, 5% widowed and 4% preferred to say.

### Assessment

- 6.57 It is worth noting that in some of these cases the legal status does have an impact when tenure and leaseholder status come into play. Moreover, some widowed people may have higher levels of vulnerability in a regeneration environment.
- 6.58 Support and advice may be required for tenants and leaseholders who have undergone either a divorce or bereavement to enable them to adequately

understand the implication of the regeneration process on their housing ownership and tenure rights.

- 6.59 Nonetheless there are no discernible variations in the marriage/civil partnership profile of those in the development area, and those respondents that are tenants, leaseholders and private tenants of non-resident leaseholders/temporary accommodation licensees.

## **Socio Economic Inequality: EQIA Finding: Positive and negative**

### **Context:**

- 6.60 From an economic activity perspective, the EQIA Household survey of those over 16 identified that, 26% of household members are employed full time, 15% part time employed, 3% self-employed, 32% in Full time education (we believe this included some children under 16), 7% unemployed, 3% permanently sick/disabled, 6% retired, 6% looking after the home.
- 6.61 56% stated that there was someone in their household on a means tested benefit, 39% stated they did not, 3% were not sure and 2% preferred not to say.
- 6.62 With regards to household income, 98 households (58% of the sample) preferred not to engage in this question. Nonetheless of the remaining, 42%, 60 (35.5%) stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty.
- 6.63 From a socio-economic inequality perspective, it is clear that there are some resident households that a living on the poverty line and some (56%) who are on means tested benefit. It seems apparent that the socio-economic inequality of those living on the Avenue Road estate is high and potentially higher than that of Cathall ward where the average household income is £26,900 (this being 25% lower than London average).

### **Assessment**

- 6.64 The regeneration programme will have impacts on residents, tenants and leaseholders alike, which might incur greater costs and hence become a burden for those residents unable to afford the associated costs, for example there may be a consequential rise in the value of the new properties in terms of real value and cost of living. Many of these direct costs are being addressed including legal costs, disturbance and moving costs. Nonetheless there may be specific protected characteristics that may have a disproportionately higher level of impact. The points below highlight some of these potential negative impacts.

### **Negative impacts**

- Perception of increasing cost and affordability of living on the new development.
- Particularly focusing on the cost impacts for older people and those financially vulnerable.
- Higher proportion of estate residents on means tested benefit.
- Older people with less earning capability.
- Non-resident leaseholders are not provided with new properties and currently no properties are for private sale. Non-residents are awarded 7.5% above market value as outlined in the leaseholders offer. Resident leaseholders are offered options within the leaseholders offer to stay on the estate in a shared ownership arrangement or choose to leave if they wish.
- Some private tenants of non-resident leaseholders may be on benefits and some may be working, this will make a difference to their future housing options.
- For resident leaseholders 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, however Shared Equity will be offered to address this. Leaseholders may need support with financial advice to ensure they are best placed to make the right decision for themselves.
- It is recognised that there may be some leaseholders who may have remortgaged their homes, spent the money from equity release and may also be unemployed. In these circumstances, it may be difficult for these leaseholders to remain on the estate. The leaseholder offer does cater for these circumstances, where the council will work with individuals to explore all available options.

### **Positive impacts**

- 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, which this regeneration programme - to a limited extent - seeks to achieve.
- Regeneration of the estate and increasing supply of council housing stock will benefit the increasing number of Waltham Forest's residents who cannot afford to buy or rent in the private sector.
- Improved energy efficiency of homes and use of sustainable technologies should lead to lower running costs.



**Context:**

- 6.65 The impact of the regeneration proposals on people who do not speak English as a primary language is unknown.
- 6.66 Alternative formats of the proposals are available upon request (such as audible copies for blind people) as well as being made available in different languages. At every stage of the regeneration, the council has sought to use plain English and avoid jargon.
- 6.67 The only data from the HNA regarding language stated that English is spoken by 61.7% of responding households. Other languages include:

- |            |              |              |
|------------|--------------|--------------|
| • Albanian | • Lithuanian | • Swahili    |
| • Amharic  | • Persian    | • Tamil      |
| • Arab     | • Polish     | • Tigrayan   |
| • French   | • Portuguese | • Turkish    |
| • Iranian  | • Romanian   | • Twi (Akan) |
| • Latvian  | • Somali     | • Urdu       |
| • Lingala  | • Spanish    | • Yoruba     |

- 6.68 Households, who had stated that English was not spoken in their home, were asked to rate their spoken and written English out of five (with 5 being high). The average responses were strong with 4.79 out of 5 for spoken English and 4.76 out of 5 for written English. There were some households that had a limited level of written English (6 households) and spoken English (5 households). These will need support through the regeneration process.

**Assessment**

- 6.69 Language, on its own, is not likely to have any significant equality impacts from the regeneration programme itself other than the ability to communicate and understand the implications of the regeneration process as it applies to different households. Most households have someone who does speak English although English is, in many cases, a second language in the homes.
- 6.70 Indeed, of those residents who stated that their main household language was not English, their average ranking of these household's spoken and written English were strong with 4.79 out of 5 for spoken English and 4.76 out of 5 for written English. Nonetheless, there were some (5-6) households that had a limited level of written and spoken English.

### Negative impacts

- Awareness of the proposals and language capability to negotiate the right outcome for tenants and connected to issues of mental health, learning disability and age.

### Positive Impacts

- Robust engagement with residents through the scheme design process via the Avenue Road Resident Regeneration Project Group (RRPG), newsletters, events, visits to other schemes, presentations.
- Input from residents into the scheme proposals and design and eventual planning submission.

### Mitigation Activity

- It is critical that residents who do have poor written and or spoken English have support through the regeneration with translation and interpretation where needed.

## Health: EQIA Finding: Positive and negative

### Context:

- 6.71 Health and housing are intricately linked. Poor quality housing and homelessness can affect a person's health and wellbeing. As noted above with respect to disability, the reduction in priority given to homelessness leads to a corresponding increase in priority to those who need to move due to illness or disability.
- 6.72 Supplementary questions regarding disability were asked including, a more detailed response of the types of perceived special needs of residents which drew out 77 responses (NB this may in some cases reflect residents with more than one of these health/care needs).

Please could you say which of the following health/care needs members of your household may have.	Total	%
Frail elderly	4	5%
Physical disability	29	38%
Learning disability	1	1%
Mental health problem	9	12%
Vulnerable young people and children/leaving care	0	0%
Sensory Disability	3	4%
Life limiting health condition	18	23%
Severe long-term illness	12	16%

Please could you say which of the following health/care needs members of your household may have.	Total	%
Other	1	1%
Total	77	100%

- 6.73 What is clear from this table is that there are a range of residents who have specific health/care needs living on the estate. This is further exemplified in another question which asked people about specific health conditions that they or members of their households have. In this case 94 responses were given. (NB this may in some cases reflect residents with more than one of these conditions).

Which of the following health needs applies to members of your household? Self-Declared Health Needs?	Frequency	%
Musculoskeletal arms, hands	3	3.2%
Musculoskeletal legs, feet	12	12.8%
Musculoskeletal back, neck	11	11.7%
Difficulties in seeing	2	2.1%
Difficulties in hearing	1	1.1%
Speech impediment	1	1.1%
Skin condition, allergies		0.0%
Chest, breathing problems	10	10.6%
Heart, blood pressure, circulatory condition	10	10.6%
Stomach, liver, kidney, digestion	2	2.1%
Diabetes	6	6.4%
Depression, anxiety	4	4.3%
Epilepsy	6	6.4%
Learning difficulties	2	2.1%
Mental health, phobias, panic attacks	7	7.4%
Progressive illness/disease	12	12.8%
Other please define	5	5.3%
Total	94	100.0%

- 6.74 This table suggests that there is a range of health conditions experienced by residents on the estate. It is likely that many of these will be impacted on by the regeneration process.

### Assessment

- 6.75 The regeneration programme is likely to have both positive and negative implications for people's health and wellbeing. This will affect households equally across the estate.

### **Negative impacts**

- Negative health and wellbeing outcomes would be associated with disruptions to existing households on the estate and the inevitable mental stress this causes.
- Impacts in the short-term associated with the disruption of moving home and uncertainty about the future stress, anxiety and depression are issues residents have stated that will impact negatively on their health.
- Construction environment can exacerbate existing health conditions and may for some be the cause of new health conditions.
- Relatively high levels of Limiting Long Term Illness and Long-term conditions present on the estate.
- Poor Health may be impacted because of the development environment through noise affecting nervous conditions, breathing and circulatory disease, asthma etc.
- The interview team uncovered those residents with self-declared health needs describing ailments/pain associated with their legs, feet, neck and backs suggesting that that would be a need to address physical mobility/access as priorities in the regeneration design of walkways and pathways.

### **Positive impacts**

- Longer term, positive impacts can be expected from providing much better-quality homes and reducing overcrowding.
- 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.
- Application of Considerate Contractor requirements to minimise negative impact during construction period.
- Lifetime homes standards and modern-day building regulations will improve accessibility throughout the estate from homes to amenity space.

## **Human Rights Impacts**

### **Context**

6.76 The issues raised in the 2017 CPO challenge in Southwark's Aylesbury estate; where the Secretary of State cited negative Human Rights Act impacts (i.e. where leaseholders are forced to move and/or face financial hardship) need to be considered. This decision raises a dilemma for councils as developers seeking CPO

powers and particularly the decant demands of estate regeneration and the limitations of market value assessments that are capped by Government guidelines.

- 6.77 On 21st April 2017, the then Secretary of State for Communities and Local Government, Mr. Javid, notified Southwark Council that he would consent to judgment and ask the court to quash his decision not to confirm the Compulsory Purchase Order for the remaining properties in Phase 1 of the regeneration.
- 6.78 A Consent Order was agreed with the Secretary of State's lawyers and was forwarded to the interested parties (Aylesbury leaseholders, their legal representatives and the 35% Campaign) for their agreement. The court decided to quash the decision, and in accordance with the terms of the Consent Order the Secretary of State arranged a new public inquiry to decide the merits of the Compulsory Purchase Order.
- 6.79 Human rights are the basic rights and freedoms that belong to every person in the world, from birth until death. The Human Rights Act came into force on 2nd October 2000 and incorporates into UK law certain rights and freedoms set out in the European Convention on Human Rights.
- 6.80 The articles of the Human Rights Act are set out below:
- Article 1 States one must have the rights of the convention in their own jurisdiction. This includes peaceful enjoyment of possession and general protection of property rights.
  - Article 2 Right to life
  - Article 3 Freedom from torture and inhuman or degrading treatment
  - Article 4 Freedom from slavery and forced labour.
  - Article 5 Right to liberty and security
  - Article 6 Right to a fair trial
  - Article 7 No punishment without law
  - Article 8 Respect for your private and family life, home and correspondence
  - Article 9 Freedom of thought, belief and religion
  - Article 10 Freedom of expression
  - Article 11 Freedom of assembly and association
  - Article 12 Right to marry and start a family.
  - Article 13 Right to that access effective remedy if people's rights are violated.
  - Article 14 Protection from discrimination in respect of these rights and freedoms
  - Protocol 1, Article 1 Right to peaceful enjoyment of your property
  - Protocol 1, Article 2 Right to education
  - Protocol 1, Article 3 Right to participate in free elections.
  - Protocol 13, Article 1 Abolition of the death penalty

- 6.81 There are four Human Rights Articles that are most applicable to social housing/regeneration. The Equality and Human Rights Commission in its Guidance for Social Housing states that these Articles are 1 (Protocol 1), 6, 8 and 14. We enclose some additional information about these four below:

**Article 1: Peaceful enjoyment of possession and general protection of property rights.**

- 6.82 This imposes an obligation on the State not to:
- Interfere with peaceful enjoyment of property.
  - Deprive a person of their possessions; or
  - Subject a person's possession to control
- 6.83 However, there will be no violation of this right if such interference, deprivation or control is carried out lawfully and in the public interest.

**Article 6: A Right to a Fair Trial - is an absolute right.**

- 6.84 Article 6 is an absolute right. For example, a person who is subject to a decision-making process in relation to a possible eviction should have access to an interpreter, if necessary. Decisions should be given with reasons. Article 6 is likely to be particularly relevant in review or appeal proceedings, which would determine a tenant's rights.

**Article 8: Which includes the right to respect for a home.**

- 6.85 Does not normally give anyone a right to a home or to any particular form of accommodation; it contains a right to respect for a home that a person already has.
- Does not contain an absolute right. Even accommodation that has been a person's home for all of their life can be taken away in the circumstances provided for by the Article itself. The Article stipulates that the right to 'respect' can be qualified by lawful action taken by a public authority which is in pursuit of a prescribed legitimate aim, is necessary, and is proportionately taken, and
  - Only applies to something properly called a 'home'. That term may not embrace very short-term accommodation such as a hotel room or transient accommodation such as an unauthorised encampment onto which a traveller has recently moved.

**Article 14: Prohibition of discrimination - is an absolute right.**

- 6.86 For example, the Human Rights Act means that a gay couple has to be treated in the same ways as a heterosexual couple in relation to the right to succeed to a

tenancy. A difference in treatment can only be justified if there is a good reason for the treatment and if it is proportionate in the light of that reason. Article 14 does not list the 'legitimate reasons' that would justify a difference in treatment.

6.87 The purpose of providing the Equality & Human Rights Guidance for this report is to recognise that the quality of social housing provision makes a huge impact on the well-being of tenants and the housing communities which they are an integral part of. Human rights are about treating people with dignity and respect. These values should be basic standards for any public service. Human rights have special significance in relation to social housing.

6.88 Lisa Harker, in her book called '*Chance of a Lifetime*', written for Shelter in September 2006, on page 8 says:

"Taking human rights into account when designing and delivering your services is also good for business. It is likely to improve the quality of your service and improve your organisation's reputation. Making sure you comply with human rights can also improve your organisation's performance during inspection and regulation".

6.89 It is the view of this report that LB Waltham Forest benefit enormously by complying with the Human Rights Act by:

- Minimising customer complaints
- Achieving best practice from the relevant regulator
- Minimising legal proceedings initiated by your customers and partners.
- Being held up as a beacon employer by the Equality and Human Rights Commission.

6.90 We would also suggest that the 'specific guidance and recommendation' supplied by the Equality & Human Rights Commission in their Guidance for Social Housing Providers<sup>17</sup>, is followed, for example:

- Recognising that poor housing can affect a person's health, work, education, relationships and life chances, which is why the right to respect for a person's home is in the Human Rights Act. By providing social housing in a way that is compatible with human rights laws, your organisation can make a positive difference to people's lives.
- The paper sets out specific areas where Articles 6, 8 and 14 pay out:
- Allocation of housing
- The terms of tenancy agreements
- Housing conditions: Repairs and maintenance

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<sup>17</sup> <https://www.equalityhumanrights.com/en/advice-and-guidance/guidance-social-housing-providers>

- Aids and adaptations
- Environmental impact
- Rent arrears and other breaches of tenancy conditions.
- Anti-social behaviour
- Relationship breakdown
- Death and succession
- Buying the home
- Specialist housing accommodation and specialist housing services
- Long leaseholders
- Change of landlord
- Termination of tenancy and eviction
- The paper provides various examples and cases where different examples are quoted against each of the topics listed above.



## **7 Summary of Key Findings**

- 7.1 The regeneration of Avenue Road Estate is a major undertaking, which will have a range of impacts that will apply to all the people living on the estate. In cases these regeneration impacts will have a potentially greater impact on certain equality groups. The protected characteristics of disability, age (particularly older and younger people), health, socio-economic inequality and language have been highlighted throughout the EQIA as having the greatest significance of impact.
- 7.2 It is clear that the Council and its housing regeneration team have been working to address these equality impacts and have sought to build in safeguards and mitigation activity in the programmes they have designed. Nonetheless in conclusion, the key equality findings which are important to note through this EQIA are described below:

### **Generic mitigation activity**

- Identification of appropriate actions to mitigate identified impacts.
- An EQIA review programme to be adopted alongside predicted key milestones in the project lifetime.
- Equality training/briefings for staff undertaking one-to-one liaison with residents currently on, moving within, and onto the new estate.
- Translation and interpretation or offer of translations and interpretation for all residents who do not confidently speak or write English.

### **Disability Mitigation activity**

- Operationally it would make sense to have early engagement with those residents and households that have a member with a stated disability. This is particularly relevant to the households who identified sensory impairments and of much importance considering the challenges associated with moving disabled families. Consulting then engaging with disabled residents before, during and after to check effects, outcomes and results is a requirement under the Equality Act 2010.
- In some cases, residents may need to have suitable and affordable alternative accommodation provided during the regeneration period where the impact of that work might negatively impact on their health and wellbeing, and where they would like to return to the estate.
- In terms of formal adaptations for disability - some engaged have felt that they have previously sought social services assessment for adaptations and equipment. In some cases, these assessments have yet to be carried out and this would suggest a need to ensure that Adult Social Care and Children's Services are engaged to support this process. Assurances are

required and resources put in place to ensure that these activities are carried out in a timely manner as part of the regeneration process.

- Retainment of dedicated regeneration based occupational therapist / social support worker may be needed to assess the disability needs of residents.
- If leaseholders are seeking to leave the estate, referrals onto other Social Care Services should be made to mitigate any possible negative impact that disabled people may experience.
- Support with adaptations in units on the new estate, designed specifically for the disabled person's needs should be a prerequisite, together with careful consideration about location of homes through the allocation process.
- Disability grants reviewed and accessed for residents in specific need, to support the funding of adaptations.

### **Age Mitigation activity**

#### Children and Young People

- Secure amenity space both during and after the regeneration programme.
- C&YP should be engaged in the design of these future facilities.

#### Older People

- Ensure that tenants, particularly those who are older, only move once into their new homes.
- Support for and recognition of the financial restraints that many older people will experience; with an aim to support them to come to terms with the transition to a new home (if a tenant or leaseholder is staying on the estate) and to support older people (tenants and leaseholders) who are moving away from the estate.
- To support older leaseholders to access the right options for them and to ensure that their support is maintained through to the conclusion of the development process and the allocation of new homes.
- To work with older people from the BAME community to ensure that they are fully supported in understanding the implications of the scheme and to ensure that they have any language needs addressed.
- Social services support for any adaptations to new homes for older people, particularly those with a disability / health conditions as part of the decant process.
- Ensure that the shared ownership option for older people will allow them to transfer the equity of their estate, should they die, to their relatives/spouses.

#### Socio-Economic Mitigation issues

- More information and support are required to help leaseholders (especially resident leaseholders) understand the options available to them and to

provide them with sufficient support and advice to help them make the best choice.

- The regeneration programme will have impacts on residents, tenants and leaseholders alike, which might incur greater costs and hence become a burden for those residents unable to afford these additional costs. The council will need to monitor the potential for a consequential rise in the costs of the new properties both in term of property values and in terms of rent and living costs.
- The Council will need to carefully monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity and to provide sufficient support and advice to ensure that they are not negatively impacted.
- Consideration needs to be given on how to make sure that failure to renew a mortgage does not automatically lead to a loss of leaseholder status.

### **Language Mitigation**

- Ensure the availability of translation and interpretation services for residents and leaseholders when specific tenant engagement and leaseholder negotiation is being undertaken.

### **Health Mitigation issues**

- Needs Assessments will need to be carried out where required and dedicated rehousing support provided by the council, including access to mental health support.
- Serious conditions should be prioritised, but progressive conditions may need to be addressed as well. This information via the research that has been carried out is available to the council.
- Particular conditions that are heightened by the ramification of the development process will need to be reviewed including noise, dust, construction waste and construction traffic.
- OT Care assessment may need to be established to mitigate negative impacts.
- A more detailed strategy will be required in due course to provide suitable facilities (such as respite rooms) away from construction activity.

### **Intersectionality**

- When you analyse what different groups are saying, like the young and old, families, disabled people and more vulnerable groups are asking for: a key priority is to restore the communities that they value and that they are part of now. Rebuilding houses and people's lives must be accompanied by enrichment activities that place communities in control of designing their future communities with all the values and commonality

they shared in the past. This needs to be an explicit part of the physical regeneration strategy.

- Whilst it is desirable to help the local community stay together and improve coherence, where there are vulnerable residents (especially elderly and disabled) who wish to use the opportunity to move away from Waltham Forest, then it is good practice under safeguarding arrangements for the council to liaise with social services in the places to which such residents choose to move.

## **Conclusions**

- 7.3 The regeneration of the estate will have regeneration impacts for the whole community. However, specific equality impacts are likely to be concentrated through the protected characteristics of disability, age, health, socio-economic inequality and language.
- 7.4 Most significantly the implications of the regeneration on older and younger people on the estate is likely to be the most significant, both in terms of health and access to amenity provision. Cost implications of the regeneration have also been highlighted and these are mainly to do with the cost of moving from the old property and resettlement in the new home.
- 7.5 Given the absolute commitment to re-house secure tenants in new homes that meet their needs, the impact of the regeneration process will likely have greater impact on leaseholders both resident and non-resident. This will require the compulsory purchase of their properties if voluntary settlements cannot be reached. In some cases, those with less disposable income may have difficulty with maintaining their leaseholder status if they decide to stay on the estate. This has been partially addressed through the Resident Offer to leaseholders. But this needs as a minimum to be supplemented with further information and support to help leaseholders make the best choices available to them.
- 7.6 Moreover, the Council should consider how to address the housing needs of private tenants displaced by the repurchase of leaseholder properties, some of whom may be made more vulnerable and potentially homeless through the regeneration process. These groups were not picked up in the survey but the Council's records suggest that there are 3 non-resident leaseholders who are renting their properties to private tenants.
- 7.7 Whilst the Council is committed to involving residents in the design process for the new estate, this should not be assumed in itself to ensure that equalities issues are addressed. An explicit on-going process is required during design development to ensure the final form of the estate will fairly address equalities issues for all existing and future residents, including but not limited to accessibility in the urban

environment, car parking, open space (design, location and accessibility), distribution of tenure types and housing types (i.e. location of wheelchair homes), etc.

### **Positive Impacts**

7.8 There is a counterbalance to these negative impacts as the regeneration programme has many positive impacts which the majority of residents have bought into, these include:

#### **Equality specific positive impacts:**

- New and better housing that responds to the needs of a wider range of protected characteristics will be provided.
- There will be more homes designed to Part M of Building Regulations (lifetime homes or equivalent standards) and with disability access.
- Improving the housing stock will provide more homes for more people, to higher standards and in turn improve the quality of accommodation for residents currently on the estate.
- Waltham Forest's environmental commitment will secure an approach that will provide better insulated homes and use sustainable forms of energy such as centralized heating and hot water, and photovoltaics to generate electricity. This should mean lower running costs and reduce fuel poverty.
- There will be an expansion of housing offer (with some additional units) for those on the waiting list, many of whom come from protected characteristics.
- The needs of older people and those with disabilities will be enhanced by the development of properties built to Part M of Building Regulations (lifetime homes or equivalent standards) and by improving the accessibility of the local urban environment.
- Families will have units that are in much better condition than they are currently and have better access to amenity and play space.

## **8 Mitigation Recommendations**

### **Recommended Actions**

8.1 Set out below are the key recommended mitigation actions as identified by EQIA.

#### **Generic Actions**

- Establish support structures/resources to enable leaseholders to get appropriate financial advice.
- Run EQIA briefing sessions, review training needs, and establish training where appropriate for housing and regeneration staff.
- Establish training where appropriate Equality training / briefing / workshops for housing regeneration liaising teams.
- Employ/identify dedicated Social Support /Occupational Health practitioners to work with the regeneration team and ensure specialisms in including sensory impairments where appropriate.

#### **Disability Mitigation Actions**

- Arrange relevant Occupational Therapy/Social Services assessments for residents where identified.
- Liaison with social care teams in other authorities where residents are seeking to move to.
- Highlight residents with complex disability and/or health needs and provide services accordingly.
- Support with adaptations in new units on the new estate.
- Commission handyman service to support additional fixtures and fittings.
- Ensure reasonable adaptations are implemented within the new homes in line with OT assessments in line with the Residents Offer.

#### **Age Mitigation Actions**

- Engage young people in the design of the future amenity space within the new estate. Ensure existing amenity space is secure during the regeneration and construction.
- Provide opportunity for independent financial advice for any resident needing it.
- Commission handyman service to support additional fixtures and fittings.
- Support older leaseholders to access the right options.
- Ensure that the Shared Equity option for older people will allow them to transfer the equity from their property, should they die, to their relatives/spouse.

### **Socio-Economic Mitigation Actions**

- The Council to monitor the potential for a consequential rise in the costs associated with the new properties both in terms of living costs and in terms of rent/mortgages.
- Review Regeneration policy and identify ways to support private tenants made vulnerable.
- The Council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.
- Facilitate access to independent financial advisors for all residents.

### **Language Mitigation Actions**

- Make translation, interpretation and alternative format provision available when specific tenant engagement and leaseholder negotiation is being undertaken.

### **Health mitigation actions**

- Undertake health and medical assessment or OT assessments where required.

### **Intersectionality Mitigation Actions**

- Develop enrichment activities for residents of the estate designed to rebuild communities.

## 9 Action Plan

9.1 The key mitigation activity set out in section 9 below detailing when and by whom actions should be undertaken to mitigate any highlighted negative impacts of the regeneration scheme.

Mitigation Issue	Actions	Outcome	Date	Responsibility
<b>Generic Mitigation</b>				
Support Leaseholders to enable them to access appropriate independent support/advice	<ul style="list-style-type: none"> <li>Provide lists of appropriate financial advice available for leaseholders</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that leaseholders have access to appropriate financial advice</li> </ul>		
Ensure all frontline staff and contractors are briefed on the findings of the EqIA and where appropriate undertake equality training	<ul style="list-style-type: none"> <li>Run EqIA briefing sessions.</li> <li>Review training needs</li> <li>Establish training where appropriate</li> </ul>	<ul style="list-style-type: none"> <li>All front-line staff able to address and identify the priorities to equality as set out in the EqIA</li> </ul>		
Ensure staff liaising with residents understand the equality impacts of the scheme	<ul style="list-style-type: none"> <li>Equality training / briefing / workshops for housing regeneration liaising teams</li> </ul>	<ul style="list-style-type: none"> <li>Recognition and understanding of equality impacts and issues as highlighted in this EqIA.</li> </ul>		
<b>Disability Mitigation Activity</b>				
Early engagement with people with a disability on the estate between the decant team and specialist social care staff	<ul style="list-style-type: none"> <li>Arrange relevant Occupational Therapy/Social Services assessments for residents where identified.</li> <li>Where necessary consideration should be given to residents that may as a result of their disability need to be moved from the estate during the construction period.</li> </ul>	<ul style="list-style-type: none"> <li>Reasonable adjustments identified in new and future properties</li> </ul>		
Ensure disability needs are picked up for residents who may opt to leave the estate under the key guarantees	<ul style="list-style-type: none"> <li>Liaison with social care teams in other authorities where residents are seeking to move to</li> </ul>	<ul style="list-style-type: none"> <li>Disabled residents leaving the estate are supported and are flagged to the relevant authorities</li> </ul>		



Mitigation Issue	Actions	Outcome	Date	Responsibility
Ensure that all disability needs are picked up where reasonable adjustments are identified.	<ul style="list-style-type: none"> <li>Support with adaptations in new units on the new estate</li> <li>Commission handyman service to support additional fixtures and fittings</li> </ul>	<ul style="list-style-type: none"> <li>Disability issues built into home designs on the new estate.</li> </ul>		
Ensure that the cost of adjustments and needs of disabled people are addressed	<ul style="list-style-type: none"> <li>Ensure reasonable adaptations are implemented within the new homes in line with OT assessments in line with the Key Guarantees.</li> </ul>	<ul style="list-style-type: none"> <li>Required adaptations are carried out by the council in line with OT Assessment.</li> </ul>		
<b>Age Mitigation Activity</b>				
Address age impacts of regeneration as they apply to young people	<ul style="list-style-type: none"> <li>Engage young people in the design of the future amenity space within the new estate. Ensure existing amenity space is secure during the regeneration and construction</li> </ul>	<ul style="list-style-type: none"> <li>Young people engaged in the design of amenity space within the new estate.</li> </ul>		
Need to address age impacts of regeneration as they apply to older people	<ul style="list-style-type: none"> <li>Provide opportunity for independent financial advice for any resident needing it.</li> </ul>	<ul style="list-style-type: none"> <li>Residents enabled to make informed financial decisions</li> </ul>		
Need to support older people through their move and settling into their new home	<ul style="list-style-type: none"> <li>Commission handyman service to support additional fixtures and fittings</li> </ul>	<ul style="list-style-type: none"> <li>Older residents given support in settling into their new homes</li> </ul>		
Need to support older leaseholders through the regeneration process	<ul style="list-style-type: none"> <li>Support older leaseholders to access the right options</li> </ul>	<ul style="list-style-type: none"> <li>Direct engagement with older leaseholders</li> </ul>		
Need for social support services for any adaptation to new homes for older people and those with a disability / health conditions.	<ul style="list-style-type: none"> <li>Employ dedicated Social Support Worker/Occupational Health practitioners to work with Regeneration team.</li> </ul>	<ul style="list-style-type: none"> <li>Older people and people with disabilities supported through the engagement of health and social care.</li> </ul>		

Mitigation Issue	Actions	Outcome	Date	Responsibility
<b>Socio-economic Mitigation Activity</b>				
Recognise and understand the cost impacts for individual households within the regeneration programme.	<ul style="list-style-type: none"> <li>▪ The Council to monitor the potential for a consequential rise in the costs associated with the new properties both in terms of living costs and in terms of rent/mortgages.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Robust estimates of future costs and values for new and existing properties provided to enable informed decision making.</li> </ul>		
Assess the potential impacts on Private tenants living in properties which are due for development	<ul style="list-style-type: none"> <li>▪ Review Regeneration policy and identify ways to support private tenants made vulnerable.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Consideration of options for private tenants</li> </ul>		
Recognise and understand the cost impacts for individual households within the regeneration programme.	<ul style="list-style-type: none"> <li>▪ The Council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.</li> <li>▪ Facilitate access to Independent Financial Advisors for all residents.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Robust estimates of future costs and values for new and existing properties provided allowing informed discussions about financial options under the Key Guarantees with each homeowner.</li> </ul>		
<b>Language Mitigation Activity</b>				
Ensure residents and wider consultees have adequate translation provision as part of the negotiation phase of the regeneration programme.	<ul style="list-style-type: none"> <li>▪ Make alternative formats, translation and interpretation provision available when specific tenant engagement and leaseholder negotiation is being undertaken</li> </ul>	<ul style="list-style-type: none"> <li>▪ Alternative formats, translation and interpretation identified and readily available</li> </ul>		
<b>Health Mitigation Activity</b>				
Address the presented health needs of residents transferring from their property to any other as part of the Regeneration	<ul style="list-style-type: none"> <li>▪ Undertake health and medical assessment or OT assessments where required.</li> <li>▪ Where necessary consideration should be given to residents that may as a result of their health condition need to</li> </ul>	<ul style="list-style-type: none"> <li>▪ Implement recommendations of assessments and prioritisation of serious / progressive conditions</li> </ul>		

Mitigation Issue	Actions	Outcome	Date	Responsibility
	be moved from the estate during the construction period.			
<b>Intersectionality Mitigation Action</b>				
Support to restore communities on the estate during and post regeneration	<ul style="list-style-type: none"> <li>Develop enrichment activities for residents of the estate designed to build communities</li> </ul>	<ul style="list-style-type: none"> <li>Empower residents to promote, celebrate and harness community cohesion and shared values</li> </ul>		

## 9.2 Suggested Future EqIAs and EqIA refreshes

EqIA Subject	Date	Responsible Body
Refresh/ review EqIA once regeneration phasing and housing transfer / allocation plans are finalised		
Refresh/review EqIA prior to implementation of the CPO		
Post Development EqIA and evaluation		

## 10 Appendix 1: Key Definitions

### Key Definitions

#### 10.1 **Diversity** equals difference:

The concept of diversity encompasses acceptance and respect. This means understanding that every person, family and group in the Waltham Forest Estates Regeneration project is unique and has specific needs. The skill when offering services to individuals and groups is to take account of these characteristics sensitively and positively throughout this project.

#### 10.2 **Equality** is the concept of knowing when to 'treat people the same' in this regeneration project and when to 'treat them differently'.

Often, we have policies, guarantees and standards which guide us to treat people the 'same' so that they receive their entitlements. But regularly in 2019 we are also faced with challenges to deliver individualised and tailored housing services to individuals, families and groups. The skill is to know when 'sameness or difference' applies and having a rationale to explain your actions.

#### 10.3 **Inclusion** has been described as a sense of belonging.

A feeling of being respected, valued for who you are; feeling a level of support and commitment from others who consult and negotiate with you over important matters, so that your voice is heard as a tenant, leaseholder or owner of a property and you can then help, shape and make important decisions.

#### 10.4 **Human Rights** are the basic rights and freedoms that belong to all of us from birth until death. Our right to live, eat, be clothed and to be respected for private and family life.

The act protects ordinary people's freedom, safety and dignity and helps us hold authorities to account when things go wrong. In Britain, these important international rights are protected by the Human Rights Act of 1998, which is now enshrined as part of UK domestic laws.

#### 10.5 **Ethnic Minority:** Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British.

10.6 **BAME:** The acronym BAME stands for Black, Asian and Minority Ethnic and is defined as all ethnic groups except White ethnic groups.

## **11 Appendix Residents Offers**

### **Summary of Offer to all Tenure Groups**

#### **Secure Tenants**

##### **Commitment 1 – Your new home on the estate**

- 11.1 You have the option of being rehoused into a new home on the redeveloped Avenue Road Estate.

Each household will be rehoused based on their current housing requirements in line with the Council's allocation policy.

##### **Commitment 2 – A new home away from Avenue Road**

- 11.2 If you want to move away from Avenue Road Estate you will be prioritised on the Housing Register for a move when you are given decant status. You will need to bid for properties that you wish to move to and that are in line with your housing need.

##### **Commitment 3 – The Right to Return**

- 11.3 There may be a need for some tenants in early phases to move out of their home to allow the development to get under way. If this is the case you will have a guaranteed right to return to the estate which we confirmed to you in writing.

##### **Commitment 4 – A New Home That Meets Your Households Needs**

- 11.4 We want you to be able to move to a home suitable for your household and in a location that you want to live, either on Avenue Road Estate or somewhere else in the Borough.

You will be able to move into a home that meets your assessed housing needs. If applicable, your newly built home will be designed to meet any health or disability requirements.

- 11.5 Each tenant being decanted will ordinarily only be eligible to receive offers of accommodation of the size that the Council has assessed them as needing, regardless of the size of the property that they are moving from.

##### **Commitment 5 –Rent guarantee**

As a secure tenant living in a newly built council home on the regenerated Avenue Road Estate, your rent will be set in the same way as existing Council rents. Your rent will always be a social rent.

##### **Commitment 6 – Compensation**

- 11.6 You will be compensated for having to move. A home loss payment will be paid to you, plus reasonable disturbance costs. Home Loss is determined by the

Government and is reviewed annually, and any changes implemented from 1<sup>st</sup> October. The Home Loss allowance set 1<sup>st</sup> October 2020 is £6500.

11.7 Compensation will be determined as follows:

Disturbance Allowance costs for each bed size property are:

- The amount of the home loss payment will be automatically updated each time it is changed by the Government. This was last changed 1<sup>st</sup> October 2020.
- At the time of printing (insert date), the home loss payment is £6,500.
- If you are required to move twice, for the reasons outlined above, then you will receive disturbance payments for both moves.
- In the unlikely event that you are required to move twice AND you have to live in another home for longer than 12 months you will receive two home loss payments. Disturbance allowance will still be paid for each move.
- If you owe the Council any outstanding rent arrears, these will be deducted from the home loss compensation.

11.8 Full details of how disturbance payments are calculated and processed will be provided in separate documentation.

### **Commitment 7 – Support**

11.9 The Council will provide you with help to enable your move, with additional support offered to you if you have special needs or a disability. In some circumstances this additional support could include:

- Assessing the suitability of a new home prior to making an offer
- Packing and unpacking services at the time of your move
- Help in claiming Housing and Council Tax benefits at the new address.
- Liaising with other agencies such as social services

The Council will work with residents on the best way to provide this support and what other support may be required.

### **Commitment 8 – Advice & Information**

11.10 The Council will provide you with advice and information to help you make informed decisions about your future housing. This will include:

- An Independent Tenant & Leaseholder Adviser (ITLA)
- Maintaining communication with you throughout the life of the regeneration project on matters such as how it will affect you.
- Advice and support to you, if you choose to seek rehousing either elsewhere in Waltham Forest or outside the borough
- More...

## **Commitment 9 – Involving You**

11.11 If you choose to stay on Avenue Road Estate, you will be able to get involved in the design of the new homes and the estate as a whole and influence decisions around the phasing of building new homes and the construction works. The Council will:

- Give you the opportunity to get involved in the design process and be clear what you can and cannot influence in the design of the new homes and the estate.
- Provide choices on fixtures and fittings in your new home where possible.
- Involve you in considering how to minimise disruption during the redevelopment process.
- Work with you to explore how the new design for the estate can help to keep service charges for the new homes lower while ensuring that repairs and maintenance are delivered to a robust standard.

### **Resident Leaseholders**

11.12 Consultation and ongoing contact

- Resident leaseholders will be provided with advice and support on the sale of their property back to the council.
- Before we buy any homes, we will contact those affected and provide information about what will happen. At these meetings we will tell you about the aims and objectives of the regeneration programme, provide more detail about the buy-back process, gather information about your individual circumstances and discuss what additional support and housing options are on offer.
- Throughout the purchase process we will maintain regular contact with you to ensure that you understand the timeline that the council is working to and that you are actively progressing you're rehousing.
- We will continually review with you your support needs in progressing your rehousing and provide whatever support is needed to assist in your successful relocation.

### **Staying on the Estate**

11.13 As a resident homeowner if you wish to continue to live within the regenerated estate, or locally, you will be given the opportunity to do so. You will be offered a range of options depending on your individual financial circumstances and qualifying criteria will need to be met to determine which options you will be eligible for. The set options are:

- Outright purchase - If you can afford to do so, you can purchase 100% of one of the newly built properties within the development.



- Shared Equity - If you wish to remain within the scheme but cannot afford 100% ownership of one of the new properties but have sufficient capital to purchase 50/60% of one of the new homes, the Council will agree to a shared equity deal with you. This is where the Council places a charge against the property but where you do not pay any rent on the portion of the property not owned by you.
- Shared Ownership - If you wish to remain within the scheme but don't have the resources for either of the above options but can afford a minimum of 25% of the value of a new property, then the Council will be willing to enter into a shared ownership arrangement with you. This will require you to pay rent on the portion of the property that you don't own, but you will have the opportunity to increase your ownership of the property when your finances allow<sup>18</sup>.

If none of the set options are appropriate, the council will explore other options with you.

### **Moving away from the estate**

- 11.14 If you, as a homeowner, do not wish to live in a home within the newly built scheme, you will need to sell your home to the council at market value (plus home loss and disturbance allowance compensation). The Council will arrange for a valuation to be carried out, which will give you information on how much you can afford to purchase another property and then arrange to purchase a suitable home where you wish to live. Our team will provide advice and support on the house purchase process as and when required.

### **Investor Leaseholders**

#### **Consultation**

- Before we buy any homes, we will meet with those affected and provide information about what will happen. At these meetings we will tell you about the aims and objectives of the regeneration programme, provide more detail about the buy-back process, gather information about your individual circumstances and discuss what additional support is on offer.
- If you are an investor owner and do not live in the property, it is important to note that LB Waltham Forest (the Council) is not obliged to re-house either your tenants or any other occupants in the property. The property must be empty when we complete the purchase of the property (all

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<sup>18</sup> Shared ownership is less widely used but, in the event, you are unable to be in a position to afford 50/60% equity in a new property, this is an option to remain on the estate.

occupants must have moved out and the property be vacant, so that you get the full value for your property). This is so that you can achieve the maximum value for your property as vacant premises will attract a higher value than occupied ones.

- You need to make sure you take suitable legal advice on how to secure possession of your property from your tenants in good time to allow us to take over the property. You will be able to recover the reasonable costs of suitable legal and surveying advice on securing vacant possession from the council.
- The council will acquire your property and pay full compensation subject to you providing the council with vacant possession.
- If you have tenants you will need to make arrangements to either relocate your tenants to an alternative property or secure possession in a lawful manner. Where necessary, the council will provide general advice and support on how this will be best achieved, but you should ensure that you secure your own legal advice.
- Some landlords, if they have a positive relationship with their tenants, are happy to move their tenants into another property that they own. Alternatively, it would be possible for you to acquire another property using the proceeds from the sale of the one you own on the Avenue Road Estate and relocate your tenants into the new property on completion of contracts. The council will fund reasonable reinvestment costs if you choose to adopt this approach.

### **When will my property be purchased?**

- 11.15 At this stage, it is far too early to be able to advise on this as there are quite a few matters that need to be progressed.
- 11.16 The key decision on whether the scheme will proceed is that the council is required to undertake a resident's ballot. Only if residents vote to agree to the regeneration scheme will it proceed.
- 11.17 As you are not resident on the estate, you do not get to vote in the ballot. Your tenants will be eligible if they are on the local authority's housing register for at least one year prior to the date the Landlord Offer is published. The Council is planning to publish this in August 2020.
- 11.18 Once we have held the ballot, we will write to you further with more detail on our anticipated timeline for the scheme delivery.

## **Private Tenants offer**

### **The scheme proposal**

- 11.19 As you are living in a block that will be demolished at some point in the future, you should discuss this at an early stage with your landlord. Waltham Forest Council will be in discussions with your landlord about purchasing the property you live in, but we will only wish to do this with vacant possession, which means that your landlord will need to take action to end your tenancy.

### **Option 1**

- 11.20 The rehousing options available to you will depend upon your circumstances and the intentions of your landlord. Some landlords will plan to reinvest the funding they get from the purchase of their property by the council and the Council will encourage this approach. Where this is the case, if you have been a good tenant, you may be able to reach an agreement with your landlord to relocate you from your current home to the new property they are purchasing. You should discuss this with your landlord at an early stage.
- 11.21 If your landlord is not willing to assist or is buying a property in a location that doesn't suit you, chooses to postpone or not reinvest at all and seeks to end your tenancy in order to sell the property to the council with vacant possession, then you should seek advice about your housing options.

### **Option 2**

- 11.22 As there are currently over 8,500 people registered for rehousing on the council's housing register, it is unlikely that the council would be able to assist you with rehousing, unless there are specific considerations which would give you a high priority.
- 11.23 If you wish to explore what options might be available there is an online tool on the Council's website at <https://walthamforest.gov.uk/content/worried-about-becoming-homeless> or you can seek advice by emailing [housing.advice@walthamforest.gov.uk](mailto:housing.advice@walthamforest.gov.uk)
- 11.24 Should you wish to register for housing you can do this via the Council's website at <https://walthamforest.gov.uk/content/apply-council-housing>
- 11.25 If you wish to find out if you might be eligible to purchase a home on a Shared Ownership basis or find out more about rental options, you can find out more about this on the Council's website at <https://walthamforest.gov.uk/node/501>
- 11.26 If you wish to continue to rent a property then you may wish to explore the Council's own lettings agency.

- 11.27 Lettings Waltham Forest is a lettings agency that's part of our council. It prioritises key workers find a home in the borough.
- 11.28 You can find out more about what options they can offer via their website at <https://lettingswalthamforest.co.uk/>
- 11.29 If you think you may be eligible for support from them you can also call on **020 8496 5525** or email [lettingswalthamforest@walthamforest.gov.uk](mailto:lettingswalthamforest@walthamforest.gov.uk)