

Equality Impact Assessment

Please state the service / project your proposal relates to:	London Borough of Sutton, Estate Regeneration Rehousing and Compensation Scheme
Lead Officer:	Simon Latham, Assistant Director Environment, Housing and Regeneration Directorate
	Simon Pickles, Housing Regeneration Manager
	Michael Hunte, Housing Regeneration Programme Officer
Directorate:	Environment, Housing & Regeneration - Housing Regeneration Team
Is this a new policy or a review of an existing policy or service? :	Redesigned policy
What are the aims and purpose of this proposal? :	The Estate Regeneration Rehousing and Compensation Scheme forms the initial principles of the Council's commitments and offer to residents on estates where regeneration is being considered. The principles of the scheme will form the basis for preliminary discussion with residents on these estates.
Which of the geographic areas does this proposal affect? (Insert any specific wards or state all borough):	The Estate Regeneration Rehousing Rehousing and Compensation Scheme has the potential to affect all Wards in the borough. However, the Council's Estate Regeneration programme is currently centred on 7 estates across 4 wards in and around Sutton town centre. These estates are identified as areas of potential estate renewal under the adopted Local Plan 2016-2031 and include: (i) Benhill Estate, (ii) Rosebery Gardens and (iii) Elm Grove in

	Sutton Central, (iv) Chaucer Gardens Estate and (v) Collingwood Estate in Sutton North, (vi) Beech Tree Place & West Street in Sutton West and (vii) Sutton Court in Sutton South.
Which stakeholder group or groups does this proposal affect? (Broad groups - e.g. Staff at LBS, residents, third and voluntary sector):	 The stakeholder group directly affected by the Estate Regeneration Rehousing Rehousing and Compensation Scheme are residents whose homes are subject to potential regeneration. These include: Council Secure Tenants Resident Homeowners (Leaseholders and Freeholders) Non-Resident Owners (Leaseholders and Freeholders) Non-Resident Landlords (Leaseholders and Freeholders) Non-Resident Landlords (Leaseholders also affected include: Council Introductory Tenants living on the affected estates Council Non Secure and Temporary Accommodation Tenants living on the affected estates Private Sector Tenants living on the affected estates Household members, Family members and Carers of residents
Whose needs is the proposal designed to meet? (Specific groups of people e.g. those who directly use the service):	 The Council's Estate Regeneration Rehousing Rehousing and Compensation Scheme is designed to meet the needs of: Council Secure Tenants Resident Homeowners (Leaseholders and Freeholders) Non-Resident Owners (Leaseholders and Freeholders) Non-Resident Landlords (Leaseholders and Freeholders)
What evidence has been collected to inform this proposal? :	 The information that has been collected, across the estate regeneration areas used to inform the proposal, include: 1. Resident details including: age, gender, ethnicity, belief, sexuality, health, disabilities, employment status, income and expenditure including mortgage details, marital

 status and pregnancy & maternity status Housing tenure, household composition, housing need, Residents views, needs and preferences collected from individual meetings and group meetings, workshops / drop in events and general correspondence Wider site ownership and occupancy details Borough and Ward data including deprivation data Strategic Housing Needs Assessment data Property assessment including: property typologies, stock condition, repairs history and cost, future planned maintenance requirements and cost, DDA / accessibility compliance and cost, planning and regeneration status or allocation Estate feasibility to determine site capacity for residential and mixed use redevelopment and regeneration, including an assessment of financial viability, planning implications and strategic allocation
 Additional Information also consideration to inform the proposal includes the latest best practice guidance on estate regeneration: Better homes for local people - The Mayors Good Practice Guide to Estate Regeneration, GLA (February 2018) Have Your Say on Estate Regeneration - Toolkit for Local Meetings. GLA (2017) Making the Case for Place - Future of London Regeneris (2017) Homes for Londoners - Mayor of London - draft Good Practice Guide to Estate Regeneration, GLA (December 2016) Estate Regeneration National Strategy and Good Practice Guide,

	 Department for Communities and Local Government. (December 2016) Meeting the challenge of urban renewal. The g15's contribution to regenerating London's Estates (October 2016) Altered Estates - How to reconcile competing interests in estate regeneration. HTA, Levitt Bernstein, Pollard Thomas Edwards and PRP. (2016) A number of Local Authority and Housing Association policies in relation to Resident Guarantees, Commitments and Offers, have been reviewed to establish examples of best practice and to inform the Sutton scheme. This includes similar schemes from: Royal Borough of Kingston London Borough of Jambeth London Borough of Merton London Borough of Merton London Borough of Westminster Metropolitan Housing Clarion Housing Association
What equality-related information, for example through consultation with stakeholders, has been gathered on this proposal? :	Group and individual meetings have been held with residents across a number of the proposed regeneration estates. Equality related information obtained from this engagement has included: residents ethnicity, age, gender, sexuality, belief, marital status, health needs and disabilities, family and household composition, marital status, employment status, tenancy status and homeownership status (inc income and outgoings, any outstanding mortgages and charges against their home). Consultation with residents has also helped to identify some of the priorities raised by residents should regeneration take place, including what they expect from the Council in terms of commitments. These include: • The opportunity to return to new

	1
	 home on the estate and to be involved in the design process A replacement home on a like for like basis to include the same number of bedrooms, similar space standards, similar housing typologies and comparable rents The option to be rehoused on another regeneration estate or another Council property in the borough The opportunity to be rehoused with some of their existing neighbours in order to keep their community together To be moved only once, in order to limit the potential disruption Help and support with moving home Compensation for the loss of their home and to cover the costs associated with moving home so they are not financially disadvantaged Support in helping homeowners in different financial circumstances to buy a new home on their estate The need for an independent advocate, separate from the Council Continuous engagement and involvement throughout the different stages of the process Honesty, fairness and transparency Retention of the Council as landlord with tenancy rights protected
Based on the information you have collated, which equality characteristics may be affected by this proposal	Suttons has an increasingly diverse population and this is reflected by the resident composition of its estates. The Estate Regeneration Rehousing and Compensation Scheme has the potential to affect all protected characteristic groups, although it could also be considered that more vulnerable groups are more likely to be affected to a larger degree, albeit on a temporary basis. These include: • Older people (Age) - affected by the disruption of having to move home in their later years • Residents from BME communities (Ethnicity) - who may have more

	 specific cultural or sensitive needs, as well as potential issues with language, communication, participation and integration Residents with disabilities (Disability) - including learning, mental health or physical disability Women (Gender) or families with babies or young children (Pregnancy & Maternity) - who could find the prospect of moving more disruptive
Please give further information on how these characteristics may be affected	Potential impact on residents as a result of moving home Estate regeneration has the potential to affect residents across all of the Protected Characteristic groups. The process can sometimes be upsetting for residents who may have lived in their property happily for many years. It can also be disruptive to the lives of individuals and families if they are required to relinquish their home in order to move to a new home, especially if they are required to move more than once, including a move to temporary accommodation until their new home is ready. Although estate regeneration can be positive in the long term, leading to better quality accommodation and an improved local environment, the process can be quite challenging for some residents, particularly more vulnerable residents.
	Mitigation: To support residents through the process of estate regeneration the Council would continue to engage with residents on a group and individual basis, in order to hear their views and better understand their individual concerns, housing needs and requirements. This would be underpinned by a process of continuous engagement and communication, alongside tailored packages of support to help address any negative effects. To help minimise the disruption caused by moving, the Council would aim to implement a one move policy where this is practically possible. The Council would also try to

move residents with their neighbours if this was their preference. The Council is committed to working collaboratively with residents and will work with them to establish steering groups to actively participate in shaping future proposal. Resident participation would also include further developing the Residents' Charter and offer, as well as in appointing an Independent Tenant and Homeowner Advisor.
Potential impact on homeowners buying a new home The Council's estates contain a high proportion of homeowners and these resident are encouraged under the Estate Regeneration Rehousing and Compensation Scheme to return to their regenerated estates. Regeneration proposals normally include the delivery of new private homes for sale, as part of a mixed tenure scheme. New homes for sale would normally be of a higher value than those they are replacing, as they would be built to a higher quality. A subsequent impact of this is that some homeowners may be unable to purchase the full value of a new home on their new estate based on this difference in values, as well as their own financial circumstances. The Estate Regeneration Rehousing and Compensation Scheme is designed to help resident homeowners buy a new home by offering a range of options to existing resident homeowners, including shared equity and shared ownership swap options. These are however dependant on the owner investing the full proceeds from the sale of their existing home and their home loss payment to buy the largest share in the new property that they can afford. However, due to the different financial circumstances amongst residents, some may need to transfer their existing mortgage or obtain a new mortgage as part of their investment to buy a new or replacement home. However, in certain cases some resident may not be able to transfer their mortgage or secure a

	new mortgage to the amount they need to purchase the required stake in the new home. This scenario could potentially affect older residents who may be unable to secure a new mortgage due to their age. It could also affect households where their income has reduced as a result of part time working, maternity pay, redundancy or another change in employment circumstances.
	Mitigation: The Council's Estate Regeneration Rehousing and Compensation Scheme offers a range of Home Swap options for homeowners to help them buy a share in a new home based on their financial circumstances. Although these options do not include a facility to fund potential shortfalls, it does make alternative provision for homeowners in financial difficulties to be offered a Council tenancy where it is clearly shown that homeownership is no longer a viable proposition.
What will be done to promote equality of opportunity as part of this proposal?:	The Estate Regeneration Rehousing and Compensation Scheme is itself a scheme designed to promote and support equality and fairness amongst eligible residents affected by estate regeneration. Through its commitments and offers it provides more opportunity and choice, whilst helping to compensate and minimise some of the adverse effects of regeneration so that no resident is left financially worse off. The scheme also places a major emphasis on continuous engagement, resident involvement and collaboration, so that those affected have the opportunity to play a significant role in the process of regeneration and in shaping future plans for their homes.
	The Estate Regeneration Rehousing and Compensation Scheme is underpinned, for Council tenants, by the Council's allocation policy under 'Band A' – (Urgent Need for Re-housing). It is also comprised of an estate Residents' Charter formed of the

 following: The Council's overall commitments Offer to Council secure tenants Offer to Resident homeowners Offer to Non-resident homeowners Under the Council's commitments, the following guarantees will be made to residents: We (the council) will be open and honest with residents We will engage with residents at an early stage, co-producing a Residents' Charter for the estate Residents have the right to live on the new estate Where possible residents will move only once, from their existing home into a new home. If residents have to move off-site temporarily, residents will have the automatic right to return Statutory home loss and discretionary disturbance payments will be offered (meeting removal and out of pocket expenses) Following a one to one meeting, residents will receive a written confirmation of their housing options
 confirmation of their housing options Vulnerable residents will receive support before, during and after moving home An independent resident adviser will be recruited jointly with residents All new homes will be more energy efficient and easier to heat
 Residents' new homes will meet the Mayor of London's quality and size standards The council intends to retain the freehold of any new estate after regeneration We will produce regular newsletter and website updates setting out progress to date and timescales for
 future plans We will produce a Rehousing and Compensation Advice Booklet setting out in more detail the above

rehousing commitments covered in this scheme.
Regeneration rehousing scheme - council secure tenants
Under the Council's offer to secure tenants, the Council will guarantee:
 the Council will guarantee: Where possible tenants will move only once, from their existing home into a new home. If a tenant has to move off-site temporarily, they will have the automatic right to return, if that is their wish, so far as possible save where the redevelopment cannot meet the size (number of bedrooms) of the existing property for all households; in such an event the council will consult with the affected residents early in the process and seek to offer suitable alternative accommodation in the local area on a voluntary basis. Secure tenants who have to move will have the choice: (a) either, to take a council tenancy in a new home on the estate (as band A applicant) or (b) if available, to take a council tenancy in an existing retained home on the estate (e.g partial redevelopment scenario) or (c) will be given high priority (Band A) to bid for a home elsewhere in the borough through the Choice Based Lettings scheme, subject to availability. The tenant's new home will meet their housing needs, according to the Council's Housing Allocation Scheme. Tenants who are overcrowded will be offered a larger home that addresses the overcrowding, according to the Sutton Housing
 Allocation Scheme. Downsizing will attract the Council's one-off incentive payment (currently)
 one-off incentive payment (currently £500 per bedroom 'given up') Exceptionally, tenants who are

 under-occupying by two bedrooms or more will be offered a new home with one bedroom above their need (for example, a couple living in a 3-bed home would be offered a 2-bed home when their actual need is for a 1-bed). The Council will consider providing separate tenancies for adult children ('hidden households') along with a reduction in the size of accommodation for the tenant accordingly, provided there is no net gain in bedrooms overall. All tenancies granted to council secure tenants under this scheme will be on the basis of existing tenancy conditions and rights, including the Right to Buy and social council rents. Moves to Housing Association properties would be on the tenancy terms of the landlord. The tenant's new home will be adaptable to meet disability needs (i.e. will meet 'lifetime homes' standards). Tenants have the option to return as a shared owner (investing a minimum stake of 25% of the property's value). If the tenant's permanent new home is not ready by the time a tenant's existing home has to be demolished, we will offer alternative temporary rented housing. The tenant will only be asked to pay rent on one property at any time (the lower of the two rents). If tenants have to move off-site temporarily, they will have the automatic right to return, subject to the qualification at 3.1 above.
Compensation offer - council secure tenants
 Council secure tenants will receive a Statutory Home Loss payment if they have lived in the property for the qualifying period, in accordance
the qualifying period, in accordance with the current statutory provisions (the Land Compensation Act 1973),

 net of any debts owed to the Council. 'Out of pocket payments' will be offered for reasonable expenditure relating to the move (including removal costs, re-connecting appliances, adjusting carpets, curtains etc.) based on submitted receipts. The Council or its partners will help tenants arrange and prepare for the move. The Council will order the removals including packing materials and a packing service. For older and vulnerable tenants the Council will help (through a 'handyman' service) with jobs such as re-hanging curtains and fitting light bulbs. We can also provide or arrange extra help with claiming benefits, changing utility suppliers, and advice about home aids and adaptations.
Regeneration rehousing scheme -
resident homeowners
 When/ if regeneration has been approved by the Housing, Economy and Business Committee, owners can opt to sell their property to the council at open market value (MV). The Council will assist payment of legal and conveyancing costs, pay Stamp Duty and your mortgage redemption fee Disturbance payments will be made for removal costs Home Swap options will be offered to owner occupiers in different financial situations to help them return to the new estate. These build on the Mayor's recommendation of a fair deal for homeowners by providing greater choices through the following options: A. Outright Ownership B. Shared Equity + (Sliding Scale) C. Shared Equity (Silent Partner) D. Share Ownership E. Open Market Fixed Equity

 value of the new home, with rent payable on the unowned share The Home Swap - Open Market Fixed Equity Scheme (Option E) is available to eligible resident homeowners to purchase a suitable replacement home on the open market off the estate subject to the valuation of the new property not exceeding 10% increase in valuation over their existing property. (eg. So for example if the value of the existing home is £300,000, then the value of the replacement home should not exceed £330,000. If the homeowner is unable to purchase the full value of the suitable replacement home, the Council could take a maximum 10% equity stake in the property as a 'silent partner', capped at £30,000. The homeowner will in turn be required to purchase a minimum 90% stake in the replacement property. The Home Swap - Alternative Regeneration Site Option (Option F) is available to eligible resident homeowners where their current property typology is not being re-provided on another of the Council's regeneration sites. This could include where houses are not being built on the new estate, but are being built on another Council regeneration site. The Home Swap Choices – Affordable Rented Accommodation Option (Option G) is available to eligible resident homeowners unable to purchase a new home under the Council's Home Swap schemes.In exceptional circumstances where an existing homeowner is shown to be in financial difficulty, and/ or unable to secure a suitable mortgage, the Council could provide rehousing by offering an Affordable Housing Tenancy in a Council owned property on the new estate or on

[· · · · · · · · · · · · · · · · · · ·
	another Council estate.
	Compensation offer - resident
	homeowners
	 homeowners Resident owners will receive a Statutory Home Loss payment of 10% of open market value. We will pay reasonable legal costs of moving from the owner's existing property to a new property, pay Stamp Duty up to the value of your existing home, homeowners' mortgage redemption fee and any early repayment charge on any mortgage that cannot be 'ported' to the new property. 'Out of pocket payments' will be offered for reasonable expenditure relating to the move (including removal costs, reconnecting appliances) based on submitted receipts. Where a Right to Buy has been exercised within the last 5 years, the homeowner (Leaseholder or Freeholder) will not be required to repay any of the Discount they received when they purchased the property from the Council, where the Council buys back the property for the purposes of a Regeneration Programme. Repayment of the Right-to-Buy Discount is exempted in these circumstances by s.160(1)(d) Housing Act 1985. For properties acquired through a Compulsory Purchase Order, owners will be offered basic Home Loss payment, legal/ valuation fees
	and other actual costs linked directly
	to the sale of the owner's existing home and to the purchase of a new
	home. This is all in line with the
	statutory codes for compulsory purchase.
	Key elements of the regeneration
	rehousing scheme - non-resident owners
	 When/ if regeneration has been approved by the Housing, Economy

 and Business Committee, non-resident owners can opt to sell their property at open market value to the council. Property swaps (A-G) will not be offered. Non-resident owners do not have the right to return to the new estate Temporary accommodation will not be offered to non-resident owners. The council has no responsibility to re-house or compensate private tenants living in existing homes belonging to non-resident owners. We will provide housing advice and support to private landlords' tenants, in order to achieve a managed vacant possession. Purchase by the Council would be conditional on vacant possession. For properties acquired through a CPO, non-resident owners would be offered open market value. Key elements of compensation offer - non-resident homeowners Non-resident owners will receive a Statutory Home Loss payment of 7.5% of MV We will pay reasonable legal costs, pay Stamp Duty on any replacement investment property bought within 12 months up to the value of your
 For properties acquired through a Compulsory Purchase Order, owners will be offered statutory Home loss payment, legal/ valuation fees and other actual costs linked directly to the sale of existing home and to the purchase of a new home. This is all in line with the statutory codes for compulsory purchase.
To promote equality of opportunity and supplement the Rehousing and Compensation Scheme proposal, the

	Council will continue to implement a process of continuous engagement, placing residents at the heart of the process. This will including more resident involvement through individual meetings and establishing resident steering groups to work collaboratively in developing proposals. This will also include consultation through a range of tools and techniques designed to maximise reach to different groups including vulnerable and hard to reach groups across the estates. Effective communications and a communication plan will also be developed to ensure sufficient resources and systems are in place and that all communication activity is effective at reaching the boroughs diverse communities, there families, carers and support networks.
In what way could this proposal positively or negatively impact on the physical and/or mental wellbeing of residents? If there is a negative impact what action will be taken to mitigate this? What evidence has been or will be collected? :	Impact of the Proposal on Protected Characteristic Groups The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to: (i) Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act, (ii) Advancing equality of opportunity between those with 'protected characteristics' and those without them and (iii) Fostering good relations between those with 'protected characteristics' and those without them. By its nature, estate regeneration has the potential to impact adversely on all Protected Characteristic groups. Although the effects could be considered as being temporary, they still require positive action to minimise the negative effect on the community. In this regard, through the commitments and offers set out in the Estate Regeneration Rehousing and Compensation Scheme, the Council can positively support residents in: • Appointing an Independent Tenant & Homeowner Advisor

 Carrying out continuous and regular engagement through consultation events and 1-2-1 meetings Preparing and sharing information and implementing an effective inclusive approach to communications which is accessible to vulnerable and hard to reach group, including newsletters, general correspondence, frequently asked questions and answers, estate specific web pages and other form of communication Working collaboratively and inclusively with residents to ensure fairness and equality, putting residents first and at the heart of decisions, including establishing resident steering groups Being open, honest and fair Further developing the resident's Charter and offer in partnership with residents.
Age & Disability During consultation with residents to date, some residents have expressed anxiety over the prospect of losing their current home and having to move home in their later year, which is likely to place additional stress on older and more vulnerable individuals. This could be compounded further if those affected don't have access to appropriate levels of support. Older people in particular are also more likely to have a disability or additional bealth
have a disability or additional health conditions that could be affected by stress. Unlike some other protected and non protected characteristic groups, older people and those with disabilities are more likely to be adversely affected by the uncertainty of regeneration. Older and disabled residents are also more likely to have local support networks established in the area, meaning displacement or unsuitable relocation could affect their

needs if not managed sensitively. In addition, disabled residents, including those who have limited mobility, or who have a sensory or visual impairment, could be affected by regeneration where this involves changes to their local surroundings, especially if their existing homes had already been adapted to meet specific needs.
Planned acts of mitigation
To mitigate the adverse impact on elderly and disabled residents, regular engagement should be undertaken to establish the extent of resident needs and to develop a programme of support. This could include providing dedicated or specialist support to work with vulnerable groups and to offer expert advice and assistance. This support should form part of any rehousing strategy to include help with identifying suitable alternative accommodation options, viewings, removals, packing/unpacking, disconnection and reconnection of supplies, making claims for home loss and disturbance costs and social / housing benefits.
The Council should also work closely with its vulnerable residents, their families and carers to ensure that a range of suitable housing is provided as part of any proposal. These will need to meet the highest design, accessibility and sustainability standards, ie equivalent to Lifetime Homes.
Officers should also work alongside Social Services, Occupational Health teams and health teams to assess the needs of older and disabled residents and to ensure that any alternative replacement homes identified are made fit for purpose. Officers should also play a greater support role in arranging for replacement homes to be improved or adapted to meet the needs of incoming occupier and to make sure they are comfortable and satisfied when settling into their new home.

1
Special arrangements should also be considered such as the making of direct offers of accommodation to any vulnerable or disabled tenant in need. Officer should ensure offers are suitable and take account of accessibility and medical requirement, to allow for such options as extra floor space, rehousing on lower floor levels and providing accommodation with internal or external lifts / stair lifts etc.
Ethnicity
<u>Ethnicity</u>
Planned acts of mitigation
To reduce any negative impact on BME groups, the Council will need to ensure sufficient resources are deployed to help BME groups better engage and understand the regeneration and re-housing proposals. This could include maximising a range of consultation and engagement tools and techniques, such as providing information in different languages, offering translation and interpreter service, and by holding consultation event at times and in locations deemed more appropriate to BME groups and/or faiths. Support will also need to be monitored closely throughout the project lifecycle to ensure the right type of assistance is being provided and that those affected are making full use of the range of options available to support them. Regeneration and the potential to deliver new homes and infrastructure could benefit existing residents as well as the wider community, irrespective of their ethnicity or beliefs. Nevertheless, it remains clear that more tailored and sensitive forms of support is required to ensure effective engagement across BME groups, so that diverse cultural requirements and aspirations can be considered fairly to meet the housing and social care needs of BME communities, taking appropriate steps to eliminate all forms of direct and indirect discrimination.
(Also see section above that give further information on how Protected Characteristic
groups may be affected)

 Appoint and Independant Tenant and Homeowner Advisor to provide free impartial advice and advocacy for residents Set up resident steering groups across each estate so that residents have a collective voice in shaping the future of their estates Follow and comply with the Mayor of London's good practice guidance on Estate Regeneration, including where applicable, holding a resident ballot. Implement an effective consultation and communication strategy to including various means of communication, including: publicity, newsletters, web page, leaflets, translated material, administering a dedicated e-mail address, home visits, public meetings etc
An Equality Impact Assessment Action Plan will be developed to implement and monitor the impacts highlighted throughout this report. The Equality Impact Assessment will also

Management Sign Off	
Housing Regeneration Manager	Simon Pickles

Signature	fina Alt
Email	simon.pickles@sutton.gov.uk
Date	7th September 2018
Lead Officer Sign Off	
Assistant Director Environment, Housing and Regeneration Directorate	Simon Latham
Signature	
Email	simon.latham@sutton.gov.uk
Date	7th September 2018