Equalities Impact Assessment (EQiA)

Equalities Impact Assessments (EQIAs) help us to meet our <u>public sector equality duty</u>. The Council has a duty under the Equalities Act (2010) to have due regard to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

The 'protected characteristics' referred to are set out in section 4.

Once the first draft is complete please send to equalities@sutton.gov.uk allowing one week minimum for review and comment.

A final version will need to be sent to this mailbox again, with the assistant directors sign off in the summary box below to complete the process.

1. Summary information

EQIA Title	Elm Grove Estate Regeneration
Proposal Description	The Council is progressing the regeneration of Elm Grove in accordance with the Ambitious for Sutton Corporate Plan priorities for Sutton to provide Quality and Affordable Housing, including commitments to 'Deliver new council homes'; 'Continue investing to maintain and improve council homes'; 'Make council homes more energy efficient'; and 'Work with residents and communities to regenerate council estates'. The regeneration of Elm Grove will contribute to these priorities and the Council's ambitions to take action on climate change, the creation of inclusive places for everyone and to enable strong and fair economic growth in Sutton. The regeneration of Elm Grove (STC45) is allocated in the Sutton Local Plan (2016-2031) and Sutton Town Centre Masterplan (2016). Elm Grove is an important part of the Council's ambitions for transforming Sutton Town Centre and its redevelopment is being progressed as part of the Council's wider programme of estate and town centre regeneration. Redevelopment of the estate will see delivery of up to 300 new high quality and sustainable homes for existing and new residents. Up to 50% will be affordable, including 1, 2 and 3 bedroom flats and maisonettes. It will add new amenity space with access to communal courtyards, rooftop gardens and play space on-site, alongside public

realm improvements that include high quality landscaping and a new multi-functional east-west link providing a direct connection from Throwley Way to the high street.

The scheme will respond to the townscape character of Sutton Town Centre to deliver high-quality designed homes that are sustainable and achieve Passivehaus standard. It will also introduce a new residential extension to the rear of Market House (216-220 High Street), alongside improvements to the existing community hub and further extend the opportunity to grow a sustainable, mixed-tenure and mixed-use community to provide a northern gateway to Sutton town centre.

The proposals for Elm Grove have been developed in collaboration with residents and stakeholders over a number of years. It includes the Elm Grove Landlord Offer (January 2022) to estate residents who are directly affected by the plans. The Landlord Offer builds on the Mayor of London's Good Practice guide and combines the Council's commitments and offers to residents in the Elm Grove Residents' Charter with the shared council and community priorities of the Community Charter, thus bringing together the regeneration plan, commitments and vision for the estate and its community.

Groups affected

The regeneration of Elm Grove will primarily affect the existing residents of the estate. However, other third party interests (freehold and leasehold) with rights over the land may be impacted by the development, to a lesser degree. The scheme is also likely to impact a number of internal and external stakeholders, including council departments, government agencies, public services, local residents and businesses and voluntary sector organisations etc.

A summary of the affected groups is listed below:

Residents within the estate who will be directly affected by the proposal:

- Council secure tenants
- Resident homeowners (Freeholders and Leaseholders)
- Council non-secure tenants in temporary accommodation
- Non-resident homeowners
- Private sector tenants living on the estate
- Household members
- Families and carers
- Elm Grove Residents' Steering Group
- Elm Grove Residents' Action Group

Other groups, businesses or individuals within the development area, who will be directly affected by the proposal due to a direct impact in the land:

 Commercial and Community tenants of Market House (216 -220 High Street), including Successful Sutton, Sound Lounge and Volunteer Centre Sutton

	,
	 Freeholder and Leaseholders of the land to the rear of 232 - 234 High Street Freeholder and leaseholder of the land to the rear of 236 - 238 High Street Residents or businesses renting a council owned parking bay within the site Other stakeholders, who could be affected by the proposal to varying degrees: Local voluntary & community sector groups and organisations Local faith groups Local businesses and landlords Local residents and resident associations Local and and property owner Local authority customers and service users Public sector organisation and services (ie Local GP's, Public Health/NHS/CCG, Education, Leisure, Police, Fire Service etc) Council officers (ie staff in charge of operations) Council departments (ie Development Growth and Regeneration, Climate Action and Emergency Planning, Safer Neighbourhoods Team, Encompass, Sutton Housing Partnership, Sutton Connect, Sutton Living, South London Legal Partnership, Finance, Procurement, Communications, Housing, Waste, Parking, Highways, Strategic Planning and Development Management etc) Local Ward Councillors, Members, HEB and S&R Committees and MP's Sutton Central Local Committee Private developers Housing Association and Registered Providers Development funders Regeneration partners, consultants and contractors Neighbouring local authorities Government organisations (ie GLA, DLUHC, TfL, DRP, Tramlink, Network Rail, DWP)
Officer completing assessment (key contact)	Michael Hunte, Housing Regeneration Manager, Housing Regeneration Team, Environment, Housing and Neighbourhoods
Assistant Director	Simon Latham, Assistant Director, Housing, Planning and Regeneration, Environment, Housing and Neighbourhoods
Directorate	Environment, Housing and Neighbourhoods
Geographical area	Sutton Central

2. Brief description of proposal

The regeneration of Elm Grove will see the demolition of the estate to create new homes, for existing residents and Sutton's growing community. The proposal will deliver:

- Provision of up to 300 new high quality one, two and three bedroom homes, including flats and maisonettes built to meet modern design, quality, energy and safety standards;
- A new rear residential extension to Market House (216-220 High Street), to deliver extra homes and improvements to the existing commercial building to maintain the established community hub (inc the Sound Lounge);
- Private outdoor space for every home with new resident only courtyard gardens with safe play areas for children, inclusive of a net increase in terms of quality and quantity;
- Better designed and more secure resident only car parking with the opportunity for electric car charging points and secure resident only cycle, bin and recycling storerooms;
- Delivery of 50% Affordable Housing to include a range of tenure types and sizes;
- Delivery of new homes to modern accessibility standards such that residents will be able to benefit from more appropriate and adaptable homes in terms of level access and wheelchair accessibility;
- High proportion of smaller and larger family housing include two-bedroom four-person homes and three-bedroom five-person homes to meet identified local demand in a town centre location;
- Tenure blind approach to development to facilitate a genuinely mixed and inclusive community;
- The design of the Development will adhere to Designing out Crime principles to seek to address anti-social activity in the area;
- A new east-west multi-functional route through the site to provide pedestrian and cycle access, connecting Benhill Avenue, Throwley Way and the High Street, significantly improving connectivity.
- Improved permeability and wayfinding through the careful placement and integration of marker buildings at key connection points along the edges;
- Landscaped and well-lit new and improved public realm to include the two existing east-west routes which connect Elm Grove and the High Street;
- Re-organisation of the rear of the High Street resulting in improved amenity, accessibility and sense of safety.
- Creation of wider economic and social benefits as a result of the development activity and the creation of jobs, apprenticeships and training opportunities during the construction phase of the scheme;
- Increase in the ecological and urban greening of the site to contribute to local biodiversity net gain;
- Incorporation of sustainable urban drainage systems; and
- Energy-efficient development, using a fabric first approach to contribute towards the Council's net-zero targets.

The proposal will also make a significant contribution to the social, economic and environmental well-being of the area and deliver wider community benefits through added social value that will include training and employment opportunities. Improvements to local infrastructure will also be delivered through the statutory planning process, including the planning gain from Community Infrastructure Levy, section 278 and 106 agreements / unilateral undertakings.

To determine the impacts of the proposal on the residents directly affected, an extensive consultation exercise has taken place since the inception of the project. This is a continuous process and has involved hosting resident steering group meetings, co-design workshops, 1 to 1 surveys and interviews, a formal section 105 consultation process and an estate ballot for qualifying residents of the estate. Throughout this process, residents have been consulted on their experience of living on the estate, in order to learn more about how regeneration might affect them. The engagement process has contributed significantly in shaping the proposals for Elm Grove, aimed at improving the lives of local people and meeting the shared priorities of the community and the Council.

Notably, collaboration with the community has led to the co-production of the Landlord Offer, which is an integral part of the proposal that offers a package of rehousing commitments, compensation and support to residents, as a means of mitigating the adverse impact of the regeneration. Ultimately, the plans to regenerate Elm Grove (underpinned by the Landlord Offer) received overwhelming support from estate residents in March 2022, with 78.6% voting in favour of the redevelopment proposal.

The main commitments under the Elm Grove Landlord Offer, include:

- 1. Being open and honest, and working collaboratively to ensure residents are fully involved in shaping the plans for the estate
- 2. Maintaining regular communication and providing clear information and advice to keep everyone informed
- 3. Work together to deliver the shared priorities, housing options, offers and commitments agreed under the offer document
- 4. Ensuring residents have access to impartial advice and support through their very own Independent Tenant and Homeowner Adviser
- 5. Enabling homeowners living on the estate to take up a range of affordable options to buy a new home on the estate, so that they can remain part of the community if they want to
- Providing council secure tenants and eligible non-secure tenants with the right to a
 new home on the regenerated estate, which meets their housing needs and
 addresses any issues of overcrowding, under-occupancy and accessibility
- 7. Offering an option for council secure and eligible non-secure tenants to instead move away from the estate to a permanent replacement home in the borough if they prefer
- 8. Preserving tenancy rights and conditions for secure tenants, including a social affordable rents guarantee
- 9. Taking into account where possible, the needs and preferences of returning tenants, on matters such as the design, layout and location of their new home, including options to move next to an existing neighbour
- 10. The Council remaining as landlord of the new affordable homes
- 11. Offering financial assistance through a homeloss compensation payment, alongside meeting the reasonable cost of moving
- 12. Facilitating one move where possible, or providing a temporary home in another council property until a new home on the estate is built
- 13. Providing extra support to vulnerable residents, before, during and after moving home

14. Working closely with residents who are not eligible for a new home under the Landlord Offer, to provide timely advice and the support to enable them to secure an alternative home in accordance with the Council's allocation policy

An Equality Impact Assessment for Elm Grove was prepared in September 2021 and considered the impact of the proposal on residents at that point in time leading up to the formal consultation process and estate ballot. This Equality Impact Assessment updates the earlier assessment by re-assesses the impact of the proposal on current residents following a positive estate ballot in March 2022 and following the Council's decision to approve the business case and delivery strategy in January 2023.

This report will also form part of the Council's Statement of Reasons and case for making of a Compulsory Purchase Order (CPO) needed to acquire the private land interests over the development area. It will also be part of the Council's Outline Planning Application for the regeneration plan that is required to secure planning permission.

3. What information will you use to inform your assessment of impact on protected characteristics?

Identify the main sources of evidence, both quantitative and qualitative, that support your assessment (e.g. demographic profile of residents or service users, recent surveys or consultation feedback). Some useful sources are https://data.sutton.gov.uk/, see the section on population. Enter N/A as applicable (e.g. if the proposal only affects staff, or certain groups of residents/service users)

The following information was collected and considered as part of the assessment of impact on Protected Characteristic groups living on Elm Grove estate:

- 1. Resident details taken from a number of the Council's housing systems (Northgate and Huume), which include the name, address and tenure of Elm Grove tenant(s), homeowner(s) and household members, their date of birth, age, gender, ethnicity, religious belief, disabilities, marital status and housing benefit entitlement
- 2. Estate and property data, including information on property typologies, bedroom sizes, stock condition, repairs and planned maintenance requirements
- 3. Findings from Elm Grove feasibility studies, option appraisals and masterplanning work
- 4. Residents' views taken from housing needs and preferences surveys, collected from individual meetings, as well feedback compiled from resident steering group meetings, co-design workshops, drop in events, estate walkabouts and general conversations and correspondence
- 5. Feedback from residents and local stakeholder on the estate issues affecting the lives of the local community, and the resident priorities established through the co-production of the Residents' Charter, Community Charter and Landlord Offer
- 6. Borough and ward data (data.sutton.gov.uk)
- 7. Local planning policy for the area
- 8. Elm Grove Estate Community Audit, prepared by Savills (2023)

Elm Grove

The Elm Grove estate was developed by the Council in the early 1980s and is located at the northern end of the high street (Sutton Town Centre). Covering 0.93 hectares, the estate comprises 73 properties and is made up of three-storey blocks of one and two bed flats, adjacent to two-storey three bed terraced houses and bungalows. The estate is of a mixed tenure that includes council secure tenants, council non-secure tenants (living in temporary accommodation), leaseholders and freeholders.

Elm Grove Tenure Breakdown (December 2023/January 2024)	Number of properties	Percentage (%)
Resident Leaseholders	8	11 %
Absentee Leaseholders	2	4 %
Resident Freeholders	4	5 %
Absentee Freeholders	1	1%
Secure Tenants	26	36%
Non-Secure Tenants (Temporary Accommodation)	27	37 %
Acquired Leasehold Properties (Void Properties)	1	1%
Void Properties	4	5 %
Total	73	100%

Protected Characteristics of Elm Grove estate

The assessment of impact on Protected Characteristic groups on the estate is based on 123 residents living across 65 occupied dwellings on the estate. This includes primary tenants, owner occupiers and household members. The remaining 8 properties are either empty or owned by absentee owners.

Data/info source/s for residents, service users and staff (where relevant)			
Residents Age	Number	Percentage (%)	
0-15 Years	32	26.9%	
16-24 Years	18	15.1%	
25-34 Years	12	10.1%	
35-44 Years	21	17.6%	
45-54 Years	13	10.9%	
55-64 Years	8	6.7%	
65 + years	15	12.6%	
Unknown	4	3.25%	
	Residents Age 0-15 Years 16-24 Years 25-34 Years 35-44 Years 45-54 Years 55-64 Years 65 + years	Residents Age Number 0-15 Years 32 16-24 Years 18 25-34 Years 12 35-44 Years 21 45-54 Years 13 55-64 Years 8 65 + years 15	

	Total	123		100%	
	*The age profile data is based on 123 residents living across 65 occupied properties on Elm Grove estate.				
Disability					
	Disability		No.	Percentage (%)	
	Mobility		10	8.13%	
	Mental health		10	8.13%	
	Visual impairment		1	0.81%	
	Hearing impairment		0	0%	
	Unknown or no disability s	specified	102	82.93%	
	Total		123	100%	
	*The data on residents' disabi properties on Elm Grove estat		sidents living	across 65 occupied	
Gender reassignment	No Data Available				
Marriage and					
civil partnership	Households in Marriage/	Civil Partnership	No.	Percentage (%)	
	Married or civil partnership	o couple	6	9.23%	
	Lone parent family	Lone parent family 25		5 38.46%	
		*The data on marriage and civil partnerships is based on an evaluation of 65 occupied properties on Elm Grove estate.			
Pregnancy or maternity	No Data Available				
Race					
	Residents Race		No.	Percentage (%)	
	White: English/Welsh/Scot	tish/Northern Irish/Bri	tish 41	33.33%	
	Any other White backgrou	Any other White background		4.07%	
	Black/African/ Caribbean/l	Black British:	27	21.95%	
	Any other Black/African/ C	Any other Black/African/ Caribbean/Black British:		0.81%	
	Asian/Asian British:Bangla	deshi	9	7.32%	

				1
	Asian/Asian British:Indian		1	0.81%
	Asian/Asian British:Pakistani		2	1.63%
	Any other Asian background		4	3.25%
	Mixed/Multiple ethnic groups:		10	8.13%
	Any other Ethnic group		1	0.81%
	Unknown or ethnicity not specified		32	17.89%
	Total		123	100%
Religion or belief	*The data on race is based on 123 residents living Grove estate. Residents Religion or belief	across 69	_	pied properties on Elm Percentage (%)
	Christian	4		3.25%
	Muslim	12		9.76%%
	Buddhist	0		0%
	Hindu	0		0%
	Jewish	0		0%
	Sikh	0		0%
	Unknown or religion not specified	107	·	86.99%
	Total	125	5	100%
	*The data on religion is based on 123 residents living across 65 occupied properties on Elm Grove estate.			
Sex	Residents Sex		No.	Percentage (%)
	Male		55	44.72%
	Female		68	55.28%
	Total		123	100%
	*The data on sex is based on 123 residents living across 65 occupied properties on Elm Grove estate.			
Sexual orientation	Residents Sexual Orientation		No.	Percentage (%)

	l			
	Heterosexual	63	51.22%	
	Gay or lesbian	1	0.81%	
	Bisexual	1	0.81%	
	Unknown or sexual orientation not specified	58	47.15%	
	Total	123	100%	
	*The data on sexual orientation is based on 123 residents living across 65 occupied properties on Elm Grove estate.			
Socio-		nts living acı	ross 65 occupied	
Socio- economic		nts living aci	Percentage (%)	
	properties on Elm Grove estate.			
	properties on Elm Grove estate. Socio-economic Status	Yes	Percentage (%)	
	Socio-economic Status Households receiving Housing Benefit	Yes 28	Percentage (%) 52.83%	

4. Impact of proposal on people with protected characteristics

Elm Grove is a diverse community, therefore the proposal to regenerate the estate has the potential to affect all Protected Characteristic groups represented or identified as living on the estate. However, based on the information gathered as part of the Equality Impact Assessment, the following Protected Characteristic group are likely to be most affected by the proposal:

- Age
- Disability
- Marriage and civil partnerships
- Race
- Religion and belief
- Sex

The local Protected Characteristic groups considered as part of this assessment include:

Socio-economic

Currently there is little or no information on the following Protected Characteristics groups or local Protected Characteristic groups to undertake a meaningful impact assessment on these groups.

- Gender reassignment
- Pregnancy and maternity
- Sexual orientation

• Care experience

4.1 Age

Positive Impact/s: age

The regeneration of Elm Grove will provide positive change for a range of age groups currently living on the estate, as well as those who move to the estate in the future. This includes the impact on older and perhaps more vulnerable residents, compared with the impact on children and younger peoples, who might be affected differently.

The age profile of Elm Grove residents is primarily of working age people, although there is still a significant number of older residents over the age of 55 (19.3%) with the highest concentration being existing council secure tenants. There is also a high proportion of young children under the age of 15 years (26.9%), although these are predominantly from non secure tenanted households.

The positive impact of regeneration on people across the mainly 'older' and 'younger' age groups are set out below, however many of these impact cut across the spectrum of ages living on the estate:

- A new home built to the latest design and space standards, which will meet the housing needs of each household, including families that are currently overcrowded, thus presenting more opportunities for children to have their own bedroom, or a shared bedroom with their siblings. This also presents an opportunity for older residents who are under occupying to move to a smaller and more manageable new home on the estate, or to take up the option to move to suitable independent living property elsewhere in the borough if they prefer. Subject to availability, there are also options to move under the Seaside and Country homes scheme.
- A new high quality modern home that is safer in terms of meeting 'secure by design' standard, is more sustainable through a fabric first approach to reduce carbon emissions, more energy efficient to ensure homes are warm in the winter and cool in the summer, and more accessible to meet residents needs, through the introduction of lifts and by creating homes with level access that are built to adapt to changes in later life, or as residents get older.
- A home that is affordable for both tenants and homeowners (old and young), including
 affordable rented homes, shared ownership accommodation and private homes for
 sale attainable under the Council's 'home swap' shared equity options. Homes will
 also be more energy efficient and therefore should be cheaper to run and heat.
- A high quality environment that includes place making features to create an inviting setting with public realm improvements, new landscaping, better access to and from the town centre, clearer wayfinding and enhanced lighting for added security. This is alongside the introduction of semi private and public amenity space for children and young people to play, and for older residents to relax, in essence the provision of new outdoor facilities for all ages to use and enjoy.
- Added social value through access to skills and employment opportunities.
- Opportunities to meet neighbours, create new relationships and be part of a new, or extended community.

• Improved health and wellbeing as a result of the combined benefits above.

Negative Impact/s: age

- Despite the positive effects of regeneration, the process can often have negative implications on those affected across different age groups. Through the consultation process, some, mainly elderly residents have explained that the prospect of losing their home to facilitate the redevelopment of new homes, irrespective of the benefits this will deliver, can be upsetting, particularly where there are sentimental attachments and where residents have lived comfortably in their homes for a number of years. This is particularly pertinent for some of the older residents who currently live in a house on the estate, where the new proposal does not provide this time of accommodation, but instead provide am equivalent flats and maisonettes. In addition, the longstanding freeholders on the estate are only able to buy a new leasehold property if they choose to return to elm grove, which would include for some, the added costs of service charges, which they currently pay as freeholder.
- The process of moving can also be overwhelming and challenging for older residents, as well as disruptive to them, as well as to families with young children. This can also be compounded further if residents and their young children are required to move twice, including a move into a temporary home for a lengthy period of time whilst their new homes are being built.
- The potential for losing an existing neighbour (if a neighbour chooses to move away) alongside the prospect of having to live next to new neighbours can often be unsettling for residents across the age groups due to a fear of the unknown. Although the uncertainty caused by this can affect all age groups, this is normally more difficult for long standing elderly residents who have established relationships with their existing neighbours over a long period of time..
- The introduction of new technologies, such as modern heating, hot water and ventilation systems, can often be overwhelming for older residents, who may have difficulty in the use of this technology, which is different from the traditional operating systems they're familiar with.

Mitigation measures: age

The following mitigation measures have been established through the consultation process and these principles have been included in the Landlord Offer:

- Secure tenants and eligible non secure tenants will be offered a right to a new home
 on the estate or a suitable replacement home elsewhere in the borough that will meet
 their housing needs, including a replacement house off site for those currently renting
 a house on the estate and a home with any adaptations necessary to ensure that
 residents are comfortable and satisfied when settling into their new home.
- Regular engagement with residents will be undertaken to establish their housing and support needs, so that the right accommodation can be provided and so they are aware of their options and entitlements under the Landlord Offer and from the Government. The design process also offers residents the opportunity to shape the design proposals for their homes and the estate, and to inform the delivery team about what specific requirements they need to live comfortably in a new or replacement home.

- Residents will receive financial assistance in the form of a homeloss compensation payment and can claim back their reasonable cost of moving through a disturbance payment.
- Residents will be assisted throughout the rehousing and moving process, including
 assistance with home removals, packing and unpacking services, the arrangement of
 disconnection and reconnection of supplies and making claims for housing benefits.
- Residents will have access to an Independent Residents Advisor through PPCR, so that they can obtain independent and impartial advice.
- Closer working with vulnerable residents (young and old), their families and/or carers
 and social care providers will be undertaken to ensure that they have access to the
 right housing, care and support services available to them.
- Special arrangements are available to make direct offers to residents who are
 vulnerable, or unable to properly use the Council's Choice Based Letting bidding
 system. The lettings process will also take into account specific medical requirements
 like a ground floor recommendation, the need for property adaptations, or special
 needs like a fully wheelchair accessible home.
- Under the Landlord Offer commitments, residents can opt to move near to their
 existing neighbours, in order to maintain their established networks, which reduce the
 threat of isolation and exclusion.
- The Council should continue to explore further measures to aid communication with residents across a range of age groups, including different forms of social media for younger residents, who may not always choose to engage under more traditional methods of engagement, as well as more specialist tools for those who may have a visual or hearing impairment. This should include the use of Touch (inc Braille, Block alphabet, Moon, Tadoma and Hand-under-hand signing), the use of Sign (inc Sign language, Makaton, Visual frame signing and Objects of reference), the use of Speech (inc Clear speech and Lipreading) and Non-formal communication such as writing or signing. Information should also be produced in a range of formats that are compliant with the government latest Accessibility guidance and policies.
- All residents, irrespective of their Protected Characteristics, will have access to support services under regeneration proposals.

4.2 Disability

Positive Impact: disability

Elm Grove has a moderate proportion of residents with at least one disability (14.63%), with 8.13% having stated a mobility issue and 8.13% having declared a disability relating to their mental health.

The regeneration of Elm Grove will contribute positively to the lives of existing and future residents with a disability. This is in terms of a physical / mobility related disability, mental health related illness or disability, or a sensory disability. It is expected that the positive impacts of the regeneration will be delivered through the following benefits:

- Provision of a new high quality home of the appropriate size and built to the latest design, space, safety and accessibility standards.
- A home that meets the needs of disabled residents, which may include providing a
 fully accessible / wheelchair accessible home with the right adaptations installed to
 meet the high level needs of a severely disabled household member.
- Options for the new or replacement home to be provided in another council or housing association property in the borough.
- Options for existing homeowners with a disability, to buy a new home on the estate under one of the Council's 'home swap' shared equity options.
- Opportunities for older residents with a disability to move to more suitable independent living accommodation, where they can benefit from the support of a specialist Independent Living Officer, or the services of Sutton Connect.
- A new home that is safe and built to 'secure by design' standard, as well as being more sustainable in reducing carbon emissions, being more energy efficient and being more affordable to run and heat.
- A more accessible estate will include lifts and homes with level access that can be adapted to meet the changing needs of disabled residents. The new environment will also benefit those affected by a physical or sensory disability, or who suffer with their mental health, through the creation of a safer and more attractive surrounding through public realm improvements, enhanced ecology and biodiversity, improved access to and from the town centre, clearer wayfinding and lighting. New private and public amenity spaces will also provide a positive impact, including the introduction of secure courtyards and private balconies that help to create a place where residents across a range of abilities and disabilities can enjoy.
- Disabled parking to be incorporated within the plans for the new estate, whilst existing
 residents currently renting a parking space on Elm Grove will be offered a
 replacement parking space on the new estate on similar terms.
- Added social value through access to skills, training and job opportunities.
- Opportunities to meet new neighbours, create new relationships and be part of a new, or extended community.
- Improved health and wellbeing as a result of the combined benefits above.

Negative Impact: disability

There are a number of negative impacts of regeneration that could adversely affect the health of a disabled residents. Some of these impacts mirror those faced by come elderly residents and ultimately could have a detrimental impact on an individual if not managed sensitively:

- The prospect of moving home can be overwhelming for some residents, particularly those that suffer with anxiety. Moving is by its nature stressful and disruptive, which will only be compounded if the process involves moving twice, with an initial move into temporary accommodation.
- Moving away from familiar surroundings whether on the new estate, or elsewhere in the borough, can heighten anxiety and the feeling of isolation. Moving away from an

existing neighbour, who may have offered a support network can also be unsettling and could lead to social exclusion. For some residents who have a disability, the impact of being rehoused away from their existing environment (either temporarily or permanently) can give rise to concerns about potential discrimination in a new community or environment. It also raised the need for additional support to protect long term their health and wellbeing.

- Disabled residents with a sensory impairment can equally be affected by a change in their environment, particularly if they have sight loss or are visually impaired.
- The reduced parking on the new estate means that there will be less opportunity to park on the estate. This could impact disabled residents who don't currently rent a parking bay on Elm Grove, but may require one later on in life. The loss of parking provision and increase in homes and people living on the estate could also impact temporary parking for visitors and carers, who provide support for disabled residents.

Mitigation measures: disability

The following mitigation measures have been established through the consultation process and these principles have been included in the Landlord Offer:

- In addition to the offer of a suitable new home on the estate, or a replacement home
 off the estate), regular consultation and engagement will be undertaken with residents
 to establish specific housing and specific support needs, so that the right
 accommodation can be provided to disabled households and so that residents are
 aware of the options and entitlements available to them under the proposal.
- The design process also offers residents with disabilities the opportunity to shape the
 design proposals for their homes and the estate, and to inform the delivery team
 about what specific requirements they need to live comfortably in a new or
 replacement home.
- Residents will receive financial assistance in the form of a homeloss compensation payment, as well as being able to claim for their reasonable moving cost, through a disturbance payment.
- Residents who are vulnerable will be assisted throughout the rehousing and moving process, including assistance with removals, packing and unpacking services, the arrangement of disconnection and reconnection of supplies and making claims for housing benefits.
- Residents will have access to an Independent Residents Advisor through PPCR, so that they can obtain independent and impartial advice.
- Closer working with vulnerable residents (including those with disabilities) and their families and/or carers and social care providers will be undertaken to ensure that they have access to the right housing, care and support services they need.
- Special arrangements are available to make direct offers to residents who are
 vulnerable, or unable to properly use the Council's Choice Based Letting bidding
 system. The lettings process will also take into account specific medical requirements
 like a ground floor recommendation, the need for property adaptations, or special
 needs like a fully wheelchair accessible home.

- Under the Landlord Offer commitments, residents can opt to move near to their existing neighbours, in order to maintain their established networks, which reduce the threat of isolation and exclusion.
- The proposal for Elm Grove includes the reallocation of a parking space for an existing
 resident who currently rents a parking bay on the estate. The current scheme has
 been designed to include sufficient parking provision for returning residents currently
 renting a bay, alongside an additional amount of disabled parking bays in line with the
 Council's planning policy requirement.
- The Council should continue to explore further measures to aid communication with residents who have a disability, including those who have a visual or hearing impairment. This should include the use of measures such as: Touch (inc Braille, Block alphabet, Moon, Tadoma and Hand-under-hand signing), the use of Sign (inc Sign language, Makaton, Visual frame signing and Objects of reference), the use of Speech (inc Clear speech and Lipreading) and Non-formal communication such as writing or signing. Information should also be produced in a range of formats that are compliant with the government latest Accessibility guidance and policies.
- All residents, irrespective of their Protected Characteristics, will have access to support services under regeneration proposals.

4.3 Gender reassignment

Currently there is no information on gender identity across the estate to undertake a meaningful impact assessment on this Protected Characteristic Group.

4.4 Marriage and civil partnership

Positive Impact: marriage and civil partnership

Elm Grove is home to a number of residents that are married, although currently there is no information to confirm the residence of couples within a civil partnership. Notwithstanding this, the regeneration proposal will provide positive impacts for this Protected Characteristic group, including:

- A new home of the right size and built to the latest design and space standards, which
 will meet the housing needs of the couple, including the provision of family sized
 accommodation if required. This will help to adequately rehouse families that are
 currently overcrowded and make provision for a range of new accommodation for the
 families of the future.
- A modern home that meets 'secure by design' standards, is more sustainable for the
 environment through a fabric first approach that will help to reduce carbon emissions
 and is more energy efficient to ensure homes are warm in the winter and cool in the
 summer and therefore are more affordable to heat and run.
- Married couples or residents in a civil partnership, including those who have young families, would benefit from having a modern accessible home that includes a communal lift to make access more convenient when living on an upper level.

- A home that is affordable for both tenants and homeowners in a married or civil partnership would benefit such groups, including affordable rented homes, shared ownership accommodation and private homes for sale available to existing homeowners under the Council's 'home swap' shared equity options. The proposal will also provide new private homes for sale on the open market, which would be available to couples to buy, who do not currently live on the estate.
- A high quality environment that includes place making features to create an inviting setting with public realm improvements, new landscaping, better access to and from the town centre, clearer wayfinding and enhanced lighting for added security. This is alongside the introduction of semi private and public amenity spaces for children and young people to play, and for families to relax.
- Added social value through access to skills and employment opportunities.
- Opportunities to meet neighbours, create new relationships and be part of a new, or extended community.
- Improved health and wellbeing as a result of the combined benefits above.

Negative Impact: marriage and civil partnership

The negative impacts of the regeneration proposal on those who are married on the estate or in a civil partnership are similar to other impacts faced by other Protected Characteristic groups. These include:

- The stress, anxiety and disruption caused by moving home, including the prospect of having to move twice, including moving into temporary accommodation for a significant period of time.
- The disappointment caused by losing one's home, especially where there are sentimental attachments and where residents have lived in their home comfortably for a number of years and would prefer not to move if they had the choice.
- Having to move to unfamiliar surroundings, which could potentially be further away from established relationships, support networks, children's schools, place of work, health care facilities and other services they would normally access locally.
- Being unable to afford to buy a new home on Elm Grove where the value of their existing home is significantly lower than the value of a new or equivalent replacement on the open market. This could result in a married couple having to accept a lower stake in a new home on the estate than they had previously anticipated, or in more extreme cases being unable to purchase a replacement home if they are in negative equity, or where their existing mortgage cannot be transferred and they are unable to the criteria to secure a new mortgage.

Mitigation measures: marriage and civil partnership

- Regular consultation and engagement should be undertaken to establish the specific needs of residents, so that the right accommodation can be offered and to ensure residents are aware of the options and entitlements available to them.
- Secure tenants and eligible non secure tenants who move under the proposal, will be provided with support and assistance to mitigate the negative effects of having to

move home. This will include arranging removals and providing financial support through a homeloss compensation payment and meeting their reasonable costs of moving. Independent advice will also be provided by the Independent Residents Adviser (PPCR).

 All homeowners across the Protected Characteristic groups will be offered the market value of their home, plus a 10% homeloss or 7.5% basic loss payment as compensation. Homeowners will also benefit from the 'home swap' shared equity options that would enable them to purchase a new home on the estate, or on the open market. In exceptional cases where a resident homeowner is unable to afford to buy a replacement home, they may be considered for an offer of affordable council housing.

4.5 Pregnancy and maternity

Currently there is no information on pregnancy and maternity across the estate to undertake a meaningful impact assessment on this Protected Characteristic Group.

4.6 Race and Religion or belief

The Protected Characteristics of Race and Religion or belief have been taken together under this impact assessment, due to similarities in the type of positive and negative impacts, and subsequent mitigation measures that are common to both groups.

Positive Impact: race and religion or belief

The regeneration of Elm Grove will offer a wide range of benefits to existing and incoming residents, including those under the Protected Characteristics of race and religion or belief.

The ethnicity of the estate is particularly diverse, with BAME groups making up 44.72% of residents living on Elm Grove, with the highest portion coming from a Black/African/Caribbean background. This would suggest that the regeneration proposals would have a significant impact on BAME communities on the estate. With regards to religion or belief there is currently only minimal information available which indicates that 3.25% of residents are of the Christian faith, whilst 9.76% of residents are Muslim.

The positive impact of regeneration on resident across both Protected Characteristic groups include:

- The provision of new high quality housing, including a new home built to modern safety, accessibility and sustainability standards and one that is affordable to tenants and homeowners with a right to return. The plans for Elm Grove have and will continue to be, co-designed with residents in mind including the needs of the different cultures and communities on the estate.
- The creation of additional affordable housing is an opportunity to increase the supply of genuinely affordable homes for the people of Sutton, including those currently living in temporary accommodation on Elm Grove, A number of these residents are from a BAME group who are not eligible for a new home under the proposal. However, they, alongside other homeless families in Sutton, across a range of ethnicities and religious beliefs, would greatly benefit from the extra supply of new affordable homes in the borough.

- The provisions of new private amenity and open space, such as private gardens, balconies, and communal courtyard will improve the quality of life for residents across all groups, especially different cultural groups with children and large families. The creation of a new public realm and surrounding environment, which incorporates enhanced biodiversity and landscaping, better lighting and clear wayfinding, will help these groups to feel safer within their surroundings and enable them to move around the estate more freely, with improved connections to and from the town centre, thus increasing access to their essential services.
- The creation of new jobs, apprenticeships and training opportunities will be available
 to local residents across different cultures, faiths and ethnicities, particularly
 underrepresented groups who might not otherwise have access to these
 opportunities.
- Existing residents across all groups, who are eligible under the Landlord Offer, will receive financial assistance in the form of a homeloss compensation payment. They will also be able to claim back their reasonable cost of moving through a disturbance payment. This is particularly important to households or specific groups on a low income.

Negative Impact: race and religion or belief

The negative impacts of the regeneration proposal on race, include:

- Displacement as a result of having to move home either temporarily or permanently, could disproportionately affect residents from a BAME community, including those communities whose culture is embedded in a specific religion or teaching. Moving by its nature can be disruptive and therefore extremely stressful for those who have already settled in their community, established local links and support networks. This can be extremely unsettling particularly for minority or underrepresented groups, which could lead to social exclusion.
- Despite efforts to be inclusive and to offer a range of methods to consult and communicate more broadly, some underrepresented communities can be inadvertently excluded from engaging and participating, especially where English is their second language. Furthermore, some of the more traditional approaches to consultation dont always accord with the cultural or religious needs of some groups, including the timing or events, which may clash with prayer times, or the location of meetings, which may conflict with the preferences of certain groups..

Mitigation measures: race and religion or belief

- Measures should be put in place to ensure that any obstacles to communication are addressed effectively. This could include making documents and other forms of communication more accessible, including producing literature in different languages that reflect the religious and cultural diversity of the estate or surrounding area.
- Participation amongst cultural groups should be encouraged and promoted to ensure
 the views of different cultures and communities are considered in shaping the plans
 for the estate. Some members of the BAME may require unique features to be
 included in the design of their new homes that can only be defined through the
 consultation process. This might include culturally specific requirements such as a
 preference for a separate kitchen area, or the orientation of specific rooms. Only
 through more inclusive consultation, greater levels of participation and a flexible and

more open approach to design will the needs of different groups be addressed fairly and transparently.

- Translation and interpreter service should be made available to maintain effective communication with those whose primary language may not be english.
- Building stronger relationships by taking into account the specific needs of different cultures and belief systems. This could include hosting meetings and events at specific times and in certain locations that are more suitable to religious and cultural requirements of different groups.
- Closer working and collaboration with the Council's Allocations team to understand specific requirements of residents from BAME groups, so to ensure where applicable, such needs can be taken into account during the rehousing process, in order to find suitable temporary or permanent accommodation for affected residents. This could include taking into account the needs of residents to be close to work, their children's schools, places of worship, health services, support networks and family and friends.
- Residents should continue to be supported through the rehousing process with removals, packing and unpacking services, arranging disconnection and reconnection of supplies and making claims for housing benefits. Special arrangements should also be made to assist those with language or communication difficulties, including assistance with completing forms and using the Council's Choice based letting system to bid for a home. The lettings process should also take into account specific cultural requirements like housing for multi-generational families to enable them to live together.
- Under the Landlord Offer, residents can opt to move near to their existing neighbours, in order to maintain their established networks, which reduce the threat of isolation and exclusion.
- A continuous and inclusive process of community engagement that gives all residents a voice and an opportunity to be heard, including additional support and access to independent and impartial advice on all aspects of the regeneration via PPCR, the Independent Residents Adviser.

4.7 Sex

Positive Impact: sex

The estate composition of Elm Grove based on sex is 44.72% male and 55.28% female, meaning women are more likely to be affected by the proposals for the estate:

- Women who may have children that are eligible for a new high quality, sustainably
 modern home under the proposal, will be rehoused in property that meets their
 housing needs in terms of space requirement in accordance with the Council's
 allocations policy. This will mean that no household will be left overcrowded and
 homes will be affordable, including being let at an affordable rent, and should be
 cheaper to heat and run.
- Residents who are eligible under the landlord offer, that choose to move sooner can
 do so as they will be given priority housing status to move to another council or
 housing association property in the borough that meets their needs.

- Families who choose to return to a new home on Elm Grove will benefit from the improved housing, as well as enhanced surroundings that include public realm improvements, direct links to the town centre, safer streets with improved lighting that are secure by design compliant and an environment that prioritises pedestrian movement. The scheme will also provide a more conducive environment for families, which offers more open space, landscaping and biodiversity, to create a better sense of place. Residents will also have access to private and communal amenity spaces, which are safe and provide areas for children and adults to play and relax.
- Added social value will provide additional benefits through presenting new job and training opportunities, so that local people with varying needs (inc women with young children) can access the right opportunities for them, that fit within their caring responsibilities and personal circumstances.
- Opportunities to meet new neighbours, create new relationships and be part of a new, or extended cohesive community.
- Improved health and wellbeing as a result of the benefits above.

Negative Impact: sex

- Residents, whether male or female, have highlighted their concerns about losing their
 current home and having to move to another home, even where the prospect of a new
 home is overwhelmingly positive. The disruption caused by moving home is disruptive
 and can be mentally distressing particularly for families with longstanding connections
 to their current home. The rehousing process can also create uncertainty and
 instability, particularly where residents may have to move twice, including into
 temporary accommodation for a number of years.
- Families have expressed concern about how their established routine could be
 affected, including the implication this could have on travelling to work, their children's
 school or child care arrangements, access to local services and wider support.
 Despite the entitlement to compensation, the negative effects of having to move away,
 would place additional financial pressures on families.

Mitigation measures: sex

- Residents will be supported throughout the rehousing and home moves process, including the help with arranging of removals. Where residents are vulnerable, extra assistance will be provided, including packing and unpacking services, arranging the disconnection and reconnection of supplies and services, and help with making benefit claims. Home adaptations will be installed in new or replacement homes where this is needed, to ensure that the special needs of families are met.
- Special arrangements will be put in place to support residents who require help with using the Council's Choice Based Letting System, to bid for a replacement home. This would also include options for the Council to make direct offers.
- Under the Landlord Offer, residents returning to a new home of the estate can opt to
 move near to their existing neighbours, so that they can maintain a sense of
 community, as well as added security, so that residents don't feel isolated or excluded.
- Maintain good relations with residents to ensure that they have access to the right housing, care and support services they need.

- Eligible residents will receive financial support through a homeloss compensation payment and can claim for the reasonable cost of moving, all of which will help to alleviate the financial stress of moving home.
- A continuous, inclusive and meaningful process of community engagement will be provided that gives all residents (male and female) access to up to date information, a platform to be heard and an opportunity to shape the evolving plans and proposals for the future of Elm Grove. A resident focused approach will also provide extra support to those who really need it, including access to their independent residents adviser for free independent and impartial advice on all aspects of the regeneration.

4.9 Sexual orientation

The data on sexual orientation shows that 51.22% of the estate is heterosexual, whilst 47.15% have not specified their identity. Only 1..62% have confirmed to be from a LGBT group. Notwithstanding this, the impact of the proposal on sexual orientation is not considered to be significant, whilst the absence of more definitive data has limited the opportunity to undertake a more meaningful impact assessment on this Protected Characteristic group.

5. Care Experience

Currently there is no information on the care experience of residents living on Elm Grove to complete a meaningful impact assessment of the proposal on this Local Protected Characteristic group. However, despite the limited data, the regeneration proposal will provide new opportunities more broadly for those in the borough that are leaving care or who have been in the cate system, by increasing the prospect of access to new affordable homes, as well as new training and job opportunities.

6. Socio-Economic Duty

The regeneration of Elm Grove will contribute to the promotion and improvement of the socio - economic wellbeing of Sutton and its communities. The estate currently includes 57 affordable properties for rent, of which 53 are let currently to the Council's existing secure tenants and non-secure tenants.

Of the 53 households renting these homes, 28 are currently in receipt of housing benefit (52.83%).

The proposal to regenerate the estate will help to support residents on low incomes and who are in receipt of benefits. It will also support the Council in its socio-economic duty in the following ways:

- Rents will be protected for council secure tenants, whether they move to a new home on the new estate, or move to another council property.
- New homes for residents returning to the estate will be built to modern standards offering better insulation, which should translate to lower heating costs
- Improvements to Market House are being designed with the current commercial/community tenants in mind, meaning these organisations can continue to

grow and contribute more social benefits to the area, including tackingling social and economic inequality.

- The wider regeneration of Sutton Town Centre, which includes the redevelopment of Elm Grove, will provide new employment opportunities for the local community, whilst the increased footfall from the new residents of Elm Grove or other nearby housing developments will help to generate more income to improve local services, alongside growth and investment into the area, which will support local people and businesses.
- The added social value initiatives will also help to offer new skills, apprenticeships and training opportunities for local residents.

7. Overlapping or intersectional impacts (impact on people that cross two or more protected characteristics)

The proposal for Elm Grove would directly affect residents who have multiple Protected Characteristics, in a range of ways, both positive and negative. These could include an overlap between the following Protected Characteristic Groups:

- Age and Disability where residents that are elderly are more likely to have a physical disability or sensory impairment
- Race and Religion or belief where Residents from particular BAME groups or culture may also closely align or overlap with a particular religious belief, and
- Sex and pregnancy and maternity where Women could be pregnant and/or on maternity leave.

8. Summary of impacts

In this section summarise the main impacts for each protected characteristic based on your assessments in section 4. Please delete as appropriate.

Protected characteristic/area	Assessment of impacts (choose and delete as appropriate)
Age	Mostly positive
Disability	Mostly positive
Gender Reassignment	Not considered under this assessment
Marriage and civil partnership	Mostly positive
Pregnancy and maternity	Not considered under this assessment
Race	Mostly positive
Religion or Belief	Mostly positive
Sex	Mostly positive

Sexual orientation	Not considered under this assessment
Care experience	Not considered under this assessment
Socio-economic	Mostly positive

9. Action Plan - summary of changes to mitigate negative impacts

Action	Expected Outcome	Owner	Deadline
Engage with residents on their housing needs and preferences for their new or replacement home	To ensure the temporary and permanent rehousing needs of secure tenants and eligible non secure tenants are met in accordance with the Council's Landlord offer commitments	Michael Hunte, Housing Regeneration Manager	Summer 2020 - Ongoing until Winter 2028
Continue to work with residents and arrange for them to complete a housing register application.	To ensure all residents rehousing needs are meet in accordance with the Landlord Offer	Michael Hunte, Housing Regeneration Manager	Ongoing - until Winter 2028
Continue to promote and implement the Council's offer and commitments to the residents, as set out in the Landlord Offer.	To enable residents to fully understand their options for rehousing, the support they will receive and the financial support and compensation they are entitled to.	Michael Hunte, Housing Regeneration Manager	February 2022 - Ongoing until Winter 2028
Continue to consult and engage with residents on the plans for their new homes and estate, through ongoing design events, resident meetings and individual conversations. Relaunch a Residents' Steering Group and ensure communication material and engagement events are well promoted, inclusive and accessible to all groups across the estate	To maintain resident support for the proposals and to ensure residents' views and contributions shape the plans for the future of Elm Grove.	Michael Hunte, Housing Regeneration Manager	Ongoing - until 2025 (full planning submission)
Continue to identify vulnerable residents and arrange for the required support to be put in place so that their needs can be considered.	To ensure vulnerable residents are given the appropriate level of support they need to participate in the consultation process and to help find them a suitable	Michael Hunte, Housing Regeneration Manager	Ongoing - until Winter 2028

	new or replacement home that meets their needs.		
Hold periodic meetings and maintain regular dialogue with the commercial / community tenants at Market House (216 -220 High Street) to discuss plans for the building and Elm Grove in order to work together to minimise the impact that the regeneration might have on their businesses and services.	To develop the proposals for Market House with the existing commercial tenants in mind, to enable them to remain in occupation during works and to establish a long term future in the building.	Michael Hunte, Housing Regeneration Manager	Ongoing until Winter 2028
Engage with Social Services and Occupational Health teams to support and assess the needs of older and disabled residents	To ensure residents are allocated homes that are suitable for their accessibility and medical needs.	Michael Hunte, Housing Regeneration Manager	Commenced January 2022 - Ongoing until Winter 2028
Support vulnerable residents by making direct offers of accommodation	To ensure vulnerable residents / households are allocated the right types of housing that meet their needs.	Michael Hunte, Housing Regeneration Manager	Commenced January 2022 - Ongoing until Winter 2028
Retain the services of PPCR and work collaboratively with specialist social care and support services	To ensure residents' have access to independent advice and specialist support services.	Michael Hunte, Housing Regeneration Manager	Commenced January 2022 - Ongoing until Winter 2028

10. Appendix

None

