

# South Kilburn Cabinet Report (June 2015)

**Department**

Regeneration and Growth

**Person Responsible**

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## Impact Assessment Data

5. What effects could your policy have on different equality groups and on cohesion and good relations?

5.1 Age (select all that apply)

- Positive

This equality analysis has been prepared to assess the impacts of the recommendations that the Cabinet give approval to authorise the Strategic Director of Regeneration and Growth to seek the Secretary of State's consent pursuant to Part V of Schedule 2 to the Housing Act 1985 to the disposal and development of Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) for the purpose of Ground 10A of Schedule 2; and also seeks approval to authorise the final Allocation Policy for secure tenants with homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only).

The impact of secure tenants having to move from their current homes within Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) to a replacement home in accordance with the final Allocation Policy for secure tenants with homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only), South Kilburn to enable their current homes to be brought forward for development as part of the South Kilburn regeneration programme is likely to be greater for older secure tenants.

21.9% of the secure tenants living within Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) are aged 65 or over, compared to 10.5% of residents within Brent as a whole. This data on age was collected from secure tenants housing needs assessment visits undertaken by the Estate Regeneration Team in autumn 2014 and spring 2015. Packing, moving and unpacking is likely to be particularly difficult for older people. Older secure tenants may also suffer greater psychological effects, including stress and uncertainty, for example in relation to having to move and may rely more on neighbours and nearby family for support, and moving home may affect these support networks. To mitigate this, the Council will ensure that the Estate Regeneration Team will help each secure tenant through the re-housing process. This will include identifying secure tenants' re-housing needs and requirements, informing them about the re-housing and move process, keeping them updated with the project and move timescales and supporting residents throughout the whole process. The Estate Regeneration Team will be able to allocate additional support and services to assist older secure tenants when moving home. For example, offering a packing and unpacking service to help older secure tenants with the move.

As with previous phases of the South Kilburn regeneration programme, secure tenants with homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) will be made a suitable offer of alternative accommodation, depending on their household make up. With regards to Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only), from a point of view of age, older secure tenants who are single or in a couple, whose children have left home and who are currently occupying a large home will be offered a smaller home that meets their current housing need in accordance with the final Allocation Policy for Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only). Secure tenants will be offered a larger replacement home that they would otherwise be entitled to if they or a member of their household requires larger accommodation on health grounds. Younger secure tenants who are single or in a couple with children who are over-crowded in their current homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) will be offered a new property that meets their housing need. This would be a positive impact to reduce overcrowding.

Secure tenants that move to a new home built as part of the South Kilburn regeneration programme will pay higher rents than on their current home, as the rents charged by Registered Providers (who own and manage new affordable homes delivered as part of the South Kilburn regeneration programme), known as target rents; are higher than those charged by the Council. The impact on secure tenants of paying higher rents on new build homes within South Kilburn than they currently pay to the Council on their existing home is likely to have less of an impact on older secure tenants who are in receipt of benefits as they will be not be affected by the introduction of a Universal Credit being introduced as part of the Welfare Reform Act 2013.

Supporting documentation can be found here :

5.2 Disability (select all that apply)

- Positive

The impact of secure tenants having to move from their current homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) to a replacement home in accordance with a bespoke allocation policy, to enable their current homes to be brought forward for development as part of the South Kilburn regeneration programme, is likely to be greater for disabled secure tenants. 29% of the secure tenants living within the Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) have a disability. This data on disability was collected from secure tenants housing needs assessment visits undertaken by the Estate Regeneration Team in autumn 2014 and spring 2015. Packing, moving and unpacking is likely to be particularly difficult for disabled people. Disabled secure tenants may also suffer greater psychological effects, including stress and uncertainty. Further, disabled secure tenants may rely more on neighbours and nearby family for support, and moving home may affect these support networks. To mitigate this, the Estate Regeneration Team will offer additional support to disabled secure tenants, similar to that described above in relation to older secure tenants. Replacement properties will be adapted in accordance with Occupational Therapist's assessments of the individual secure tenant or a member of their household.

The impact of having to move from their current home within Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) as part of the South Kilburn regeneration programme, may be particularly difficult for secure tenants with mental illness. Where secure tenants have mental health problems the Estate Regeneration Team will work with the secure tenants' existing support network/carers/GP to ensure that the necessary support and care is provided.

5.3 Gender identity and expression (select all that apply)

- Neutral

It is not anticipated that the recommendations being sought in relation to the South Kilburn regeneration programme would have any differential impact on residents because of their gender identity or expression.

5.4 Marriage and civil partnership (select all that apply)

- Neutral

It is not anticipated that the recommendations being sought in relation to the South Kilburn regeneration programme would have any differential impact on residents because of their marital or civil partnership status.

5.5 Pregnancy and maternity (select all that apply)

- Positive

The impact of secure tenants having to move from their current homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) to enable their current home to be brought forward for development as part of the South Kilburn regeneration programme is likely to be greater for pregnant women and women on maternity leave, than for other secure tenants. Packing, moving and unpacking is likely to be difficult for pregnant women and women on maternity leave. To mitigate this, the Estate Regeneration Team will offer additional support to secure tenants who are pregnant or on maternity leave, similar to that described above in relation to older secure tenants and disabled secure tenants.

5.6 Race (select all that apply)

- Neutral

Table 2 provides a summary of the ethnicity of secure tenants with homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only). This data on race was collected from secure tenants housing needs assessment visits undertaken by the Estate Regeneration Team in autumn 2014 and spring 2015.

As per Table 2, the impact of the Allocation Policy for secure tenants in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) will be felt by an above-average number of secure tenants from Black/African/Caribbean/ Black British heritage, who are overrepresented in comparison with the ethnic diversity of Brent as a whole. However the proposals should not have a negative impact on anyone because of their race and in the long term, the regeneration should benefit people from all backgrounds by delivering a range of benefits and improvements.

Supporting documentation can be found here :  
[150601-Ethnicity-Table-Equality-Analysis.pdf](#)

5.7 Religion or belief (select all that apply)

- Neutral

Table 3 provides a summary of the religion or belief of secure tenants with homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only). This data on religion or belief was collected from secure tenants housing needs assessment visits undertaken by the Estate Regeneration Team in autumn 2014 and spring 2015.

As per Table 3, the impact of the recommendations being sought in relation to the proposed redevelopment of Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) will be felt by an above-average number of secure tenants from Christian, Buddhist and Muslim faiths particularly, when compared with the religious breakdown of Brent as a whole. However the proposals should not have a negative impact on anyone because of their religion or belief and in the long term, the regeneration should benefit people from all backgrounds by delivering a range of benefits and improvements.

Supporting documentation can be found here :  
[150601-Religion-or-Belief-Table-Equality-Analysis.pdf](#)

#### 5.8 Sex (select all that apply)

- Neutral

According to data collected from secure tenants in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) during housing needs assessment visits undertaken by the Estate Regeneration Team in autumn 2014 and spring 2015, 47.7% of secure tenants are male and 45.2% are female (7.1% preferred not to say). There is no evidence that male or female secure tenants will have any particular needs during the relocation process.

#### 5.9 Sexual orientation (select all that apply)

- Neutral

It is not anticipated that the recommendations being sought in relation to the South Kilburn regeneration programme would have any differential impact on residents because of their sexual orientation.

#### 5.10 Other (please specify) (select all that apply)

- Neutral

Section 9 of the Allocation Policy for secure tenants with homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) confirms that secure tenants who are allocated a new replacement property built as part of the South Kilburn regeneration programme will pay higher rent than their existing Council property. This is due to two reasons:

- i) Council rents are below the rents charged by Registered Providers, which are known as target rents; and
- ii) the higher value associated with a quality new build home, compared with an existing Council property, will be reflected in a higher target rent.

Annual rent increases for the new replacement homes will be in line with the Government's guidance on social rents. Registered Providers are required to meet the 'key requirements' set out within the Rent Standard Guidance. The Rent Standard guidance currently provides that annual rent increases for social housing will be limited to the Consumer Price Index plus one per cent. This will mean that there will always be a difference in the rent charged for existing Council properties in South Kilburn, compared with new homes for rent from Registered Providers, built as part of the South Kilburn regeneration programme. Secure tenants whose rent is met by housing benefit are likely to continue to have their rent met by housing benefit in part/full in their new home (subject to any change in circumstances and the impact of the welfare reforms). For secure tenants whose rent is not met by housing benefit, the rent levels of the new affordable homes built as part of the South Kilburn regeneration programme will be discussed with them at the housing needs assessment and other meetings prior to their move. It is not anticipated that the rent levels of the new affordable homes built as part of the South Kilburn regeneration programme would have a negative impact on anyone because of their ethnicity, nationality or national origin, age, gender, sexual orientation, disability, gender identity or expression or religion or belief.

#### 6. Please provide a brief summary of any research or engagement initiatives that have been carried out to formulate your proposal.

What did you find out from consultation or data analysis?

Were the participants in any engagement initiatives representative of the people who will be affected by your proposal?

How did your findings and the wider evidence base inform the proposal?

Census 2011.

Data on secure tenants in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) was collected during housing needs assessment visits undertaken by the Estate Regeneration Team in autumn 2014 and spring 2015.

Statutory consultation undertaken on the Council's proposals to seek the Secretary of State's consent pursuant to Part V of Schedule 2 to the Housing Act 1985 to the disposal and development of Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) for the purpose of Ground 10A of Schedule 2, to make a Compulsory Purchase Order (CPO) on properties in Hereford House, Exeter Court and 4 to 26 Stuart Road.

7. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

- No

The South Kilburn regeneration scheme proposes a phased redevelopment of the majority of the housing stock by prioritising the redevelopment of the worst quality blocks and delivering new homes within a higher quality, better managed and more connected place. The proposition is for traditional street patterns, front doors, high quality domestic materials, and retail and community space in the right locations. The South Kilburn regeneration scheme also proposes to deliver improved open spaces, new shops, a new health facility and a new consolidated school.

The Council aims to ensure that the South Kilburn regeneration programme will meet the varied individual needs and expectation of residents with homes due for demolition as part of the South Kilburn regeneration programme. The new homes in South Kilburn are available to secure tenants within South Kilburn regardless of their ethnicity, nationality or national origin, age, gender, sexual orientation, disability, gender identity or expression or religion or belief. Homes are designed to Lifetime Homes standards and the Mayor of London's Housing Supplementary Planning Guidance (November 2012). A proportion of the new homes are designed to be wheelchair adaptable while the allocation process considers the housing needs of secure tenants in terms of providing aids/adaptations to their new home, where required.

The Council also aims to ensure that everyone has equal access to services, regardless of their protected characteristics. We recognise the services provided to South Kilburn residents must be relevant, responsive and sensitive and that the Council must be fair and equitable in its provision of services to residents.

The Council also aims to foster good relations by undertaking meaningful consultation with residents and stakeholders on the regeneration proposals. South Kilburn Trust, a local regeneration charity working to bring about lasting change for the communities of South Kilburn, through its widening participation, seeks to find ways of involving and engaging with all local residents, particularly those who traditionally are 'hard to reach'.

8. What actions will you take to enhance any potential positive impacts that you have identified?

The Estate Regeneration Team will engage with secure tenants with homes in Hereford House, Exeter Court and 4 to 26 Stuart Road (even numbers only) on a regular basis right up to their move, to provide information and support and mitigate stress and uncertainty associated with the move.

9. What actions will you take to remove or reduce any potential negative impacts that you have identified?

No potential negative impacts have been identified.

10. Please explain the justification for any remaining negative impacts.

NA