

## SSA EQUALITY IMPACT AND NEEDS ANALYSIS

<b>Directorate</b>	Housing and Regeneration
<b>Service Area</b>	Regeneration Division
<b>Service/policy/function being assessed</b>	Withdrawal of the Tenants offer and local lettings plan (Alton Regeneration scheme)
<b>Which borough (s) does the service/policy apply to</b>	Wandsworth
<b>Staff involved in developing this EINA</b>	Bernard Brennan / Anna Singleton/ Andy Algar/ Alex Jones
<b>Date approved by Policy and Review Manager</b> All EINAs must be signed off by the Policy and Review Manager	Approved by Andrew Hagger on 6/9/22

### 1. Summary

The Equality Act 2010 requires that the Council when exercising its functions must have "due regard" to the need to eliminate discrimination, to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. As such an Equality Impact Needs Analysis (EINA) has been undertaken on 1st September 2022. The EINA has found that any negative equality impact would be high – reflective of the termination of the procurement process and withdrawal of the Tenant's offer and subsequent Local Lettings Plan for the scheme.

#### Please summarise the key findings of the EINA.

##### **Baseline assessment**

The EINA includes a baseline assessment of protected groups living in a core impact area defined by the boundary of the Wandsworth 007B lower layer super output area (the Alton west estate), within which the site lies. This local area has a total population of 1,881 people living in 799 households.

Data has also been extrapolated from information held on DataWand for both the borough and the ward of Roehampton and Putney Heath which is the ward which is where the Alton estate exists.

##### **Background:**

##### **Termination of procurement**

The Masterplan was adopted in 2014 which set out the vision for a large-scale mixed-use regeneration of the estate. Those proposals included demolition of a number of blocks within a defined area, the development of new homes built to meet the housing need of secure tenants and resident leaseholders as well as new improved community facilities, which includes a revitalised and enhanced retail offer.

Following a lengthy procurement process, Redrow Homes Ltd were appointed as a development partner in 2017 to deliver the regeneration of the Alton estate. Following an announcement in July 2020, Redrow announced they had taken a strategic decision to scale back development in London, and as a part of that, Redrow made the decision to withdraw from the scheme which was finalised in September of that year.

In February 2021 Paper No. 21-45 agreed revised objectives for the proposed Alton Estate regeneration, approved the procurement process to appoint a joint venture partner and agreed that procurement would commence once Greater London Authority (GLA) Stage 2 approval to the Council's planning application for the estate was received.

The planning application was approved by the Planning Applications Committee on 22nd October 2020. The scheme was referred to the GLA for its formal consideration in December 2021 and in late January 2022 the Mayor of London confirmed he was content for the Council, as Local Planning Authority, to grant permission for the scheme. The LPA issued the planning permission in late March 2022.

The consented scheme is a mixed-use regeneration that proposes the following:

- Around 1,100 residential units including 261 affordable homes
- A new community hub containing a new replacement library, new community hall, enhanced youth facilities and bespoke replacement accommodation for two GP surgeries (known as Block A).
- A purpose-built and co-located replacement children's centre and nursery at Portswood Place.
- Improved retail space
- Affordable office space to support small and start-up businesses
- Improvements to play space including refurbishment of play space at the Alton Activity Centre and Downshire Field playgrounds.

The new administration requested that procurement be paused, and bidders were advised on this in May 2022.

### **The tenant's Offer**

The Council Tenants' Offer was first published in 2014 and outlines its offer to secure tenants and who occupy blocks that are identified for demolition.

In summary, the Tenants' Offer extends to those secure tenants whose blocks were identified for demolition as part of the masterplan proposals. The headlines of the offer are that secure tenants will be offered a new home with a secure periodic tenancy that meets their current housing need, and then a new Council home will be delivered as part of the regeneration. Secure tenants are given Band A priority if they opt for early moves, and this is contained within the Local Lettings Plan for the Regeneration of the Alton Estate which was most recently approved in February 2021 (Paper No. 21-45).

### **Review of the objectives for the Alton estate regeneration**

#### **Extract from Housing Committee report**

*"The current administration has long held reservations about the nature and scale of the proposed regeneration of the Alton Estate, not least about the proportion of Council housing when*

*compared to private housing. A net gain of 48 social housing units on a 15-year project equates to 4.3% (48/1108) proportionately to the time, cost, energy, displacement and financial risk that regeneration can bring. For the new administration this is simply not enough”.*

*There is a belief that more should be done to ensure the proposed community buildings meet current and future demands of the area, particularly in terms of services to young people. More should also be done to try and improve access to public transport on what it a relatively isolated area.*

*In light of the above, it is an appropriate point in time to review other options to improve the estate and the lives of the people that live there”.*

It is therefore recommended that officers and external consultants undertake an exercise to identify options. Once options have been developed, they will be brought to the Committee for further review and scrutiny.

#### **Proposals:**

The Housing Committee and Executive will consider a report to terminate the existing procurement and will ask officers to identify and assess alternative options.

The decision to terminate the masterplan procurement removes any immediate prospect of demolition. As the Tenants’ Offer is predicated on the prospect of demolition will need to be withdrawn. In the absence of the Tenants’ Offer the Local Lettings Plan can also no longer apply.

This consequence is made clear in the Alton Regeneration ‘Council Tenant rehousing information booklet’ most recently published in October 2021.

#### **Impacts:**

##### Positive:

- The withdrawal of the offer will free up allocation officers who have been allocated to cases arising from the scheme to spend time working with other applicants from other priority queues, 70% of whom are in the 30–59-year-old age bands
- The council remains committed to investing in improvements on the Alton Estate so any future investment may mitigate some of the negative impacts of this decision.

##### Neutral:

- All existing tenants have secure tenancies at their existing property so there is no loss of security of tenure for remaining tenants in the redevelopment area

##### Negative:

- Existing residents will remain in their existing accommodation, some of which are living in overcrowded conditions.
- Tenants will lose existing priority rehousing status associated with the tenant’s offer
- Tenants lose the right to be rehoused automatically into either one of the satellite sites (Fontley Way and McKinney House) or to one of the future blocks on the existing site.

- The proposals negatively impact on the number of people affected in the 55 to 64 age group by comparison to the proportional representation on the estate.
- The proposal negatively impacts on the number of people affected from a black ethnic background more than any other by comparison to their proportional representation on the estate.
- Terminating procurement causes delay to the development of new homes built to meet the specific needs of tenants in the redevelopment area
- Terminating procurement causes delay to the development of community facilities and retail offer.
- Terminating procurement causes delay to the public realm and accessibility around the estate
- Reviewing the objectives Introduces a level of uncertainty and apathy which has long been in the minds of tenants following two previous failed regeneration programmes.

## 2. Evidence gathering and engagement

### a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
Data from our internal records on our tenant profile.	Tenant profile (by ethnicity, age, disability, and gender) as of 31 <sup>st</sup> March 2022.
Resident and ward population data	Data ward – population explorer - <a href="https://www.datawand.info/population-explorer/">https://www.datawand.info/population-explorer/</a>

### b. Who have you engaged and consulted with as part of your assessment?

A letter will be circulated to secure tenants within the redevelopment area, and we are seeking comments over the proposal to remove the Tenants Offer and the Local Lettings Plan for the Alton estate, that we are terminating the procurement process and reviewing the scheme's objectives. This will run from w/c 5 September 2022 until 26 September 2022

## 3. Analysis of need

### Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity, and inclusion

There are currently 80 secure tenants living within the current redevelopment area. The existing Tenants' Offer enables residents to be relocated on a 'one move' basis which helped to avoid unnecessary costs, upheaval, and stress on residents. Also included within this was the opportunity to either be provided new accommodation appropriate to their need in the same area, or the opportunity to be rehoused to existing stock in the borough in areas chosen by those applicants.

The offer also ensured that all secure tenants in the development area were offered accommodation suitable to their housing need which is periodically updated by officers.

To obtain an accurate breakdown of impacted tenants by protected characteristics, our end of year tenant profile (as of 31<sup>st</sup> March 2022) was obtained which provides a reliable update on the makeup of our tenants by some protected characteristics.

The end of year tenancy profile was broken down to the individual blocks which are impacted by the proposed changes which includes the following blocks:

1-45 Allbrook House (Cons)  
 Danebury Avenue (3, 11-29 Odd)  
 Danebury Avenue (31-115 Odd)  
 Danebury Avenue (117-211 Odd)  
 Danebury Avenue (213-243 Odd)  
 Harbridge Avenue (1-31 Odd)  
 Harbridge Avenue (2-32 Even)  
 Harbridge Avenue (33-83 Odd)  
 Harbridge Avenue (34-84 Even)  
 Harbridge Avenue (85-115 Odd)  
 1-28 Kingsclere Close (Cons)  
 1-14 Portswood Place (Cons)

The information on tenants from these blocks is used to determine the potential impact and outcome of this strategy change.

Only 4 out of the 9 protected characteristics could be analysed since the Council only holds comparable data on age, disability, ethnicity, and sex.

The data is limited to the named tenant in each of the properties and does not include data on household members. The same dataset has been used for the estate so direct comparison can be made.

Once the review exercise has been undertaken and a better understanding of the impacts of those findings has been determined, another EINA on the impacts of the recommendation will be brought forward as part of a committee report. The impacts of future findings have not been considered until there is an appropriate moment to do so.

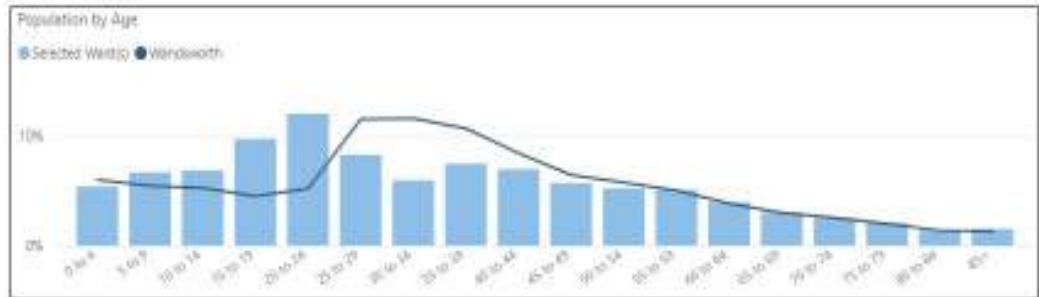
When looking at the termination of the procurement process, the area of impact is far greater than those within the redevelopment area, so we have extrapolated data across the ward and the borough for comparison.

To mitigate these proposals, the council confirms it is committed to investing in improvements on the Alton Estate which may mitigate some of the negative impacts of this decision if the proposal offers new homes to existing secure tenants

Details of the analysis are below.

Protected group	Findings
Age	<p><u>Termination of procurement</u></p> <p>The termination of the procurement, impacts upon people in the 15-24 age bracket relatively higher impact than in other age brackets. Those in the 15-24 age bracket account for 21.8% of the population of the ward, many of whom would substantially benefit from the community facility offer (new youth facilities and new library). Looking</p>

across the borough, there is 9.73% representation in this age bracket which identifies that this age band in particular will be disproportionately affected when compared to boroughwide figures.



**Tenant offer withdrawal**

Tenants under the ages of 55 to 64, 45 to 54 and 65 to 74 represent the largest groups within the affected area (30%, 29% and 16% respectively). The most significant impact can be found in the age range between 55 to 64, where the percentage affected is 30% by comparison to those tenants on the estate which is 19%.

The borough average for residents aged 55-64 is 8.87%, aged 45-54 is 12.2% and aged 65-74 is 5.54%. The percentages of tenants potentially impacted is above the borough averages for all these age groups.

The average for Roehampton ward residents aged 55-64 is 9.04%, aged 45-54 is 10.95% and aged 65-74 is 5.55%. The percentages of tenants potentially impacted is above the ward averages for all these age groups.

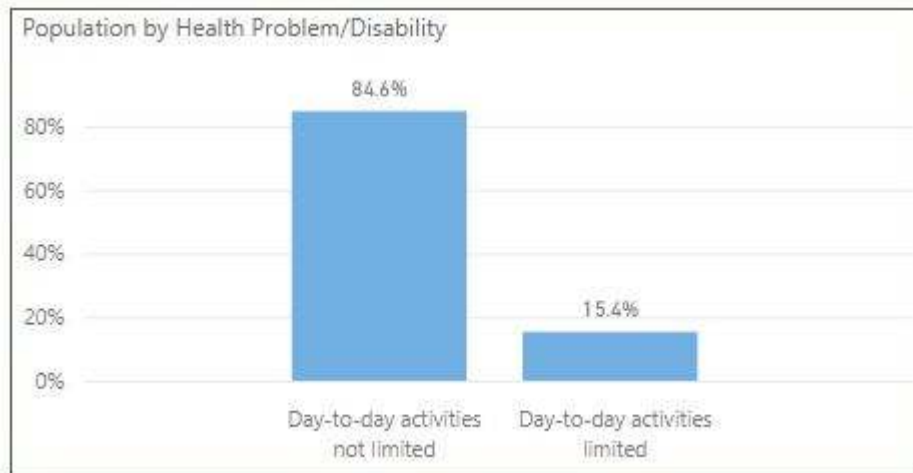
The proposed changes would therefore disproportionately affect these age groups (older residents) in particular because of the proposal. The proposed changes would have considerably less impact on those tenants in younger age brackets comparative to their representation on the estate more broadly.

Age Group	Alton Estate		Affected blocks	
	No. of tenants	% Of tenants	No. of tenants	% Of tenants
Under 25	26	2%	0	0%
25 to 34	245	15%	4	5%
35 to 44	350	21%	8	10%
45 to 54	391	24%	23	29%
55 to 64	313	19%	24	30%
65 to 74	177	11%	13	16%
75+	126	8%	8	10%
Grand Total	1628	100%	80	100%

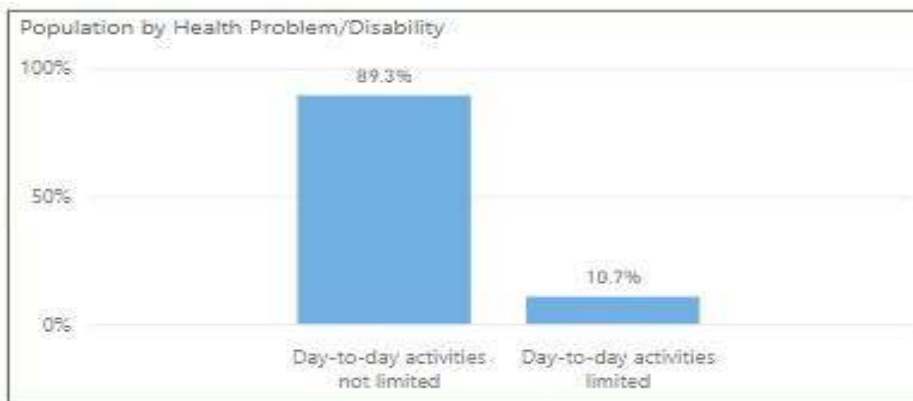
**Disability**

Termination of procurement

15.4% of the ward’s population identify as being limited in their day-to-day activities which equates to 2,577 people. Delays to the project will have a significant impact on their ability to access both across the estate and access to community facilities. This represents a higher percentage than the representation across the borough which is approximately 10.7%.



**Ward**



**Borough**

Tenant Offer withdrawal

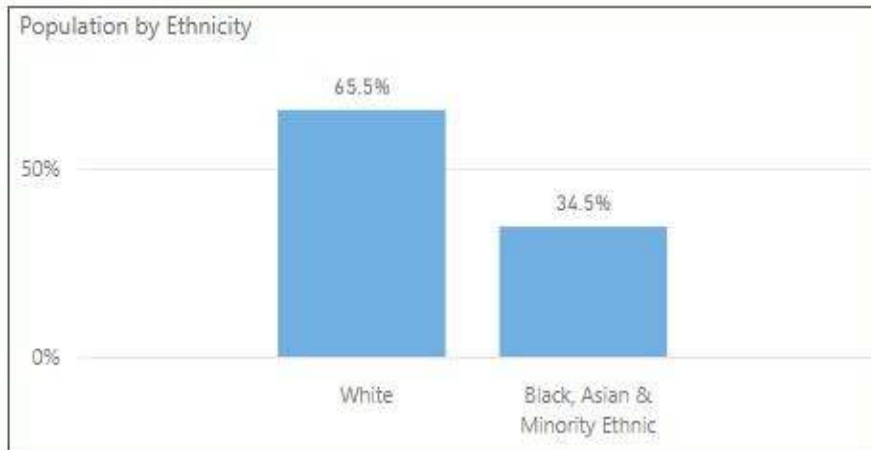
There are comparative data limitations for this protected group, since the only data available is the internal council tenant end of year tenant profile.

As of the 31<sup>st</sup> of March 2022, 4% of tenants in an affected block said they were disabled. This is lower than the percentage for the whole of the Alton Estate and also for the borough where 10.7% of residents said in the Census their day-to-day activities were limited. The proposals therefore do not appear to adversely impact disabled residents.

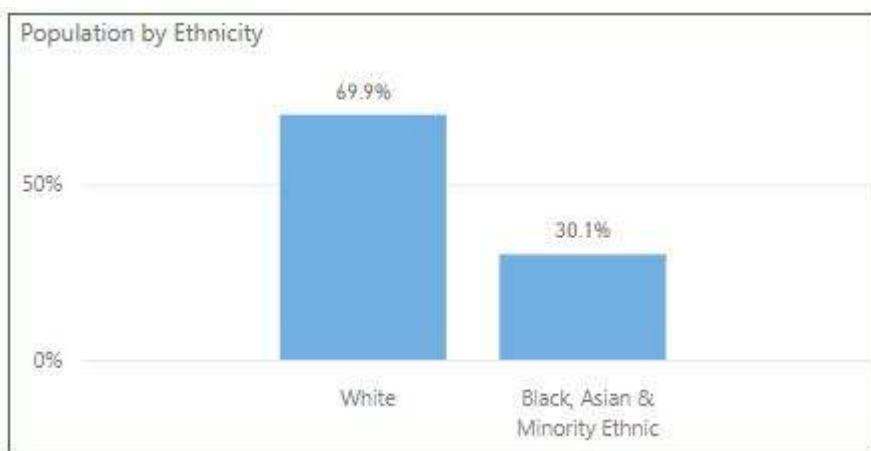
Disability	Alton Estate		Affected blocks	
	No. of tenants	% Of tenants	No. of tenants	% Of tenants
No	1487	91%	77	94%
Yes	141	9%	3	4%

<p><b>Sex</b></p>	<p><u>Termination of the procurement process</u>                  Across the ward the data shows 52% Female and 48% male making up the area population. There is no disproportionate adverse effect on either sex when looking comparatively across the borough.</p> <p><u>Tenants offer withdrawal</u>                  There is no disproportionate adverse impact on tenants in this category when you compare the affected area with the rest of the estate.</p> <table border="1" data-bbox="400 551 1201 748"> <thead> <tr> <th rowspan="2">Sex of the tenant</th> <th colspan="2">Alton Estate</th> <th colspan="2">Affected blocks</th> </tr> <tr> <th>No. of tenants</th> <th>% Of tenants</th> <th>No. of residents</th> <th>% Of residents</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>1084</td> <td>67%</td> <td>54</td> <td>67.5%</td> </tr> <tr> <td>Male</td> <td>544</td> <td>33%</td> <td>26</td> <td>32.5%</td> </tr> </tbody> </table>	Sex of the tenant	Alton Estate		Affected blocks		No. of tenants	% Of tenants	No. of residents	% Of residents	Female	1084	67%	54	67.5%	Male	544	33%	26	32.5%
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Female	1084	67%	54	67.5%																
Male	544	33%	26	32.5%																
<p><b>Gender reassignment</b></p>	<p>No data available – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.</p>																			
<p><b>Marriage and civil partnership</b></p>	<p>no data available – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.</p>																			
<p><b>Pregnancy and maternity</b></p>	<p>no data available – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.</p>																			
<p><b>Race/ethnicity</b></p>	<p><u>Termination of procurement</u>                  Delays caused by the termination of the current procurement process will impact 34.5% of those in the ward from the black, Asian and minority ethnic groups. There is larger impact on this group when a boroughwide comparison is made whereby those from black, Asian and minority ethnic backgrounds make up 30.1% of the borough’s population.</p>																			





Ward



Borough

Tenant offer withdrawal

When looking at the comparison between representation in terms of ethnicity, those from a Black ethnic background are disproportionately affected by the proposal when you compare representation across the estate with those from the affected blocks. It is important to note again this is a small cohort of 80 tenants when we compare that to some 1,628 tenants across the estate.

Looking at the borough 10.8% of residents are from a Black ethnic background, 10.2% from an Asian background and 6.3% mixed. This also highlights those tenants from a Black ethnic background are disproportionately affected by the proposal

Ethnic Group	Alton Estate		Affected blocks	
	No. of tenants	% Of tenants	No. of residents	% Of residents
Asian	201	12%	10	12.5%
Black	394	24%	24	30%
Mixed	56	3%	1	1.25%
Other	78	5%	3	3.75%
Unknown	158	10%	7	9%

## Appendix 2 – Paper No. 22-253

	White	741	46%	35	44%
<b>Religion and belief, including non-belief</b>	no data available – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.				
<b>Sexual orientation</b>	no data available – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.				
<b>Across groups i.e., older LGBT service users or Black, Asian &amp; Minority Ethnic young men.</b>	no data available – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.				

**Data gaps**

<b>Data gap(s)</b>	<b>How will this be addressed?</b>
As addressed, data on all protected characteristics is not currently collected.	A large proportion of our tenants will have been a tenant of the Council for many years and data is mainly collected once the tenant has signed up to the property. In addition, the Council is mainly collecting data on age, ethnicity, disability, and gender, which restricts our ability to provide a richer assessment of other protected groups based on our tenant profile. This is something we can consider changing going forward, however, there will still be limitations since we may only be able to collect data on new tenants rather than existing tenants, since we will need to rely on existing tenants to contact us to provide us with data.

**4. Impact**

<b>Protected group</b>	<b>Positive</b>	<b>Negative</b>
<b>Age</b>	No positive impacts identified	Those in the 15-24 age bracket account for 21.8% of the population

		<p>of the ward, many of whom would substantially benefit from the community facility offer (new youth facilities and new library). Any delay would have a negative impact on them.</p> <p>Tenants in the 55-74 age bands appear to be more adversely affected by the tenants offer withdrawal when you look at the proportional representation across the estate.</p> <p>For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them but may be assessed for a move on the council’s access queue.</p>
<b>Disability</b>	No positive impacts identified	<p>Delays to the project will have a significant impact on those residents in this bracket and their ability to access both across the estate and access to community facilities.</p> <p>No comparable adverse effect on these residents when looking at comparative data across the Alton estate in terms of the offer withdrawal.</p> <p>Disabled residents would have been offered an early move or new accommodation which has been modified to a minimum M4(2) accessible and adaptable standard by comparison to their current accommodation.</p> <p>For those in favour of a move or in overcrowded accommodation will now have to wait for an allocation of social housing via the General Needs queue which has lower priority.</p>
<b>Sex</b>	No positive impacts identified	<p>For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them but may be assessed for a move on the council’s access queue.</p>

<b>Gender reassignment</b>	No positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them but may be assessed for a move on the council’s access queue
<b>Marriage and civil partnership</b>	Although we were unable to provide comparative analysis on this protected group, no positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them but may be assessed for a move on the council’s access queue
<b>Pregnancy and maternity</b>	Although we were unable to provide comparative analysis on this protected group, no positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them but may be assessed for a move on the council’s access queue
<b>Race/ethnicity</b>	No positive impacts identified	<p>Delays caused by the termination of the current procurement process will impact 34.5% of those in the ward from the black, Asian and minority ethnic groups. There is larger impact on this group when a boroughwide comparison is made whereby those from black, Asian and minority ethnic backgrounds make up 30.1% of the borough’s population.</p> <p>Those tenants who identify as being from a black background are deemed to be more adversely affected from the offer withdrawal than any other group when you compare their representation in the redevelopment area relative to the representation across the estate.</p> <p>For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them but may be assessed for a move on the council’s access queue</p>
<b>Religion and belief, including non-belief</b>	No positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them
<b>Sexual orientation</b>	Although we were unable to provide comparative analysis on this protected group, no positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them

**5. Actions to advance equality, diversity, and inclusion**

Action	Lead Officer	Deadline
Not applicable in this case		

**6. Further Consultation (optional section – complete as appropriate)**

Consultation planned	Date of consultation
A letter will be circulated to the tenants within the redevelopment area, and we are seeking comments from those in the impacted area over the proposal to remove the Tenants Offer and the Local Lettings Plan for the Alton estate, and that we are terminating the procurement process and reviewing the scheme's objectives. This will run from w/c 5 September 2022 until 26 September 2022	5 September 2022 to 26 September 2022 (comments sought for executive committee on 27 September 2022).