LB TOWER HAMLETS EQUALITY IMPACT ASSESSMENT

HARRIOTT, APSLEY AND PATTISON HOUSES REGENERATION SCHEME

October 2021



LB Tower Hamlets Equality Impact Assessment

Harriott, Apsley & Pattison Houses Regeneration Scheme Independently Reported by Ottaway Strategic Management Ltd October 2021

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1 Executive Summary

Introduction and context

- 1.1 Regeneration programmes need to be managed to ensure that the positive impacts of the regeneration are maximised and correspondingly to ensure that the negative impacts are minimised. In this context, the regeneration of the Harriott, Apsley & Pattison Houses has undergone an equality impact assessment (EqIA).
- 1.2 This independently commissioned EqIA is for the Harriott, Apsley & Pattison Houses Regeneration Scheme, which is currently at RIBA stage 3 of the development cycle. The EqIA seeks to understand how this regeneration programme will impact on people with protected characteristics as set out in the Equality Act 2010. Critical to this EqIA is the need to distinguish between general regeneration impacts and specific equality impacts.
- 1.3 The EqIA has reviewed the equality impacts of the current status of the regeneration scheme and in particular key decisions being sought of Cabinet, including:
 - Capital estimates and budget approval.
 - Decant status to allow secure tenants to be decanted.
 - Service of Initial Demolition notice.
 - Consent to make a CPO.
 - Ability to rely upon Section 203 rights to light.
 - New Lease to Mosque.
 - Delegation to procure and appoint build contractor.
 - Delegation to enter into all necessary contracts and agreements to deliver the scheme.
 - Carry out tThe regeneration proposals including resident engagement, design, planning and phasing.
 - The Landlord Offers and its guides for Council Secure tenants, resident and nonresident leaseholders and selling properties to the council.

Approach and methods

1.4 This EqIA has included a comprehensive desktop review of core legislation, policy and council papers. These are set out in Appendix 3. Data previously held by the borough has also been reviewed relating to those living on the estate as well as the borough's common housing register for people seeking a social housing tenancy. Much of this data only addressed the equality characteristic of age, gender and ethnicity. Moreover, the

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- bulk of this information is related only to the head of each household surveyed as opposed to all those living in each household.
- 1.5 On this basis, it was agreed with the Housing Regeneration Team that this EqIA would be supplemented with a targeted household survey completed by a survey interview team. A survey was conducted in February and March 2021.

Key household survey findings

- 1.6 The survey was undertaken between 24th February and 12th March 2021 and 72 responses were captured. Full details of the household surveys are set out in the main report in Section 4. These survey responses were based on self-declarations of a household member, but the information gathered relates to all the members of that household. In total 72% of the targeted households were engaged in this survey, 72 of the estate's 100 units, comprising of:
 - 31 council homes, comprising 43.1% of the survey respondents and 86% of the sample of council owned homes on the site (36 units)
 - 23 resident leaseholder homes, comprising 31.9% of the survey responses and 68% of the sample of resident leaseholders on the site (34 units)
 - 2 non-resident leaseholders and 16 privately tenanted households, comprising 25% of the survey sample and 60% of the sample of non-resident /privately tenant households on the site (30 units)
- 1.7 The headline equality findings of the primary research completed are:
 - Collectively 76% of residents in the survey sample have lived in their home for more than 6 years.
 - From the sample there were 344 people living in the 72 units, 141 of which are council tenants, 112 are resident leaseholders and 91 are non-resident / private tenants.
 - BAME populations on the Harriot, Apsley & Pattison House are significant. The white British Population in Harriot, Apsley & Pattison House is 7.0%, leaving a 93% ethnic minority population¹ and a BAME population² of 90.6% non-white populations. This compares to a borough ethnic minority population of 66% and a BAME population of 55%. The Bangladeshi population of the estate is most the significant ethnic grouping representing 72.2% of the population, 80.1% of council tenants, 79% of resident leaseholders and 52% of non-resident leaseholders and private tenants.
 - The gender profile of the estate is comparable with the borough's gender profile with 51% stating they were male, and 49% female compared to 52% male and

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

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

- 48% female in the borough. There were no report of gender neutral or transgender people in any of the households
- There are 15.3% of respondents on the estate who have stated they have a disability.
- Of these, 44% stated they had a long-standing illness and health condition, 42% with physical impairments, 6.1% with mental health conditions, 4.5% learning disabilities and 3% sensory impairment.
- 6.9% of residents in the sample are registered carers.
- 31.9% of households have a family member who looks after or supports someone else in their home that needs help with their day-to-day life due to a disability, illness, or old age.
- 15.3% of households in the sample stated they had made an adaption to their home.
- 27% are under 18. The working age population (18-64) are represented by 66.9% on the site while the over 65 population is 6.1%.
- None of the respondents identified as gay/lesbian or bisexual, with 100% stating they were straight/heterosexual.
- 81% of respondents identified as Muslim, 10% held no religious faith or belief while 6.1% stated they were Christian.
- Respondents stated that 0.87% of population (3 women) were either pregnant or who had given birth in the last 12 months.
- In terms of marriage and civil partnership 52.6% of adults over 16 have never been married or in a civil partnership, 41.4% were married, 1.4% separated, 1.4% divorced and 3.2% widowed.
- 42% of household members are employed full time, 9% employed part time with 12% in full time education and 17% unemployed and available for work.
- Sylheti (a dialect of Bangla) is spoken as a main household language in 53% of households, English as a main household language is spoken in 40% of responding households. Somali and French is spoken in 2.8% of households respectively and 1.4% of households speak Portuguese. Moreover of those who had English as a second language all households stated that they have strong written and spoken English.
- Respondents to the survey stated that 25% of households lived in 2 bedrooms, 58.3% in 3 bedrooms and 12.5% in 4 bedrooms and 4.2% in 5 bedrooms. Nb there are no 5 bedroom units in Harriott, Apsley and Pattison and these responses came from private tenants of leasehold units, who we assume to have been using the living room as a bedroom.
- 44% stated their household has the right number of bedrooms, 56% stated they did not.
- 58% stated their household was over-crowded and 40% stated it was not.
- 4.2% stated that their home was under occupied and 93.1% stated that it was not.
- 12% of respondents felt there would be a negative impact from the regeneration scheme on the health and wellbeing needs of their household.
- 8% felt there would be a negative impact from the regeneration scheme on the childcare school provision of members of their household.

- 1% felt there would be a negative impact from the regeneration scheme on the employment and skill needs of members of their households.
- 5% felt there would be negative impacts from the regeneration scheme on the elderly care/support received by members of their households.
- 86% wanted to see improvements to health services, 85% improvements to community facilities, 46% to play areas, 36% to local shops, and 26% to local transport.
- 54% of household residents are on some form of income related benefit.
- 28.7% of households stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty.
- The preferred forms of communication about the regeneration proposals, was telephone (75%), letter (42%) and email (29%).
- 1.8 Aside from the residents living in Harriott, Apsley and Pattison there are also three community facilities, two disability day centres and the Redcoat Community Centre and Mosque. In all three cases direct approaches were made following the provision of contact details by the council.

Vibrance Centre for adults with learning disabilities

- 1.9 As of July 2021 Vibrance centre had 35 service users. Currently the profile is based on:
 - 22 male (63%) and 13 female (37%) service users.
 - None of the service users are under 18. 3 (9%) are between 19 and 24, 9 (26%) are between 25 and 34, 9 (26%) are between 35 and 44 and 14 (40%) are over 45.
 - Ethnicity of users: White British 18 (52%) Bangladeshi 8 (23%), Black Caribbean 3 (9%). In summary 49% come from ethnic minority backgrounds and 40% are from BAME backgrounds.
 - Religion or belief identified by service users is 63% Christian and 26% Muslim, 3% Jewish and 9% not stated.
 - 100% of the service users who attend the Vibrance Centre have a complex physical and learning disability.
 - 40%, have both a Learning Disability and a Physical disability
 - 60% of service users have a Learning Disability

Council disability day centre

1.10 Following discussion with regeneration staff, it was agreed not to engage with staff at the council's Disability Day centre on the Clichy Estate. The view was taken that this centre was being re-provided elsewhere in the borough and hence the impact upon it would be minimal to service users.

Profile of the Redcoats Community Centre and Mosque

1.11 At the time of this EqIA, the Mosque were approached to request a profile breakdown of their worshipers. Unfortunately, the General Secretary of the Redcoats Community Centre and Mosque declined to provide any information about the equality and diversity

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- profile of its worshipers/congregation, as they were still in negotiations with the council, and they did not want to provide this information until the negotiations were complete.
- 1.12 It is, however, safe to suggest that the worshipers of the Mosque come from a range of ethnic backgrounds and that they represent all age groups and genders. Clearly there is also a collective association with the Islamic faith.

Perception of impact

1.13 The major issues and concerns raised by residents regarding their perceptions of the impact of the regeneration proposals are highlighted below:

Perceived concerns

- Car parking this issue was raised repeatedly and there was great concern about how this was to be addressed following the regeneration of the estate.
- The loss of green space across the estate was also raised by several participants.
- Lack of warmth in the current properties.
- Concerns around the possibility of fewer school places.
- Some general concerns about the uncertainty of the regeneration and what it may bring for residents.

Perceived positives

- Many welcomed the regeneration of the estate feeling that it would improve the look of what some considered to be a rundown estate and welcomed the possibility of a better environment.
- Some residents experienced overcrowding and felt that this may be addressed in the new development.
- Some leaseholders stated they couldn't currently sell their flat but, in the future, this would be easier, or they could sell to the council and move.
- A fresh environment and better housing conditions
- Likelihood of larger properties
- Reduction in Anti-Social behaviour

Summary of EqIA findings

1.14 Summary of key points identified in relation to each protected characteristic, and related priorities of language, socio-economics and health:

Race

- · High levels of racial diversity
- Critical that regeneration plans are consistent / fair and not influenced by someone's race.
- Regeneration plans neutral from a race perspective
- Negative impacts of other protected characteristics will be experienced by BAME groups given the estate's diversity
- No identified negative impacts from a race perspective

Gender

- Strong sense that the improvement to housing stock and the provision of new homes would be a strong positive of the regeneration process.
- Regeneration plans are broadly neutral from a gender perspective
- From the evidence gathered there are no identified negative impacts from a gender perspective

Trans-Gender

- No individuals who have undergone or are undergoing a gender transition process
- Regeneration plans are broadly positive from a gender reassignment perspective
- From the evidence gathered there are no identified negative impacts from a gender reassignment perspective

Disability

Negative impacts identified

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

Age

Negative impacts identified

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

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Marriage/Civil Partnership

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

Pregnancy/maternity

Negative impacts identified

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

Sexual Orientation

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

Religion/belief

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

Language

Possible negative impacts identified

- Language is critical particularly the ability to communicate and understand the implications of the regeneration process
- Research suggests that all residents currently on site have good grasp of written and spoken English
- Understanding may also be connected to issues of visual and or sight impairment, mental health, learning disability and age

Socio-Economic

Possible negative impacts identified

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

Health

Possible negative impacts identified

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

Mitigation Priorities

1.15 As part of this EqIA the following mitigation activity has been highlighted. This is set against those protected characteristics (or related priorities) where negative impacts have been identified.

Generic mitigation activity

- An EqIA refresh programme to be adopted alongside predicted key milestones in the project lifetime.
- The staff working on this project are experienced and have worked with similar regeneration schemes across the borough delivering to a diverse community. They have had equality training/briefings on one to one liaisons with residents.

Disability Mitigation activity

- Operationally it would make sense to have early engagement with those
 residents and households that have a member with a stated disability. This is
 particularly relevant to the households who identified sensory and physical
 impairments within their families, and where this would place additional
 challenges when moving disabled families to new properties. Consulting and
 engaging with disabled groups before, during and after change to check effects,
 outcomes and results is a legal requirement under the Equality Act 2010.
- In terms of formal adaptations for disability some engaged have felt that they have previously sought social services assessment for adaptations and equipment. In some cases, these assessments will need to be applied when the design of new homes can more easily accommodate these needs.
- The regeneration team to seek the support of dedicated occupational therapist / social services worker to assess the disability needs of residents.
- If leaseholders are seeking to leave the estate, referrals on to other Social Care Services should be made to mitigate any possible negative impact that disabled people may experience.
- Support with adaptations in units on the new estate, designed specifically for the disabled person's needs should be a prerequisite.
- Disability grants reviewed and accessed for residents in specific need to support the funding of adaptations.

Age Mitigation activity

Children and Young People

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

Older People

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

Socio-Economic Mitigation issues

 Resident homeowners would be compensated by offering them market value, plus 10% home loss, for their current home. Non-resident homeowners are

- being offered market value plus 7.5% for home loss. Disturbance costs including reasonable legal and valuation costs will also be paid, including moving costs, disconnection/reconnection of utilities, post redirection.
- These costs are also being afforded to council tenants.
- The regeneration programme will have impacts on residents, tenants and leaseholders alike, which might incur greater costs and hence become a burden for those residents unable to afford the associated costs. The Council needs to monitor the potential for a consequential rise in the costs of the new properties both in term of property values and in terms of rent.
- The Council will need to carefully monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.

Language Mitigation

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

Health Mitigation issues

- Health Needs Assessments will need to be carried out where required and dedicated rehousing support provided by the Council, including access to mental health support.
- Serious and long-term health conditions should be prioritised, but progressive conditions may need to be addressed. This information via the research that has been carried out is available to the council.
- OT assessments may need to be established to mitigate negative impacts.

Intersectionality

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

Conclusions

- 1.16 The regeneration of the Harriott, Apsley & Pattison Houses will have generic impacts for the whole community. However, equality impacts are likely to be concentrated through the protected characteristics of disability, age, health, socio-economic inequality and language.
- 1.17 Most significantly the implications of the regeneration on disabled people, older and younger people on the estate is likely to be the most significant, both in terms of health and access to amenity provision. Cost implications of the regeneration have also been highlighted and these are to do with the regeneration process, for example costs of moving from the old property and resettlement into the new home. In terms of cost the council intends to cover all reasonable costs to the new home. Moreover the rehousing

- offer seeks to protect older leaseholders who may not be able to renew a mortgage with a variety of options.
- 1.18 The impact of the regeneration process will have greater bearing on leaseholders both resident and non-resident. This will require the CPO of their properties if voluntary settlements cannot be achieved.
- 1.19 In some cases, those with less disposable income may have difficulty with maintaining leaseholder status if they decide to stay on the estate. This has been addressed through the leaseholder guarantees, which provide alternative options of shared equity and shared ownership arrangements. The borough will support the housing needs of private tenants displaced through the repurchase of lease holder properties, if they are on the housing register and are in bands 1 and 2. The remaining private tenants will be able access housing advice or have their housing options assessed, and we understand that the council have been in contact with these private tenants.
- 1.20 Set out below are the key actions recommended as part of this EqIA. These have been put into an action plan laid out in section 9 of this report.

Generic Actions

- Run EqIA briefing sessions, review training needs, and establish training where appropriate.
- Establish training where appropriate Equality training / briefing / workshops for housing regeneration liaising teams.

Disability Mitigation Actions

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

Age Mitigation Actions

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

Socio-economic Mitigation Actions

- The Council to monitor the potential for a consequential rise in the costs associated with the new properties both in terms of living costs and in terms of rent/mortgages.
- Private tenants will be rehoused if they are on the housing register and if they are in bands 1 and 2. The remaining private tenants will be signposted to the relevant housing options team/service and provided with information as to what their housing options are.
- The Council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.
- Facilitate access to Independent Financial Advisors for all residents.

Language Mitigation Actions

 Make alternative formats, translation and interpretation provision available when specific tenant engagement, leaseholder negotiation and wider off-site consultations are being undertaken.

Health Mitigation Actions

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

Intersectionality Mitigation Actions

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

2 Introduction and context

- 2.1 This Equality Impact Assessment (EqIA) has been commissioned as an independent report by LB Tower Hamlets Housing Regeneration team and it will focus on the key elements of the housing regeneration proposals for the Harriott, Apsley & Pattison House. The EqIA will address the key decisions required of Cabinet.
 - Capital estimates and budget approval.
 - Decant status to allow secure tenants to be decanted.
 - Service of Initial Demolition notice.
 - Consent to make a CPO.
 - Ability to rely upon Section 203 rights to light.
 - New Lease to Mosque.
 - Delegation to procure and appoint build contractor.
 - Delegation to enter into all necessary contracts and agreements to deliver the scheme.
 - Carry out tThe regeneration proposals including resident engagement, design, planning and phasing.
 - The Landlord Offers and its guides for Council Secure tenants, resident and nonresident leaseholders and selling properties to the council.

Equality Act 2010

- 2.2 Tower Hamlets council like all other public bodies has a duty pursuant to s.149 of the Equality Act 2010 to have due regard to the need to:
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act,
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it,
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Tower Hamlets Equality Policy

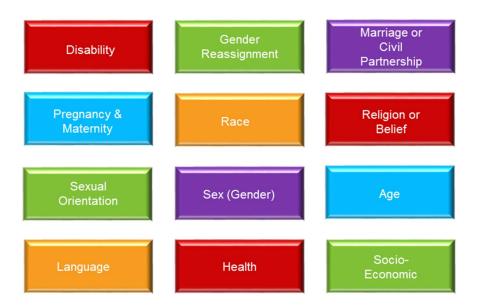
2.3 Tower Hamlets is one of the most diverse boroughs in the country and equality is a central priority to the way the borough works for its communities. Moreover, in addition to the nine protected characteristics outlined in the Equality Act 2010, this EqIA will also considers 3 additional priorities of socio economic inequality, health inequality and language, particularly English as a second language.

Equality Impact Assessments

2.4 This EqIA adopts the borough's model for Equality Assessments set by the borough's equalities policy leads. Like most other authorities, Tower Hamlet's Equality Assessments are a self-assessment tool to help look at the likely positive and negative impacts of the

borough's work on staff, citizens, partners and communities regarding equality of opportunity, and promoting diversity in employment and service delivery.

2.5 Tower Hamlets is one of the most diverse boroughs in the country and its approach to equality expressed through an ambition of fairness and the guiding values of equal opportunity and social justice. The protected characteristics and Tower Hamlet's priority characteristics are set out below. Each of these protected characteristics and Tower Hamlets local priority characteristics will be assessed in this EqIA.



- The EqIA will cover the following areas in the context of the council's general duty have due regard to the need to:
 - eliminate discrimination.
 - promote equality of opportunity.
 - promote good relations between different people.
 - •
- 2.7 From a methodological perspective, the EqIA will focus on addressing:
 - Likely regeneration programme impacts.
 - Likely / expected equality impacts (i.e. impacts on protected characteristics/local priorities).
 - Direct equality impacts.
 - Indirect equality impacts.
 - Proportionality of impact across protected characteristics/local characteristics including proportion, and disproportion, thereby assessing proportional positive impacts and negative impacts and or disproportional positive and negative impacts.
 - As part of this process it is critical to enable the council to assess what actions it will undertake to address the outcomes of these assessments.

- This analysis will enable a process of highlighting these impacts, which will
 enable Tower Hamlets to choose options for the mitigation of negative impacts
 accordingly.
- 2.8 The housing regeneration scheme for Harriott, Apsley & Pattison Houses will also operate within the council's own policies. To this end the EqIA has reviewed:
 - The Tower Hamlets Housing Strategy 2016-2021
 - 'Homes for Londoners- A Draft Good Practice Guide to Estate Regeneration' (GLA)
 - Strategic Plan 2020-2023
 - Local Plan 2031
 - The Council and its Common Housing Register Partners' Allocations Scheme (2020)
 - London Plan
- 2.9 Therefore, this EqIA has sought to address the context of the regeneration programme in Tower Hamlets and the core housing policies and processes which impact on residents.

3 The scheme

- 3.1 The current site consists of 100 homes based in the three blocks of, Harriott, Apsley and Pattison Houses. The tenure profile of the site is made up of 36 secure council tenancies, 34 residents leaseholders and 30 non-resident leaseholder the majority of whom are renting their units to private tenants. Within the site there are also three additional non-residential facilities, the Redcoat Community Centre and Mosque at 256 Stepney Way and two day care units for people with learning disabilities, the Day Opportunities Service (operated by LBTH) at 260-262 Stephney Way and the Vibrance Day Care unit at 262 Stephney Way (operated privately).
- 3.2 Like most urban areas, Tower Hamlets is experiencing a housing crisis. The council has committed to having 2,000 new council homes in delivery by 2022. The borough is seeking to make the most of land that they already own, including buildings no longer used as they once were, as well as buying additional homes. However this is not enough.
- 3.3 Through its options appraisal, the borough identified three options of refurbishment of the existing buildings, the regeneration of existing building and the development of infill sites and the full demolition and redevelopment of the site as a whole. A ballot was undertaken in 2020 and showed a universal support for the demolition and redevelopment option.
- 3.4 The proposed redevelopment will provide 438 homes, of which 79 will be replacement homes for existing tenants and resident leaseholders. The scheme will also accommodate a new mosque and community centre. However, the two disability day centres will be relocated to sites in other parts of the borough replicating the facilities currently available on the Harriott, Apsley & Pattison House site.
- 3.5 In line with the Tower Hamlets Local Plan, the additional homes created will provide at least 35% genuinely affordable housing and contribute to an overall target for 50% of all new homes to be affordable. The council will prioritise and maximise the development of genuinely affordable homes where feasible. The remainder will be developed for market rent or sale and will help to fund the construction of the affordable homes.
- 3.6 New homes will be a mix of one, two, three and four bedroom properties. They will be both flats and duplexes. The new development will meet the needs of existing residents

- by providing more new family sized homes as well as smaller sized homes for future residents who are both on the housing register and in housing need.
- 3.7 The borough has recognised that there would be a substantial cost for leaseholders to meet if this option were to be chosen.
- 3.8 Following the Ballot, the scheme progressed through concept design and onto design refinement and completion, with the submission of the scheme's planning application due in the Autumn 2021.

4 Summary of equalities evidence held by LB Tower Hamlets.

4.1 This section will set the context by reviewing the borough's equality and diversity profile, the equality and diversity profile of those on the borough's housing register and the equality and diversity profile of those living in Stepney Green Ward.

Borough Profile 2020³

- 4.2 ONS estimated the borough's population in 2019 as 324,745. Tower Hamlets has experienced the fastest growing population nationally, with a 2.2% population increase in the past year (from 2018 to 2019). That is the fourth highest after the City of London (11.7%), Camden (3.0%) and Westminster (2.3%). This is an equivalent to 19 additional residents every day in the last year.
- 4.3 According to the Census 2011, Tower Hamlets has a significantly higher proportion of residents who are single (53.3%) compared to London and England, compared to 44.1% in London and 34.6% in England. The two largest ethnic groups in the borough are White British (31%) and Bangladeshi (32%). Four in ten residents were born outside of the UK.
- The latest population estimates published by ONS show that Tower Hamlets continues to have one of the youngest populations in the country with a median age of 31.6. Along with Leicester, the borough has the equal fifth youngest median age after Oxford (28.9), Nottingham (29.7), Manchester (30.1) and Cambridge (30.3).
- 4.5 Tower Hamlets has a similar proportion of young people aged 0-19 to England and London. One in four (25%) of the borough's residents are in this age group. The largest age group is the 20-39 year olds. 46% of the population are aged 20-39. This is higher than London (33%) and England (26%).
- 4.6 In 2019 there were 4,331 live births in Tower Hamlets. Between 2018 and 2019 the borough experienced a 4.0% decrease in the number of live births compared to 3.1% nationally and 3.8% regionally.
- 4.7 The borough has around 14,000 more male residents than female residents. This is the 4th highest ratio of males to females in the country; this is higher than the ratio in both London and UK where there are more females than males.
- 4.8 The borough has 52.1% male residents and 47.9% female residents (*ONS Mid-Year Estimates 2019*).
- 4.9 The most recent data about the marital status of residents in the borough is from the 2011 Census. Tower Hamlets has significantly higher proportion of residents who are

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³ Borough Profile 2020 Chapter 1 population LB Tower Hamlets

- single compared to London and England. In 2011 55.3% of residents were single, compared to 44.1% in London and 34.6% in England.
- 4.10 A question was not included in the 2011 Census about sexual orientation, but the Office for National Statistics has included a question on sexual orientation in the 2021 Census, the results of which are yet to be published.
- 4.11 Experimental estimates published by ONS for 2017, show that nationally 2% of the UK population aged 16 and over identify as lesbian, gay, bisexual (LGB), regionally, people in London (2.6%) are more likely to identify as LGB.
- 4.12 Local authority level experimental data published for 2013-15 estimate that 4.3% of the Tower Hamlets population identified as lesbian, gay or bisexual.
- 4.13 The borough's two largest ethnic groups are the White British and the Bangladeshi populations, each accounting for one third of the population. Tower Hamlets has the largest Bangladeshi population in the country. The third largest group is the White Other population, who account for 12% of the borough's population. This group is diverse and includes residents from a mix of ethnic backgrounds, Europeans, Australians and Americans.
- 4.14 A significant proportion of the borough's population are Somalian. The 2011 Census identified 2,925 Somali-born residents, 1.2% of the population. The overall size of the Somali population in the borough, including subsequent and second generations, is larger, between 6,000 and 9,000 or 2-3% of the population.
- 4.15 Tower Hamlets has the highest number of Muslim residents in the country. Around 38% of the residents are Muslim, compared with 5% in England and 13% in London. Conversely, the borough has the lowest number of Christian residents at 30%, compared with 59% in England and 49% in London.

Demand for Housing

- 4.16 The Tower Hamlets Housing Strategy 2016-2021 outlines the major concern over the shortage of affordable housing and that future rents set by the council and housing associations will force people out of the borough. 44% of households live in income poverty and the average cost of a property in LBTH is more than 14 times (£450,000) what a typical essential worker could earn in wages (£35,000). The population of Tower Hamlets is likely to increase by 26% by 2026, adding further pressure.
- 4.17 The purpose of the Housing Delivery Strategy is to demonstrate how Tower Hamlets is proposing to reduce the current anticipated housing shortfall and deliver housing sustainably, and in a way that meets local housing needs.
- 4.18 Tower Hamlets has the highest housing target of all London Boroughs (3,473 homes a year⁴). This figure is derived from the Mayor of London's publication of the London Plan (March 2021) and was set following a London-wide Strategic Housing Market Assessment

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⁴ Table 4.1 – 10-year targets for net housing completions 2019/20 – 2028/29

(SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year in London. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons' accommodation within the overall figure.

4.19 The London Plan target is significantly higher that the borough's Objectively Assessed Need (OAN) of 3,100 homes a year, established by the LBTH SHMA (2017). The OAN provides an estimate of the borough's housing need, based on the latest population projections.

4.20 Key Housing data shows that:

- The private rented sector is the fastest growing housing sector in the borough.
- There are close to 15,000 ex-council homes which have been bought under the right to buy. An estimated 6,000 of these are now being let, usually as Houses in Multiple Occupation, by private landlords.
- The borough is growing by over 3,000 homes per year, making Tower Hamlets the quickest growing borough in London.
- MHCLG⁵ data on dwelling stock records a figure of 121,539 private homes in the Borough for 2019. The MHCLG data breaks down the tenure types of these properties, 9% were identified as local authority stock, 26% identified as being private registered provider stock and 64% (78,040 homes) in the private sector (comprising both owner occupier and the private rental market).
- There are 121,539 households in Tower Hamlets of which council and Registered Provider homes constitute 35%. The number of affordable homes in Tower Hamlets is 42,539
- There are 21,188 households on the council's Common Housing Register (CHR) as of 1st March 2021.
- The borough needs to deliver 1,965 affordable homes each year to meet housing need. This figure has been calculated from the council's Local Plan 2031 that sets out the borough's overall housing supply target of 58,965 new homes to be delivered between 2016 and 2031, of which 50% to be affordable.
- The average level of affordable housing completions over the last 3 years (2017-2020) is 833, significantly less than half the above annual target.

4.21 Summary context:

- Tower Hamlets remains a borough of high housing need.
- There is a sustained increase of net migration into the borough.
- While the borough has a good average income, a significant percentage of the population has incomes of less than £15,000 per year, which has impacted upon their ability to meet their housing costs, particularly as the largest housing tenure available in the borough is the private rented sector.
- The borough needs to deliver a significant number of affordable homes each year to meet housing need; and

⁵ https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants

 A substantial percentage of those homes must be three bedrooms plus, to meet demand from over-crowded households.

Housing Register

- 4.22 This section describes the profile of Tower Hamlets' housing register applicants .The data is based on a snapshot of the housing register on 10th May 2021. This information was provided by Tower Hamlets.
- 4.23 Key information:
 - 21,246 households on the housing register
 - 2,853 households living in temporary accommodation.
- 4.24 The borough's housing register holds basic equality information, which is set out below.
 - On 10th May 2021, there were 21,246 applicants on the council's housing register.

Age:

The table below shows the spread and breakdown of the ages of current common housing register applicants as of 10^{th} May 2021

Age group	Number	Percentage of applicants
18-25	2033	9.57%
25-40	9662	45.48%
41-50	5219	24.56%
51-60	2360	11.11%
60+	1971	9.28%

Gender:

Applicants on the housing waiting list

■ There are more female (53%) than male (47%) applicants. This is broadly comparable to the gender profile of the population of Tower Hamlets (aged 18 and over)

Disability:

 A disability was reported in 383 applicants on the housing register, representing a little under 2% of all applicants on the housing register

Race

• The largest ethnic group represented on the common Housing Register as of 10th May 2021 are those who identify as Asian (60%), with applicants who identified as from White ethnic groups representing 18% of all applicants. Just 10% of applicants identified as Black, with the remaining 7% of applicants who chose to disclose this information as identifying with another unspecified ethnic group. 4% of applicants declined to disclose this information.

Religion or belief:

There is a deficit in the information available on the religion or belief systems that applicants on the Common Housing Register identify with. This is largely due to the fact that this is a self-determining process of the part of the applicant and the majority of applicants choose not to disclose this information

Sexual orientation:
 Again, there is a deficit in the information available on the sexual orientation which
CHR applicants identify with, the majority of applicants either choose not to answer
or do not disclose this information
Marriage and civil partnership:
■ There is a deficit in the data which is held on the marital status of applicants on
the CHR.

Equalities issues raised by applicants on the Housing Register

- 4.25 What this data clearly describes is the extreme diversity of people on the Borough's housing register. Any provision of social housing is likely to address this diversity and the increase of affordable housing on the Harriott, Apsley & Pattison site is likely to benefit a diverse cross section of those on the CHR. This is likely to have a positive equality outcome for those seeking new accommodation.
- 4.26 The true measure of this however will only be seen going forward. Indeed, it may be important for the council to monitor the profile of those residents in the newly developed private housing to assess this impact effectively; this will also enable the assessment of the furtherance of the borough commitment to community cohesion.

Stepney Green Ward

4.27 The table below summarises data findings for Stepney Green ward, taken from the 2011 census and subsequent research and is collated by the GLA.

Stepney Green Ward	Equalities and diversity data
Population	• At the time of the 2011 Census, the population for Stepney Green ward was 11,258 which accounted for 4.4% of the total population of Tower Hamlets. The current population of Stepney Green ward was 12,857 (ONS ward level population estimates (experimental statistics)).
Age	 The child population (0-15) represents 22.8% of the total population in Stepney Green, this is more than Tower Hamlets 19.7%, London 20.0% and England 18.9% Working age population 16-64 in Stepney Green is 67.8% this is less than Tower Hamlets 74.1%, London 68.6% and England 63.2% Older people (65+) in Stepney Green are 9.4% more than the level in Tower Hamlets 6.1%, but less than London 11.4% and England 17.8% Stepney Green ward has a high proportion of its population in the 65+ age group, 9.4% of residents are in this age group compared to the borough average of 6%. Correspondingly, the ward has the third lowest proportion of working age residents (16- 64).
Gender	• At the time of the 2011 Census the ward had 5,723 males and 5,535 females providing a gender split in the ward of 50.8 % male and 49.2 % female.

Stepney Green	Equalities and diversity data
Ward	
	• 73% of residents in Stepney Green are from BAME groups, more than Tower Hamlets 67%, London 53% but higher than England 19%.
Race	The three largest ethnic groups in the borough (White British, Bangladeshi and White Priceships) The three largest ethnic groups in the borough (White British, Bangladeshi and White Priceships)
	Other) accounted for 83% of all residents in this ward
Main	■ The % for whom English is not their first language in Stepney Green is 39% higher
languages	than 34% for Tower Hamlets and 12.9% for London but higher than 4.4% for
spoken	England.
	• The proportion of residents who identified themselves as Christian was 22.3% –
	lower than the borough average of 30%. At 49.5% of the population, the proportion
Region or belief	of Muslim residents was the third highest proportion of the 20 wards in the borough. 1,357 residents in the Stepney Green ward explicitly stated that they had no religion,
Beller	this equated to 12.1% of the ward population, compared to the borough average of
	19.1%.
Gender	No data is held on LB Tower Hamlets systems for gender reassignment.
reassignment Sexual	No data is held on LB Tower Hamlets systems for sexual orientation.
orientation	·
Pregnancy and maternity	No data is held on LB Tower Hamlets systems for pregnancy and maternity.
Marriage and	No data is held on LB Tower Hamlets systems for marriage or civil partnership.
civil partnership	
	• On Census Day 2011, 1,092 residents (9.7%) in Stepney Green had a long term
	health problem or disability limiting the persons day to day activities alot, while
	around 8.1% (908 residents) had a long term health problem or disability limiting the
Health and	
aisability	
	■ The employment rate for residents in Stepney Green was 47.7% compared to 57.6%
Economic	for Tower Hamlets, 62.4% for London and 62.1% for England.
activity	• The unemployment rate for residents in Stepney Green was 7.1% compared to 6.7%
	·
Benefit	
claimants ⁶	
	four times higher, whereas the claimant count among 50+ year olds had doubled.
Economic activity	 persons day to day activities a little. In Stepney Green, the rate of people with a long term health problem or disability limiting day to day activities a lot and the rate of people with a long term health problem or disability limiting day to day activities a little were both above London and Tower Hamlets averages. The employment rate for residents in Stepney Green was 47.7% compared to 57.6% for Tower Hamlets, 62.4% for London and 62.1% for England. The unemployment rate for residents in Stepney Green was 7.1% compared to 6.7% for Tower Hamlets, 5.2% for London and 4.4% for England. The Claimant Count in Stepney Green ward rose sharply from March 2020 onwards as the impact of the Covid 19 pandemic took effect. As of January 2021, the claimant count was around three times higher than it had been in January 2019. The most affected age group was the 25-49 year old group where the number of claimants was

⁶ Department for Work and Pensions 2021.

Stepney Green	Equalities and diversity data
Ward Household composition	 The proportion of households in this ward with three or more people accounted for 43.6% of the total households in the ward. This proportion was higher than the borough average of 35%. On Census Day 2011, 737 households were recorded as having five or more people living in them. This equates to 18.4% of the households in the ward and was higher than the average for Tower Hamlets (12.3%). The average household size in this ward was 2.81 compared to the borough average of 2.51.
Household tenure	 The proportion of owner-occupied households in Stepney Green was 24.5% compared to 26.6% in Tower Hamlets, 49.5% in London and 64.1% in England. The proportion of social rented households in Stepney Green was 51.6% compared to 39.6% in Tower Hamlets, 24.1% in London and 17.7% in England. The proportion of private rented households in Stepney Green was 22.3% compared to 32.6% in Tower Hamlets, 25.1% in London and 16.8% in England.
Household Income	■ Tower Hamlets had a median household income of £28,769 in 2020, slightly below the medium household income in London. In 2020, Stepney Green ward had the 5th lowest median income of any ward in Tower Hamlets, with the average household income being below £23k. 3,700 households had an income below £35k and 1,100 had an income below £15k. (Source: CACI Paycheck 2020)
Deprivation – 2019 Indices of Multiple Deprivation.	 In 2019, Tower Hamlets was the 50th most deprived local authority area (of 317) based on its Rank of Score⁷. It was the 14th most deprived local authority area based on Income Deprivation Affecting Children and the most deprived area in the country based on Income Deprivation Affecting Older People. Stepney Green ward has high levels of deprivation compared to the borough as a whole and the London region. According to Greater London Authority analysis of the 2019 Indices of Multiple Deprivation, Stepney Green ward was the 5th most deprived ward in Tower Hamlets (of 20). It was the 69th most deprived ward in London out of 633 based on rank of score, placing it just outside the most deprived decile of wards in the capital. Stepney Green ward was the 6th most deprived in Tower Hamlets based on Income rank (within the most deprived 1% of wards) and the 38th most deprived in London. It was 6th most deprived ward in Tower Hamlets based on Employment rank and the 94th most deprived in London. In terms of Income Deprivation Affecting Children, Stepney Green ranked as the 140th most deprived ward in London. In terms of Income Deprivation Affecting Older People, it ranked 7th in both London and Tower Hamlets.

Commentary on these Data sets

4.28 An overall assessment of this information shows that there are limitations with these recorded datasets from an equalities perspective. In all cases, the profile of information

⁷ The 2019 Indices of Multiple Deprivation rank each local Authority area and each ward location within local authorities and sets these against national comparators.

is based on the head of household with no way to distinguish between other members of the household. Moreover, not all protected characteristics have been addressed and the level of health need is not fully stated.

- 4.29 A case for additional data, and more targeted primary research:
 - Need for full household data.
 - Need for data on all 9 protected characteristics and additional requirement based on health, socio economic and language priorities.
 - Extending the data analysis beyond the red line of the CPO process.
 - Consideration of alternative data sources to build a fuller picture of the equality impacts from this regeneration process.
- 4.30 With this case in mind, regeneration managers agreed that a household survey of residents within the development site should be completed to capture the equalities and diversity data for residents affected by this regeneration scheme. This survey is summarised in section 5 of this EqIA. The survey seeks to profile the protected characteristic make up of each household who responded to the telephone survey team and who completed the face to face follow ups.

5 Primary Research: Summary of Household EqIA Survey Findings 2021

Introduction and rationale

- The data below sets out the findings of the Household Survey completed in February/March 2021. The survey had 45 questions, which were asked via a telephone survey and followed up through a face-to-face completed by interviewers through a doorstep survey of households on the estate. The recorded data is broken down by the profiles of respondents for the whole estate, council tenants, resident leaseholders, and non-resident leaseholders/private tenants (renting from non-resident leaseholders).
- 5.2 There were 100 properties in the sample for the Harriott, Apsley & Pattison House (the site). In total 72 surveys were completed by the survey team. This represented:
 - 72% of the estate (100 units), comprising of:
 - 31 of council homes, being 43.1% of the survey respondents and 86% of the sample of council owned homes on the site (36 units)
 - 23 resident leaseholder homes, being 31.9% of the survey responses and 68% of the sample of resident leaseholders on the site (34 units)
 - 2 non-resident leaseholders and 16 privately tenanted households, being 25% of the survey sample and 60% of the sample of non-resident / privately tenanted households on the site (30 units)

Methodology and approach

- 5.3 The survey included 45 questions which profile all 9 protected characteristics of the Equality Act 2010 as well as other questions agreed with officers from Tower Hamlets. The equalities characteristics when broken down have been defined by both national data sets and categories used by the borough, both of which align to guidance of the Equalities and Human Rights Commission (EHRC).
- 5.4 The field work was delivered by experienced interviewers and street/household survey practitioners.
- 5.5 A database of property contact details (telephone numbers and emails) was provided by LB Tower Hamlets and each property was contacted at least once and in some cases several times. Indeed the residents who did not respond had at least 6 call backs and their household was also visited by a researcher. Within the database there were however 33 households where there was either no telephone number available or details were incorrect.
- The household data captured through the survey is reliant on the respondents fully describing the make-up of their household. The survey was not an audit of the household profile, but it is a reliable account of the household makeup from the

- respondents' perspective. With this note in mind the findings of the survey are considered to be the most detailed and reliable summary of household composition.
- 5.7 This data has been summarised and is reported below.

Key findings

The first three questions identified the house number, block and the residents' name. The fourth question identified the **tenure** of the occupant's household.

Which of the following describes how you occupy your home?	Frequency	Percent
Council Tenant	31	43.1
Resident Leaseholder	23	31.9
Non-resident leaseholder	2	2.8
Private tenant	16	22.2
Total	72	100.0

5.9 From those identified as resident and non-resident leaseholders, 48% had a mortgage and 52% were with a mortgage.

If you are the owner occupier, are you an owner occupier	Frequency	Percent	Valid Percent
With a mortgage	12	16.7	48.0
Without a mortgage	13	18.1	52.0
Total	25	34.7	100.0
Missing	47	65.3	
Total	72	100.0	

The **length of time** people have lived in their homes is varied and differs between the whole sample and among council tenants, resident leaseholders and non-resident leaseholders /private tenants. Collectively 76% of residents in the survey sample have lived in their home for more than 6 years. This rises to 87% for council tenants and 91% for resident leaseholders. For non-resident/private tenants the length of time they have lived in their home is however lower at 39%. Nonetheless what this collectively shows is that the majority have lived on the site for a long time. Indeed just under 50% have lived in their homes for over 20 years.

How long have you lived in	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
your home?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Less than 1 year	4	5.6	0	0			4	22.2
1-5 years	13	18.1	4	12.9	2	8.7	7	38.9
6-10 years	11	15.3	6	19.4	1	4.3	4	22.2
11-20 years	9	12.5	4	12.9	4	17.4	1	5.6
20+ years	35	48.6	17	54.8	16	69.6	2	11.1
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.11 Responses to the **total number of people that live in each household** is set out below. The table beneath that calculates what this means in terms of the total population from the respondents engaged in the survey by tenure type.

How many people live in your	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
household?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
person 1	3	4.2	2	6.5	1	4.3		
person 2	4	5.6	3	9.7	1	4.3		
person 3	9	12.5	3	9.7	5	21.7	1	5.6
person 4	19	26.4	8	25.8	3	13.0	8	44.4
person 5	13	18.1	5	16.1	4	17.4	4	22.2
person 6	12	16.7	6	19.4	4	17.4	2	11.1
person 7	6	8.3	2	6.5	3	13.0	1	5.6
person 8	3	4.2	1	3.2	1	4.3	1	5.6
person 9	3	4.2	1	3.2	1	4.3	1	5.6
Total	72	100.0	31	100.0	23	100.0	18	100.0

With these responses it is possible to calculate what this means in terms of the population of these 72 units that responded to the survey. To this end there are some 344 people living in the 72 units, 141 of which are council tenants, 112 are resident leaseholders and 91 are non-resident / private tenants.

Household size	Whole Sample	Council Tenants	Resident Leaseholders	Non Resi/Private Tens
1	3	2	1	0
2	8	6	2	0
3	27	9	15	3
4	76	32	12	32
5	65	25	20	20
6	72	36	24	12
7	42	14	21	7
8	24	8	8	8
9	27	9	9	9
Total	344	141	112	91

- 5.13 The next question identified the **gender** profile of each household,
 - 50.9% were male.
 - 49.1% were female.
 - None preferred not to say.

5.14 There were slight variations to this profile by tenants, residential leaseholders and non-resident leaseholders/private tenants. This is set out in the table below.

Gender profile	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
•	Count	%	Count	%	Count	%	Count	%
Male	174	50.9%	68	48.2%	60	54.1%	46	51.1%
Female	168	49.1%	73	51.8%	51	45.9%	44	48.9%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	342	100.0%	141	100.0%	111	100.0%	90	100.0%

5.15 The full **age** profile of the population of the respondent living on Harriott, Apsley and Pattison is set out in the table below:

Age Profile	Whole Sample		Council 1	Tenants	Resid Leaseh		Non Resi/Private Tens		
	Count	%	Count	%	Count	%	Count	%	
0-5 years	23	6.7%	9	6.4%	13	11.6%	1	1.1%	
6-11 years	25	7.3%	10	7.1%	5	4.5%	10	11.1%	
12-17 years	45	13.1%	22	15.6%	11	9.8%	12	13.3%	
18-24 years	49	14.2%	29	20.6%	10	8.9%	10	11.1%	
25-34 years	68	19.8%	16	11.3%	22	19.6%	30	33.3%	
35-44 years	51	14.8%	16	11.3%	23	20.5%	12	13.3%	
45-54 years	41	11.9%	22	15.6%	7	6.3%	12	13.3%	
55-64 years	21	6.1%	10	7.1%	10	8.9%	1	1.1%	
65-74 years	15	4.4%	5	3.5%	8	7.1%	1	1.1%	
75-84 years	5	1.5%	2	1.4%	2	1.8%	1	1.1%	
85+ years	1	0.3%		0.0%	1	0.9%	0	0.0%	
Total	344	100.0%	141	100.0%	112	100.0%	90	100.0%	

The under 18 profiles of the respondents to the survey within the site is 27%. This shows that 3 in 10 members of the site are under 18. The working age population (18-64) of those on the site is 66.9% and the over 65 population is 6.1%. This is summarised in the table below.

Summary age groups	Whole Sample	Council Tenants	Resident Leaseholders	Non Resi/ Private Tens
Under 18	27.0%	29.1%	25.9%	25.6%
Working age	66.9%	66.0%	64.3%	72.2%
Over 65	6.1%	5.0%	9.8%	2.2%

5.17 The next question sought to identify those people living on the site who have their day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months. This is as close a proxy there is to understanding the number of people living on the site with a **disability**. To this end 7.2% have a health problem/disability that limited their life a lot and 8.1% that had a health problem/disability that limited their life a little. Some 100 people preferred not to

disclose this information. This could suggest that some 15.3% have a health problem/disability of some form. This is set out in the table below:

Are any person's day-to- day activities limited	Whole S	Sample	Council ⁻	Tenants	Resid Leaseh		Non Resi/Private Tens		
because of a health problem or disability which has lasted, or is expected to last, at least 12 months (include any problems related to old age)?	Count	%	Count	%	Count	%	Count	%	
Yes, limited a lot	24	7.2%	9	9.7%	11	18.0%	5	6.2%	
Yes, limited a little	27	8.1%	12	12.9%	12	19.7%	3	3.7%	
No	183	54.8%	72	77.4%	38	62.3%	73	90.1%	
Prefer not to say	100	29.9%		0.0%		0.0%		0.0%	
Total	334	100.0%	93	100.0%	61	100.0%	81	100.0%	

5.18 A more detailed breakdown of types of **disability/health problem** is set out below. This accounts for sensory impairment, physical impairment, learning disability, mental health condition and long standing illness or health condition. This is set out in the table below:

Please state the type of health problem or disability that applies to	Whole	e Sample	Counci	l Tenants	Resident Leaseholders		Non Resi/Private Tens	
each person (if applicable)?	Count	%	Count	%	Count	%	Count	%
Sensory impairment, (such as being blind / having a visual impairment or being deaf / having a hearing impairment)	2	3.0%	1	3.0%	1	4.2%		0.0%
Physical impairment, (such as using a wheelchair to get around and / or difficulty using your arms)	28	42.4%	14	42.4%	11	45.8%	3	33.3%
Learning disability, (such as Downs syndrome or dyslexia) or cognitive impairment (such as autism or headinjury)	3	4.5%	2	6.1%	1	4.2%		0.0%
Mental health condition, (such as depression or schizophrenia)	4	6.1%	2	6.1%	1	4.2%	1	11.1%
Long-standing illness or health condition (such as cancer, HIV, diabetes, chronic heart disease, or epilepsy)	29	43.9%	14	42.4%	10	41.7%	5	55.6%
Total	66	100.0%	33	100.0%	24	100.0%	9	100.0%

5.19 Long standing illness or health condition represented 43.9% of the cohort of those with health problems and/or disabilities, this was followed by physical impairments at 42.4%, mental health conditions at 6.1%, learning disability at 4.5% and sensory impairment at 3%.

5.20 The table below sets out the numbers and profiles of those who stated that a member of their household is a **registered carer** of someone living at that address. It shows that 6.9% of residents in the sample are registered carers.

Are you, or any member of your household a	Whole Sample		Council T	enants	Resid Leaseho		Non Resi/Private Tens		
registered carer to someone living at this address?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent	
Yes	5	6.9	1	3.2	3	13.0	1	5.6	
No	43	59.7	24	77.4	14	60.9	5	27.8	
Total	48	66.7	25	80.6	17	73.9	6	33.3	
Missing	24	33.3	6	19.4	6	26.1	12	66.7	
Total	72	100.0	31	100.0	23	100.0	18	100.0	

5.21 The table below shows the number and profile of those who are a **volunteer or family carer** that look after or support someone else in their home who needs help with their day-to-day life due to a disability, illness, or old age. To this question 31.9% of household have a family members that fulfils this role.

Are you a volunteer or family carer who looks after	Whole Sample		Counci	l Tenants		Resident seholders	Non Resi/Private Tens		
or supports someone else in their home who needs help with their day-to-day life due to a disability, illness, or old age?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent	
Yes	23	31.9	12	38.7	9	39.1	2	11.1	
No	25	34.7	13	41.9	8	34.8	4	22.2	
Total	48	66.7	25	80.6	17	73.9	6	33.3	
Missing	24	33.3	6	19.4	6	26.1	12	66.7	
Total	72	100.0	31	100.0	23	100.0	18	100.0	

5.22 The next question sought to establish, for those that deliver this role, the average weekly number of **hours people undertake in providing care**.

If 'Yes', how many hours a week do you	Whol	e Sample	Counci	l Tenants	Leas	Resident seholders	Non Re	si/Private Tens
provide care for on average? (Please enter approximate hours per week)	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
10	1	1.4			1	4.3		
14	1	1.4			1	4.3		
20	3	4.2	2	6.5	1	4.3		
25	1	1.4	1	3.2				
30	2	2.8			1	4.3	1	5.6
40	10	13.9	7	22.6	3	13.0		
50	1	1.4	1	3.2	1	4.3		
60	3	4.2	1	3.2	1	4.3	1	5.6
80	1	1.4			1	4.3		
168	1	1.4	1	3.2				
Total	24	33.3	13	41.9	9	39.1	2	11.1
Missing	48	66.7	18	58.1	14	60.9	16	88.9
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.23 The next question sought to identify which of the following **health needs** apply to members of each household.

Which of the following health needs apply to member/s of your	Who	le Sample	Counc	il Tenants		Resident seholders	Non Re	si/Private Tens
household? Self-Declared Health Needs	Count	%	Count	%	Count	%	Count	%
Problems with arms, hands	1	1.4%		0.0%	1	3.7%		0.0%
Problems with legs or feet	16	22.5%	7	20.0%	7	25.9%	2	22.2%
Problems with back or neck	2	2.8%		0.0%	1	3.7%	1	11.1%
Difficulty in seeing	1	1.4%		0.0%	1	3.7%		0.0%
Difficulty in hearing		0.0%		0.0%		0.0%		0.0%
Speech impediment		0.0%		0.0%		0.0%		0.0%
Skin conditions, allergies		0.0%		0.0%		0.0%		0.0%
Chest, breathing problems	4	5.6%	2	5.7%	2	7.4%		0.0%
Heart blood pressure, circulation	6	8.5%	3	8.6%	3	11.1%		0.0%
Problems with stomach, liver, kidney, digestion		0.0%		0.0%		0.0%		0.0%
Diabetes	8	11.3%	3	8.6%	4	14.8%	1	11.1%
Depression, bad nerves	4	5.6%	2	5.7%	2	7.4%		0.0%
Epilepsy		0.0%		0.0%		0.0%		0.0%
Learning difficulties	3	4.2%	2	5.7%	1	3.7%		0.0%
Mental illness, phobia, panics	3	4.2%	2	5.7%	1	3.7%		0.0%
Learning disabilities		0.0%		0.0%		0.0%		0.0%
Long term medical condition	19	26.8%	11	31.4%	4	14.8%	4	44.4%
Progressive illness	4	5.6%	3	8.6%		0.0%	1	11.1%
Total	71	100.0%	35	100.0%	27	100.0%	9	100.0%

5.24 Finally from a health and social care perspective, the survey asked residents if they had made any **adaptations** to their homes providing aids for their health problem/disability. 15.3% of households in the sample stated they had made an adaption to their home. Specific forms of adaptions provided by respondents included adaptations to their bathrooms, including baths and toilets.

Have you had any aids or adaptations made to	Whole Sample		Council T	enants	Resid Leaseho		Non Resi/Private Tens		
your home?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent	
Yes	11	15.3	5	16.1	5	21.7	1	5.6	
No	36	50.0	19	61.3	12	52.2	5	27.8	
Total	47	65.3	24	77.4	17	73.9	6	33.3	
Missing	25	34.7	7	22.6	6	26.1	12	66.7	
Total	72	100.0	31	100.0	23	100.0	18	100.0	

5.25 The table below sets out the **ethnic** profile of the respondents to the survey from within the site. The Ethnic Minority⁸ profile of respondents for the site is 93.0%, the BAME⁹ population of the estate is 90.6%. Clearly this shows that there is a significantly strong

⁸ Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British.

⁹ The acronym **BAME** stands for Black, Asian and Minority Ethnic and is defined as all ethnic groups except White ethnic groups.

level of diversity on the site with Bangladeshi residents making up 72% across the whole sample of residents. This can be broken down further to show that 80% of council tenants, 78.9% of resident leaseholders and 52% of non-resident leaseholders/private tenants identify as Bangladeshi.

Ethnicity	Whole Sample	Council Tenants	Resident Leaseholders	Non Resi/Private Tens
Ethnic Minority	93.0%	100.0%	90.8%	84.8%
BAME	90.6%	100.0%	89.9%	77.2%
Bangladeshi	72.2%	80.1%	78.9%	52.2%
Black African	7.6%	11.3%	3.7%	6.5%
White British	7.0%	0.0%	9.2%	15.2%

5.26 A full breakdown of ethnicity is set out in the table below.

Ethnicity	Whole S	Sample	Council	Гenants	Resid Leaseh		Non Resi Ter	
Lumony	Count	%	Count	%	Count	%	Count	%
White: English/Welsh/Scottish /Northern Irish/British	24	7.0%		0.0%	10	9.2%	14	15.2%
White: Irish		0.0%		0.0%		0.0%		0.0%
White: Gypsy or Irish Traveller		0.0%		0.0%		0.0%		0.0%
White: Roma	3	0.9%		0.0%		0.0%	3	3.3%
White: Other White	5	1.5%		0.0%	1	0.9%	4	4.3%
Mixed/multiple ethnic group: White and Black Caribbean	6	1.8%	6	4.3%		0.0%		0.0%
Mixed/multiple ethnic group: White and Black Africa	5	1.5%		0.0%		0.0%	5	5.4%
Mixed/multiple ethnic group: White and Asian	3	0.9%	2	1.4%	1	0.9%		0.0%
Mixed/multiple ethnic group: Other Mixed		0.0%		0.0%		0.0%		0.0%
Asian/Asian British: Indian	5	1.5%	4	2.8%	1	0.9%		0.0%
Asian/Asian British: Pakistani	6	1.8%		0.0%	6	5.5%		0.0%
Asian/Asian British: Bangladeshi	247	72.2%	113	80.1%	86	78.9%	48	52.2%
Asian/Asian British: Chinese	1	0.3%		0.0%		0.0%	1	1.1%
Asian or Asian British Vietnamese		0.0%		0.0%		0.0%		0.0%
Asian/Asian British: Other Asian	3	0.9%		0.0%		0.0%	3	3.3%
Black/African/Caribbean/Black British: African	26	7.6%	16	11.3%	4	3.7%	6	6.5%
Black/African/Caribbean/Black British: Caribbean		0.0%		0.0%		0.0%		0.0%
Black/African/Caribbean/Black British: Somali		0.0%		0.0%		0.0%		0.0%
Black/African/Caribbean/Black British: Other Black		0.0%		0.0%		0.0%		0.0%
Other ethnic group: Arab		0.0%		0.0%		0.0%		0.0%
Other ethnic group: Any other ethnic group	8	2.3%		0.0%		0.0%	8	8.7%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	342	100.0%	141	100.0%	109	100.0%	92	100.0%

5.27 The **sexual orientation** profile of respondents is set out in the table below:

What is the Sexual Orientation of your household members? (This	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
only applies to residents over 18 years of age)	Count	%	Count	%	Count	%	Count	%
Straight/Heterosexual	225	100.0%	87	100.0%	73	100.0%	65	100.0%
Gay or Lesbian		0.0%		0.0%		0.0%		0.0%
Bisexual		0.0%		0.0%		0.0%		0.0%
Other		0.0%		0.0%		0.0%		0.0%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	225	100.0%	87	100.0%	73	100.0%	65	100.0%

- 5.28 The data states that 100% of respondents stated that they were straight/heterosexual.
- 5.29 The **religion/faith** profile of responding households is set out below:

What is the Faith of members of your household?	Whole Sample		Council 1	Tenants	Resid Leaseh		Non Resi/Private Tens		
	Count	%	Count	%	Count	%	Count	%	
Atheist/Agnostic		0.0%		0.0%		0.0%		0.0%	
Christian	21	6.1%	7	5.0%	1	0.9%	13	14.3%	
Buddhist		0.0%		0.0%		0.0%		0.0%	
Hindu		0.0%		0.0%		0.0%		0.0%	
Jewish		0.0%		0.0%		0.0%		0.0%	
Muslim	277	80.8%	128	90.8%	93	84.5%	56	61.5%	
Sikh		0.0%		0.0%		0.0%		0.0%	
Humanist		0.0%		0.0%		0.0%		0.0%	
No Religion	34	9.9%	6	4.3%	12	10.9%	16	17.6%	
Other	4	1.2%		0.0%	4	3.6%		0.0%	
Prefer not to say	7	2.0%		0.0%		0.0%	6	6.6%	
Total	343	100.0%	141	100.0%	110	100.0%	91	100.0%	

- 5.30 The Muslim faith makes up the largest group of respondents at 80.8% of the whole sample, 90.8% of council tenants, 84.5% of resident leaseholders and 61.5% of non-resident leaseholders/private tenants.
- 5.31 The number of residents who are either **pregnant** or who have given birth in the last 12 months was 3. This represents some 0.87% of the population from the sample. While this does seem quite low it is consistent with the lower proportion of pregnancies during the Covid 19 pandemic.
- 5.32 There were no responding households that indicated that there were any members of that household, who have undergone or presently undergoing a **Gender reassignment** process.

5.33 The responses to the question about the marital or registered civil partnership or cohabitation status is set out below:

What best describes each person's marital, registered civil partnership	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
or cohabitation status? (This only applies to persons over 16 years of age)	Count	%	Count	%	Count	%	Count	%
Never married and never registered a same sex civil partnership	116	52.7%	39	45.9%	32	47.1%	45	67.2%
Married	91	41.4%	39	45.9%	32	47.1%	20	29.9%
Separated, but still legally married	3	1.4%	2	2.4%		0.0%	1	1.5%
Divorced	3	1.4%	3	3.5%		0.0%		0.0%
Widowed	7	3.2%	2	2.4%	4	5.9%	1	1.5%
In a registered same-sex civil partnership		0.0%		0.0%		0.0%		0.0%
Separated, but still legally in a same sex civil partnership		0.0%		0.0%		0.0%		0.0%
Formerly in a same-sex civil partnership which is now legally dissolved		0.0%		0.0%		0.0%		0.0%
Surviving partner from a same-sex civil partnership		0.0%		0.0%		0.0%		0.0%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	220	100.0%	85	100.0%	68	100.0%	67	100.0%

- The high proportion of those that have never married and never registered a same sex civil partnership (52.7%) will mostly be young adults. Within the responding households 41.4% of people over 16 were married, 1.4% were separated, 1.4% divorced and 3.2% widowed.
- 5.35 It is however worth noting that in some of these cases the legal status does have an impact when tenure and leaseholder status come into play.

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

Which of the following applies to members of your household? (This	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
applies to those over 16 years of age)	Count	%	Count	%	Count	%	Count	%
Employed Full Time	101	42.3%	29	33.0%	35	42.7%	37	53.6%
Employed Part Time	21	8.8%	7	8.0%	9	11.0%	5	7.2%
Self-employed Full Time or Part Time	2	0.8%		0.0%	2	2.4%		0.0%
On a government supported training programme e.g. Apprenticeship/Training		0.0%		0.0%		0.0%		0.0%
Full time education	29	12.1%	14	15.9%	3	3.7%	12	17.4%
Unemployed available for work	41	17.2%	23	26.1%	12	14.6%	6	8.7%
Permanently sick/disabled	3	1.3%		0.0%	3	3.7%		0.0%
Retired	24	10.0%	7	8.0%	14	17.1%	3	4.3%
Looking after the home	9	3.8%	4	4.5%	2	2.4%	3	4.3%
Full time carer of elderly or disabled person	4	1.7%	3	3.4%	1	1.2%		0.0%
Full time child carer	3	1.3%	1	1.1%	1	1.2%	1	1.4%
Doing something else (please specify?)		0.0%		0.0%		0.0%		0.0%
Prefer not to say	2	0.8%		0.0%		0.0%	2	2.9%
Total	239	100.0%	88	100.0%	82	100.0%	69	100.0%

- 5.37 42% of household members are employed full time, 9% part time and 12% in full time education and 17% unemployed and available for work. This is data gathered in 2021 and reflects the estate population during the third Covid-19 lockdown (January 2021). In summary 81.2% of the estate are economically active and 18.0% are economically inactive and 0.8% preferred not to say.
- 5.38 The numbers of households where there was currently a **furloughed employee** was 4 (5.6%) of responding households.
- 5.39 The **status of under 18 year olds** is set out in the table below. What this shows is that 14.9% of children are under school age and intending to enrol in a state school in the borough. 5.3% are under school age and intending to enrol to a state school outside the borough. 67% were currently in a borough school or nursery. 4.3% in a state school or nursery outside the borough. 3.2% are in private schools or nursery outside the borough and 3.2% are in post 16-18 colleges and 2.1% are in post 16 employment.

What is each person under 18s	Whole	e Sample	Counci	l Tenants	Resident Leaseholders		Non Resi/Private Tens	
status?	Count	%	Count	%	Count	%	Count	%
Under school age & intend to enrol at a state school in Tower Hamlets	14	14.9%	5	11.6%	9	30.0%		0.0%
Under school age & intend to enrol at a private school in Tower Hamlets		0.0%		0.0%		0.0%		0.0%
Under school age & intend to enrol at a state school outside of Tower Hamlets	5	5.3%	3	7.0%		0.0%	2	9.5%
Under school age & intend to enrol at a private school outside of Tower Hamlets		0.0%		0.0%		0.0%		0.0%
School or nursery pupil enrolled in state school in Tower Hamlets	63	67.0%	30	69.8%	18	60.0%	15	71.4%
School or nursery pupil enrolled in private school in Tower Hamlets		0.0%		0.0%		0.0%		0.0%
School or nursery pupil enrolled in a state school outside Tower Hamlets	4	4.3%		0.0%		0.0%	4	19.0%
School or nursery pupil enrolled in a private school outside Tower Hamlets	3	3.2%	3	7.0%		0.0%		0.0%
Post 16 -18 college student	3	3.2%	1	2.3%	2	6.7%		0.0%
Post 16-18 employment	2	2.1%	1	2.3%	1	3.3%		0.0%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	94	100.0%	43	100.0%	30	100.0%	21	100.0%

5.40 The range of **languages** spoken as a main language in households on the estate is set out below. Bangladeshi is spoken in 52.8% of households and English is spoken in 40.3% of responding households. Somali and French is spoken in 2.8% of households respectively and 1.4% of households speak Portuguese.

Which of the following, is the main language spoken	Whole Sample		Counc	l Tenants	Leas	Resident seholders	Non Resi/Private Tens		
in your household?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent	
English	29	40.3	10	32.3	13	56.5	6	33.3	
Bengali	38	52.8	18	58.1	10	43.5	10	55.6	
Somali	2	2.8	2	6.5					
French	2	2.8	1	3.2			1	5.6	
Other please specify (Portuguese)	1	1.4					1	5.6	
Total	72	100.0	31	100.0	23	100.0	18	100.0	

5.41 A supplemental question was asked of those who did not have English as their first language. None of the respondents marked their spoken or written English as being anything less than 5 out of 5. The overall ranking score was 5 for spoken English and 5 for written English. This suggests that written and spoken English is good in all households.

If English is not the main language of people living in your home, please rate on a scale of 1 to 5 your household's ability to converse in English? With 1 being low and 5 being high.	1	2	3	4	5	Total	Average ranking
Spoken English					43	43	5
Written English					42	42	5

The next question asked respondents how many **bedrooms** their home had. To this end 25% of households occupy 2-bedroom units, 58.3% occupy 3-bedroom units and 12.5% occupy 4-bedroom units and 4.2% occupy 5-bedroom units. Nb there are no 5 bedroom units on the estate and these responses came from non-resident leasehold units that were occupied by private tenants, and hence it is assumed are using the living room as a bedroom.

How many	Whole Sample		Cou	ncil Tenants	Resident L	easeholders	Non Resi/Private Tens		
bedrooms does your property have?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent	
2	18	25.0	7	22.6	4	17.4	7	38.9	
3	42	58.3	23	74.2	16	69.6	3	16.7	
4	9	12.5	1	3.2	3	13.0	5	27.8	
5	3	4.2					3	16.7	
Total	72	100.0	31	100.0	23	100.0	18	100.0	

5.43 The next question asked respondents if at the moment, they consider their household to have the **right number of bedrooms**. 44% stated they did and 56% stated they did not. The detail of this response is set out below.

At the moment, do you consider your household has the right number of bedrooms?	Whole Sample		Council Tenants		Resident L	easeholders	Non Resi/Private Tens		
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent	
Yes	32	44.4	13	41.9	8	34.8	11	61.1	
No	40	55.6	18	58.1	15	65.2	7	38.9	
Total	72	100.0	31	100.0	23	100.0	18	100.0	

5.44 The next question asked if respondents felt their household was **overcrowded**. 58.33% stated it was and 30% stated it was not. 2 households did not respond to this question.

At the moment, do you consider your household is over-crowded?	Whole Sample		Counci	l Tenants		Resident seholders	Non Resi/Private Tens		
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent	
Yes	42	58.3	20	64.5	14	60.9	8	44.4	
No	29	40.3	11	35.5	9	39.1	9	50.0	
Total	71	98.6	31	100.0	23	100.0	17	94.4	
Missing	1	1.4					1	5.6	
Total	72	100.0					18	100.0	

5.45 The next question asked if their home was **under occupied**. 4.2% stated that it was and 93.1% stated that it was not. Once again 2 households did not respond to this question.

At the moment, do you consider your	Whole Sample		Counc	il Tenants	Leas	Resident seholders	Non Resi/Private Tens		
household is under- occupied?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent	
Yes	3	4.2	2	6.5	1	4.3			
No	67	93.1	29	93.5	22	95.7	16	88.9	
Total	70	97.2	31	100.0	23	100.0	16	100	
Missing	2	2.8					2	11.1	
Total	72	100.0	31	100.0	23	100.0	18	100.0	

5.46 The next four questions sought to understand whether residents felt there would be **positive or negative impacts** as a result of different aspects of the rebuilding proposals including health and wellbeing, childcare and school provision for young people, employment and skills and elderly care/support. In part, this data would describe people's sense of concern re the proposals.

Perceptions of Impact		Whole Sample	Council Tenants	Resident Leaseholders	Non Resi/Private Tens
Overall how would the rebuilding	Positive	67%	77%	57%	33%
of this estate impact on the health and wellbeing of your household?	No Impact	20%	10%	17%	61%
	Negative	12%	13%	26%	6%
How will the rebuilding of this	Positive	16%	22%	17%	6%
estate impact on the childcare and	No Impact	75%	72%	70%	89%
school provision of young people in your household?	Negative	8%	6%	13%	6%
How will the rebuilding of this	Positive	1%	0%	4%	0%
estate impact on the employment	No Impact	97%	100%	91%	100%
and skills needs of those in your household?	Negative	1%	0%	4%	0%
How will the rebuilding of this	Positive	3%	6%	0%	0%
estate impact on the elderly care/	No Impact	92%	90%	87%	100%
support received by members of your household?	Negative	6%	3%	13%	0%

- 5.47 What is clear is that the levels of perceived negative impacts seem low.
 - 12% of respondents felt there would be a negative impact on the health and wellbeing needs of their household.
 - 8% felt there would be a negative impact on the childcare school provision of members of their household.
 - 1% felt there would be a negative impact on the employment and skill needs of members of their households.
 - 5% felt there would be negative impacts on the elderly care/support received by members of their households.

These questions also gave respondents the opportunity to explain their responses. A summary of these open-ended statements is set out below, N.B. these statements are themes emerging from the responses gathered. Some are in support of positive statements and others set out people's concerns:

Respond	•	mpact of the regeneration plowing aspects	rogramme
Health and well being	Childcare/School Provision	Employment and Skills	Elderly care/support
Stress and fear of the unknown and the construction period	Concerns re children's play facilities and open spaces reducing	No perceived concerns raised	Concern regarding electrical supply due to dialysis
Lack of warmth in current properties	Concerns about the loss of school places		Unknown and carer parking
Reduced Anti-Social Behaviour	More security		
More space, need for bigger property			
Loss of green space, reduced physical space			
Fresh environment			
Loss of parking amenity			

5.49 The next question asked residents to think about the future of their area and identify those **facilities they feel would benefit residents**.

Thinking about the future of your area, what facilities and services	Whole Sample		Coun	cil Tenants	Lea	Resident aseholders	Non Resi/Private Tens	
would benefit residents? Please tick all that apply:	Count	Percent response	Count	Percent response	Count	Percent response	Count	Percent response
Improved health services	62	86%	29	94%	21	91%	12	67%
Improved community facilities	61	85%	28	90%	22	96%	11	61%
Play areas	33	46%	16	52%	15	65%	2	11%
Local shops	26	36%	13	42%	12	52%	1	6%
Local transport	19	26%	11	35%	8	35%		
other	9	13%	6	19%	3	13%	0	0%

5.50 86% wanted to see improvements to health services, 85% improvements to community facilities, 46% to play areas, 36% to local shops, and 26% to local transport. The additional other areas of improvement identified, are set out in the table below:

If other, please specify	Frequency	Percent
No suggestions offered	59	81.9
More external space	1	1.4
Bike sheds	1	1.4
Infrastructure challenge and security	1	1.4
More open space	2	2.8
Need green areas	1	1.4
Need to quadruple play space, trashing of community and loss of community infrastructure	1	1.4
Overcrowding in area	1	1.4
Parking	1	1.4
Parking issue	1	1.4
Parking key issue	1	1.4
Reduce anti-social behaviour	1	1.4
Secure areas	1	1.4
Total	72	100.0

5.51 The proportion of those on the site where there are members of a household in receipt of an **income related benefit** is set out in the table below. 54% household residents who completed this question are receiving some form of income related benefit. The remainder either stated they were not or were not sure.

Are there any members in your household in receipt of income	Whole Sample		Council Tenants			Resident eholders	Non Resi/Private Tens	
related benefit?	Count	%	Count	%	Count	%	Count	%
Yes	90	54%	49	75%	27	53%	14	27%
No	70	42%	16	25%	21	41%	33	65%
Not sure	7	4%		0%	3	6%	4	8%
Prefer not to say		0%		0%		0%		0%
Total	167	100%	65	100%	51	100%	51	100%

5.52 The annual **household income levels** of respondents for the whole of the estate are set out below:

Which of the following bandings does your	Whole	e Sample	Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
annual household income fall within?	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Less than £10,000	12	16.7	6	19.4	2	8.7	4	22.2
£10,000 - £15,000	8	11.1	7	22.6			1	5.6
£15,000 - £20,000	3	4.2	3	9.7				
£20,000 - £25,000	1	1.4	1	3.2				
£25,000 - £30,000	1	1.4			1	4.3		
£30,000 - £35,000	1	1.4	1	3.2				
£35,000 - £40,000	2	2.8	1	3.2	1	4.3		
More than £50,000	3	4.2			3	13.0		
Don't Know	34	47.2	12	38.7	11	47.8	11	61.1
Prefer not to say	7	9.7			5	21.7	2	11.1
Total	72	100.0	31	100.0	23	100.0	18	100.0

- 5.53 27.8% of households stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty. This suggests there is likely to be a sizeable number across the estate beneath the poverty line as defined by the DWP¹⁰.
- 5.54 The final question asked residents their **preferred forms of communication** about the regeneration proposals, with telephone, letter and email being the highest preferred options.

Preferred communication	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
methods	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Telephone	54	75.0%	23	74%	16	70%	15	83%
Letter	30	41.7%	15	48%	10	43%	5	28%
Email	21	29.2%	10	32%	9	39%	2	11%
Noticeboard	2	2.8%		0%		0%	2	2%
Newsletter	2	2.8%		0%		0%	2	2%

Contextual concerns raised by residents from Harriott, Apsley & Pattison House.

- 5.55 The points below represent key concerns that residents have raised and or issues that were felt to be pertinent to this EqIA.
 - Many welcomed the regeneration of the estate feeling that it would improve the look of what some considered to be a rundown estate and welcomed the possibility of a better environment.
 - Car parking this issue was raised repeatedly and there was great concern about how this was to be addressed following the regeneration of the estate.
 - The loss of green space across the estate was also raised by several participants.
 - Some residents experienced overcrowding and felt that this would be supported in the new development.

Profile of the social care facilities

5.56 Aside for the residents living in Harriott, Apsley and Pattison there are also three community facilities, two disability day centres and the Redcoat Community Centre and Mosque. In all three cases direct approaches were made following the provision of contact details by the council. It was felt important to understand the profile of the beneficiaries of all three facilities within the site, in order to understand the likely impact both from a regeneration perspective and from an equalities and diversity perspective.

 $^{^{10}}$ DWP in 2017 put the level of household incomes beneath the poverty line at a weekly average of £288 per week. This equates to an annual income of £16,128. Annual incomes beneath £15,000 per annum would represent households beneath the UK poverty line.

Vibrance Centre for adults with learning disabilities

- 5.57 As of July 2021 Vibrance centre has 35 service users. Currently the profile is based on:
 - 22 male (63%) and 13 female (37%) service users.
 - None of the service users are under 18. 3 (9%) are between 19 and 24, 9 (26%) are between 25 and 34, 9 (26%) are between 35 and 44 and 14 (40%) are over 45.
 - Ethnicity of users: White British 18 (52%) Bangladeshi 8 (23%), Black Caribbean 3 (9%). In summary 49% come from ethnic minority backgrounds and 40% are from BAME backgrounds.
 - Religion or belief identified by service users is 63% Christian and 26% Muslim, 3% Jewish and 9% not stated.
 - 100% of the service users who attend the Vibrance Centre have a complex physical and learning disability.
 - 40%, have both a Learning Disability and a Physical disability
 - 60% of service users have a Learning Disability
- Interviews were held with staff from Vibrance. They confirmed that their Community Based Day Services for adults with Learning Disabilities was located on the proposed development site at Stepney Way. The site, formerly known as the Redcoat Centre, is leased from LBTH with a 15 year lease, having moved from their previous base in the William Brinson Centre to Stepney Way in 2018 following that site being identified for development for Social Housing. The provisions of their lease are such that the LA must find them an alternative location of which they have identified the Pritchard Centre (former Mental Health Day Service council run).
- They are hoping for a like for like facility. However the proposed new property does not have adequate facilities in respect of disabled toilets, wet room and changing facilities. It was made clear that Vibrance have many clients who need full support and hoisting for personal care and there is no provision currently at the new location to enable this. All of their clients need a disabled toilet as a minimum and most require support with personal care using large tables, showers and overhead ceiling hoists.
- 5.60 In addition the new facility would require overheads hoists for physiotherapy, sensory and to enable people to have sufficient periods of time out of wheelchairs as part of their support plans. This will require structural surveys to the ceiling and installation of hoists. These facilities are currently available in the Stepney Way site.
- 5.61 Security is also an issue as the new facility has a shared entrance. Vibrance have indicated that some of their clients will require keycodes for fob entry and door automatically close as they have a number of clients who will potentially try and leave the facility, and this would put them at a significant risk of harm. This risk is

- accentuated by their clients' lack of road awareness, limited communication and extreme vulnerability.
- 5.62 Subsequent to discussion with LB Tower Hamlets this EqIA can report that as of the 20th of September LBTH Property have made contact with Vibrance and confirmed:
 - LBTH has extended the period when they will require them to relocate to August 2022
 - LBTH has undertaken to adapt the premises to make the building suitable for their use working with them in terms of the spec needed
 - LBTH have confirmed the move costs will be met
 - LBTH have confirmed they would work with them in terms of site security

Council disability day centre

5.63 Following discussion with regeneration staff, it was agreed not to engage with staff at the council's Disability Day centre on the Clichy Estate. The view was taken that this centre was being re-provided elsewhere in the borough and hence its impact would be minimal to service users.

Profile of the Redcoats Community Centre and Mosque

- 5.64 At the time of this EqIA , the Mosque was approached to request a profile breakdown of their worshipers. Unfortunately, the General Secretary of the Redcoats Community Centre and Mosque declined to provide any information about the equality and diversity profile of its worshipers/congregation, as they were still in negotiations with the council, and they did not want to provide this information until the negotiations were complete.
- 5.65 It is however safe to suggest that the worshipers of the Mosque come from a range of ethnic backgrounds and that they represent all age groups and genders. Clearly there is also a collective association with the Islamic faith.

Headline Summary of the Primary Research completed

5.66 Implications for the EqIA

- In total 72% of households engaged in this survey, 72% of the estate (100 units), comprising of:
- 31 of council homes 43.1% of the survey respondents and 86% of the sample council owned homes on the site (36 units)
- 23 resident leaseholder homes, 31.9% of the survey responses and 68% of the sample of resident leaseholders on the site (34 units)
- 2 non-resident leaseholders and 16 privately tenanted household, (25% of the survey sample and 60% of the sample of non-resident / privately tenanted households on the site (30 units)
- Collectively 76% of residents in the survey sample have lived in their home for more than 6 years.
- From the sample there were 344 people living in the 72 units, 141 of which are council tenants, 112 are resident leaseholders and 91 are non-resident / private tenants.
- BAME populations on the Harriott, Apsley & Pattison House are significant. The white British population in Harriott, Apsley & Pattison House is 7.0%, leaving an 93% ethnic minority population¹¹ and a BAME population¹² of 90.6% non-white populations. This compares to a borough ethnic minority population of 66% and a BAME population of 55%. The Bangladeshi population of the estate is the significant ethnic group with 72.2% of the population, 80.1% of council tenants, 79% of resident leaseholders and 52% of non-resident leaseholders and private tenants.
- The gender profile of the estate is comparable with the borough's gender profile with 51% stating they were male, and 49% female compared to 52% male and 48% female in the borough.
- There are 15.3% of respondents on the estate that stated they have a disability.
- Of these 43.9% stated they had a long standing illness and health condition, 42.4% with Physical impairments, 6.1% with Mental health conditions, 4.5% learning disability and 3% sensory impairment.
- 6.9% of residents in the sample are registered carers.
- 31.9% of household have a family members that looks after or supports someone else in their home who needs help with their day-to-day life due to a disability, illness, or old age.
- 15.3% of households in the sample stated they had made an adaption to their home.
- 27% are under 18. The working age population (18-64) of those on the site is 66.9% and the over 65 population is 6.1%.

¹¹ Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British

¹² The acronym BAME stands for Black, Asian and Minority Ethnic and is defined as all ethnic groups except White ethnic groups.

- None of respondents stated they were gay/lesbian or bisexual, 100% stating they were straight/heterosexual.
- 81% of respondents said they were Muslim, 10% with no religion and 6.1% stated they were Christian.
- Respondents stated that 0.87% of population (3 women) were either pregnant or who had given birth in the last 12 months.
- In terms of marriage and civil partnership 53% of adults over 16 have never been married or in a civil partnership, 41.4% were married, 1.4% separated, 1.4% divorced and 3.2% widowed.
- 42% of household members are employed full time, 9% part time and 12% in full time education and 17% unemployed and available for work.
- Bangladeshi is spoken as a main household language in 53% of households, English as a main household language is spoken in 40% of responding households. Somali and French is spoken in 2.8% of households respectively and 1.4% of households speak Portuguese. Moreover of those who had English as a second language all households stated that they have strong written and spoken English
- Respondent to the survey stated that 25% of households lived in 2 bedrooms, 58.3% in 3 bedrooms and 12.5% in 4 bedrooms and 4.2% in 5 bedrooms. Nb there are no 5 bedroom units in Harriott, Apsley and Pattison and these responses came from private tenants of leasehold units, who clearly must have been using the living room as a bedroom.
- 44% stated their household has the right number of bedrooms, 56% stated they did not.
- 58% stated their household was over-crowded and 40% stated it was not.
- 4.2% stated that their home was under occupied and 93.1% stated that it was not.
- 12% of respondents felt there would be a negative impact on the health and wellbeing needs of their household.
- 8% felt there would be a negative impact on the childcare school provision of members of their household.
- 1% felt there would be a negative impact on the employment and skill needs of members of their households.
- 5% felt there would be negative impacts on the elderly care/support received by members of their households.
- 86% wanted to see improvements to health services, 85% improvements to community facilities, 46% to play areas, 36% to local shops, and 26% to local transport.
- 54% household residents are on some form of income related benefit.
- 28.7% of households stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty.
- The preferred forms of communication about the regeneration proposals, was telephone (75%), letter (42%) and email (29%).

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

Perceived concerns

- Car parking this issue was raised repeatedly and there was great concern about how this was to be addressed following the regeneration of the estate.
- The loss of green space across the estate was also raised by several participants.
- Lack of warmth in the current properties
- Concerns around the possibility of less school places
- Some general concerns about the uncertainty of the regeneration and what it may bring for residents.

Perceived positives

- Many welcomed the regeneration of the estate feeling that it would improve the look of what some considered to be a rundown estate and welcomed the possibility of a better environment.
- Some residents experienced overcrowding and felt that this may be addressed in the new development.
- Some leaseholders stated they could not currently sell their flat but, in the future, this would be easier, or they could sell to the council and move.
- A fresh environment and better housing conditions
- Likelihood of larger properties
- Reduction in Anti-Social behaviour

6 Equality Impact Assessment

6.1 This section incorporates both data and analysis to assess the regeneration proposals and their associated decisions. In particular it seeks to consider the regeneration scheme will have on residents who fall under the protected characteristics of the Equality Act 2010 and the additional priorities that Tower Hamlets wanted to assess including, language, health and socio-economic factors.

Aims of the proposal.

- The general aim of this regeneration scheme is to demolish 100 units that make up Harriott, Apsley and Pattison Houses and to rebuild 438 homes, of which 79 will be replacement homes for existing tenants and resident leaseholders. The additional homes created will provide at least 35% genuinely affordable housing and contribute to an overall target for 50% of all new homes to be affordable. The council will prioritise and maximise the development of genuinely affordable homes where feasible. The remainder will be developed for market rent or sale and will help to fund the construction of the affordable homes.
- 6.3 The tenure profile of the existing homes on the site is made up of 36 secure council tenancies, 34 residents leaseholders and 30 non-resident leaseholders the majority of whom are renting their units to private tenants.
- 6.4 Within the site there are also three additional non-residential facilities, the Redcoat Community Centre and Mosque at 256 Stepney Way and two day care units for people with physical disabilities, the Day Opportunities Service (operated by LBTH) at 260-262 Stephney Way and the Vibrance Day Care unit at 262 Stephney Way (Operated privately). The scheme will also accommodate a new mosque and community centre. However, the two residential centres will be relocated to sites in other parts of the borough replicating the facilities currently available on the Harriott, Apsley & Pattison House site.
- Through its options appraisal, the borough identified three options of refurbishment of the existing buildings, the regeneration of existing building and the development of infill sites and the full demolition and redevelopment of the site as a whole. The ballot undertaken in 2020 showed a substantial majority that support for the demolition and redevelopment options.

Context of this EqIA

The regeneration of the Harriott, Apsley & Pattison Houses has been designed to address the needs of a wide range of people with protected characteristics.

Regeneration by its very nature is a disturbing period particularly for residents directly affected by it. Across regeneration schemes there are always likely to be a range of

- outcomes, some of which will be negative for some people; however, the regeneration aspiration aims to maximise the positives for many more people and for a longer period.
- 6.7 What is critical in this EqIA is the need to ensure that any detriment experienced by residents is not a result of their protected characteristic. Indeed, there will be consequences of the unsettling and disturbing nature of the regeneration, which will include elements that have a direct impact on people within the site and in some cases, these direct/indirect impacts will be felt with more force by some people rather than others.
- A pertinent differentiation is the ownership of each unit. The offer for tenants is different to the offer for resident leaseholders and non-resident leaseholders and private tenants of non-resident leaseholders. These offers will generate different impacts on households in each of these tenure types. However, these impacts are a direct result of the regeneration process and are therefore universally applied to tenants, leaseholders and non-resident leaseholders and private tenants of non-resident leaseholders. Nonetheless some of these impacts may be disproportionately felt by some tenants and leaseholders by dint of their respective protected characteristic. This EqIA will seek to identify options that the council can consider to minimise/mitigate these regeneration impacts.
- 6.9 To this end, the EqIA will review the regeneration proposals under consideration and seek to assess plans in terms of their:
 - Likely and actual benefits for the regeneration proposals
 - Recognition of the negative impacts of the regeneration process
 - An appraisal of impacts on people with protected characteristics
 - Assessment of the direct and indirect impacts of the regeneration programme and their proportional or disproportional distribution between different protected characteristics
 - Assessment of the specific impacts placed on tenants and leaseholders and those within and outside the CPO area and where different protected characteristics of either have a likely proportional or disproportional negative impact.

Mapping Impacts

- 6.10 A central process within this EqIA is to establish the planned activity set out in the Cabinet Report and to assess the likely impacts for residents in general. It also aims to highlight, how these impacts may manifest themselves and how those with some protected characteristics may experience these impacts more than others.
- 6.11 The key decisions required of Cabinet.
 - Capital estimates and budget approval.
 - Decant status to allow secure tenants to be decanted.
 - Service of Initial Demolition notice.
 - Consent to make a CPO.
 - Ability to rely upon Section 203 rights to light.
 - New Lease to Mosque.

- Delegation to procure and appoint build contractor.
- Delegation to enter into all necessary contracts and agreements to deliver the scheme.
 - Carry out tThe regeneration proposals including resident engagement, design, planning and phasing.
- The Landlord Offers and its guides for Council Secure tenants, resident and nonresident leaseholders and selling properties to the council.

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6.12 Many of these impacts arising from different elements of the scheme will depend on how the proposals are implemented. The table below sets out the key components of the regeneration programme as described in the Cabinet Report. It seeks to describe generic impacts of the regeneration programme and to draw from that likely equality impacts. The essence of this table will be drawn into the EgIA assessment in 6.12.

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

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Reducing the borough housing waiting lists	Council-wide commitment to increase social housing by 2,000 units by 2022.	 Increasing opportunities for those on the housing register to access social housing in the borough. Benefits of enabling more people to access social housing, the waiting list is highly diverse with higher levels of BAME peoples on the housing waiting list. A number of residents are keen to see new properties, which are built to lifetime home standards, more energy efficient and with potentially less problems 	 The housing needs of a wider range of protected characteristics currently represented on the common housing register will be positively enhanced through the development of these new units. More homes designed to lifetime homes standards and with disability access. Improving the housing stock will provide homes to higher standards and hence improve the quality of accommodation for residents currently on the estate, particularly those with sensory and mobility impairment, and long term health conditions

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Demarcation of CPO area	Central to assemble the development site to commence construction	 Highlight which units are included within the development red line area. Confirm those units that are due for demolition. Raises potential concerns for residents, particularly those with a leasehold interest in their property. Demolition places a strain on residents within the development red line area, with the realisation of the 'clock ticking' before they need to leave their old homes 	 There may be negative impacts on older leaseholders who are less able to afford their new home. General sense of stress, anxiety and disturbance for residents within the development red line area
Design	New energy efficient homes built to Lifetime homes standards	 Transferring tenants/leaseholders will have access to the specification and designs of their new homes. Improved housing - better insulated, more energy efficient and removing current housing maintenance shortfalls. Design incorporates secure by design (SBD) principles which should improve safety and reduce anti-social behaviour and the landscape design ensures the open spaces are of a superior quality and more useable. 	 The needs of older people and people with disabilities will be enhanced by the development of properties built to lifetime homes standards. Families with dependent children and or adults with specific needs will have units that are in much better condition than currently. The new units are likely to be better insulated and cheaper to heat, hence reducing the risk of fuel poverty.
Planning	Planning applications to release the development process	 The planning of the scheme sets out the project masterplan, unit design and compliance with local and national planning regulations. As yet a planning application has not been made as the scheme is currently transitioning through RIBA Stage 2 and 3. 	The planning process itself should be equalities neutral.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Development programme	The construction programme itself.	 Impact on residents within the site as well as those outside it. Impact of development for properties outside the CPO but immediately adjacent to the regeneration itself include: Disruption, noise, dust and construction disturbance. Potential parking issues on site during the period of the regeneration. 	 Potential negative health impacts of the construction process including noise, dust, construction debris and environmental impacts negatively impacting on health and disability. Households with children and older people may find the regeneration process and construction harder to live with.
Decant	Decanting of those on the site to new units built on open land within the site.	 At this stage in the development the decant proposals have yet to be established. It is perceived that there will be an element of decant to enable the development, but this will be defined following the current consultation programme and will be set out at the point of the planning application due in October 2021. 	 The decant process will need to address the equality needs of residents. Those are most likely to be affected negatively are those who are older, younger, disabled and/or have health conditions. Wellbeing is a critical factor, as is the support network previously available pre-regeneration. Some residents may lose immediate neighbours in the transfer to new accommodation which may have negative impacts on residents reliant on a local/neighbour care network. The council have stated that they will look to rehouse neighbours together especially if there is a caring responsibility expressed.
Allocations of new housing	The site specific allocations policy has yet to be developed/drafted for this regeneration scheme	While effort will be made to ensure there is as close to a like for like replacement of their homes, there are clearly going to be some residents who will not get what they had before.	Effort is needed to ensure that the regeneration implications do not affect certain protected characteristics disproportionally, but also, and critically, it is important that the key needs of these protected characteristics are considered in the reallocation process, and there may be a need for specialist OT and support staff.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Transfer to new housing	Based on the allocation policy, the transfer will, for tenants and resident leaseholders wishing to remain on the estate, be to a new home.	 The designs of the new homes are yet to be finalised. Nonetheless, the improved quality of homes will ensure greater energy efficiency, better design and will be built to lifetime homes standards. The details for future rents has yet to be defined. 	 Transfers to new homes and the allocations/negotiation process, needs to be set against the resident's equality needs. Staff undertaking this work need to recognise these equality implications. Affordability of the new homes will impact more on those with less disposable income.
Phasing	The phasing of the development has yet to be defined	 The development process has identified clear first phases to allow residents of future phases to move only once into new homes where requested. Creating opportunity to move (in a single move) residents to new properties to free up their previous unit/block to commence second and third phases of the development process. Minimising the number of moves is part of the aims of the regeneration programme. 	 Clarity and communication of the phasing process is critical, and residents have stated their concerns, frustration and the associated stress and anxiety this causes.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Landlord Offer: Rights for Secure Tenants – the principles	All tenants will have the right to a tenancy of a newly built social rented home in the new development. They will continue to be a tenant of Tower Hamlets Council with their existing tenancy rights such as the right to buy and succession rights retained.	 Secure tenants will be charged 'social' rents. Council tenants are entitled to home loss payments and disturbance allowances. Tenants will be entitled to a home loss payment which is currently set by law at £6,400. The council will also pay a disturbance allowance to ensure that tenants are not financially disadvantaged by the regeneration. Tenants can apply for the size of home that meets the housing needs of their household. An additional bedroom may be requested on a discretionary basis for carers both within and outside the family. Some tenants may experience a move out of the estate before returning to a new home on it. 	 The principles behind this offer seem to be equality neutral. The council should ensure that they are not applied differently for people with different equality characteristics. Many of the potential impacts are likely to become visible once residents are in detailed discussions with Tower Hamlets teams about their own personal circumstances including financial, physical and social, as they explore the options available to them. Staff completing this work will need to be mindful of the location diversity and to address the needs of each household appropriately.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Landlord Offer: Rights to homeowners – the principles	The document explains the Council's approach to buying back their property when demolition or redevelopment is proposed and the options, they will have to buy a replacement home.	 Provides for the option of: Purchasing a replacement home Purchasing a new shared equity property at no extra cost Part-shared equity and partrent Lease swap to a Council property elsewhere in Tower Hamlets. Sell to the Council and buy a property elsewhere. Council offer options to discuss and hear leaseholder concerns. Following Cabinet approval, the Council will arrange an initial valuation of their property. The council would pay (within in certain limits) for: Home loss payments Claiming fees for professional adviser Valuation fees Negotiation fees Legal fees for the sale of their home Legal fees for buying a replacement home. Removal fees Surveyor's fees on new home purchases (off site) Stamp Duty Land tax Succession rights are defined for the leaseholders' spouse or immediately family member living at the property to inherit it under the same financial/rental arrangements 	 The principles behind this offer seem to be equality neutral. The key equality implications relate to older people, particularly those who are no longer earning, this may place a burden of financial hardships on those needing to raise further mortgage. Furthermore some leaseholders, especially if they speak English as a second language, may experience difficulty in understanding the implications of the negotiation process. N.b. evidence from the survey has suggested that from the sample all those who do not speak English as a first language believe they have a good grasp of written and spoken English.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Rights for Non-Resident Homeowners – the principles.	Non-resident homeowners, (not living in the property for the last 12 months), will be offered the full market value by the council to purchase their property. They will also be paid a 7.5% basic loss compensation payment as well as reimbursements.	 Reimbursements include reasonable fees and taxes incurred for both the sale of the property and for the purchase of a replacement property for a limited period, including independent valuation and legal support. Owners should engage with the council for an initial valuation, to discuss concerns and to negotiate a settlement. The Council valuer will arrange an appointment to make an initial valuation of the property. The council will pay (within certain limits) for: Basic loss payments Repaying arrears Fees for independent surveyor Negotiation fees Valuation fees Legal fees for the sale of their home Legal fees for buying another property. Removal fees Stamp Duty Land tax (for the onward purchase of one property) The Council does not have an automatic responsibility to rehouse people who may be occupying a property. If these 'private' tenants or other occupiers require housing advice, they can contact the Council to obtain this, but that does not imply they will have any entitlement to relocation support. 	 The principles behind this offer seem to be equality neutral. Whilst not an equalities impact, there are private tenants living in units owned by non-residential leaseholders. They have the right to be rehoused if they are on the housing register in bands 1 and 2. The remaining private tenants will be able to access housing advice and to review their housing options.

HARRIOT, APSLEY & PATTISON HOUSE Equality Impact analysis in summary

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

Race: EqIA Finding: None/neutral

Context:

6.14 Tower Hamlets has the highest Bangladeshi population in London (32% at the time of the last census). The number of those from white British backgrounds is 31%. The BAME population for Stepney Green Ward is 73%, compared to 67% for Tower Hamlets, 53% for London and 19% for England. 80% of those on the borough's housing register are from BAME communities and applicants from the Bangladeshi community represent 61% of those on the register. BAME households have higher levels of housing need compared to white British households.

Race profile of the estate

6.14.1 The white British population in Harriott, Apsley & Pattison House is 7%, leaving a 93% ethnic minority population and a BAME population of 90.6% non-white populations. Bangladeshi residents making up 72% of the site population, and 80% of council tenants, 78.9% of resident leaseholders and 52% of nonresident leaseholders/private tenants. The population on the site has therefore a higher BAME and Bangladeshi population than the local ward and borough population profiles.

Assessment

- 6.14.2 The positive impacts for this group relate to the same impacts that secure a successful regeneration of the estate. Homes will be available to all communities in the same way. The diversity of the local community is significant. A critical factor is the need to enable those wanting to stay on the estate to do so and to work to ensure that the relocation of residents is consistent and fair and not influenced by someone's ethnicity.
- 6.14.3 The recent EqIA survey undertaken, indicated that residents did not raise the issue of race as a concern.
- 6.14.4 Moreover, from the evidence gathered, there are no stated negative impacts from a race perspective and regeneration plans were seen as broadly positive from a race equality perspective.
- 6.14.5 It is critical to ensure that council tenants, resident leaseholders, and non-resident leaseholders and their private tenants have positive experiences from

this regeneration proposal irrespective of their race. There are clearly a majority of BAME people living on Harriott, Apsley & Pattison. Nonetheless there may be some groups that will have a higher likelihood of negative impacts particularly those who are older, with lower socio-economic status and those with health conditions and disability. It's likely that many of these people will also be from BAME communities. There is therefore a risk of indirect negative impacts on BAME populations.

- 6.14.6 A central characteristic of the Harriott, Apsley & Pattison is its diversity, and it is important to ensure that the BAME residents and indeed all residents are effectively engaged through the regeneration process.
- 6.14.7 It is likely that the proportional benefits of the regeneration programme will be felt by these Ethnic Minority and BAME populations, given the high proportions on the estate. It is equally critical that where negative impacts are identified for other protected characteristics or identified priorities, these are addressed, thereby mitigating any indirect negative impacts felt by BAME populations.
- 6.14.8 From the evidence gathered there are no direct negative impacts from a race perspective, and the regeneration plans are therefore broadly neutral from a race equality perspective.

Gender: EqIA Finding: None/neutral

Context

6.15 Tower Hamlets' gender split is 51% male and 49% female. In Stepney Green the gender profile is 50.8 % male and 49.2 % female. However on the housing register there are more female (53%) than male (47%) applicants. Indeed regarding housing need, women applying for housing are more likely to have dependent children and therefore require family-sized homes while men applying for housing more likely to require studios or 1-bedroom homes. The gender split therefore has a bearing on the need of different property sizes.

Gender profile of the estate

- 6.15.1 Based on the primary research carried out, the gender profile of Harriot, Apsley and Pattison shows a 50.9% male population and a 49.1% female population.
- 6.15.2 8.3% respondents to the survey indicated they were single parent families. The majority of these are households were headed up by women.

Assessment

- 6.15.3 There was a clear sense that the improvement to housing stock and the provision of new homes would be a strong positive of the regeneration process. This should benefit both men and women and as such gender should not be a factor in the allocation of these social housing units going forward as the allocation policy should take over and hopefully secure equitable distribution of tenancies.
- 6.15.4 From the evidence gathered, there are no stated negative impacts from a gender perspective, thus plans are broadly neutral from a gender perspective.

Gender re-assignment: EqIA Finding: None/neutral

Context:

Borough wide housing data is not available for people who have undergone or who are undergoing a gender reassignment process. Applicants are given priority according to the scheme criteria, not gender. Services are customer-focused and there is discretion within the proposed scheme to respond to individual circumstances if necessary.

Gender re-assignment profile of the estate

6.16.1 Based on the primary research carried out there are no individuals who have undergone or are undergoing a gender transition process.

Assessment

6.16.2 From the evidence gathered there are no stated or perceived negative impacts from a gender re-assignment perspective and plans are broadly neutral from a gender re-assignment perspective.

Disability: EqIA Finding: Positive & Negative

Context

- 6.17 15% of Tower Hamlets' working age population have been identified as having some form of disability. The regeneration scheme is committed to supporting residents with a disability through medical and OT assessments to inform adaptations needed for units prior to residents with needs moving in.
- 6.18 Tower Hamlets' Common Housing Register Partnership Allocations Scheme (November 2020) has two Bands (1&2) which are the housing needs bands where applicants have reasonable preference to be housed. There are two groups within Band 1 (Group A and Group B) both of which would ensure that secure council tenants who have a medical or disability need for a ground floor or a wheelchair accessible property (Group A) or who are priority decants (these are decants with less than a year to clearance date or a decant household which requires 4 bed or larger or a decant requiring a wheelchair accessible property category A or B), will be housed. Group B of Band 1 will cover priority medical and all other decants (with more than a year until clearance).
- 6.19 In 2011, 1,092 residents (9.7%) in Stepney Green had a long term health problem or disability limiting the persons day to day activities a lot, while around 8.1% (908 residents) had a long term health problem or disability limiting the persons day to day activities a little. This shows that 17.8% of residents in Stepney Green have a health problem or disability limiting the persons day to day activities a lot or a little.

Disability profile of the estate

- 6.19.1 Based on the primary research carried out, the disability profile of the estate shows:
 - 7.2% had a health problem/disability which limited their life a lot and 8.1% had a health problem/disability that limited their life a little. This suggests that some 15.3% have a health problem/disability of some form.
- 6.19.2 Several respondents to the open-ended health and age questions referenced members of their households with levels of disability.
- 6.19.3 A more detailed response of the types of perceived additional needs of residents is set out below:
 - 44% had a long -standing illness or health condition (such as cancer, HIV, diabetes, chronic heart disease, or epilepsy)
 - 42% had a physical impairment (such as using a wheelchair to get around and/or difficulty using their arms)
 - 6.1% had a mental health condition (such as depression or schizophrenia)
 - 4.5% had a learning disability (such as Downs syndrome or dyslexia) or cognitive impairment (such as autism or head-injury)

- 3% had a sensory impairment (such as being blind / having a visual impairment or being deaf / having a hearing impairment)
- 6.19.4 Responses suggest that there are some equality impacts which will impact either negatively or positively for residents with disabilities. These include:

Potential negative impacts:

- The disturbance of moving may have a disproportionate impact on disabled residents. (66 residents from the survey sample).
- The quality of life of some residents will be affected by the regeneration programme itself, particularly if their disability is accompanied by a respiratory condition (29 residents have a long-standing illness).
- Residents with a sensory impairment may be particularly by loud noise or construction machinery.
- The new physical layout of the estates will be challenging to those with visual impairment (2 households with sensory impairment).
- It would be important to move people with a disability only once in the process and preferably into homes with readily set up adaptations (28 residents have a physical impairment).
- People with learning difficulties, subject to the intensity of their condition, will also be affected by the construction process and may need separate forms of communication and engagement to enable their understanding of the reality of their situation. (3 residents from the survey)

Potential Positive Impacts

- All new homes will be built to lifetime homes standards.
- At least 10% of properties are being built for disabled people and will have relevant adaptations and equipment built in. All existing tenants and leaseholders are able to complete a health assessment form, and this will be reviewed by the occupational health team and appropriate modifications will be made to the new unit/s.
- Access and egress from the new homes will be supported with lifts and dedicated disabled parking supported by secure design principles.
- Greater choice to disabled people who cannot achieve independent living due to lack of suitable housing in the borough's housing stock.
- Application of Considerate Contractor requirements to minimise negative impact during the construction period.

Age: EqIA Finding: Positive & Negative

Context

- 6.20 Tower Hamlets has a similar proportion of young people aged 0-19 to England and London. One in four (25%) of the borough's residents are in this age group. The largest age group is the 20-39 year olds. 46% of the population are aged 20-39. This is higher than London (33%) and England (26%).
- In Stepney Green, the child population (0-15) represents 22.8% of the total population of Stepney Green, this is more than Tower Hamlets 19.7%, London 20.0% and England 18.9%. the ward's working age population 16-64 in Stepney Green is 67.8% this is less than Tower Hamlets 74.1%, London 68.6% and England 63.2%. Older people (65+) in Stepney Green is 9.4% more than the level in Tower Hamlets 6.1%, but less than London 11.4% and England 17.8%

Age profile of the estate

6.22 The under 18 profiles of the respondents to the survey within the site is 27%. This shows that 3 in 10 occupants of the site are currently under 18. The working age population (18-64) of those on the site is 66.9% and the over 65 population is 6.1%.

Assessment

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

Potential negative impacts:

- Older people with disabilities are likely to have varying negative impacts potentially because of this regeneration programme.
- In general, older people have been living on the estate for a longer period than other residents and will be more settled and are likely to require more support when moving.
- For people of all ages, the regeneration programme is likely to cause disturbance the impact of which in particularly likely to apply to older people if they are living on their own, frail and vulnerable.
- For children and young people, the loss of the estate's amenities and play space can be critical during the construction period.
- There may also be disruption to school life particularly for young people trying to study at home during the construction period itself.
- There may be an impact on childcare arrangements particularly if there are informal arrangements with other residents who may be moving off the estate. Access to childcare, nurseries, creches and schools will need to be addressed to minimise any disruption.

Specific issues for older Leaseholders

- The profile of age by tenure type shows that there is a slightly higher proportion of resident leaseholders who are over 65.
- Older leaseholders may find it difficult to raise any additional mortgage on their new properties. The shared ownership/equity option seeks to address this, but this still may cause older leaseholders to feel their aspirations of owning 100% their own home is being undermined although they will own an asset of the same value as that previously owned.
- All these aspects are likely to cause residential leaseholders, particularly older leaseholders' greater levels of anxiety, stress, depression possibly leading to ill health.

Potential Positive Impacts

- All new homes will be built to lifetime homes standards.
- 10% of properties are being built for disabled people and will have relevant adaptations and equipment built by design, many of these disabled people are also older people and this would benefit this community too. All existing tenants and leaseholders are able to complete a health assessment form, and this will be reviewed by the occupational health team and appropriate modifications will be made to the new unit/s.
- Key guarantees provide options for both tenants and residential leaseholders to relocate into new homes on the estate.

Sexual Orientation: EqIA Finding: None/neutral

Context:

- 6.23 Local authority level sexual identity experimental estimates published for 2013-15 estimate that 4.3% of the Tower Hamlets population identified as lesbian, gay or bisexual. Experimental estimates published by ONS for 2017, show that nationally 2% of the UK population aged 16 and over identify as lesbian, gay, bisexual (LGB), regionally, people in London (2.6%) are more likely to identify as LGB.
- There is only a limited amount of information on sexual orientation available, regionally and nationally. Guidance from the Equality and Human Rights Commission states to collect it where relevant and sexual orientation is not relevant to the majority of housing services, with the exception of tackling harassment.

Sexual orientation profile of the estate

The sexual orientation profile of residents responding to the survey shows that 100% of respondents stated that they were straight/heterosexual.

Assessment

- 6.25.1 In reviewing the current proposals for the regeneration of Harriott, Apsley and Pattisson there are no discernible negative impacts identified for LGBT groups. The design of the new homes and spaces will create a place that is secure by design and can be policed more easily. The public realm will offer a greater level of security to all which may be relevant to LGBT residents who are more likely to be subject to hate crime and harassment.
- 6.25.2 Through the course of the engagement interviews with 72 householders on the site (72% of those on the site) there were no raised concerns regarding sexual orientation and the regeneration process.

Religion and belief: EqIA Finding: None/neutral

Context:

- 6.26 Tower Hamlets has the highest number of Muslim residents in the country. Around 38% of the residents are Muslim, compared with 5% in England and 13% in London. Conversely, the borough has the lowest number of Christian residents at 30%, compared with 59% in England and 49% in London.
- 6.27 In Stepney Green, the proportion of residents who identified as Christian was 22.3% lower than the borough average of 30%. At 49.5% of the population, the proportion of Muslim residents was the third highest proportion of the 20 wards in the borough. 1,357 residents in the Stepney Green ward explicitly stated that they had no religion, this equated to 12.1% of the ward population, compared to the borough average of 19.1%.

Religion and belief profile of the estate:

- 6.27.1 The Muslim faith makes up the largest group of respondents at 80.8% of the whole sample, 90.8% of council tenants, 84.5% of resident leaseholders and 61.5% of non-resident leaseholders/private tenants.
- 6.27.2 The scheme also includes the demolition and rebuild of the Redcoat community centre and Mosque.

Assessment

- 6.27.3 There were no discernible negative impacts raised by residents in the engagement process. Moreover, there are no aspects which would prevent residents from practicing their religion/faith.
- 6.27.4 To this end, the Council will consider people's ability to practice their faith through the different stages of the project. The rehousing team will ask

- people about their use of places of worship to see the extent to which disruption to their lives can be minimised.
- 6.27.5 The extension of the Mosque's lease is a key recommendation to Cabinet. This would enable the Mosque and its worshippers the benefit of a new purpose built building rather than the temporary units it currently operates from within. This outcome is still being negotiated with the Mosque although based on the current information available there seem to be not likely negative impacts to the Mosque at this stage in the regeneration proposals.

Pregnancy and maternity: EqIA Finding: Positive and negative

Context:

6.28 In 2019 there were 4,331 live births in Tower Hamlets. Between 2018 and 2019 the borough experienced a 4.0% decrease in the number of live births compared to 3.1% nationally and 3.8% regionally.

Pregnancy and maternity profile of the estate:

6.29 The number of those who are either pregnant or who have given birth in the last 12 months was 3. This represents some 0.87% of the population from the survey sample. While this does seem quite low, it is consistent with the lower pregnancy rates since the Covid-19 pandemic.

Assessment

6.29.1 From previous analysis and engagement of partners with newborn children on regeneration estate schemes it is likely that there will be both negative and positive impacts. These include:

Negative impacts

- There is likely to be disruption during the construction period and the council may wish to provide access routes through the estate during this time. This may negatively impact on pregnant mothers or families with new-born children.
- Efforts to address this disruption will be universal to the entire population of the estate but are more likely to impact on people with buggies and or wheelchairs.
- Those who have to move as a result of the regeneration programme may lose the on-hand support of carers neighbours/family and friends in the area as a result of the move. Where possible the council will seek to move neighbours with each other where this is requested.

Positive Impacts

- New housing will have greater accessibility and will support parents of new-born babies or mothers in periods of pregnancy and maternity.
- The design and layout of the new homes will consider access, lift and stairs so that larger family homes are either accessible by lift or not above four storeys high without a lift. The design of the public realm will consider accessibility for people moving around the estate, pushing buggies etc.
- Any affected council tenants who are pregnant at the time of re-housing may be entitled to a larger property as per the allocations policy.
- The design will meet modern space standards with provision for buggy storage at ground floor level in blocks with no lift.

Marriage & Civil Partnership: EqIA Finding: None/neutral

Context:

- 6.30 The most recent data about the marital status of residents in the borough is from the 2011 Census. Tower Hamlets has a significantly higher proportion of residents who are single compared to London and England. In 2011, 55.3% of residents were single, compared to 44.1% in London and 34.6% in England.
- 6.31 The council recognises same-sex relationships and civil partnerships with respect to household composition. There are no known negative impacts on these groups.

 Nonetheless there are other married or legal partnership statuses that will have some implications particularly where property ownership and tenure matters are concerned.

Marriage and civil partnership profile of the estate:

The high proportion of those that have never married and never registered a same sex civil partnership (52.7%) will mostly be young adults. Within the responding households 41.4% of people over 16 were married, 1.4% were separated, 1.4% divorced and 3.2% widowed.

Assessment

- 6.32.1 It is worth noting that in law, marital status does have an impact, particularly, with regard to property tenure, ownership rights and access to finance/lending/pensions. This could apply in a number of ways:
 - Tenancy rights for parties who are resident but who are not named as
 either the head of household and or not named on the tenancy agreement
 but who are either separated or divorced from that person.
 - Unmarried couples and those who are not named on property deeds.
 - Financial problems with couples who have separated, (reduction in joint earnings etc).
 - Financial difficulties in raising loans and or mortgages.
 - Splitting statutory loss payments.

- 6.32.2 Indeed, the stress and anxiety of regeneration schemes can be accentuated for people where their marital status has changed and/or if a partner has left or died. For example, some bereaved residents may experience higher levels of vulnerability in a regeneration environment particularly if they were not married to their partner who has died.
- 6.32.3 Support and advice may be required for tenants and leaseholders who have undergone either a divorce or bereavement to enable them to adequately understand the implication of the regeneration process on their housing ownership, tenure rights and accessibility to obtaining a mortgage.
- 6.32.4 The scheme itself does not present direct negative impact on the grounds of marriage or civil partnership and is thus seen as equalities neutral.

 Nonetheless it may generate some indirect negative impacts for people where their marriage or civil partnership status affects their tenancy agreement and or ownership of property. In these cases, support and advice may be required to secure the necessary agreement on which to progress the transfers, transaction and to mitigate any negative impacts of the scheme. These complexities are relevant in many regeneration schemes and will need to be addressed as they arise.

Socio Economic Inequality: EqIA Finding: Positive and negative

Context:

- 6.33 While the borough has a good average income, a significant percentage of the population have incomes of less than £15,000 per year, which has impacted on the housing market. The borough needs to deliver a significant number of affordable homes each year to meet housing need.
- The employment rate for residents in Stepney Green was 47.7% compared to 57.6% for Tower Hamlets, 62.4% for London and 62.1% for England. The unemployment rate for residents in Stepney Green was 7.1% compared to 6.7% for Tower Hamlets, 5.2% for London and 4.4% for England.

Socio-economic profile of the estate:

- 6.35 42% of household members are employed full time, 9% part time and 12% in full time education and 17% unemployed and available for work. This is data gathered in 2021 and reflects the estate population during 3rd Covid-19 lockdown (January 2021). In summary 81.2% of the estate are economically active and 18.0% are economically inactive and 0.8% preferred not to say.
- The numbers of household where there was currently a **furloughed employee** was 4 (5.6%) of responding households.
- 6.37 The proportion of those on the site where there are members of households who receive an income related benefit was asked as part of the survey. 54% of household residents who completed this question are in receipt of some type of income related benefit. The remainder either stated they were not or were unsure.
- 6.38 In the EqIA survey, 27.8% of households stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty. This suggests there is likely to be a sizeable number across the estate beneath the poverty line as defined by the DWP¹³.

Assessment

6.38.1 The regeneration programme will have impacts on residents, tenants and leaseholders alike, which might incur greater costs and hence become a burden for those residents unable to afford the associated costs, for example there may be a consequential rise in the value of the new properties in terms of rent levels. Many of the direct costs associated with the scheme are being addressed including legal costs, disturbance and moving costs. The points below highlight some of these potentially negative impacts.

 $^{^{13}}$ DWP in 2017 put the level of household incomes beneath the poverty line at a weekly average of £288 per week. This equates to an annual income of £16,128. Annual incomes beneath £15,000 per annum would represent households beneath the UK poverty line.

Negative impacts

- Perception of increasing cost and affordability of living on the new development.
- Increased rental cost may have a negative impact on those on lower and fixed incomes including older people.
- Higher proportion of estate residents on income related benefits.
- Older people with less earning capability.
- Resident and non-residents leaseholders have no choice but to sell however rehousing is available for resident leaseholders on the estate if they can afford the new home and/or the option of shared equity or shared ownership if they cannot. In short, they will be offered a property on a like for like basis however if they want a larger unit, they will need to demonstrate they have a housing need for any additional bedroom.
- For resident leaseholders wishing to remain on the estate, it is recognised that the value of similar sized new homes would be more than their current home and therefore it could be difficult for them to buy a new home on the estate outright. However, the provision of shared ownership/equity options does seek to mitigate this by giving them the ability to retain the same level of financial investment in a new home on the estate.
- It is recognised that there may be some leaseholders who may have remortgaged their homes, spent the money from equity release and may also be unemployed. In these circumstances, it may be difficult for leaseholders to either remain on the estate or buy elsewhere. The shared ownership option should cater for these circumstances.

Positive impacts

- The acute shortage of homes and rising population is adding extra pressure on the need to provide affordable and social rented homes in the Borough, which this regeneration programme seeks to achieve.
- Regeneration of an estate and increasing supply of council housing stock will benefit the increasing number of Tower Hamlets' residents who cannot afford to buy or rent in the private sector.
- Improved energy efficiency of homes and use of sustainable technologies should lead to lower running costs.
- S106 obligations will provide employment and training opportunities.

Language: EqIA Finding: None

Context:

- 6.39 The percentage for whom English is not their first language in Stepney Green is 39%, higher than 34% for Tower Hamlets and 12.9% for London but, higher than 4.4% for England.
- 6.40 The impact of the regeneration proposals on people who do not speak English as a primary language is likely to be significant. Alternative formats of the proposals are

available upon request (such as audible copies for blind people) as well as being made available in different languages. At every stage of the regeneration, the council has sought to use plain English and avoid jargon.

6.41 The estates regeneration website where residents can review the proposals is translated into different community languages and support is available to those unable to use the system.

Language profile of the estate:

- 6.41.1 The range of languages spoken as a main language in households on the estate is set out below. Bangladeshi is spoken in 52.8% of households and English is spoken in 40.3% of responding households. Somali and French is spoken in 2.8% of households respectively and 1.4% of households speak Portuguese.
- 6.41.2 Moreover of those who had English as a second language all households stated that they have strong written and spoken English.

Assessment

6.41.3 Language on its own is not likely to have any significant equality impacts from the regeneration programme itself other than the ability for residents to communicate and understand the implications of the regeneration process as it applies to different households. Most households have someone who does speak English although English is in many cases a second language in a home.

Key negative impacts

 Capacity and capability to understand is not always about language, it may also be connected to issues of mental health, learning disability and age.

Positive Impacts

- Robust engagement with residents through the scheme design process via the Residents Panel, newsletters, events, visits to other schemes, presentations
- Input from residents into the scheme proposals and design and eventual planning submission.

Health: EqIA Finding: Positive and negative

Context:

Health and housing are intricately linked. Poor quality housing and homelessness can affect a person's health and wellbeing. As noted above with respect to disability, the reduction in priority given to homelessness leads to a corresponding increase in priority to those who need to move due to illness or disability.

Health profile of the estate:

6.42.1 The following health needs apply to members of each household.

Which of the following health needs apply to member/s of your	Whol	e Sample Council Tenants		Resident Leaseholders		Non Resi/Private Tens		
household? Self-Declared Health Needs	Count	%	Count	%	Count	%	Count	%
Problems with arms, hands	1	1.4%		0.0%	1	3.7%		0.0%
Problems with legs or feet	16	22.5%	7	20.0%	7	25.9%	2	22.2%
Problems with back or neck	2	2.8%		0.0%	1	3.7%	1	11.1%
Difficulty in seeing	1	1.4%		0.0%	1	3.7%		0.0%
Difficulty in hearing		0.0%		0.0%		0.0%		0.0%
Speech impediment		0.0%		0.0%		0.0%		0.0%
Skin conditions, allergies		0.0%		0.0%		0.0%		0.0%
Chest, breathing problems	4	5.6%	2	5.7%	2	7.4%		0.0%
Heart blood pressure, circulation	6	8.5%	3	8.6%	3	11.1%		0.0%
Problems with stomach, liver, kidney, digestion		0.0%		0.0%		0.0%		0.0%
Diabetes	8	11.3%	3	8.6%	4	14.8%	1	11.1%
Depression, bad nerves	4	5.6%	2	5.7%	2	7.4%		0.0%
Epilepsy		0.0%		0.0%		0.0%		0.0%
Learning difficulties	3	4.2%	2	5.7%	1	3.7%		0.0%
Mental illness, phobia, panics	3	4.2%	2	5.7%	1	3.7%		0.0%
Learning disabilities		0.0%		0.0%		0.0%		0.0%
Long term medical condition	19	26.8%	11	31.4%	4	14.8%	4	44.4%
Progressive illness	4	5.6%	3	8.6%		0.0%	1	11.1%
Total	71	100.0%	35	100.0%	27	100.0%	9	100.0%

Assessment

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

Negative impacts

- Negative health and well-being outcomes would be associated with disruptions to existing households on the estate and the inevitable stress this causes.
- Impacts in the short-term associated with the disruption of moving home and uncertainty about the future stress, anxiety and depression are issues residents have stated that will impact negatively on their health.

- The construction environment can exacerbate existing health conditions and may be, for some, the cause of new health conditions, currently there are relatively high levels of Limiting Long Term Illness and Long-term conditions present on the estate (29 people).
- Resident's health can be negatively impacted as a result of the development through respiratory and circulatory disease, asthma etc.
- Potential health impact when ground is broken and the construction activity starts, will necessitate the requirement to assess and diagnose those that have indicated their conditions are likely to be affected.
- The interview team uncovered residents with self-declared health needs describing particularly ailments/pain associated their legs, feet, neck and backs. This suggests that there is a need to address physical mobility/access as priorities in the regeneration design of walkways and pathways.

Positive impacts

- Longer term, positive impacts can be expected from providing much better-quality homes and reducing overcrowding.
- Quality homes designed according to best practice in urban design, producing a high-quality home and urban environment and a safe and secure new neighbourhood, will contribute positively to resident's quality of life.
- Application of Considerate Contractor requirements to minimise negative impact during construction period.

7 Key Findings

- 7.1 The regeneration of Harriott, Apsley & Pattison Houses is a major undertaking, which will have a range of impacts applicable to all the residents living on the estate. In several cases these regeneration impacts will have a potentially greater bearing on certain equality groups. The protected characteristics of disability, age (particularly older and younger people), health, socio- economic inequality and language have been highlighted through the EqIA as having the most significance of impact.
- 7.2 The council and its housing regeneration team will need to work to address these equality impacts and to build in safeguards and mitigation activity in the programme they are designing.
- The scheme is seeking approval to move to its next stage and in particular to release the funding to develop detailed designs, to seek approvals to make a CPO, to agree the decant status of secure tenants and to serve initial demolition notices. Operationally the scheme is also seeking approval from the council to allow officers the delegation to procure and appoint a building contractor and delegation to enter into all necessary contracts and agreements to deliver the scheme. To date the scheme has achieved ballot approval from residents to demolish 100 existing units and build 438 new residential units on the site. In addition cabinet are being asked to establish a new lease for the Redcoat Community Centre and Mosque.
- 7.4 The scheme is currently at RIBA stage 3, detailed design stage. In December 2020, two options were proposed which went out to resident consultation. These options were refined throughout the spring and early summer and a planning application is being prepared for submission in the autumn of 2021. Options for the development of the site, its phasing and its development capacity have now been considered to ensure that the optimum number of residents on the site can be decanted and rehoused in the first phases on the scheme.

CPO process

7.5 Much of the engagement with residents (tenants and leaseholders) has been based on the design and phasing process to date. The Cabinet report sets out a request to make, and hence to start, the CPO process. To this end, much of the proposed CPO activity is governed by the CPO legislation and guidance nationally. However, there are some impacts that are a direct and indirect result of the CPO process, which are identified below. Where feasible this EqIA has sought to distinguish between generic regeneration impacts and equality specific impacts:

Generic Regeneration Impacts

The CPO process does have a direct impact on leaseholders (resident and non-resident) as their homes will be compulsorily purchased. This is universal to all leaseholders and is not in itself an equality impact.

- What resident leaseholders chose to do next will be based on the options set out
 in the right for resident leaseholder document. In short, they have the options of
 taking their sale value (subject to an independent valuation) and buying
 elsewhere or porting their mortgage and purchasing a home in the new estate or
 entering a shared equity arrangement (not paying rent) or a shared ownership
 arrangement (part paying rent).
- Non-Resident leaseholders are being offered the sale of their property back to the council subject to an independent valuation.
- Some leaseholders may feel they are forced to sell and leave or stay and port their mortgage to a new property.
- The CPO process will have disproportionately negative impact on leaseholders who are less able to afford their new home either forcing them to sell and move off the estate.
- For some, the offer of porting mortgages and entering shared ownerships may place financial burdens particularly for people with low earning capability.

Equality specific negative impacts

- Some burden may arise from households where their marital status has changed since the property has been purchased and this may cause legal costs to clarify ownership and to agree the way forward for that household.
- The CPO process may have disproportionate negative impacts for leaseholders
 who are either older people, disabled and or single parent families or where they
 have less financial capacity to meet the increased value. Similarly, this will have
 impacts on all leaseholders who find difficulty in meeting the increased cost of
 home ownership on the estate.

Regeneration programme (design, and construction)

7.6 The regeneration of any physical space creates its own impacts, not simply because of the development process itself but also the associated impact that has on people living in or close to the development site itself. Particularly this relates to:

Equality specific negative impacts

- The inevitability of change and movement to a new home may place a burden on people who are settled and have established lives particularly where care networks and support are based on neighbours and family members living close by. The council will work closely with residents to keep support networks together.
- Potential negative health impacts of the construction process including noise, dust, construction debris and environmental impacts, often negatively impacting more disproportionately on people with poor health and disability.
- Households with children and older people may find the regeneration process and construction harder to live with.

Resident engagement

7.7 Critical to any regeneration process is the need to ensure that engagement with residents is maximised. There has been much work delivered on the estate by tenant liaison and advisors which has established some productive work. Moreover due to Covid there has been much effort placed on remote and virtual engagement which has been supported with videos and graphical illustrations of design options.

Equality specific negative impacts

- Language is potentially an issue for residents (leaseholders and tenants alike)
 and residents who did not speak English as their first language could feel that
 their understanding of the impact of the regeneration scheme had suffered
 because of this. However through the survey undertaken, all those engaged even those that did not speak English as their first household language felt their
 written and spoken English was good.
- Much of the interaction with residents will be through housing staff and those
 negotiating with tenants and leaseholders. In these cases, there is a real need to
 ensure that the borough's equalities commitments are maintained in the
 negotiations process, particularly with the training of staff to recognise equalities
 issues of those in negotiation. We should note that the council has ensured that
 a Bengali translator has been made available at every engagement event held to
 date.

Decant and housing allocations process.

7.8 Elements of this EqIA are focused on activity that will happen in time. This includes the phasing of the scheme, the decanting of residents and the rehousing/allocation of housing for the new estate.

Equality specific negative impacts

- The decant process must address the equality needs of residents. These are most likely to be affecting those who are older, disabled and or who have specific health conditions.
- Wellbeing is a critical factor, as is the support network previously available preregeneration. Some of these networks are based on neighbours and where feasible efforts should be made to enable neighbours who want to live close to other is facilitated.
- The sense of community, particularly among those who are friendly with their immediate neighbours could have negative impacts on residents reliant on a local/neighbour care network. Potentially, this is most likely to impact on older people, disabled residents and those with health conditions. Where feasible the decant process is seeking to cluster residents from Harriott, Apsley and Pattison in new units together with those they had previously lived with.

Positive Impacts

7.9 There is a counter-balance to these possible negative impacts as the regeneration programme has several positive impacts which many residents have bought into, these include:

Equality specific positive impacts

- The housing needs of a wide range of protected characteristics will be positively enhanced through the development of these new units providing opportunities for housing. The housing register in the borough has significantly more people from diverse communities when compared with the population profile of the borough many of whom are likely to benefit from this regeneration scheme.
- There will be more homes designed to Category 2 standard¹⁴ for accessibility which is broadly equivalent to 'Lifetime' homes standards and with at 10% with disability access.
- Improving the housing stock will provide homes to higher standards and hence improve the quality of accommodation for residents currently on the estate, potentially improving residents health and wellbeing.
- Families will have units which are in much better condition than those they currently occupy.
- The s106 agreement will provide economic benefits to the local community.
- Energy efficient design and improved sustainability should lead to lower running costs for new homes.

Appendix 4 - Equalities Impact Assessment (Oct 2021)

¹⁴ Category 2 means a home must be accessible to most people and able to suit older people, those with reduced mobility and some wheelchair users, and is estimated to cost developers an extra £1,400 per home. Requirements include level access front and rear doors, an entrance level bathroom, kitchen and dining area and low height windows.

8 Mitigation Recommendations

8.1 The points set out below list the core mitigation activity that is recommended to address the impacts highlighted through the EqIA.

Generic mitigation activity

- An EqIA refresh programme to be adopted alongside predicted key milestones in the project lifetime.
- Equality training/briefings for staff undertaking one to one liaisons with residents moving into the new estate, this is currently in place and will need to continue.

Disability Mitigation activity (currently in place but needing to continue)

- The Council to continue to work closely with the Lettings and OHT to determine resident's housing needs. In particular to ensure that the OHT continues where needed to make medical assessments and make the necessary recommendations and requests for aids and adaptations before residents move. The properties residents move to will be built/adapted to their needs.
- Ensure that tenants, particularly those with a disability, only move once into their new homes.
- The Data from the EqIA may support the continued engagement with those residents and households who have a member with a stated disability. This is particularly relevant to the households who identified sensory and physical impairments within their families, and where this would place additional challenges when moving disabled families to new properties. Consulting and engaging with disabled groups before, during and after change to check effects, outcomes and results is a legal requirement under the Equality Act 2010.
- In terms of formal adaptations for disability some residents said that they have previously sought social services assessment for adaptations and equipment.
 These assessments will need to be applied when the design of new homes can more easily accommodate these needs.
- If leaseholders are seeking to leave the estate, referrals on to other Social Care Services should be made to mitigate any possible negative impact that disabled people may experience.
- Continue to provide support with adaptations in units on the new estate, designed specifically for the disabled person's needs should be a prerequisite.
- Disability grants reviewed and accessed for residents in specific need to support the funding of adaptations.

Age Mitigation activity

Children and Young People

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

Older People

 Ensure that tenants, particularly those who are older, only move once into their new homes.

- Support for and recognition of the financial constraints that many older people will experience in an aim to support them to come to terms with the transition to a new home (if a tenant or leaseholder is staying on the estate) and to support older people (tenants and leaseholders) who are moving away from the estate.
- To support older leaseholders to access the right options for them and to ensure that their support is maintained through to the conclusion of the CPO process and the allocation of new homes.
- Social services support for any adaptations to new homes for older people, particularly those with a disability / health conditions as part of the decant process.

Socio-Economic Mitigation issues

- As a general principle the council have stated that as part of the regeneration scheme residents will not be left in a worse financial state than before the scheme began
- Resident homeowners would be compensated by offering them market value, plus 10% home loss, for their current home. Disturbance costs including reasonable legal and valuation costs will also be paid.
- The regeneration programme will have impacts on residents, tenants and leaseholders alike, which might incur greater costs and hence become a burden for those residents unable to afford the associated costs. The Council needs to monitor the potential for a consequential rise in the costs of the new properties both in term of property values and in terms of rent.
- The Council will need to carefully monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.

Language Mitigation

• Ensure the availability of adapted communications, translation and interpretation services for residents and leaseholders, when specific tenant engagement and leaseholder negotiation is being undertaken. The regeneration team to continue to provide translation slips with each communication.

Health Mitigation issues

 Individual Health Needs Assessments will need to be carried out where required and dedicated rehousing support provided by the Council, including access to mental health support.

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

- Serious and long term health conditions should be prioritised, but progressive conditions may need to be addressed. This information via the research that has been carried out is available to the council.
- The Housing Regeneration Team to continue to liaise with the OHT and are working collaboratively to understand household needs.

Intersectionality

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

9 Action Plan

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

Mitigation Issue	Actions	Outcome	Date	Responsibility
Generic Mitigation				
Ensure all frontline staff and contractors are briefed on the findings of the EqIA and where appropriate undertake equality training	Run EqIA briefing sessionsReview training needsEstablish training where appropriate	 All front-line staff able to address and identify the priorities to equality as set out in the EqIA 		
Ensure staff consulting with residents understand the equality impacts of the scheme	 Equality training / briefing / workshops for housing regeneration liaising teams 	 Recognition and understanding of equality impacts and issues as highlighted in this EqIA. 		
Disability Mitigation Activity			T	
Early engagement with people with a disability on the estate between the decant team and specialist social care staff	 Arrange relevant Occupational Therapy/Social Services assessments for residents where identified. This is in place and will need to continue where relevant Where necessary consideration should be given to residents that may as a result of their disability need to be moved from the estate during the construction period. 	 Reasonable adjustments identified in new and future properties 		
Ensure disability needs are picked up for residents who may opt to leave the estate under the key guarantees	 Liaison with social care teams in other authorities where residents are seeking to move to 	 Disabled residents leaving the estate are supported and are flagged to the relevant authorities 		
Ensure that all disability needs are picked up where reasonable adjustments are identified.	 Support with adaptations in new units on the new estate 	 Disability issues built into home designs on the new estate. 		

Mitigation Issue	Actions	Outcome	Date	Responsibility
	 Commission repair person service to 			
	support additional fixtures and fittings			
Ensure that the cost of adjustments and	 Ensure reasonable adaptations are 	 Required adaptations are 		
needs of disabled people are addressed	implemented within the new homes in	completed by the council in line		
	line with OT assessments as set out in	with OT Assessment.		
	the key Guarantees.			
Age Mitigation Activity				
Address age impacts of regeneration as	 Engage young people in the design of 	Young people engaged in the		
they apply to young people	the future amenity space within the new	design of amenity space within		
	estate. Ensure existing amenity space is	the new estate.		
	secure during the regeneration and			
	construction			
Need to address age impacts of	 Provide opportunity for independent 	 Residents enabled to make 		
regeneration as they apply to older	financial advice for any resident needing	informed financial decisions		
people	it.			
Need to support older people through	Commission repair person service to	Older residents given support in		
their move and settling into their new home	support additional fixtures and fittings	settling into their new homes		
Need to support older leaseholders	Support older leaseholders to access the	Direct engagement with older		
through the regeneration process	right options	leaseholders		
Need for social support services for any	Secure a Social Worker/Occupational	Older people and people with		
adaptation to new homes for older people	Health practitioners to work with	disabilities supported through		
and those with a disability / health	Regeneration team.	the engagement of health and		
conditions	Trogerior diservices	social care.		
Socio-economic Mitigation Activity				
Recognise and understand the cost	The council to monitor the potential for	 Robust estimates of future costs 		
impacts for individual households within	a consequential rise in the costs	and values for new and existing		
the regeneration programme.	associated with the new properties both	properties provided to enable		
	in terms of living costs and in terms of	informed decision making.		
	rent/mortgages.			

Mitigation Issue	Actions	Outcome	Date	Responsibility
Assess the potential impacts on Private tenants living in properties which is due for development	 Review Regeneration policy and identify ways to support private tenants made vulnerable. 	 Consideration of options for private tenants 		
Recognise and understand the cost impacts for individual households within the regeneration programme.	 The council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity. Facilitate access to Independent Financial Advisors for all residents. 	 Robust estimates of future costs and values for new properties allowing informed discussions about financial options under the rights for homeowners. 		
Language Mitigation Activity				
Ensure residents and wider consultees have adequate translation provision as part of the negotiation phase of the regeneration programme.	 Make alternative formats, translation and interpretation provision available when specific tenant engagement and leaseholder negotiation is being undertaken 	 Alternative formats, translation and interpretation identified and readily available 		
Health Mitigation Activity				
Address the presented health needs of residents transferring from their existing home to any new property as part of the Regeneration	 Undertake health and medical assessment or OT assessments where required. Where necessary consideration should be given to residents that may as a result of their health condition need to be moved from the estate during the construction period. 	 Implement recommendations of assessments and prioritisation of serious / progressive conditions 		
Intersectionality Mitigation Action				
Support to restore communities on the estate during and post regeneration	 Develop enrichment activities for residents of the estate designed to build communities 	 Empower residents to promote, celebrate and harness community cohesion and shared values 		

9.2 Suggested Future EqIAs and EqIA refreshes

EqIA Subject	Date	Responsible Body
Regeneration phasing and housing transfer / allocation plans		
Construction management plan		
Post Development EqIA and evaluation		

10 Appendix 1: Key Definitions

Key Definitions

10.1 **Diversity** equals difference:

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

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

Often, we have policies, guarantees and standards which guide us to treat people the 'same' so that they receive their entitlements. But regularly in 2017 we are also faced with challenges to deliver individualised and tailored housing services to individuals, families and groups. The skill is to know when 'sameness or difference' applies and having a rationale to explain your actions.

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

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

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

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

- 10.5 **Ethnic Minority**: Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British.
- 10.6 **BAME**: The acronym BAME stands for Black, Asian and Minority Ethnic and is defined as all ethnic groups except White ethnic groups.

11 Appendix 2: Scoping of the EqIA

11.1 The EqIA will address the priority components of the regeneration proposals, the planned compulsory purchase order for the estate and the decisions that Cabinet is being asked to make, as set out below. Moreover, this EqIA will review the Landlord offer and the specific guidelines for Council tenants, and resident and non-resident leaseholders. The EqIA will also assess the impact on the regeneration programme on the Mosque and its congregation as well as the residents in the two residential care units on the site, which are due to be relocated to sites elsewhere in the borough.

Description of the estate regeneration proposals

- 11.2 The Council is committed to delivering extra homes for social housing to deliver a new generation of homes for Tower Hamlet's residents. The Council also needs to look forward to future demand beyond this period, where it is predicted that the Council will need to enable and deliver more than 2,000 new homes per annum until 2022.
- 11.3 The Harriott, Apsley & Pattison House is part of the Council's Estates Regeneration Programme. The principal reason for inclusion of the estate in the programme is that it represents an opportunity to build a significant number of additional homes and because the condition and design of the estate means that a more comprehensive solution beyond the Tower Hamlets Housing standard investment programme is required. Given its location and public transport accessibility levels, there is scope for a significant increase in the number of homes. The key rational for the estate redevelopment are:
 - The current poor condition of many properties.
 - The costs of delivering the Tower Hamlets Housing Standard means it is unaffordable.
 - Refurbishment itself would not resolve the main problems with the condition of the properties.
 - There is the potential for wider regeneration benefits, including delivery of additional new homes.
- 11.4 With the regeneration scheme the Harriot, Apsley & Pattison House is made up of 100 properties; these include tenanted and leasehold properties, the site also includes a mosque and two resident care units. The scheme has been taken to Ballot (April 2019) where local people voted almost universally 98% for the demolition and rebuild option. The scheme is now at the point where officers are going back to Cabinet to approve the next phase of the plans for rebuilding the estate.
- 11.5 Specifically Cabinet are being asked to:
 - Approve the Capital estimate / budget for the scheme.

- To agree the decant status of tenants, allowing secure tenants to be decanted if they wish to do so.
- Provide notice of demolition.
- Provide consent to make a Compulsory Purchase Order (CPO).
- Section 203 rights to light.
- Provide a new Lease to Mosque.
- Provide delegation to procure and appoint a building contractor.
- Provide delegation to enter into all necessary contracts and agreements to deliver the scheme.
- Review the regeneration proposals including resident engagement, design, planning and phasing.
- Agree the Landlord Offers and its guides for, council Secure tenants, resident and non-resident leaseholders.

EqIA Rationale and context

- 11.6 Aside from the public duty requirement of the Equality Act 2010 Tower Hamlets council will be taking these regeneration proposals through to a Cabinet Decision. A de facto requirement of all cabinet decision is the need to complete an Equalities Impact Assessment. To this end this EqIA will seek to meet all the scrutiny requirement of Cabinet based decisions.
- 11.7 Through discussion with Officers in the Housing Regeneration team it was agreed that the focus of this EqIA would be on key elements of the Housing Regeneration proposals on the Harriot, Apsley & Pattison House at this stage in its development and specifically relating to the requests for Cabinet decision as set out above.

Regeneration Proposals (including design, Planning and Phasing)

- 11.8 The proposed redevelopment will provide 438 homes, of which 79 will be replacement homes for existing tenants and resident leaseholders.
- 11.9 In line with our Local Plan, the additional homes created will provide at least 35 % genuinely affordable housing and contribute to an overall target for 50 % of all new homes to be affordable. The council will prioritise and maximise the development of genuinely affordable homes where feasible. The remainder will be developed for market rent or sale and will help to fund the construction of the affordable homes.
- 11.10 New homes will be a mix of one, two, three and four bedroom properties. They will be both flats and duplexes. The new development will meet the needs of existing residents by providing more new family sized homes as well as smaller sized homes

- for the adult children of existing residents who are both on the housing register and in housing need.
- 11.11 Current secure tenants and resident leaseholders, in conjunction with the Residents' Panel, will be given the opportunity to choose from a range of selected materials and colours including:
 - Kitchen units (door fronts, worktops and handles)
 - Floor coverings
 - Paint colour for walls in selected rooms
- 11.12 Other practical features include:
 - Homes will deliver a high level of noise insulation to avoid noise nuisance issues.
 - Security will be provided through secure courtyards and video entry systems with fob access.
 - Lifts will be provided in all buildings with level access to all properties.
- 11.13 A sustainable, energy efficient heating system will be installed in the development. Properties will be thermally insulated. Further details will be provided during the design consultation process.
- 11.14 Green spaces will be designed into any new development. Play facilities will be provided close to homes for families to enjoy. A significant number of existing residents currently worship at Redcoat Community Centre and Mosque. The existing facility is housed in temporary structures. A new mosque would be larger than the current building and would have homes on upper floors allowing it to meet the needs of a growing community. It will be re-provided in the north-east corner of the estate and this part of the project was to go ahead whether or not there was a majority for regeneration in the ballot.
- 11.15 The new development will be 'car free,' which is part of the council's planning policy. Parking spaces will be available for adapted/wheelchair accessible homes only. This will allow us to create more enjoyable and practical green and open spaces. If you are an existing resident living in Harriott, Apsley or Pattison House, you will be able to retain your rights to apply for a parking permit after moving into one of the new homes in the development, but this will be for general on-street parking.

The Landlord Offer

Rights for Secure Tenants – the principles:

Remaining and returning:

- 11.16 All tenants will have the right to a tenancy of a newly built social rented home in the new development. They will continue to be a tenant of Tower Hamlets Council with their existing tenancy rights such as the right to buy and succession rights retained.
- 11.17 If tenants don't wish to remain in the new development, they will have a choice of permanent rehousing by bidding through the Choice Based Lettings Scheme for:
 - An existing council home elsewhere in Tower Hamlets, still as a secure tenant of the council with the same tenancy rights. Those who choose this option will not be able to return to the new development.
 - A home with a housing association either in Tower Hamlets or another London borough (if available). Existing council tenancy rights would not be protected under this option. If a temporary move away from the estate is necessary, residents would still be entitled to a new home once the development has been completed. This is a right to return.

Rent and service charges.

Rents for your new home:

11.18 Existing secure tenants who accept the offer of a newly built home on the estate with Tower Hamlets Council will be charged social rents. This means that rents for the new council properties will be comparable with rents for council properties of a similar type and size, but they will reflect the fact that these are new homes. Rent levels may increase slightly and tenants will be made aware of rent levels prior to agreeing on any move.

Service charges (included in social rent):

11.19 Residents can only be recharged for services that they benefit from. The law is clear that only the actual cost of services can be passed on by the landlord. We are committed to making sure any charges are kept as low as possible and conduct regular reviews to ensure value for money.

Compensation

11.20 Council tenants who have been secure tenants for at least 12 months before a decant is agreed are entitled to home loss payments and disturbance allowances.

Home loss payment:

11.21 Tenants will be entitled to a home loss payment which is currently set at £6,400. The amount is set by the government and not by the council.

Disturbance allowance:

- 11.22 The council will also pay a disturbance allowance to ensure that you are not financially disadvantaged by the regeneration.
- 11.23 The disturbance allowance covers reasonable expenses for items such as removal costs, disconnection and reconnection of services including gas, electricity, telephone and re-direction of posts for three months.

Hidden households

- 11.24 The redevelopment will also allow the council to identify and rehouse 'hidden households' provided they meet certain criteria. 'Hidden households' are typically considered to be adult children of the tenant who are known by the council to have been living with the tenant or leaseholder for over a year.
- 11.25 Depending on their circumstances, these 'hidden households' will have the option to remain living as part of their parent(s) household, or to be registered independently on the council's housing register with additional priority for their own home as part of the rehousing process.

Specific points raised in the Guide for Secure tenants

Housing need – number of bedrooms

- 11.26 The council will work with you to ensure that your rehousing preferences are met as far as is possible. Tenants can apply for the size of home that meets the housing needs of their household, with the appropriate number of bedrooms, as defined in the council's lettings policy (which is available on the council's website).
- 11.27 If a resident receives care and support from someone who is not in their immediate family, an additional bedroom may be requested on a discretionary basis and in accordance with the council's lettings policy.
- 11.28 If a tenant currently lives in a home larger than the standard size defined by the council's lettings policy (i.e. when the tenant is under-occupying their current home), an application can be made for a property with a bedroom size that matches their needs, plus one additional bedroom, to recognise existing living arrangements. This is sometimes called 'housing need plus one.' It is subject to the following restrictions:
 - 11.28.1 It must be a flat or maisonette on the same floor level or above as current home.
 - 11.28.2 It cannot be for a property of four or more bedrooms as there is a significant shortage of homes of this size in Tower Hamlets.
- 11.29 Where the current property size is larger than the household requires, council officers will re-assess tenant needs and an appropriate alternative property will be

offered. In that situation, an incentive payment would be offered for downsizing, in addition to the statutory home loss payment they will receive. The incentive amount will be discussed with each individual tenant in a detail at a one to one meeting.

Double decanting – having to move twice.

- 11.30 Depending on the progress of the new build housing programme it is possible that some tenants, with specific needs may only have a restricted choice of home. As a result, there may need to be a temporary move to another home outside of the estate whilst the new home is being built. This process is known as 'double decanting.' It is expected that it will be limited to only a few tenants.
- 11.31 If such double decanting becomes necessary, those impacted will be given a clear assurance of their entitlement to a new home on the estate in the newly built homes, as well as the reasonable costs of both moves being reimbursed (details of reimbursements are given elsewhere in this document). If they decide not to exercise their option to return to the estate, the council will still be required, by law, to provide a suitable alternative permanent home.

Rights for Homeowners – the principles.

- 11.32 The borough has developed a guide is for homeowners who live in the property they own as their main home and have done so for more than a year prior to the issuing of the Landlord Offer Document in February 2020. It explains the Council's approach to buying back their property when demolition or redevelopment is proposed and the options, they will have to buy a replacement home.
- 11.33 This includes the option of purchasing a new shared equity property at no extra cost on the new estate once it is ready. Other options include 'part-shared equity and part-rent' on the estate or a lease swap to a Council property in the area or elsewhere in Tower Hamlets (subject to meeting the required criteria).
- 11.34 Alternatively, the leaseholder may prefer to sell to the Council and make their own arrangements to find another property to buy elsewhere, including out of the borough. All these options are explained in this guide.
- 11.35 The proposal for redevelopment is at an early stage. The Council will organise dropins, one-to-one surgeries and other events where leaseholders can discuss their options and raise any specific concerns they have.
- 11.36 Resident leaseholder will be invited to meet with Council officers to confidentially discuss their particular circumstances and any concerns that you may have about the process.
- 11.37 Once a redevelopment scheme is approved by Cabinet in 2021, the Council will contact leaseholder to arrange an initial valuation of their property. The assessment of full market value (FMV) is undertaken by a Council valuer.

11.38 The Council advises all leaseholders to get their own independent advice, including their own independent valuation done by a surveyor recognised by the Royal Institute of Chartered Surveyors. The cost of obtaining this independent advice from one qualified surveyor will be covered by the Council. The guide explains the process of the Borough's and their surveyors negotiating an agreed value for the property. This could go to an Upper Tribunal should agreement not be made, the costs for which would be decided by the Tribunal.

Temporary decant.

- 11.39 The guide explains the possibility for some residents to first move out of their existing homes so work can take place. Where this cannot be avoided, affected residents will have priority for rehousing.
- 11.40 Resident leaseholders on the estate will have an option to return to a permanent new replacement home on the estate if this is their preference. If the resident leaseholder choses the option to return, the Council will buy their existing property from them at the full market value and simultaneously enter into a contract to hold this money on their behalf until the purchase of their new property can be conducted. Leaseholders will not be charged rent during their stay at the temporary property. Although they will be asked to pay the service charges. Any reasonable moving costs would also be covered by the Council for both moves.
- 11.41 The guide then sets out the fees the council would pay (within in certain limits) for:
 - Home loss payments
 - Claiming fees for professional adviser
 - Valuation fees
 - Negotiation fees
 - Legal fees for the sale of their home
 - Legal fees for buying a replacement home.
 - Removal fees
 - Surveyor's fees on new home purchases (off site)
 - Stamp Duty Land tax
- 11.42 The guide then sets out the options for buying a new home in the development, this includes:
 - Option A Buying a new home built by the Council outright.
 - Option B Shared Equity (Guarantee) Buying a new shared equity home where the resident pays no rent on the remaining unpurchased equity.
 - Option C –Shared Equity (Flexi) Buying a new shared equity home where the resident pays no rent on the remaining unpurchased equity.
 - Option D Part Shared Equity / Part Rent) Buying a property where you part- own and part rent the new home.
 - Option E Leasehold swap (to another property of similar age and value as their existing home, providing they can acquire the full value of the new home.

Option F - Where home ownership is no longer a feasible option: Where a
homeowner is unlikely to obtain a new mortgage or cannot financially
manage the ownership of a new home, they should notify the Council
immediately. The Council will work with homeowners to explore different
options until a reasonable solution has been found.

Succession rights

- 11.43 The Guide also sets out succession rights for the leaseholders' spouse or other immediately family member living at the property as their permanent home to inherit it under the same financial/rental arrangements.
- 11.44 The Councils definition of immediate family member is defined as a person living in continuous occupation with the owner for a period of at least 12-months prior to their death, as part of their household, i.e. A spouse/civil partner, son/daughter, brother/sister, parent/grandparent, or in the case of another relative, having been similarly in continuous occupation as an acknowledged carer.

Compulsory Purchase Order (CPPO)

- 11.45 The guide then explains the CPO process. It confirms that any potential development site may comprise multiple land interests, including leaseholders, freeholders, commercial interests, access rights etc. Before it can start a development, the Council has to acquire these interests from their legal owners.
- 11.46 Whilst the Council aims to purchase properties through negotiated settlements, it is normal practice to consider making a CPO to ensure the Council can obtain vacant possession of the buildings and land needed commence with the redevelopment . The decision to request permission from the Secretary of State to make a CPO is taken by the Mayor for the Council, after weighing up the need for the regeneration proposals and the impact these will have on those affected.
- 11.47 A CPO process has several stages:
 - Information gathering
 - Making of the order
 - Objections
 - Public local inquiry
 - Decision
 - Further challenge
 - Taking possession of the property
- 11.48 The section finally confirms that the Council would keep residents informed throughout all the stages of a CPO and it will continue to negotiate with residents even if there is an ongoing public inquiry.

Rights for Non-Resident Homeowners – the principles:

- 11.49 Non-resident homeowners will be offered the full market value by the council to purchase their property. They will also be paid a 7.5 percent 'Basic loss' compensation payment as well as reimbursements. These include reasonable fees and taxes incurred for both the sale of your property and for the purchase of a replacement property for a limited period, including independent valuation and legal support.
- 11.50 The Council encourages owners to come forward and talk to them so that they can arrange an initial valuation of the non-resident homeowner's property, discuss any concerns they may have and start to negotiate a satisfactory settlement for all parties. The Council valuer will arrange an appointment to make an initial valuation of the property.
- 11.51 The Council also recommends leaseholders to obtain their own valuation completed by a RICS (Royal Institute of Chartered Surveyors) qualified surveyor, the costs for which can be claimed back from the Council.
- 11.52 The Council will **not** acquire properties with tenants in occupation as they will be buying the property in the open market with vacant possession. If non-resident leaseholders rent their property, it will be their responsibility as the landlord to ensure that they give appropriate and timely notice to their tenants or other occupiers, in line with good practice and legal requirements, to secure vacant possession before completion of the sale to the Council. The Council cannot assist non-resident leaseholders in this process. The Council does not have an automatic responsibility to rehouse people who may be occupying your property. If these 'private' tenants or other occupiers require housing advice, they can contact the Council to obtain this, but that does not imply they will have any entitlement to relocation support.
- 11.53 The guide then sets out the fees the council would pay (within in certain limits) for:
 - Basic loss payments
 - Repaying arrears
 - Fees for independent surveyor
 - Negotiation fees
 - Valuation fees
 - Legal fees for the sale of their home
 - Legal fees for buying another property.
 - Removal fees
 - Stamp Duty Land tax (for the onward purchase of one property)
- 11.54 The guide then explains the CPO process as set out above.

12 Appendix 3: Policy Backdrop.

- 12.1 This appendix of the EqIA sets the legislative and policy context of the Equalities Impact Assessments for London Borough of Tower Hamlets Estate Regeneration Programme. Of central importance is the Equality Act 2010, which sets out the public sector equality duty.
- 12.2 The section sets out the legislation and policy directly relevant to housing regeneration and lists the desk research that has been completed to set the context for this Equality Impact Assessment:
 - Equality Act 2010
 - Tower Hamlets equality objectives
 - Equal Life Chances for All, the Mayor's equality strategy revised in June 2014.
 - Mayor of London's Equality, Diversity and Inclusion Strategy
 - London Plan 2016 and December 2021
 - Statutory homelessness
 - Localism Act 2011
 - Tower Hamlets Equality Commission
 - Homelessness Reduction Act 2017 and its implications for Tower HamletsTemporary accommodation
 - National Estate Regeneration strategy and Good Practice
 - Mayor's Estate Regeneration Good Practice Guide
 - Tower Hamlets Housing Strategy 2016-2021
 - Tower Hamlets Strategic Plan 2020 -2023
 - The Tower Hamlets Local Plan 2031
 - Estate Regeneration National Strategy DCLG December 2017
 - Mayor of London: The London Strategic Housing Market Assessment (SHMA) 2017.
 - Tower Hamlets Common Housing Register Allocations Scheme (2021)