

FULL EQUALITIES IMPACT ASSESSMENT FORM B
Function being assessed: Cambridge Road Estate - Programme Delivery
Is this a new function or a review of an existing function? In March 2020, residents voted in favour of proposals to regenerate the Cambridge Road Estate (CRE). RBK has appointed Countryside homes as its joint venture partner. This ambitious programme will provide 2000+ new homes, shared spaces and community facilities for the neighbourhood. 1. Growth Committee also recommended to Full Council to approve that the Council proceed “in principle” with making Compulsory Purchase Orders (CPOs) on property interests identified within the proposed regeneration site that have not been acquired voluntarily through negotiation. This was approved by Full Council on 18 July 2017. In July 2017 at Full Council, Members resolved that the Council proceed ‘in principle’ with making Compulsory Purchase Orders (CPOs) on property interests identified within the proposed regeneration site (Cambridge Road Estate) that have not been acquired voluntarily through negotiation. This report is a follow up report to make the actual CPO for CPO1 area of Cambridge Road Estate. Boundary map is included in Committee papers.

What are the aims/purpose of the function?

The primary purpose of the Compulsory Purchase Order (“Order”) is to facilitate the initial phases of the comprehensive redevelopment and regeneration of the Estate. A primary driver for the regeneration is to improve the quality of housing for current residents. The estate suffers from significant condition issues but also fundamental design flaws that would make it impossible to deliver modern day ‘secure by design’ including designing out crime and improving accessibility standards through refurbishment due, to layout and changes of levels across the site. New build accommodation would also allow tenants and leaseholders to benefit from higher standards in terms of better insulated homes, increased accessibility and connectivity.

The Council is confident that the proposed redevelopment will result in social, economic and environmental improvements to the Estate and the Borough. It will also secure new private and affordable housing in place of that proposed to be removed, thus securing both quantitative and qualitative improvements to the housing available in the Borough.

Following the outcome of a regulated procurement process a 50:50 joint venture has been established between the Council and Countryside Properties (UK) Ltd to undertake the regeneration of the Estate, which is to be delivered over a number of phases. The basis of the partnership involves the Council investing land and capital as equity, with Countryside bringing matched investment. Both parties are responsible for delivering the development through a Limited Liability Partnership (LLP), which is managed through a Board structure and profits distributed in proportion to investment stake. A Community Board has also been established to be the representative body for the community ensuring that their views continue to be taken into account at every opportunity.

The Council is now seeking to secure clean title and vacant possession of the Order Land in order to ensure the implementation of the initial phases of the redevelopment.

Across the Estate there is considered to be an urgent need for redevelopment to give residents a much higher quality living environment, to increase the provision of mixed-tenure homes, and deliver comprehensive regeneration. The Order Land comprises Phases 1 and 2 of the proposed comprehensive regeneration scheme, as shown on the Phasing Plan attached as [Appendix 2]. Subsequent phases may also require the use of the Council’s CPO powers to ensure timely delivery.

Although the Council owns the freehold interest in the majority of the Order Land, the implementation of Phases 1 and 2 requires the acquisition of all property interests currently owned by third parties, including a number of freehold and leasehold interests.

The acquisition of the Order Land will enable the redevelopment of Phases 1 & 2 of the Estate regeneration scheme. This will deliver new homes, community facilities, and environmental improvements in a manner that will improve the economic, social and environmental wellbeing of the area.

The Council has and will continue to take steps to engage and negotiate with the remaining third party owners within the Order Land to acquire their interests by agreement, but it is clear that compulsory purchase powers must be employed to ensure that Phases 1 & 2 of the redevelopment can be achieved within a reasonable timeframe, or at all. Further, it may be necessary for the Council to use its compulsory purchase powers to facilitate acquisition of future phases of the regeneration scheme.

Is the function designed to meet specific needs such as the needs of minority ethnic groups, older people, disabled people etc?

The Order is applicable to all resident homeowners living on Cambridge Road Estate, non-resident homeowners and commercial properties. This cuts across all of the equalities protected characteristics.

In implementing the CPO order the Council is mindful that not all homeowners will be wanting to sell and will benefit from varying levels of support throughout the process.

As stated in section 6.3 (see extract below) of the Freeholders and Leaseholders Decant policy additional support will be made available to vulnerable residents.

6.3.1 The Council is also aware that there are leaseholders and freeholders that have complex needs which make them vulnerable. We will provide additional support to those leaseholders and freeholders with complex needs that are assessed as being vulnerable and assist them with their move.

6.3.2 A vulnerable leaseholder or freeholder for the purpose of this policy is someone that is “less able to safeguard his or her personal welfare or the welfare of any children in the household, and will be in need of care and attention by reason of age, infirmity, or suffering from chronic illness or mental disorder, or substantially handicapped by being disabled”. Detailed consultations will be conducted with social services and relevant health practitioners to obtain the necessary information and documentation (e.g. care needs/packages) regarding the needs of the household to assess and determine vulnerability.

What information has been gathered on this function? (Indicate the type of information gathered e.g. statistics, consultation, other monitoring information)? Attach a summary or refer to where the evidence can be found.

Household referencing exercise was carried out in 2019 to ensure communication materials were being sent to the correct homeowners and addresses. This exercise is currently being updated.

There are 832 properties on the Cambridge Road Estate. At the start of the regeneration programme there were 179 leaseholders and freeholders. At present the Council have purchased 27 of these properties. Out of the remaining 154 properties, 40 are located in phases 1 and 2. The 40 homeowners are broken down as follows

Tenure type	
Phase 1 - resident homeowner	3x Freeholders (FH) & 5x Leaseholders (LH)
Phase 1 - non-resident homeowner	2x FH & 5x LH
Phase 1 - Shared Ownership	1x FH property with Wandle Housing
Phase 2 - resident homeowner	3x FH & 6x LH
Phase 2 - non-resident homeowner	5x FH & 10x LH

Resident homeowners will have the right to one of the new homes on the Cambridge Road Estate. Most resident homeowners will be able to move straight into their new properties and will only need to move once.

Some resident homeowners in phase 1 who wish to remain on Cambridge Road Estate will need to move into temporary decant accommodation while their new home is built. The Council will provide this for resident homeowners who wish to purchase one of the new homes.

Prior to the ballot a comprehensive household verification exercise was carried out with all social tenants, residents in temporary accommodation and homeowners. The primary purpose of this was for robust identification of all eligible voters. The secondary purpose was to ensure we had accurate and up to date information.

The verification process took place between June and September 2019. A total of 863 households and other freeholders were written to with details of the information the Council currently held on them and they were asked to confirm or amend this. The Council commissioned Persona Associates, a land referencing agency, to verify the land registry records of all home-owners on the estate and to assist with the data gathering exercise.

The following information was checked for all current household members:

- Name, Date Of Birth, gender
- Relationship to main tenant
- First language / translation needs
- Ethnic origin
- Disability categories
- Contact details

The resident steering group was consulted with, prior to distribution of the forms, to ensure the questionnaires and accompanying letters were clear and the recommended amendments were made.

To encourage completion of the forms, follow-up letters were sent and a number of drop-in sessions were held at Tadlow Hub for residents who had any questions or required assistance. The questionnaires were publicised widely by text, newsletters, on the web site and in person via the regeneration team door knocking and at events. Information was also circulated in 14 different languages and interpreting services offered on request.

The overall return rate was 69%. The return rate for leaseholder / freeholder households was the lowest at 57%. The Council can confidently confirm that to date every effort has been made to ensure that accurate information has been recorded on as many households as possible who will be affected by the regeneration.

The data used to inform this impact assessment has been taken from the following sources:

- Housing landlord service records (Universal housing - Civica)
- CRE household verification data
- Land registry
- Home Connexions (housing register data)
- Leasehold services records
- Kingston data observatory
- GLA (Greater London Authority) projections 2020
- ONS (Office for National Statistics) census 2011
- RBK Annual Public Health Report 2014
- LGBT in Britain, Trans report (Stonewall 2018)

Does your analysis of the information show different outcomes for different groups (higher or lower uptake/failure to access/receive a poorer or inferior service)? If yes, indicate which groups and which aspects of the policy or function contribute to inequality?

For some homeowners who are retired or unemployed increasing or transferring an existing mortgage may be problematic but be possible. As per 6.2 of the Freeholders & Leaseholders CRE Decant policy there is additional & assistance for homeowners in financial difficulties.

In recognition some residents may repurchase new properties on or off the estate at higher values to get an equivalent property to what they currently own, the Council has made available shared equity and shared ownership (please see below brief description of these two offers) offers to all resident homeowners. Residents may take up this offer for purchases of properties anywhere in the UK up to the equivalent value of a new home on Cambridge Road Estate.

Brief descriptions

Shared Equity

The Council offers the option where you own a proportion of a new property which you purchase from the Council. The Council retains the remaining proportion of the equity and you do not pay rent on the unowned proportion, which is retained by the Council. On any sale of the property, you and the Council will share the proceeds in proportion with the amount you and the Council own.

Shared Ownership

This is a part-buy, part-rent scheme where you own a proportion of the property and pay rent on the unowned portion, which is retained by the Council. Leaseholders can buy a proportion of the new property and pay rent on the unowned proportion.

Covid-19 pandemic

Since March 2020 we have faced an unprecedented and ongoing world-wide pandemic caused by the SARS-CoV-2 virus. England, along with most other countries, went into lockdown to reduce the spread of the disease. This meant severe restrictions on public life including school and business closures, social distancing measures and shielding for people who were particularly vulnerable to infection. At the time of writing many of these measures are still in place. The risk to public health is ongoing. The Council is currently operating in a very different way with some services closed and others functioning very differently. This needs to be taken into account when assessing the potential impact of purchasing properties on Cambridge Road Estate residents.

The issues which need to be considered to ensure that no residents are disadvantaged in the buy back process due to the pandemic are set out below:

- Residents' economic situation, particularly where they have been unable to work or been made redundant
- Safe property viewings
- Risk assessments for packing and removals
- The potential increased anxiety that a house move may cause under these circumstances and how residents can be well supported

- Resident's ethnic origin - COVID 19 infection rates appears to be higher in certain communities
- Resident's who wish to relocate to a different area of the United Kingdom impeded due to current guidelines of not travelling too far away from current residence

Vacant possession for the majority of Phase 1 is not required until 2022, therefore there is no need to proceed with any purchases of properties from homeowners on CRE if they do not wish to sell because they are shielding or for any other matter.

The Council will continue to contact and communicate with homeowners in CPO1 area and are ready to start the buy back process when homeowners are ready and willing to do so. The CPO order as the last resort and the desire is to negotiate with the purchase with all 40 remaining homeowners in phases 1 and 2 through negotiation.

Are these differences justified (e.g. are there legislative or other constraints)? If they are, explain in what way.

For some the process will be straight forward and there are no identified inequalities in their ability to make informed choices or in the final outcomes for these households. For the groups listed below this assessment has identified some potential differences in outcome if the right measures are not put in place.

- Homeowners over the age of 65 years
- Homeowners who do not speak English as a first language
- All residents affected by any COVID-19 restrictions which may be in place during the buying and selling of their property

The Council has already worked hard to ensure that all residents will be homeowners are supported and have their needs taken into account during the regeneration programme .

Actions are already in place, which are detailed below, which are under constant review to see if these need amending or additional measures are required, to ensure all homeowners are not adversely impacted.

All communication which has been circulated to homeowners have the offer of being translated on request. One to one meetings to discuss homeowners individual have and will continue to be offered (face to face or via video link) with a translator if required.

The Council with permission has and will continue to speak to homeowners appointed representatives be that a family member of friend or anyone else.

Also the Council have and continue to be willing to speak to homeowners outside of weekday working hours if this is an obstacle for any of them.

The Council have appointed Independent tenant and homeowner advisors for the regeneration programme which is free service for all residents and homeowners to access if they wish to do so.

What action needs to be taken as a result of this Equality Impact Assessment to address any detrimental impacts or meet previously unidentified need?

Continuation of the activities described above and to continue to assess health and safety measures in place during COVID-19 lockdown restrictions.

	Action	Groups of residents this will reduce potential inequalities for
1	Offer information (communications) in various accessible formats and translated into other languages.	Residents with sensory impairments Residents with learning disabilities Residents with low literacy levels BAME residents with English as a second language

2	Offer video conference and telephone appointments and face to face appointments, when allowed, that meet government safety guidelines. These can be arranged outside of weekday working hours if need be.	All homeowners
3	Risk assessment for property viewings to be completed to reduce infection risk	All homeowners
4	The Freeholder & Leaseholder Decant policy was drafted in a way that no party (either the Council or any leaseholder or freeholder) is financially better or worse off as a result and leaseholders and freeholders should not be financially disadvantaged by the regeneration.	All homeowners

When will you evaluate the impact of action taken? Give review dates.

The Council will revisit the impact assessment and review the impact of actions throughout the process of making of the CPO order and post making, up to and including any inquiry which needs to take place.

Assessment completed by:

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