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08 September 2021

To: All Members of the Housing and Regeneration Scrutiny Panel

Dear Member,

Housing and Regeneration Scrutiny Panel - Monday, 13th September, 2021

I attach a copy of the reports for the above-mentioned meeting which were not available at the time of collation of the agenda:

9. BROADWATER FARM (PAGES 1 - 44)

This item consists of two parts. The Panel requested an update about repair and maintenance issues on the estate and a report on this was included in the original agenda pack.

The Panel also requested an update about the consultation of residents in the Stapleford block. Full details on this have now been published as part of the papers for the Cabinet meeting on Tues 14th September. These papers are reproduced as part of this supplementary agenda pack and can be used as the basis of discussion and questions to the Cabinet Members and officers at the Scrutiny Panel meeting on Mon 13th September.

Yours sincerely

Dominic O'Brien
Principal Scrutiny Officer

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Report for: Cabinet – 14th September 2021

Title: Options for the future of Stapleford North Wing, Broadwater Farm Estate

Report authorised by : David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: David Sherrington/Sarah Lovell

Ward(s) affected: West Green Ward

Report for Key/

Non Key Decision: Key Decision

1. Describe the issue under consideration

- 1.1 Between July 26th and August 26th 2021 the Council undertook a consultation with the 21 eligible households (out of 24) of the Stapleford North block on Broadwater Farm Estate to seek their views on the future of their block in the light of the Council's plans for Northolt tower and Tangmere block (see 6.1-2 below). 2 of the households contain unauthorised occupants and 1 is vacant. For secure Council tenants this consultation was a statutory s105 consultation under the 1985 Housing Act.
- 1.2 This report asks Cabinet to consider the feedback received from residents during this consultation (summarised in section six and set out in full in appendix one) and agree to include the demolition and re-provision of homes in the Stapleford North Wing block in the 'preferred design scenario' that will be presented to Broadwater Farm residents in a resident ballot in the coming months.

2. Cabinet Member Introduction

- 2.1 Since the discovery of significant structural issues in a number of blocks on the Broadwater Farm estate in 2018, the Council has been working closely with the residents and the community to develop design proposals for new Council homes on the estate to replace those which will be demolished. We've made strong progress in developing these designs and extensive engagement has been undertaken with residents on the estate to feed into proposals for over 200 new council homes at council rents.
- 2.2 Through the design work it became clear that a number of residents living in the Stapleford North block (flats 25-36 and 61-72 only) would face heightened levels of disruption for an extensive period through demolition, new build works, and refurbishment works. As a Council we're committed to seeking resident's views on proposals that significantly impact their lives so through July and August we undertook a consultation with affected residents about the possible options we could progress.

- 2.3 Of the 24 homes in the block, 21 were eligible to participate in this consultation. I'm pleased to see that we received responses from all 21 of the eligible households following extensive engagement and out-reach by officers. 13 residents indicated a preference for the council to include the demolition and re-provision of homes in the up and coming ballot while 8 residents indicated a preference for existing homes to be retained and refurbished.
- 2.4 Following the conclusion of this consultation, this paper recommends that the demolition and replacement of this block is included in the proposals for new homes on the estate. As noted previously this programme is subject to a resident ballot, where all residents on the estate will get the final say on the proposals.
- 2.5 We recognise that not all residents agreed with this proposal and I am committed to ensuring the council and partners work with them to ensure they are properly supported throughout the next steps of the process. The Council's Rehousing team and the independent Tenant and Leaseholder Advisor will work one to one with residents to ensure they have access to the support and information necessary in the coming months, dealing with specific concerns throughout the next steps of the project.

3. Recommendations

It is recommended that Cabinet:

- 3.1 Note the feedback of the consultation from secure tenants in Stapleford North pursuant of Section 105 of the Housing Act 1985, and the non-statutory consultation with Council leaseholders of the same block, as described in paragraphs 6.3-6.16 and as set out in Appendix 1;
- 3.2 Authorise the inclusion of the demolition and re-provision of Stapleford North wing (flats 25-36 and 61-72) on Broadwater Farm in the 'preferred design scenario' and subsequent resident ballot.

4. Reasons for decision

- 4.1 The recommendations within this Cabinet report are being proposed following a consultation with residents on the future of the Stapleford North block.
- 4.2 The consultation presented residents with two main options but also gave residents the opportunity to raise further options for the Council to consider, if they felt that this was appropriate:
- 1) **Option one:** To refurbish the homes in Stapleford North and work with residents throughout the works to minimise disruption.
 - 2) **Option two:** To demolish the Stapleford North block and rehouse current residents, with a Right to Return to the estate once the new homes are built.
- 4.3 Residents were also encouraged to indicate if they felt there were any options we hadn't considered and were presented with a third potential option, for

permanent rehousing for the duration of the Northolt works. Responses to this are expanded on at 5.2 of this report and in Appendix 1 to this report.

- 4.4 The consultation has now been concluded and resident feedback has been received. Of the 21 eligible households, 21 responses were received (100%). 13 were in favour of the demolition and re-provision of Stapleford North being included in the forthcoming resident ballot and 8 were in favour of retention and refurbishment.
- 4.5 This paper recommends that proposals to demolish and re-provide new homes are included within the forthcoming ballot. The paper also considers the reasons why residents were not in favour of the approach and sets out proposals to work with residents in the coming months to address these reasons.
- 4.6 With the intended ballot on proposals for Broadwater Farm in Autumn 2021, this is a period of considerable uncertainty for residents about their future housing. Through the rehousing team and the independent advisor, officers will work with residents to ensure they understand the next steps of the process and are supported at each stage.

5. Alternative options considered

- 5.1 As mentioned above, the consultation document sent to residents presented two main options for consideration, these were: Option 1 – refurbishing homes within the Stapleford North block and working with residents throughout the period of works to minimise disruption and Option 2 – Demolishing the Stapleford North block and rehousing residents.
- 5.2 The document also explained that a further option would be for all residents of Stapleford North to be rehoused for the duration of the works and then have the option to move back into a refurbished Stapleford North block once the works were complete. This was not presented as a main option because it would require residents to move for a period of up to three and a half years, which would be disruptive and inconvenient for residents. However, the consultation document made clear that residents could ask that this, or any other option be considered by the council if they wished. Only 1 resident referred to this option, as such it is not being taken forward.

6. Background information

- 6.1 Since taking the decision to demolish the Tangmere and Northolt blocks on Broadwater Farm Estate in 2018 due to structural faults, the Council has been working in partnership with residents and wider stakeholders on designs for new homes. This design work is progressing well and public exhibitions were held in June and August to show the latest design proposals for resident feedback. This feedback is being used to further refine the designs as we work toward a resident ballot in the Autumn and construction starting on the first new homes in 2022.
- 6.2 Through the design work, it became clear that one small block on the estate, the Stapleford North block, was likely to experience very significant levels of disruption over a prolonged period due to its location. Disruption would be

caused by the demolition of Northolt (which is connected to the block via a link bridge), the subsequent new build work which will take place on land adjacent to the block as well as the structural and refurbishment works required to bring the homes up to current standards. The disruption will include noise, dust, changes to access and substantial hoarding around the block for long periods of time.

Consultation with Stapleford North residents

- 6.3 On 13th July 2021, the Council's Cabinet agreed to consult the 21 eligible households who live in the Stapleford North wing block on their preference on the future of their block (a further two properties in the block contain unauthorised occupants and one is vacant). As set out in the Cabinet report, the reasons for undertaking the consultation were to seek residents' views given the levels of disruption that they will experience if they remain in their homes due to the demolition of the Northolt tower, construction of the new homes, and refurbishment works required to the block.
- 6.4 The consultation took place between the 26th July and 26th August 2021 and for the secure council tenants living in the block the consultation was a s105 consultation under the 1985 Housing Act. The consultation was originally due to conclude on 24th August but due to a delay in posting the information online the consultation deadline was extended to August 26th. Residents were notified of this extension during the consultation.
- 6.5 In order to ensure that all residents were able to access the consultation, the following methods were used:
- A letter and information pack were sent to all households in the block. Residents were able to request this in other languages where necessary and large print and braille versions were available upon request.
 - The information was set out on the Broadwater Farm section of the Council's website and the Section 105 webpage. They were also able to complete the consultation online.
 - Residents received phone-calls and in-person visits from the Council's engagement team on three separate occasions to discuss the options and go through the questionnaire.
 - Details of the Independent Tenant and Leasehold Advisor were provided should tenants or leaseholders wish to obtain advice outside the council.
 - A reminder flyer was sent to the 21 eligible households two weeks prior to the consultation closing date, to remind them of how to respond, advertise the ITLA details and remind them of the details of the BWF engagement officer.
- 6.6 To ensure that it was easy for residents to voice their opinions in the consultation, they were able to:
- Return the questionnaire and booklet with their views using a freepost envelope that was provided to all households.
 - Voice their opinion to a dedicated email address.
 - Voice their opinion via a dedicated phone number.

- Give their feedback directly to one of our rehousing or engagement officers.

Summary of the results of the consultation and key issues raised

- 6.7 21 households (100% of eligible residents) responded to the consultation. A detailed consultation feedback report is appended in Appendix one and provides redacted detailed feedback received from residents in response to the consultation. An unredacted report (including verbatim resident comments) is provided to Cabinet as part of the exempt materials.
- 6.8 A summary of the headline responses is as follows:
- 21 residents (100%) who gave a preference
 - 8 residents (38% of responders) who preferred option one
 - 13 residents (62% of responders) who preferred option two
- 6.9 Residents were asked in the consultation whether there were any other options that the council could consider outside of the two presented. This included the option of residents moving out of the block throughout the period of demolition and construction of new build homes and given the opportunity to move back in once works were completed. One resident indicated that they may have preferred this option (however, this resident also indicated that they preferred option 2 in the consultation). This is expanded on at 6.12, below. One resident proposed the installation of a new lift for Stapleford residents.

Key themes in consultation responses

Theme	Response
The size of homes that people may move to – some residents expressed concerns about the size of the home they would move to if demolition took place.	Three secure tenants are currently living in over-crowded accommodation and welcomed the opportunity to move to a home that is more suited to their household size. The rehousing team will work with secure tenants to undertake an assessment of the housing need to ensure that homes they are eligible to bid for reflect their housing need as assessed through the Council's allocations policy.
The cost of moving home – some residents expressed a concern around the cost of moving and whether the payments offered by the council would be sufficient to cover all associated costs.	The Broadwater Farm rehousing and payments policy sets out the payments residents will be eligible for through the rehousing process. The disturbance payment will cover the costs of moving and can either be paid a flat rate or can be based on the actual costs incurred by the residents. The principle of the policy is that no

	<p>resident will be financially worse off as a result of costs associated with moving and the rehousing team will work with residents to ensure all necessary costs are covered. These costs include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Cost of removals • Cost of mail redirection • Cost of reconnection of appliances • Cost of address changes
<p>The process of moving home – some residents expressed a concern around the process of moving home and moving away from established community links and support networks.</p>	<p>As part of the rehousing process, the rehousing team will undertake a detailed needs assessment and will work with residents to identify a new home that meets these needs. In addition, the rehousing team can support residents with the process of moving. For example, the council can support residents to make arrangements with removal firms.</p>
<p>The rent charged in homes that people may move to – some residents requested that the homes they move have the same rent as their current home.</p>	<p>Rents are based on the individual property so it is not possible to ensure that rents in a future home are the same as the existing. The rehousing team will work closely with residents to ensure that the proposed rent on a home they move to is affordable and is set out clearly before any decision to move is made.</p>
<p>Condition of current homes – some residents said that they liked their current home and did not want to move as their current home met their needs.</p>	<p>The rehousing team can work with residents to ensure that any temporary home is in a good standard of repair.</p> <p>Conversely, some residents felt their current homes were in poor condition and welcomed the opportunity to move to a new home that would be in better condition.</p>

Other responses

6.10 The Council received a response to the consultation from Defend Council Housing, arguing that residents should have been offered the opportunity to be

permanently rehoused (with a Right to Return) whilst the works took place to Stapleford North and on the Northolt site (i.e., for a number of years whilst demolition and re-building took place).

- 6.11 In the consultation materials sent to every household in Stapleford North, this option was offered as an alternative to the two main options and residents were encouraged to notify us if they wished us to consider this option more seriously. It was explained that this option was not included as one of the main two options due to the fact that:
- No resident had proposed this option during pre-consultation conversations with the residents of Stapleford North.
 - Officers and the design team felt that moving residents out for this period of time (likely three and a half years) would have been disruptive without delivering the many positive improvements that would be possible under the demolition option (i.e., residents would still be moving back to refurbished Stapleford North properties, which would not meet many of their needs due to over-crowding and other issues).
- 6.12 During the consultation, only one respondent indicated that they may have preferred this third option. This respondent also indicated that they preferred option 2 (demolition). Therefore, although this option was considered, it was discounted as there is no evidence residents wish the council to deliver it and it would not deliver many of the benefits for all residents deliverable from option 2 (demolition).
- 6.13 A full response to concerns raised by Defend Council Housing was provided by the Director for Housing, Planning and Regeneration. This can be found in full, along with the original letter from Defend Council Housing, in appendix 1 to this report.
- 6.14 Residents were also given space to make any other comments or propose any other alternative options they felt hadn't been considered by the council. Only three responses were received to this question – the responses to which are fully expanded on in Appendix 1 to this report.
- 6.15 Feedback was also received, via email, from the Residents' Association on 21st July 2021 in response to draft versions of the consultation materials. The response noted a number of concerns about the consultation, such as a belief that the council had not considered or offered all options to residents. In addition to this, the response argued that the consultation should be paused until residents could be promised more information about rent levels of new homes. As these concerns were raised before the consultation opened, officers sought to address these concerns – for example, by including a question encouraging residents to propose any alternative options and highlighting that an alternative option was available should they wish (this is explained in more detail at 5.2 of this report). The email is provided in appendix one to this report with a full council response that addresses the concerns raised.
- 6.16 Parts of appendix 1 are exempted due to the fact that some responses to the consultation made it possible to identify individuals. The full unredacted version
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of this appendix has been provided to Cabinet members to inform their decision making.

Next steps

- 6.17 This report makes recommendations to Cabinet about including the demolition of Stapleford in the forthcoming resident ballot on new homes. Should Cabinet agree the recommendations in this report, the following next steps will be taken:
- A letter will be sent to each resident explaining the outcome of the Cabinet report and seeking to arrange a meeting with each household.
 - The rehousing team will meet each individual household within Stapleford North to address any specific issues raised during the consultation, answer any questions they may have and explain what will happen next.
 - The rehousing team will work closely with the seven residents that preferred the retention of the block, to work through and address any concerns they may have and advise them of their options.
 - The demolition and re-provision of Stapleford North will be included within the preferred design scenario which will be discussed by Cabinet at its meeting in October ahead of the ballot.
 - Engagement across the wider estate will be undertaken to set out the preferred design scenario ahead of the ballot.

The Ballot

- 6.18 Cabinet will receive a further report in October setting out the design proposals for new homes on Broadwater Farm and asking Cabinet to authorise issue of the Landlord Offer to all households on the estate. The Landlord Offer will form the basis of the ballot and residents will be asked if they support the council's proposals.
- 6.19 The ballot will give all eligible Broadwater Farm residents a vote on the preferred design scenario, as presented in the Landlord Offer. Stapleford North residents will be included in the ballot.
- 6.20 Eligible residents are those who meet the criteria set out by the Greater London Authority (GLA) and include those aged 16+ and who meet the following additional criteria:
- Social tenants (including those with secure, assured, flexible or introductory tenancies) named as a tenant on a tenancy agreement dated on or before the date the landlord offer is published.
 - Resident leaseholders or freeholders who have been living in their properties as their only principle home for at least one year prior to the date the landlord offer is published and are named on the lease or freehold title for their property.
 - Any resident whose principal home is on the estate and who has been on the council housing register for at least one year.

- 6.21 The ballot will be carried out under the GLA resident ballot requirement and will be administered by an independent organisation who will oversee the process for registering voters, counting votes and validating the outcome.
- 6.22 The indicative date for the ballot is November 2021.

Rehousing and Repayments Policy

- 6.23 In 2018 the Council agreed the Broadwater Farm Rehousing and Repayments policy. This sets out the offer to tenants and leaseholders in affected blocks and was based on the Council's Estate Renewal and Rehousing Policy.
- 6.24 The consultation materials and July Cabinet report noted that any rehousing as a result of demolition – in the event of a 'yes' vote in the resident ballot – would be undertaken using the Broadwater Farm Rehousing and Payments Policy.
- 6.25 The policy was developed following an extensive consultation process with Tangmere and Northolt tenants and leaseholders. It is proposed that the terms of the offer set out in this policy would be extended to Stapleford residents if the block is to be demolished.
- 6.26 Residents would be supported by rehousing officers, who would undertake full needs assessments to determine how they can be best supported into suitable new homes. The process also makes access to the Choice Based Lettings system available for secure tenants and ensures they get priority for moves. Leaseholders would have affordable options to acquire new homes, including through access to equity loans.

7. Contribution to strategic outcomes

- 7.1. Haringey's Borough Plan 2019-2023, outcome 1: objective A to 'deliver as many new, good quality homes of all kinds as we can, in good quality neighbourhoods.'
- 7.2. Haringey's Borough Plan 2019-2023, outcome 3: objective A to 'improve the quality of Haringey's Council housing, including that a minimum of 95% of homes meet the Decent Homes Standard by 2022.'
- 7.3. Haringey's Borough Plan 2019-2023, outcome 3: objective D to 'ensure safety in housing of all tenures across the borough, responding to new regulations as they emerge.'
- 7.4. Haringey's Borough Plan 2019-2023, outcome 10: objective A to 'provide safe and accessible public spaces for everyone, especially children, young people, and people with disabilities.'
- 7.5. Objective 4 of the Haringey Housing Strategy 2017-2022 identifies that a key priority is to "Provide stable, safe well-managed homes in decent environments". Ensuring that all residents live in safe homes is essential to delivering this priority.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

- 8.1 The report seeks approval to include the demolition and re-provision of Stapleford North wing (flats 25-36 and 61-72) on Broadwater Farm in the 'preferred design scenario' and subsequent resident ballot.
- 8.2 If approved, the demolition and re-provision of Stapleford North will be included in the ongoing work on BWF scheme in the HRA business and financial plan, which will be presented to cabinet.

Procurement

- 8.3 Strategic Procurement notes the contents of this report and confirms there are no procurement implications that need consideration as this stage of the process.

Legal

- 8.4 The Head of Legal & Governance has been consulted in the drafting of this report.
- 8.5 S105 of the Housing Act 1985 requires that secure tenants be consulted on these proposals; while there is (at this stage) no statutory requirement to consult with leaseholders, it is the council's practice to do so.
- 8.6 Compliance with the Council's published arrangements (the "Arrangements") for consultation with secure tenants is set out in the body of the report.
- 8.7 Before making a final decision, Cabinet must consider and take conscientious account of all representations made in accordance with the Arrangements.
- 8.8 Cabinet must also take into account the issues raised by the Equalities Impact Assessment and the comments under the head of "Equality" below.
- 8.9 The Head of Legal and Governance sees no legal reasons preventing Cabinet from approving the recommendations in the report.

Equality

- 8.10 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
 - Advance equality of opportunity between people who share those protected characteristics and people who do not.
 - Foster good relations between people who share those characteristics and people who do not.

- 8.11 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.
- 8.12 An Equalities Impact Assessment is attached as an appendix to this report, which explains the potential impact on those with protected characteristics of the decision and the steps that will be taken to mitigate any negative impacts.
- 8.13 Due to the small number of residents involved in the consultation for Stapleford North, it has been determined that there is a risk of being able to identify them individually – and therefore some of this information held in the EqlA has been redacted in order to protect personal information.

9. Use of Appendices

Appendix one – Consultation Summary Report
Appendix two – Equality Impact Assessment
Appendix three – EXEMPT Consultation Summary Report
Appendix four – EXEMPT Equality Impact Assessment
Appendix five – EXEMPT Cabinet report

10. Local Government (Access to Information) Act 1985

July Cabinet report authorising officers to begin Section 105 consultation with Stapleford North residents

Appendices 3, 4 and 5 contain exempt information. Exempt information is under the following categories (identified in amended Schedule 12A of the Local Government Act 1972): 1. Information relating to any individual; 2. Information which is likely to reveal the identity of an individual; 3. Information relating to the financial or business affairs of any particular person (including the authority holding that information); 5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

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Appendix 1: Broadwater Farm – Stapleford North consultation report summary

1. Introduction

Following the decision to consult with the residents of Stapleford North (flats 25-36 and 61-72) on the Broadwater Farm estate, the consultation commenced on 26th July 2021 and closed on 26th August 2021. For secure council tenants, this was a Section 105 consultation under the Housing Act 1985.

The consultation presented residents with two options:

- 1) To refurbish the homes in Stapleford North and work with residents throughout the works to minimise disruption.
- 2) To demolish the Stapleford North block and rehouse current residents, with a Right to Return to the estate once the new homes are built.

In addition to this, residents were notified that a third option would be for the block to be refurbished with a full decant for the duration of the works to the block and on the Northolt side. This option was not formally put forward due to the council taking the view that being rehoused for (up to) three and a half years for refurbishment was overly disruptive compared to the benefits to residents. Residents were also encouraged to notify us if there was an option we hadn't considered that they would like us to.

The block consists of 24-households and of these, 23 were occupied with 4 leaseholders, 17 secure council tenants, and 2 unauthorised occupants. One property was unoccupied.

2. Consultation and engagement approach

Initial Engagement

On 18th June 2021, officers wrote to the residents of Stapleford North informing them that, subject to Cabinet approval, a consultation would be taking place. This letter also set out:

- Why the consultation was taking place.
- What the two proposed options were.
- Details of the Independent Tenant and Leaseholder Advisor (ITLA).
- Details of the Broadwater Farm Engagement Officer to contact with any questions.

Following the delivery of this letter, the rehousing team undertook outreach phone calls and door-knocking with residents during the week commencing 21st June 2021. This took place to ensure residents were able to express any concerns or ask any questions prior to the consultation opening, as officers were aware that residents would want more information than could be provided in the original letter. During this engagement, officers were able to speak to residents from 17 out of the 21 households that we wished to consult with. This early engagement also enabled officers to identify where residents had additional needs that needed to be reflected in the Equality Impact Assessment and to ensure that the consultation was accessible for all affected residents.

Cabinet approval was given on 13 July 2021 to proceed to formal consultation and the final consultation materials were drafted and approved ahead of the 26th July opening date.

Methods

A range of methods to encourage all eligible residents to take part in the consultation. This included:

- Sending a pack to each household that contained a covering letter from the lead member, the consultation booklet outlining the two options, the consultation questionnaire, and a free-post returns envelope.
- Making the consultation available online on the council's website.
- Giving residents the contact details of the Broadwater Farm engagement officer to call or email with feedback.
- Outreach door-knocking and phone calls to remind residents to participate and answer any questions.
- A reminder post-card two weeks before the closing date to re-iterate the above and remind people of the contact details for the ITLA.

To ensure all residents could equally access and participate in the consultation, the letter and each pack contained a 'translation panel' enabling residents to request the material in a different language. The packs were also available in large print and braille upon request.

3. Responses to the consultation

By 26th August 2021, the council had received responses from 21 of the 21 eligible households in the block. Of these responses, 13 were in favour of option 2 and 8 were in favour of option 1.

The number of responses is broken down below by household type:

	Secure tenants	Resident Leaseholders	Non-resident leaseholders
Number of responses	17 [81%]	2 [9.5%]	2 [9.5%]

All responses received from the 21 households were completed written questionnaires.

We also received general responses from a member of the Resident's Association and Defend Council Housing. These general responses did not respond to the consultation questionnaire set out and have both been responded to directly in other forums. These responses are expanded on at the end of this report.

Questions 1 and 2 referred to personal data.

Question 3: Please indicate which option is your preferred option

	Secure tenants	Resident Leaseholders	Non-resident leaseholders
Option 1 – retain and refurbish	6	2	0
Option 2 – demolish and replace	11	0	2

The above table shows that of the 21 responses received, secure tenants were more strongly in favour of option 2 (11 or 65% for option 2; 6 or 35% for option 1). Resident leaseholders exclusively chose option 1, whilst non-resident leaseholders exclusively chose option 2.

Question 4: Please state why you preferred this option.

Those in favour of option 1:

The below table sets out all of the reasons given for supporting option 1.

[Table redacted (unredacted in EXEMPT version of this document)]

Summary and response to comments

Happy with current property: A number of the responses note that they are happy with their current properties, community and/or neighbourhood and therefore have no desire to move. The council recognises that moving home can be a stressful experience and will work closely with residents to ensure that they can find a property that they like in an area that is good for them, wherever possible. Where residents wish to remain on the Broadwater Farm estate (e.g., in a similar property), effort will be made to enable this in one move. Where this isn't possible, residents would have the opportunity to move back to the estate when a suitable property becomes available.

Re-imbusement for improvements: One respondent noted that they had made improvements to their home in the form of decorations. Under the Broadwater Farm Rehousing and Payments Policy, Disturbance Payments can cover 'Home improvements that have been notified and approved by the Council, less the cost of depreciation.' In this situation, rehousing officers would work with this resident to try to arrange re-imbusement for the costs of home improvements.

Demolition and construction: One respondent argued that the issues presented in the consultation are normal parts of the demolition and construction process and therefore the reasons for offering demolition does not make sense. The council firmly believes that the situation of Stapleford North is unique due to its very close proximity to Northolt and the fact that these buildings are directly connected to one another. Although the council acknowledges demolition and construction would be possible in such close proximity, the consultation made clear that the council believed residents should be aware of this and be able to make an informed decision. The reasons for considering demolition also related to the wider benefits to the whole estate. These benefits included improved placemaking opportunities, more family homes, safer and wider streets, and improved layout at the heart of the estate.

This response also argued that all residents can access their property via the Stapleford main entrance. Whilst this is true, step-free access to certain properties (i.e., via a lift) is currently provided through Northolt. This could be re-provided in the event of retention and refurbishment – it would not be suitable for the council to not re-provide this access.

Those in favour of option 2:

The below table sets out all of the reasons given for supporting option 2.

[Table redacted (unredacted in EXEMPT version of this document)]

Summary and response to comments

Overcrowding: A number of responses highlighted overcrowding as a reason for supporting option 2. Due to the Stapleford North block consisting only of 1-bedroom flats, these residents will be supported through the Broadwater Farm Rehousing and Payments Policy to move to

more suitable properties for their family's needs. Similarly, a number of respondents highlighted their desire to move home for other reasons.

Condition of blocks: Two respondents highlighted the poor condition of the existing blocks, with one response specifically highlighting that they do not believe improving the blocks would be good value for money. Whilst the council believes that refurbishing the block is possible and would improve its longevity, the design team highlight that there are significant additional benefits to demolition – including improved green and open space, better ground floor layout, more family homes, and new, high quality council homes. Therefore, the council agrees that demolition and re-provision offers better value for money on the whole.

Question 5: Do you think there is an option we haven't considered? If so, could you provide details below.

This question received fewer responses, with only 3 out of 21 respondents choosing to answer this question. Of those that did respond to this question, all were in favour of option 2 (demolition). The responses are in the table below:

[Table redacted (unredacted in EXEMPT version of this document)]

Summary and response to comments

Lift access: The first response proposes a lift for Stapleford North. This was already part of the proposals for option 1 (retain and refurbish), where a lift would have been built to re-provide step-free access for those who currently use the lift in Northolt. It is unclear if the respondent meant something different to this.

Rehousing: The second response refers to 'permanent rehousing' under option 1. Although this was not included in option 1, the consultation materials set out clearly that this could be possible under the retain and refurbish option if residents wished us to consider this. It is not clear whether this response wished for this option to be chosen or just wanted to highlight it.

Rents: The third response highlights an important issue about future rents. This is an issue that the council are aware of and are working hard to address. Under the Broadwater Farm Rehousing and Payments Policy, residents would be supported by rehousing officers to find a property that was both suitable for their needs (e.g., family composition) and is affordable to live in. Residents would not be asked to move to properties that were not suitable for them.

Insofar as the response is referring to the future rents of the replacement council homes, the council does anticipate these rents to be more expensive due to the improved space standards and quality of the homes. However, they will still be secure council tenancies and work is ongoing to determine the likely rent levels of these homes so that residents have this information prior to the resident ballot. They will be calculated as social rents on the same basis as they are now and therefore any rent increases will be due to the improved quality and standards of the new homes. We anticipate that some increased cost will be offset by lower running costs and improved energy efficiency.

Question 6: Do you have any other comments you would like to make with reference to the two options?

This question received fewer responses, with only 10 out of 21 respondents choosing to answer this question. Of those that did wish to make further comments, the responses are provided in the table below:

[Table redacted (unredacted in EXEMPT version of this document)]

Summary and response to comments

Timing: The first response relates to when tenants need to be notified (this response was received from a non-resident leaseholder). If approved by Cabinet in September 2021, the demolition of Stapleford North would be included in the 'preferred design scenario' to be presented to residents in an estate wide ballot. The current programme sets out that the 'preferred design scenario' would be agreed by Cabinet in October 2021, with the ballot due to be held in November 2021. Under this timeline, the rehousing process for residents would begin in December 2021 following a 'yes' outcome in the ballot. If the ballot was a 'no' outcome, more work would need to be undertaken before rehousing would commence. Therefore, communication with all residents in this block will be ongoing throughout September-December 2021 to ensure they understand the next steps and when rehousing is likely to begin.

Rent: The rent issue raised in the second response has been addressed in the previous section, above.

Rehousing needs: The issue raised by the deaf resident is one that council officers were already aware of. Under the rehousing process (should it go ahead following the ballot), rehousing officers would work closely with this resident to ensure that their new property provided them with suitable light and conditions so as not to impede on their ability to communicate.

Cost of moving: One resident expressed a concern around the cost of moving and whether the payments offered by the council would be sufficient to cover all associated costs. The Broadwater Farm rehousing and payments policy sets out the payments residents will be eligible for through the rehousing process. The disturbance payment will cover the costs of moving and can either be paid a flat rate or can be based on the actual costs incurred by the residents. The principle of the policy is that no resident will be financially worse off as a result of costs associated with moving and the rehousing team will work with residents to ensure all necessary costs are covered. These costs include, but are not limited to, the following:

- Cost of removals
- Cost of mail redirection
- Cost of reconnection of appliances
- Cost of address changes

Leaseholder Charges: One respondent noted the impact that leaseholder charges may have on them in the event of refurbishment and retention – and noted that they felt this did not offer good value for money for them or for the council. Although refurbishment and retention is deliverable, the council also agrees that demolition and re-provision offers the best value for money in terms of benefits to residents and the wider estate and long-term investment.

Demographics of respondents.

A number of respondents did not complete or only partially completed the equalities form. Therefore, much of the data below is not complete.

Sex

Sex	Number of responses
Male	6
Female	7
No response / not known	8

Age

Age	Number of responses
Under 20	
21-30	1
31-40	1
41-50	2
51-60	3
61-70	2
71+	5
No response / not known	7

Disability

Disability	Number of responses
Yes	5
No	8
No response / not known	8

Ethnicity

Ethnicity	Number of responses
Arab	1
Asian	2
Black	7
Mixed	
Other	2
White	3
No response / not known	6

Religion

Religion	Number of responses
Christian	5
Muslim	9
No religion	1
Other	1
No response / not known	5

Other responses:

Defend Council Housing

Paul Burnham, part of the Defend Council Housing group, provided a detailed response to the consultation. David Joyce, Director of Housing, Planning and Regeneration responded to the concerns raised in detail. The original letter from Defend Council Housing is included at the end of this report. This response is re-provided below for reference:

Dear Paul,

Thank you for contacting us with your concerns about the consultation currently taking place at Stapleford North on the Broadwater Farm estate. Councillor Gordon has asked me to respond on her behalf.

I appreciate you setting these out so that I can ensure we are providing clarity and confidence for residents throughout the consultation.

Haringey council understand the importance of council housing and the security offered by council tenancies and council properties. We are passionate about building a new generation of council homes so that residents can continue to benefit from them for decades to come.

I hope that this response goes some way to re-assuring you that our interests lie with ensuring the best outcomes for our residents.

As your query covered a range of issues I have set out some information using the same headings.

(1) Withholding the Refurbishment with Decant Option

The consultation materials

Whilst I appreciate that the refurbishment with decant option was not included as one of the main two options, the council has included this option within the consultation materials and is willing and able to deliver upon this if residents wished us to do so. I believe that some of the confusion is due to the fact that the wording you quote is from a draft version of the consultation materials.

As you will note from your scanned copy of page 4, the final published version reads:

'A further option would be for all residents of Stapleford North (flats 25-36 and 61-72) to be rehoused for the duration of the works to Northolt and then have the option to move back into your homes (if you wished) once the works were complete. Stapleford North would be refurbished as under option one, below. The Council is not proposing this as an option because:

- 1. It would require residents to move for a period of up to three and a half years, which would be disruptive and inconvenient for residents. Residents could return to the refurbished homes if they wished.*
- 2. During engagement with residents, no resident has suggested to the Council that they would want this as an option.*

Nevertheless, if you would wish the Council to choose this as an option, you can say so in response to question 5 on the survey included in this pack (or indeed any other option we haven't considered).'

The intention was that this would make it clear that, while the Council is not proposing it for the reasons given, there is an option of a full decant with a right to return to refurbished homes.

However, given that the structure of the block, if simply refurbished, would remain that of a late 1960s/early 1970s system build, it is clear that demolition and rebuilding would produce

higher quality homes. Therefore, if residents were to move out for a significant period of time anyway, the council believes that it would be sensible to take the opportunity of producing the new, high quality council homes residents deserve. This is why option two is presented as a demolition option. I also believe that the numerous other benefits to the whole estate that are set out within the consultation materials would be a positive thing for all existing and future Broadwater Farm residents.

Design work has shown that residents in this block can remain in-situ for the duration of the demolition and rebuilding works taking place at Northolt. The council however wished to consult with residents due to the disruption this may cause them. We opted not to present a preferred option in this consultation, as it is important to us that residents are able to freely express their preference to us.

Because the demolition and rebuilding works would not mean that these residents have to move, the criteria within the Housing Allocations Policy according residents Band A priority for rehousing 'where Homes for Haringey (on behalf of the Council) needs to provide alternative accommodation for its tenant in order to carry out repairs or improvements to their property or where the tenant needs to be moved as part of a regeneration scheme' (see below) would not be met.

However, if the option taken is for the block to remain and for structural and refurbishment works to be done then, where the works do require people to move, they will be supported in line with council policy, including the Housing Allocations Policy when applicable.

The Housing Allocations Policy (15.14.8) states that 'for the tenant to be awarded decant priority, the Decants Panel will need to be satisfied that the work is so disruptive that it cannot be completed with the tenants remaining in occupation and either:

- The work is likely to take more than 3 months to complete; or
- The health of the tenant or a member of their household will be severely affected if they have to leave their home and then move back again at a later date.'

Where decants are necessary for repairs 'moves will usually be temporary but in some circumstances consideration will be given to permanent moves arising from a decant.' (15.14.2 of the Housing Allocations Policy).

At present, it is not believed that the structural and refurbishment works would require anyone in the block to move out for more than 3 months. This is why option one of the consultation (refurbish and retain) refers to these moves as temporary. In the additional option provided, the council have notified residents that if they wished to move for the duration of the demolition and rebuild (as opposed to temporary moves due to refurbishment) then we would be able to deliver this option. However, the council does not believe that this option provides the best outcomes for the residents in this block or for the Broadwater Farm estate as a whole.

Whilst developing more detailed designs to the structural improvements and refurbishment for Stapleford North – if this is the option chosen - it will become clearer which residents may be required to move to undertake this work and for how long. Should residents be required to move for a period of more than 3 months, they would be rehoused according to the Housing Allocations Policy. This means that they would have a Right to Return, or to remain, at their option.

It is correct that the Council seeks to comply with the judgment in *R (on the application of Moseley) v London Borough of Haringey [2014]*; for obvious reasons, both officers have this well in mind.

”... officers have been canvassing demolition options with residents without Cabinet approval

We wrote to and spoke to residents prior to the Cabinet decision on 13th July to let them know about the proposed upcoming consultation and the options that would be presented. These conversations were to ensure that residents were aware in advance of proposals in relation to their homes and prepared for the consultation, to increase participation, and ensure residents were properly supported e.g., with language or accessibility needs. Cabinet approval is not required for such engagement.

Due to the sensitivity of the issue and awareness that such consultations can be stressful for residents, we believed that it was important to ensure residents were engaged early so that they would be aware of what was happening and how they can have their opinions heard.

(2) Right of Return compromised

We are strongly committed to the Right to Return and I believe the council has been clear in the commitments made to residents. We are absolutely committed to ensuring that – should demolition be the preferred option – residents moved from the estate would have a Right to Return. This is in line with several council policies as we recognise the impact that such schemes can have on residents who undoubtedly have connections to their community and surrounding area.

The sentence quoted from page 10 of the consultation pack (‘You are likely to have to move away from Broadwater Farm, either for a number of years or on a permanent basis’) is contextualised by the repeated and clear references to the Right to Return that precede it. The immediately previous page (page 9) states that:

*‘The first new homes on the estate are expected to be completed in late 2024 or early 2025. **You can either stay in the home that you have moved to or you could return to a new property on the estate under the right to return policy**’.* (emphasis added)

The Right to Return is emphasised throughout the consultation materials and it is clear for residents that the wording to which you refer is about the residents’ choice to remain in their decant accommodation or to return. It is not about the council deciding whether they can return.

If the decision is taken to demolish the block, the Broadwater Farm Relocating and Payments policy will apply. This policy guarantees two Rights to Return to the estate for secure tenants (to an available Broadwater Farm home if they wish and to a new home once completed). This policy was consulted on extensively in 2018 and it offers strong guarantees to residents. Haringey Council are in agreement with Defend Council Housing about the importance of Right to Return commitments being honoured in the event of estate regeneration.

(3) Rents, and the policy commitment that no residents will be financially worse off

I recognise that all residents will be concerned about changes to rents at the new council homes. I understand the importance of this issue and we are working to ensure residents are provided with clarity on this issue before we ask them to vote for or against our proposals in the ballot.

However, I do not believe that the figures you are quoting are an accurate representation of the rents of the new homes. Similarly, I do not believe it is fair to characterise the new homes as anything other than council properties with secure council tenancies – just as the current properties are.

To be clear, the new homes will be secure council tenancies at council rents. As the consultation materials make clear, the rents of these new properties will not be exactly the same as current rents. Social rents are calculated using a government formula and the council uses this formula to set its rents. We are currently at an early design stage for new homes and work to establish future rent levels is ongoing. Crucially, initial estimates suggest they would be significantly lower than those you quote, which assumes the formula rent cap would be reached. Due to the relatively low land values on the estate, it is highly unlikely that the new rents would reach this cap.

The figures quoted also assume all existing service charges paid by BWF will be paid on new homes. The work to establish service charges is not yet complete and so the figures quoted are unlikely to be correct. Further to this, the new homes will be more energy efficient and hence cheaper to run. This will help to offset any change in rent.

The commitment to residents not being financially worse off, contained within the Estate Renewal Rehousing and Payments Policy (ERRPP), and re-iterated in the consultation materials, is expanded upon within both the ERRPP and the consultation materials. The ERRPP states that:

- 1) 'Haringey Council is also committed to ensuring that no resident should be financially worse off as a result of the renewal scheme. But this does not necessarily mean that every tenant, leaseholder and freeholder will pay exactly the same housing costs after the move as they did before the move' (pages 8-9).
- 2) 'This means that rents will change for some tenants, particularly if they move to larger or smaller homes, or change landlords, as a result of the renewal scheme' (page 9).
- 3) 'The commitment that no tenant will be financially worse off as a result of the renewal scheme is deemed as being met by ensuring that a home is available on the scheme at an equivalent rent, and by the payment of the Home Loss and Disturbance payments to cover tenants' costs. The commitment to ensuring that the new home is at an equivalent rent means that the rent for the new property will be calculated on the same basis as their current rent. Where a tenant is on a social rent, this means that the new rent will also be a social rent, calculated according to the rent policies of the new landlord, not for example an "Affordable Rent" at up to 80% of market rents' (page 9).

The consultation materials state that:

- 1) 'No tenant or leaseholder will be financially worse off. This means that you will be supported with Home Loss and Disturbance Payments. The rent of the new Council homes will be calculated on the same basis as your current rent. It does not mean that your rent will be exactly the same as it is now' (page 7).
- 2) 'If you are a secure tenant and you move to another council home, your rent will still be a council rent but may be different to the rent you're currently paying. Any changes to your future rent or service charges will be discussed with you in detail as part of the rehousing process' (page 10).

I believe that these quotes from both documents emphasise and clarify the fact that the rents of the new council homes will not be exactly the same as the rents on the estate currently.

I recognise that residents deserve clarity on this issue before being asked to support our proposals and we will ensure that residents get this. Full details on the proposed rents will be included in the landlord offer so that existing residents of Broadwater Farm, and those who have been moved from Northolt and Tangmere, will have clear information about the proposed rents for new homes.

If the decision is taken to demolish Stapleford North, rehousing officers will work closely with residents to ensure that the new homes they move to are affordable for them. Residents would also be supported through this move with a number of payments, including disturbance payments, as set out in the consultation materials and Broadwater Farm Rehousing and Payments Policy.

(4) Independent Tenant and Leaseholder Advisor (ITLA)

In advance of the consultation, on 18th June 2021, residents in Stapleford North received a letter which gave them more information about why the council is undertaking this consultation and letting them know how to get involved; the letter also provided details of the Independent Tenant and Leaseholder Advisor (ITLA), who can give residents impartial information and advice about the consultation and the options.

The covering letter to the consultation materials should have repeated this information. It was an error that this was not included.

A further letter has now been sent to the residents on re-iterating that an ITLA is available and letting them know their contact details - which are as follows:

- Pam Kovachich, Independent Tenant and Leaseholder Advisor: PPCR Associates, pkovachich@ppcr.org.uk 020 7199 0901 or 07966 595 527.

(5) S105 Consultation materials not made publicly available

On 28th July 2021, the consultation materials and information were posted on Haringey's website [here](#) and linked to the full booklet and questionnaire [here](#). I recognise that these should have gone live at the same time as the launch of the consultation, on 26th July 2021.

The information can now also be found [here](#), on the council's Section 105 area of the website.

Due to the two-day delay in this information being made public, the council will be extending the consultation until Thursday 26th August 2021. I apologise for the error and we will work hard to ensure all residents are given enough opportunity to respond to the consultation.

Delegated authority

In respect of the required delegations we believe we have worked within Council policy and the terms of the delegated authority.

Conclusion

I am grateful that you have written to me and I hope the above addresses the concerns you have raised. We believe strongly that our proposals will make the Broadwater Farm estate a better place to live for generations to come – improving safety and security, providing more council homes, delivering more family homes, creating opportunities for local people, and introducing new services and amenities that will benefit all residents. I believe these are ambitions that we can all support in the future.

The Resident's Association

On 21st July 2021, an email was sent to David Sherrington, Director of Broadwater Farm, from a member of the Broadwater Farm Resident's Association. The letter sets out a number of concerns with the consultation. It has been re-produced in full at the bottom of this report, with the council's responses to the issues raised provided here:

Response: It is important to note that the email was received in response to the Resident's Association reviewing the draft version of the consultation materials (5 days before the consultation opened). Therefore, some of the comments do not relate to the material in the final form that was provided to residents in Stapleford North.

In response to the first point, it is important to note that in the final version of the consultation materials a permanent move for the duration of the refurbishment, demolition of Northolt, and building of new homes was possible. Residents were encouraged to note if they wished this option to be considered. Only one resident did so, which has been expanded on earlier in this report. Where the consultation materials referenced a temporary move for refurbishment, this was presumed to be a move shorter than 3 months – which under the Housing Allocations Policy does not require permanent rehousing. Were households required to move for longer, this would have been done in accordance with the Housing Allocations Policy.

The reference to no tenant or leaseholder being financially worse off refers to the provisions set out in the Estate Renewal Rehousing and Payments Policy (ERRPP). This provision refers to the costs of moving home. In the final consultation materials provided to Stapleford North residents, this was made clear with some additional text: 'No tenant or leaseholder will be financially worse off. This means that you will be supported with Home Loss and Disturbance Payments. The rent of the new Council homes will be calculated on the same basis as your current rent. It does not mean that your rent will be exactly the same as it is now' (page 7 of the consultation materials). This language made it clear that we were not promising rents would be the same as they are now.

We did not agree with the request to delay or postpone the consultation and felt that it was carried out in a fair and transparent way that gave residents real choice over their future options.

Other responses to the consultation in full

Paul Burnham letter on behalf of Defend Council Housing

Haringey Council is refusing to move people facing excessive noise and disturbance at Broadwater Farm: unless they agree to the demolition of their homes in a consultation which starts on Monday 26 July 2021.

Paul Burnham of Haringey Defend Council Housing says, **“The Council is bullying residents to accept demolition if they want a peaceful life. The consultation options are not fair choices, and they need to add the third option of the block being repaired while residents are temporarily re-located during the works period.”**

In 2018, Haringey Council agreed to demolish two blocks at Broadwater Farm for safety reasons. On 13 July 2021 the Council’s Cabinet agreed to consult residents on the additional demolition of the 24 homes at Stapleford North.

The reason given by the Council for proposing demolition at Stapleford North is that residents ‘face heightened levels of disruption for an extensive period through demolition [of the neighbouring Northolt block], new build works and refurbishment works’. At the Cabinet meeting Cllr Ruth Gordon, Cabinet Member for House Building, Placemaking and Development, said that Stapleford North **“is going to be right in middle of an area that is going to be full of dust and construction works for a very long period of time”**.

The consultation will offer residents just two options:

- Remain in their homes throughout the duration of the works and while the block is refurbished.
- Agree that the block should be demolished and replaced with new council owned homes.

This is in breach of good practice, and of the council's own policy, because in cases of excessive disturbance from works, a temporary move away should be offered, often with options of a right to remain in the new property, or to return to the existing property once it has been refurbished (yes, a choice for residents!). This is known as a 'decant'; and as treating people with fairness, decency and respect.

The Council's Housing Allocations Policy says: 'Decants occur when a Decants Panel has decided that a transfer to alternative accommodation offers the best way of ensuring that essential repairs and redevelopment take place without causing huge disruption or hardship to the tenants'.

Also, the Council is not telling the tenants that rents for the new homes after demolition would have rents 87% higher than at present (rent increases of £69.32 per week), and total rent including service charges of £183.57 pw instead of £114.25 pw at present. What will happen if people cannot afford these big rent increases?

This is all part of a pattern. At Stapleford North, you must agree to demolition, otherwise we will make your life a misery for years. All Broadwater Farm residents must vote for the redevelopment plan this Autumn, otherwise the external decorations (including communal areas inside the blocks) will never be done. They are supposed to be done once every five years, but were last done 17 years ago; and much of the estate looks terrible because of landlord neglect."

Increasing rents by demolition is part of a strategy of forced gentrification and social cleansing, but tenants and residents will continue to resist.

When we knocked on doors to talk to people at Stapleford North on Saturday, there was plenty of support for 'no demolitions and no rent increases'. Meanwhile the Council must comply with its Decant policy, advise tenants on the real amounts of future rents, and abandon the flawed consultation at Stapleford North, which begins on Monday 26 July.

The Resident's Association

On 21st July 2021, an email was sent to David Sherrington, Director of Broadwater Farm, from a member of the Broadwater Farm Resident's Association. It has been re-produced in full below:

Dear David

The consultation is misleading. We are talking here about moving people because they cannot stay in their home when work is being carried out due to noise and disruption which is a decant. You state that the only options if the block is not demolished are for residents to stay while the work is being done or going for a very long term 'temporary' move and coming back when all the noise of demolition and building the new homes is finished (2 years or so until the new homes are built as far as I can tell). As you know, if a decant is going to be for a long period, i.e. a year or more, then under HfH policy the person being decanted can be given a permanent home somewhere else. When their property is ready to be occupied again it could be let to another tenant. This would avoid the need for replacing Stapleford

North with higher cost homes at 'New Homes Rent' which it may not be possible to rent to the lowest income households due to the benefit cap. Why are the existing residents not being consulted on this option?

Also, in the 'Option two Demolish Stapleford North' section you state:

'No tenant or leaseholder will be financially worse off.

All tenants and resident leaseholders will have a right to return (if they wish to do so).'

This is misleading. It implies the tenants won't be financially worse off they come back to one of the new homes. They will be worse off if it is at 'New Homes Rent' and you have no guarantee it won't be. Also, tenants may end up being signed up for one of the other homes around Haringey being built at New Homes Rent. This already happened to at least one Love Lane decantee who ended up massively worse off.

You must put the consultation on hold until it is rewritten with an honest choice of options and cast-iron guarantees over rent that have been signed off by the financial officers responsible for this. These guarantees must be put in front of the Council, agreed and included in publicly available minutes.

Yours sincerely

XXX

(Broadwater Farm Residents' Association)

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EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Stapleford North consultation
Service area	Housing, Regeneration and Planning
Officer completing assessment	Sarah Lovell
Equalities/ HR Advisor	Ed Ashcroft
Cabinet meeting date (if applicable)	14 th September 2021
Director/Assistant Director	David Joyce

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

This EqIA was originally used to inform a consultation with residents and has now been updated to inform a final decision recommended for Cabinet in September 2021.

Background:

In 2018, the decision was taken to demolish the Tangmere and Northolt blocks on Broadwater Farm Estate in North Tottenham due to structural faults. Since then, the Council has been working in partnership with residents and wider stakeholders on designs for new homes. It has become apparent that one small block on the estate, the Stapleford North block, is likely to experience very significant levels of disruption over a prolonged period due to its location.

Cabinet approved a consultation in July 2021 with residents in the 24 1-bedroom properties in Stapleford North wing block on Broadwater Farm about the future of their block. The residents were presented with two options:

- Option 1 – Refurbishment of the block. In this option the Stapleford North block would have the strengthening and refurbishment works completed to it. The majority of the 24 residents would be able to stay in situ, however residents were informed that it is likely to be necessary to temporarily relocate some of the households on the edge of the blocks whilst this work is completed.
- Option 2 – In this option the Stapleford North block would be demolished and new homes would be built. Residents would be rehoused under the existing Broadwater Farm Rehousing and Payments Policy, which gives residents the right-to return to new homes on the estate once they have been completed.

Consultation & decision-making path:

The consultation ran from 26th July 2021 to 26th August 2021. The council put in place a series of measures to ensure that all of the affected residents were able to participate fully in the consultation. This is so that all residents, regardless of their background, first language, or individual needs, were able to understand and respond to the consultation and receive all of the information and support that they need. Measures included extensive 1-1 engagement with the residents of the affected properties. This included several attempts to knock on doors and call each resident. It also included making sure translations, accessible versions, and independent support was available.

A majority of respondents chose option 2 (13 compared to 8 for option 1). A report is being considered by Cabinet on 14th September 2021 recommending for the demolition of Stapleford North to be included in the 'preferred design scenario' which residents will be asked to vote on in an estate wide ballot. The demolition is not confirmed to happen until the ballot has taken place with a majority of residents voting 'yes' to the proposals. This ballot is scheduled to take place in November 2021. Given that Cabinet are being asked to approve option 2 being included in the 'preferred design scenario', this updated EqIA only considers the impact of option 2 (demolition and replacement homes).

Equalities Impact and Mitigations

It was originally believed that the block contained 19 secure Council tenants, 4 leaseholders, and 1 tenant in temporary accommodation. Upon beginning the consultation, officers became aware that the block actually consisted of 17 secure tenants, 4 leaseholders, 2 unauthorised occupants, and 1 vacant property. The residents in this block are disproportionately from older age groups, BAME backgrounds, and lower socio-economic households.

Should option 2 be approved by Cabinet and residents, all residents in this block would face short-term disruption but would be positively impacted in the long-term as they would be living in safer properties. Specific mitigations, set out in this EqIA, will be put in place to mitigate the potential negative impacts on those with protected characteristics.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Homes for Haringey resident data	This proposal does not affect staff.
Gender Reassignment	Homes for Haringey resident data	
Age	Homes for Haringey resident data	
Disability	Homes for Haringey resident data	
Race & Ethnicity	Homes for Haringey resident data	
Sexual Orientation	Homes for Haringey resident data	
Religion or Belief (or No Belief)		

	Homes for Haringey resident data	
Pregnancy & Maternity	Homes for Haringey resident data	
Marriage and Civil Partnership	Homes for Haringey resident data	

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

This decision impacts 24 households. Housing officers were familiar with and have previously engaged extensively with the residents in this block. From this, we have identified that a number of these households contain individuals with protected characteristics. Two of the households have unauthorised occupants, one is unoccupied, and a further resident was unreachable despite multiple attempts. Therefore, the data presented below does not always add up to 24.

Data analysis:

- **[Redaction (included in the EXEMPT version of the report)]**

As the above demonstrates, residents in this block are disproportionately (compared to borough averages) from older age groups, BAME backgrounds, and lower socio-economic households. These individuals will be negatively impacted in some ways by the decision to recommend the demolition of this block, as this will cause short-term disruption to their lives due to needing to be rehoused. However, the following mitigations would be put in place which would help to deliver long-term benefits:

- More suitable sized properties for those over-crowded due to the Broadwater Farm Rehousing and Payments Policy.
- Financial and logistical support offered by the Broadwater Farm Rehousing and Payments Policy.
- The two Right's to Return offered under the Broadwater Farm Rehousing and Payments Policy – meaning all of the residents (except unauthorised occupants and non-resident leaseholders) can return to the estate and benefit from a new, high quality council home that meets their needs.
- Residents moving to safer council homes that meet their needs under the Broadwater Farm Rehousing and Payments Policy.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqlA guidance

The feedback received in this consultation has been considered fully and presented back to Cabinet with a recommended course of action to include option 2 in the 'preferred design scenario' for Broadwater Farm. The results of the consultation have informed the recommendation made to Cabinet, with the majority of respondents opting for option 2.

Several residents (who supported either option) have raised concerns which this EqlA and our future support for and work with residents will aim to address.

To enable all residents to participate in this consultation, some key actions took place:

- All materials to residents contained a translation panel for residents to inform us if they need to receive this in a different language or accessible format (e.g., braille or large print). A translator was also made available upon request.
- Door-knocking took place on three separate occasions to ensure all residents were aware of the information and had a chance to ask Council staff questions about the consultation.
- Follow up phone calls took place to check in on any residents that were unreachable at the door.
- Multiple options for responding to the consultation were given, including over the phone, online, attending a drop-in session, or completing and returning a consultation booklet.
- The information was set out on the Broadwater Farm section of the Council's website.
- A reminder leaflet was sent to all households 2 weeks before the end of the consultation, reminding them of how to get involved and giving them contact details for our engagement officer and the Independent Tenant and Leaseholder Advisor.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

The consultation closed on 26th August 2021. We received 21 responses from the 24 households. Of these 21 responses, 8 chose option 1 (refurbish and retain) and 13 chose option 2 (demolish and replace). A full summary of the responses to the consultation is included as an appendix to the Cabinet report. As a majority of responses opted for option 2, the Cabinet report recommends that this option is included in the 'preferred design scenario' to be presented to residents in an estate wide ballot.

Residents gave varying reasons for opting for option 2, these included concerns around disruption whilst work is ongoing as well as a desire to move to new and more suitable accommodation. Concerns identified with current accommodation included poor condition, size, and overcrowding. The council has a number of measures in place to respond to these concerns under the Broadwater Farm Rehousing and Payments Policy

– this includes access to the Choice Based Lettings system to enable residents to find the most suitable and appropriate housing for them and individual needs assessments to ensure residents needs are identified and prioritised.

Some residents, however, supported option 1 including citing the length of time they had been in their current property, recent moves, expenditure on their current property, and a desire to remain in place. Concerns were also raised about the disruption that would be caused by demolition. The council recognises that moving can be difficult for residents, particularly when they have long-term ties to an area or community. Under the Broadwater Farm Rehousing and Payments Policy residents will be helped to find properties in the local area wherever possible (should they wish to). Further to this, the two Right's to Return under the policy ensures that residents will have a chance to return to the Broadwater Farm estate prior to the new homes being built (if they wish) when a suitable property on the estate becomes available. This will not compromise their ability to get one of the new homes once they have been built. The financial support offered under the Broadwater Farm Rehousing and Payments Policy is intended to ensure residents are not financially worse off as a result of moving, through the provision of disturbance payments and home loss payments.

A concern was also raised about the potential impact on rent levels. Work is being undertaken to give all residents clarity about future rents on the estate ahead of the ballot, which will allow residents to make an informed decision on the future of their estate.

[Redaction (included in the EXEMPT version of the report)]. This response was from a resident who preferred option 1. As the Cabinet report recommends option 2, this concern can be mitigated when supporting the resident with their move to a new home – ensuring that it is a suitable property for their needs. Should residents support the proposals in the ballot, rehousing officers will work closely with this resident to ensure their concerns can be addressed appropriately.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. Sex (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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The data suggests that there is a fairly even split of males and females in the affected block – in line with the borough population.

There is no reason to believe that there would be specific negative impact on anyone due to this protected characteristic as a result of the preferred option.

However, it is noted that residents with children and lone parents (who are disproportionately likely to be women) may face particular disruption. The Council recognises that moving home will be more disruptive to households with children, who may have to make alternative arrangements for schooling. These changes are more likely to affect single mothers who may have support networks in place in the local area, benefit from local facilities aimed at single parent households, and benefit from proximity to work arrangements.

Under the Broadwater Farm Rehousing and Payments Policy, those with children in a local school will be given priority to remain in the local area should they wish to do so. Further to this, they would be positively impacted by the two rights to return that are guaranteed within this policy.

[Redaction (included in the EXEMPT version of the report)].

Leaseholders would be positively impacted with the provision for equity loans and the leaseholder right to return contained within this policy.

2. Gender reassignment *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	X	Unknown Impact	X
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The Council does not hold specific data on residents regarding this protected characteristic. Individual engagement throughout the consultation has not identified any of the residents in this block with this protected characteristic.

The Council recognises that re-housing can be a challenge for someone with this protected characteristic, due to the need to access specific healthcare and support networks. The Council will continue to work with residents of this block to ensure that specific impacts based on this protected characteristic were mitigated, in the event that this is identified at a later date.

Under the proposed option, the Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible.

Under the Broadwater Farm Rehousing and Payments Policy they would be positively impacted by the two rights to return that are guaranteed within this policy.

Leaseholders would be positively impacted with the provision for equity loans and the leaseholder right to return contained within this policy.

3. Age *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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The age profile in the block is considerably older than the age profile across the borough. The decision taken as a result of this consultation will therefore have a disproportionate impact on older residents.

Elderly residents

Where elderly or vulnerable residents are to be rehoused under option 2, the Council recognise that this may more significantly impact them due to the higher prevalence of physical disabilities and mental health difficulties amongst the older population (compared to the general population). Dedicated support would be offered to impacted residents – such as financial and practical support throughout the rehousing process.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible. This would include carrying out occupational therapy assessments to determine if any specialist adaptations or equipment would be required in the new property – which the Council would pay for.

Young children

Where there are young children in this block, the Council recognises that the impact of rehousing on them could be negative. All effort would be made to work closely with residents to ensure that those with children are prioritised for moves in the local area, so that they do not need to move schools wherever possible.

Where young children are present on the site, they would be negatively impacted in the short term if it was necessary for them to move schools as a result of rehousing. Under the Broadwater Farm Rehousing and Payments Policy, those with young children would be prioritised for housing in the local area, and housing officers would work closely with these residents to help them find the most suitable housing option. This should mitigate this concern, by helping these residents remain at the same school wherever possible.

Under the Broadwater Farm Rehousing and Payments Policy they would be positively impacted by the two rights to return that are guaranteed within this policy.

Leaseholders would be positively impacted with the provision for equity loans and the leaseholder right to return contained within this policy.

4. Disability *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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[Redaction (included in the EXEMPT version of the report)].

Under the proposed option, the Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible. This would include carrying out occupational therapy assessments to determine if any specialist adaptations or equipment would be required in the new property – which the Council would pay for.

Under the Broadwater Farm Rehousing and Payments Policy they would be positively impacted by the two rights to return that are guaranteed within this policy. The new homes would be more accessible and be more friendly to those with disabilities, positively impacting those with this protected characteristic.

Leaseholders would be positively impacted with the provision for equity loans and the leaseholder right to return contained within this policy.

Further to this, all residents would be positively impacted by moving into safer properties and many residents would benefit from moving to properties that are more suitable for their needs.

5. Race and ethnicity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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The Council is aware that those living in this block are more likely to be from BAME backgrounds than the general or borough populations. Therefore, there will be a disproportionate impact on those with this protected characteristic. The Council recognises that for BAME people there may be specific cultural ties, such as businesses locally that cater specific cultural needs of residents of a particular race or ethnicity.

As a result of their over-representation in the impacted group, residents from a BAME background would be disproportionately impacted by the disruption caused from needing to be rehoused under option 2. The residents would receive dedicated support to ensure that they were able to prepare for and be supported through these moves. The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or cultural ties in the local area. These

residents would be supported to find a suitable property in the local area where possible under the Broadwater Farm Rehousing and Payments Policy.

Under the Broadwater Farm Rehousing and Payments Policy they would be positively impacted by the two rights to return that are guaranteed within this policy. They will also be positively impacted by the financial and logistical support they will receive under the rehousing policy, which aims to make sure no resident is financially worse off as a result of rehousing.

Leaseholders would be positively impacted with the provision for equity loans and the leaseholder right to return contained within this policy.

All residents would be positively impacted by the higher quality of the new homes and the fact that they would no longer be living in structurally unsound blocks.

6. Sexual orientation *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	X	Unknown Impact	X
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The Council and Homes for Haringey do not collect this data on residents and where the data is collected, it is frequently under-reported. **[Redaction (included in the EXEMPT version of the report)]**.

Should option 2 be approved, it is not believed that the disruption caused by rehousing would disproportionately impact affected residents based on this protected characteristic. Secure tenants and leaseholders would be positively impacted by the rights to return guaranteed by the Broadwater Farm Rehousing and Payments Policy and by the improved safety and quality of their new homes.

7. Religion or belief (or no belief) *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	Y	Negative	Y	Neutral impact		Unknown Impact	
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The Council and Homes for Haringey do not collect this data on residents and where the data is collected, it is frequently under-reported. **[Redaction (included in the EXEMPT version of the report)]**.

There may be a greater impact on those who go to a specific place of worship or are part of a religious community. Where possible, the Broadwater Farm Rehousing and Payments Policy aims to give residents choice about their move to a new home and therefore should help these residents ensure they have access to places of worship or their religious community.

Secure tenants and leaseholders would be positively impacted by the rights to return guaranteed by the Broadwater Farm Rehousing and Payments Policy and by the

improved safety and quality of their new homes. This Right to Return will ensure that, should residents wish, they can return to the estate and therefore be close to the religious institutions or communities that they currently belong to.

The effects of being required to move will, in part, be offset by support being given to each household, including financial help with the costs of moving. They would also receive support from housing officers to find suitable properties in the local area where possible.

8. Pregnancy and maternity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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The council does not hold data on pregnancy and maternity among its tenants and leaseholders. **[Redaction (included in the EXEMPT version of the report)].**

The disruption caused by option 2 will need to be mitigated through dedicated support for any resident who presents with this protected characteristic during the rehousing process (should residents vote 'yes' in the ballot).

The Council recognises that residents with this protected characteristic would be negatively impacted by the process of rehousing. Housing officers would work closely with residents in this case to ensure that they were supported to find suitable properties, such as in the local area to continue accessing healthcare and support networks. However, these residents would be positively impacted by the rehousing policy as this would allow them to move to a more suitable sized property for their household (the Stapleford North properties are all 1-bedroom). The council have already identified several residents who would benefit as a result of this.

Leaseholders would be supported through equity loans that would help them purchase a suitable property in the right area for them, under the provisions set out in the Broadwater Farm Rehousing and Payments Policy.

Secure tenants and leaseholders would be positively impacted by the rights to return guaranteed by the Broadwater Farm Rehousing and Payments Policy and by the improved safety and quality of their new homes.

9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

Positive		Negative		Neutral impact	Y	Unknown Impact	
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People who are in a civil partnership will be treated the same as people who are married in all respects.

10. Groups that cross two or more equality strands e.g. young black women

Many of the residents in this block will have protected characteristics in two or more equalities strands, [Redaction (included in the EXEMPT version of the report)].

The Council recognises that inter-connected protected characteristics require a tailored approach that recognises the specific needs of individuals and households. This is why all effort will be made to ensure that every resident has all of the information and support necessary throughout the rehousing process, such as by undertaking individual needs assessments and providing financial support under the Broadwater Farm Rehousing and Payments Policy.

Socio-economic disadvantage

The Council recognises that social tenants, temporary accommodation residents and leaseholders in this block are disproportionately likely to be from low-income households. Therefore, those from low-income backgrounds will disproportionately be impacted by the decision to recommend option 2 for Stapleford North to be included in the 'preferred design scenario'.

Under option 2, these residents will face some level of disruption due to the need to be rehoused. The provisions set out under the Broadwater Farm Rehousing and Payments Policy – such as disturbance payments and the Right to Return – will help to offset these negative impacts.

The Council recognises that residents with this protected characteristic would be negatively impacted by the process of rehousing. Housing officers would work closely with residents in this case to ensure that they were supported to find suitable properties, including through the financial provisions set out in the Broadwater Farm Rehousing and Payments Policy. This policy was developed in adherence to the Estate Renewal Rehousing and Payments Policy (ERRPP) which aims to ensure that residents are not financially worse off as a result of rehousing. This includes by providing a £6,500 Home Loss payment and disturbance payments to cover the reasonable costs of moving home.

Leaseholders would be supported through equity loans that would help them purchase a suitable property in the right area for them, under the conditions set out in the Broadwater Farm Rehousing and Payments Policy. This includes Home Loss payments at 10% of their property value and disturbance payments for the reasonable costs of moving home.

Secure tenants and leaseholders would be positively impacted by the rights to return guaranteed by the Broadwater Farm Rehousing and Payments Policy and by the improved safety and quality of their new homes.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?**

- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?
This includes:
 - a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
 - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
 - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

It is not believed that this proposal would result in any direct or indirect discrimination for any group that shares a protected characteristic.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale

<p>Age and disability – these individuals will be negatively impacted in the short term by both option 1 (disruption, noise, possible temporary rehousing) and option 2 (rehousing, children moving school).</p>	<p><i>Option 2: Inclusion of provision in the recommendations of the July 2021 Cabinet report to extend the Broadwater Farm Rehousing and Payments Policy to these residents. This ensures adaptations can be made for disabled residents and those with young children can be prioritised for local rehousing. It also guarantees the Right to Return and sets out clearly the payments residents will be entitled too.</i></p>	<p>Sarah Lovell</p>	<p>Complete – July 2021</p>
<p>Socio-economic – most residents will be low-income households and will be impacted by the disruption under option 1 or the rehousing or sale of their property under option 2.</p>	<p><i>Option 2: extend the Broadwater Farm Rehousing and Payments Policy to give residents two rights to return and leaseholders the offer of equity loans to find suitable properties. Ensure residents are aware of the financial support available to them to enable them to move home.</i></p>	<p>Sarah Lovell</p>	<p>Complete – July 2021</p>

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

Rehousing can be a stressful and difficult experience for any resident. Using the Broadwater Farm Rehousing and Payments Policy will ensure that this is done in a fair and equitable way, that will give residents the best chance of remaining in the local area if they wish, finding suitable properties, and returning to the estate when the new homes are ready. Further to this, personalised support would be offered via the council's rehousing officers and individual needs assessments would be undertaken for secure tenants to ensure that residents with specific needs can be supported fully.

However, it is recognised that the short-term impact of rehousing could still negatively affect some residents, particularly those with strong ties to the area or young children.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

This equality impact assessment has been monitored and updated following the results of the consultation. Where any resident has noted their protected characteristic in response to the consultation, this has been taken into account for the decision that is being recommended to Cabinet. Further to this, during the consultation and engagement with the affected residents, where the Council has identified those with protected characteristics, this information has been used to inform this updated EqIA and the subsequent decision to be taken.

7. Authorisation

EqIA approved by
(Assistant Director/ Director)

Date
.....

8. Publication

Please ensure the completed EqIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqIA process.

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