



NOTICE OF MEETING

Cabinet Member Signing

THURSDAY, 5TH FEBRUARY, 2015 at 14:00 HRS – CIVIC CENTRE, HIGH ROAD WOOD GREEN, N22 8LE.

MEMBERS: Councillor Alan Strickland, Cabinet Member for Housing and Regeneration

AGENDA

1. URGENT BUSINESS

The Leader/Cabinet Member will advise of any items they have decided to take as urgent business.

2. LOCAL LETTINGS POLICY IN RESPECT OF AMBROSE COURT AND MALLORY COURT, CANNON ROAD, N17 (PAGES 1 - 46)

The report will seek approval for a Local Lettings Policy for the Council's allocations to 30 new homes being constructed at Ambrose Court and Mallory Court, Cannon Road, N17 to give priority Love Lane residents whose homes will be demolished.

3. NEW ITEMS OF URGENT BUSINESS

To consider any new items of urgent business admitted under Item 1 above.

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Report for:	Cabinet Member for Housing and Regeneration	Item Number:	Item for Cabinet Member Signing on 5 February 2015
Title:	Local Lettings Policy in respect of Ambrose Court and Mallory Court, Cannon Road, N17		
Report Authorised by:	Tracie Evans (Chief Operating Officer)		
Lead Officer:	Perry Singh (Project Officer) perry.singh@homesforharingey.org 020 489 4890		
Ward(s) affected:	All wards	Report for Key/Non Key Decisions:	Non Key Decision

1. DESCRIBE THE ISSUE UNDER CONSIDERATION

- 1.1 This report describes a Local Lettings Policy being proposed for the Council's allocations to 30 new homes being constructed by Newlon Housing Association at Ambrose Court and Mallory Court, Cannon Road, N17. The proposed Local Lettings Policy gives priority to Love Lane Estate residents whose homes will be demolished following approval of the High Road West Masterplan Framework by the Council's Cabinet in December 2014. The new homes at Ambrose Court and Mallory Court are scheduled for completion at the end of March 2015, when they will be ready for letting.
- 1.2 The report also summarises the results of an extensive consultation exercise on the Local Lettings Policy, conducted with Love Lane Estate residents and all applicants on the Housing Register which closed on 11 January 2015. It also reports on an Equalities Impact Assessment undertaken.
- 1.3 The decision on Local Lettings Policies is delegated to the Cabinet Member for Housing and Regeneration, in consultation with the Chief Operating Officer. This report seeks approval from the Cabinet Member for the Local Lettings Policy in respect of Ambrose and Mallory Courts, taking into account the consultation results and Equalities Impact Assessment.



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2. CABINET MEMBER INTRODUCTION

2.1 This item is for decision by the Cabinet Member.

3. RECOMMENDATIONS

3.1 It is RECOMMENDED that the Cabinet Member:

1. Notes and considers the results of the consultation with applicants on the Housing Register and Love Lane Estate residents, as set out in paragraphs 5.10 – 5.22 of the report and Appendices 5,6 and 7
2. Notes and considers the Equalities Impact Assessment, as set out in the report and Appendix 8
3. Approves the Local Lettings Plan for Ambrose Court and Mallory Court, Cannon Road, N17, as set out in Appendix 1, taking account of the consultation results and Equalities Impact Assessment.

4. ALTERNATIVE OPTIONS CONSIDERED

4.1 The alternative option considered was to allocate the 30 new homes at Ambrose and Mallory Courts to households on the Housing Register in the normal way, in accordance with the main provisions of the Council's approved Allocations Policy, adopted by the Cabinet on 14 October 2014. Whilst, clearly, this would meet the housing needs of 30 Housing Register households, it would not allow the local re-housing of up to 30 Love Lane Estate tenants whose homes are due to be demolished and would not help facilitate the High Road West Regeneration Scheme which will bring a wide range of community benefits, including the development of up to 1,200 new homes - a significant proportion of which will become available to households on the Housing Register in the longer term.

5. BACKGROUND INFORMATION

Local Lettings Policies

5.1 The Council normally allocates housing on the basis of giving priority to households in greatest need, as set out in the main provisions of the Council's Allocations Policy. However, the Allocations Policy also includes a section on Local Letting Policies which describes how the Council and its partners may decide, in exceptional circumstances, to allocate properties on a different basis through a Local Lettings Policy, for example, to build sustainable communities or deal with particular local issues.

5.2 The Allocations Policy describes the purpose of Local Lettings Policies as being to ensure a balance between housing priority (in accordance with legal duties and responsibilities) and the longer term sustainability of local communities. It confirms



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that Local Lettings Policies may be used to achieve a wide variety of housing management and other policy objectives, including:

- Reducing the incidence of anti-social behaviour
- Dealing with concentrations of deprivation
- Improving difficult-to-let estates
- Protecting existing stable communities
- Preventing future problems occurring on newly developed estates or in relation to recently modernised properties
- Helping to create balanced communities and achieve wider community objectives, such as a broader social mix and supporting and encouraging people into employment
- Making best use of the Council's housing stock.

5.3 The Allocations Policy also confirms that:

- (a) the decision to apply a Local Lettings Policy will be made jointly by the Council and the landlord of the property.
- (b) Local Lettings Policies should not directly or indirectly discriminate against any particular person.
- (c) Local Lettings Policies should be agreed for a specific period of time.
- (d) a Local Lettings Policy will only be approved if it forms part of a strategy to tackle identified problems or contribute to sustainable communities.
- (e) Local lettings may be dealt with by restrictive labelling of vacancies advertised through the choice based lettings scheme.
- (f) All Local Lettings Policies will be subject to consultation with affected parties and will be supported by an Equalities Impact Assessment.
- (g) The Lead Cabinet Member for Housing has delegated authority to approve Local Lettings Policies.

5.4 The minutes of the Cabinet meeting on 14 October 2014 relating to the approval of the Allocations Policy read as follows:

“ii. That it be noted that the Leader had agreed that the Cabinet Member for Housing and Regeneration should approve Local Lettings Plans in line with the principles set out in 5.22 to 5.27 of the report.”

5.5 The most relevant aspects of paragraphs 5.22 to 5.27 of the Cabinet report (referred to in the minute above) read as follows:

“5.22 Local Lettings Plans can be used to respond to a range of issues relating to a particular area. They could be used to support the physical regeneration of an area, in particular relocating tenants.....”



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“5.24 Local Lettings Plans will be used to support the regeneration of estates, by facilitating the decanting and relocation of tenants throughout the regeneration cycle. Schemes will differ in their type and phasing. Where the intention is primarily to manage decanting requirements within an estate new build properties may be designated for tenants that are required to move. On other occasions tenants may be prioritised through the choice based lettings system.”

“5.26 The Leader has agreed that decisions on Local Lettings Plans should be taken by the Lead Member for Housing and Regeneration in consultation with the Chief Operating Officer. Each Local Letting Plan will be subject to consultation, an equalities impact assessment and approval individually through the Cabinet Member signing process.”

High Road West Regeneration Scheme

5.6 At its meeting on 16 December 2014, the Cabinet considered a report on the Council’s vision for regeneration of the High Road West area, following extensive work completed with local residents on compiling plans for this part of Tottenham. The regeneration proposals described in the report include 1,200 new homes, increased green spaces, new public spaces, business space and a stronger town centre area.

5.7 Following its consideration of this report, the Cabinet approved:

- (a) the High Road West Masterplan Framework for regeneration of the area
- (b) the proposed demolition of the Love Lane Estate and gave authority to the Director of Regeneration, Planning and Development to serve the initial demolition notice
- (c) the commencement of the re-housing process for phase 1 of the Love Lane Estate (which requires all secure Council tenants within phase 1 to be put on the housing register and awarded ‘Band A’ priority status for re-housing).

The Ambrose Court and Mallory Court Development

5.8 Newlon Housing Association is currently developing new social rented homes at Ambrose and Mallory Courts, which are located at Cannon Road, North Tottenham, N17, nearby the Love Lane Estate, which is approved for demolition as part of the High Road West Regeneration Scheme (as described in paragraphs 5.6 and 5.7 above).

5.9 As part of the section 106 agreement for this scheme, the Council and Newlon Housing Association reached agreement on the Council’s nomination rights in respect of the 30 social rented homes included in the Local Lettings Policy, as follows:

- 16 x 1 bedroom/2 person units
- 4 x 2 bedroom/3 person units
- 5 x 2 bedroom/4 person units



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4 x 3 bedroom/5 person units

1 x 4 bedroom/6 person units

Local Lettings Policy Consultation

- 5.10 The consultation in respect of the Local Lettings Policy for Ambrose and Mallory Courts has been conducted with:
- (a) the Love Lane Estate residents (as part of the section 105 consultation on the High Road West Regeneration proposals) and
 - (b) all households on the Housing Register.
- 5.11 The consultation letter sent to Love Lane Estate residents is attached as Appendix 2 and the consultation letter sent to Housing Register applicants is attached as Appendix 3.
- 5.12 The Ambrose and Mallory Court Local Lettings Plan and feedback card were included within the High Road West consultation pack, which was sent to all 297 properties on the Love Lane Estate. The Local Lettings Plan formed part of the wider consultation on the High Road West Masterplan proposals. This consultation took place between 13th September 2014 and 25th October 2014. The Housing Register consultation letter was sent to over 9,300 households on the Register, with a closing date of 11 January 2015. All the consultation letters despatched were accompanied by:
- a copy of the proposed Local Lettings Policy for Ambrose and Mallory Courts (Appendix 1)
 - a Feedback Form (Appendix 4)
 - a freepost return envelope and
 - a form in six community languages for households to request translated, audio, disk, Braille or larger type versions of the consultation documents. N.B. The Housing Register consultation deadline was extended until 25 January 2015, for the 20 households who requested and received translated or larger type consultation documents.
- 5.13 A summary of the 12 consultation responses from Love Lane Estate residents is presented in Appendix 5. All these responses were sent by post. The equivalent summary of the 725 responses from Housing Register applicants is presented in Appendix 6. Of these responses, 18 were submitted online and 707 by post.
- 5.14 The 12 Love Lane Estate responses represents a 4% response rate. The 725 Housing Register responses represent a response rate of more than 7%.
- 5.15 The Feedback Form asked both sets of consultees, the same set of 4 questions, with the following summarised results:



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Consultation Questions	Love Lane Estate responses	Housing Register responses
1. Is the proposal for letting the social housing units at Ambrose and Mallory Courts clear?	Yes 9 (75%) No 3 (25%)	Yes 650 (91%) No 62 (9%)
2. Do you agree with the proposal to prioritise the tenants of the Love Lane Estate, for the units available at Ambrose and Mallory Courts?	Yes 9 (75%) No 3 (25%)	Yes 594 (84%) No 116 (16%)
3. Do you agree with the method we are proposing to prioritise Love Lane tenants who wish to move to Ambrose and Mallory Courts?	Yes 9 (75%) No 3 (25%)	Yes 591 (83%) No 119 (17%)
4. Units which remain un-let after the tenants of Love Lane have had the option to move will be advertised on Home Connections. Do you agree that this is the correct approach?	Yes 10 (83%) No 2 (17%)	Yes 610 (87%) No 95 (13%)

5.16 The consultation responses summarised above should be treated with some caution in respect of the Love Lane Estate responses, given the low number of responses received. In summary, the responses received indicate that :

- (1) A significant majority (75%) of the Love Lane responses received and a very substantial majority (91%) of Housing Register respondents found the proposal to be clear.
- (2) A significant majority (75%) of the Love Lane responses received and a substantial majority (84%) of Housing Register respondents agreed with the proposal to prioritise Love Lane tenants for the units available.
- (3) A significant majority (75%) of the Love Lane responses received and a substantial majority (83%) of Housing Register respondents agreed with the method being proposed within the Local Lettings Policy to prioritise between the Love Lane tenants wishing to move to Ambrose and Mallory Courts.
- (4) A substantial majority (83%) of the Love Lane responses received and a very substantial majority (87%) of Housing Register respondents agreed that units which remain un-let after the tenants of Love Lane have had the option to move, should be advertised on Home Connections.

5.17 These consultation results demonstrate a high or very high level of support, from both the Love Lane responses and Housing Register applicants, for the proposed Local Lettings Policy for Ambrose and Mallory Courts. However, the low number of Love Lane responses means that this conclusion, in respect of Love Lane residents, should be treated with some caution.

5.18 Support for the proposed Local Lettings Policy from the Love Lane respondents, who are potential beneficiaries of the policy, is perhaps unsurprising. However, Housing Register applicants, who may otherwise have anticipated being able to bid for



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the 30 homes at Ambrose and Mallory Courts, might not have been expected to support the policy.

5.19 An analysis of the additional comments provided in some consultation responses has been conducted. Additional comments were provided on 289 responses from Housing Register applicants (40% of the total). No additional comments were added on the Love Lane responses. The results of this analysis, which summarises the points/themes and the number of times they were raised, is set out below:

	Category	Count	Percentage
A.	People in temporary accommodation should be prioritised for properties	5	1%
B.	People already on the Housing Register should be prioritised for properties	29	7%
C.	People with a disability should be prioritised/I have disability and should be prioritised	24	6%
D.	Agree with the Local Lettings Policy	41	9.5%
E.	Residents unhappy with their current housing situation/conditions	57	13%
F.	Residents who raised an existing health problem they/family member has	38	9%
G.	Disagree with Local Lettings Policy	41	9.5%
H.	Other	60	14%
I.	People who are working should be prioritised for properties	5	1%
J.	Residents want to be considered for a property/want a new home	102	23%
K.	Concern for older or younger people. Need to support prioritise them.	6	1%
L.	Need more affordable homes in the borough	14	3%
M.	Overcrowding is a current issue for residents/people in overcrowded accommodation should be prioritised	11	3%

5.20 Each respondent making additional comments, raised one or more of the points/themes set out in paragraph 5.19 above, but most raised no more than 3 points/themes.

5.21 The additional comments made by respondents, as grouped under the 13 points/themes A-M (set out in paragraph 5.19 above), have been considered and the responses to each point/theme are set out in Appendix 7. These responses consider



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the comments made and confirm how Housing Register applicants are prioritised under the main provisions of the Allocations Policy, how the needs of particular groups are met and how the Local Lettings Policy is being progressed to support regeneration, which will provide more affordable housing.

5.22 One response has been received from the 20 Housing Register applicants who requested and received translated/larger type consultation documents (see paragraph 5.12 above). This respondent answered the four consultation questions and provided additional comments, which are reflected in the tables at paragraphs 5.15 and 5.19 above.

6. COMMENTS OF THE ASSISTANT DIRECTOR OF FINANCE AND FINANCIAL IMPLICATIONS

6.1 The costs of developing this policy including consultation with residents have been contained within existing budgets. The proposal is expected to be broadly cost neutral, as its concerns the allocation of social rented homes and the total number of social rented homes available is not affected by this proposal. The wider Regeneration project is expected to bring financial benefits to the Council in supporting economic growth.

7. COMMENTS OF THE ASSISTANT DIRECTOR OF CORPORATE GOVERNANCE AND LEGAL IMPLICATIONS

7.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report.

7.2 Section 166A(3) of the Housing Act 1996, requires the Council when allocating housing accommodation to give reasonable preference to a range of specified groups such as the homeless, those with urgent medical need, those living in overcrowded, unsanitary or unsatisfactory housing etc. However, section 166A(6) of the Housing Act 1996 enables the Council to allocate accommodation to people of a particular description, whether or not they fall within these reasonable preference categories, provided that overall the Council is able to demonstrate compliance with s166A(3). This provides the statutory basis for Local Lettings Policies, which are summarised in paragraphs 5.1 – 5.3 above.

7.3 Although there is no statutory duty to do so, it is good practice and accords with the Council's Consultation Charter and Allocations Policy to consult with those affected by Local Lettings Policies.

7.4 In approving this Local Lettings Policy the Council must have due regard to its Public Sector Equality Duty under the Equality Act 2010. This requires the Council in exercising its functions to have regard to the need to eliminate discrimination, harassment, and victimisation; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not and foster good relations between persons who share a relevant protected characteristic and those



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who do not. The protected characteristics include age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation.

7.5 An Equality Impact Assessment has been undertaken in compliance with the Council's Public Sector Equality Duty and the Lead Member is required to take into account the Equalities Impact Assessment at Appendix 8 and the responses to the consultation exercises summarised at Appendices 5, 6 and 7 in coming to his decision.

8. EQUALITIES AND COMMUNITY COHESION COMMENTS

8.1 An Equality Impact Assessment has been produced in consultation with the policy and strategy team and the Council's legal team, which is attached as Appendix 8 to this report.

8.2 The Equality Impact Assessment considers:

- (a) whether there are any equalities implications in respect of protected groups, arising from the proposed re-housing of Love Lane Estate tenants, rather than Housing Register applicants, at 30 homes at Ambrose and Mallory Courts.

The analysis conducted compares the profiles of Housing Register applicants and High Road West residents, with comparative information available in respect of gender, disability and ethnicity only. This demonstrates that both the Housing Register and High Road West residents include similarly high proportions of disadvantaged groups and that re-housing Love Lane Estate residents under the proposed Local Lettings Policy, rather than Housing Register applicants, will not have a significant impact.

Whilst the impact for most groups is assessed as neutral, a positive impact is identified in respect of people with a disability, as the Local Lettings Policy gives a high priority to critical and serious medical cases, which will include people with disability/health needs. Also, the 30 homes at Ambrose and Mallory Courts are built to 'lifetime homes' standards, which means they can be adapted to meet the needs of people with a disability, and 7 (23%) are wheelchair accessible units.

- (b) Whether the consultation undertaken has been conducted in accordance with equalities guidance and whether the consultation responses raise any equalities concerns in respect of protected groups.

The analysis conducted compares the profile of consultation respondents from Love Lane with the wider High Road West population and, similarly, compares the profile of Housing Register respondents with all households on the Housing Register, where this information is available.



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This has shown that the consultation respondents from both Love Lane and the Housing Register broadly reflect the wider populations from which they are drawn.

The consultation responses are substantially in favour of the proposed Local Lettings Policy (although this conclusion should be treated with some caution in respect of Love Lane tenants, given the low number of responses). Only a small proportion of the additional comments provided relate to equalities issues, in respect of disability/health, older people and younger people, and mostly seek greater re-housing priority for the group the respondent belongs to.

It is recognised that the data available in respect of some groups is insufficient and this will be addressed in future Local Lettings Policy consultations.

9. HEAD OF PROCUREMENT COMMENTS

9.1 The Head of Procurement has confirmed that there are no procurement implications.

10. POLICY IMPLICATION

10.1 The proposed Local Lettings Policy for Ambrose and Mallory Courts has been developed and put forward for approval in accordance with the Allocations Policy requirements – set out in paragraph 5.3 (a) to (g) above – as follows:

- (a) It has been agreed jointly by the Council and Newlon Housing Association, based on nomination rights secured in a section 106 agreement
- (b) It will not discriminate directly or indirectly and implementation of the policy, if approved, will be subject to equalities monitoring.
- (c) The agreement between the Council and Newlon only relates to initial lettings at Ambrose and Mallory Courts and, therefore, is time limited.
- (d) It forms part of a strategy, approved by the Cabinet, to re-house Love Lane Estate residents, as one element of the High Road West Regeneration Scheme
- (e) A method of prioritising Love Lane Estate residents is contained in the Local Lettings Policy, outside the normal Choice Based Lettings criteria. Any homes not let to Love Lane residents will be allocated to Housing Register applicants via Choice Based Lettings.
- (f) It has been subject to consultation with the affected parties and is supported by an Equalities Impact Assessment.
- (g) It is being submitted for approval by the Cabinet Member for Housing and Regeneration, via this report.

11. REASONS FOR DECISION

11.1 The main reasons for the decisions recommended in paragraph 3.1 are:



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- (a) to consider the proposed Local Lettings Policy for Ambrose and Mallory Courts in accordance with the relevant provisions of the Council's approved Allocations Policy
- (b) to progress the re-housing of tenants in phase 1 of the Love Lane Estate regeneration programme
- (c) to help fulfil the Cabinet decisions taken on 16 December 2014, to progress the High Road West Regeneration Scheme and the community benefits it provides.

12. USE OF APPENDICES

- 12.1 Appendix 1 - Proposed Local Lettings Policy for Ambrose Court and Mallory Court
- Appendix 2 - Consultation Letter to Love Lane Estate residents
- Appendix 3 - Consultation Letter to Housing Register applicants
- Appendix 4 - Consultation Feedback Form
- Appendix 5 - Summary of Consultation Responses from Love Lane Estate residents
- Appendix 6 - Summary of Consultation Responses from Housing Register applicants
- Appendix 7 – Summary of Responses to Additional Comments made by Consultation Respondents
- Appendix 8 – Equality Impact Assessment

13. LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

13.1 Background papers:

- (a) Allocations Policy
- (b) Cabinet report and minute in respect of Allocations Policy – 14 October 2014
- (c) Cabinet report and minute in respect of High Road West Regeneration Scheme – 16 December 2014

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LOCAL LETTINGS POLICY FOR AMBROSE COURT AND MALLORY COURT, NORTH TOTTENHAM

1. Introduction

- 1.1 The purpose of a Local Lettings Policy is to ensure a balance between housing priority in accordance with legal duties and responsibilities and the longer term sustainability of the local community.
- 1.2 Section 166A(6)(b) of the Housing Act 1996 enables housing authorities to allocate properties to people of a particular description, whether or not they fall within the reasonable preference categories. This is done by the implementation of Local Lettings Policies.
- 1.3 It is important that, in most circumstances, priority for accommodation goes to those in greatest housing need. However, Local Lettings Policies may be used to achieve a wide variety of housing management and other policy objectives, including:
- Reducing the incidence of anti-social behaviour
 - Dealing with concentrations of deprivation
 - Improving difficult to let estates
 - Protecting existing stable communities
 - Preventing future problems occurring on newly developed estates or in relation to recently modernised properties.
 - Helping to create balanced communities and achieve wider community objectives, such as a broader social mix and supporting and encouraging people into employment.
 - Ensuring that the scheme allows the council and its partner organisations to make the best use of homes and in particular adapted properties
- 1.4 The council's Allocations Policy enables the council to implement Local Lettings Policies when required.

2. Background

- 2.1 The council has been working with the local community to develop a Masterplan and regeneration proposals for the High Road West area. The High Road West area spans 7 hectares and includes the council owned Love Lane housing Estate.
- 2.2 The Love Lane Estate has 297 properties, comprising of 219 council tenanted properties and 78 leasehold properties. Under the current Masterplan proposals, the Love Lane Estate will be demolished to make way for significant improvements to the area, including new housing, leisure and community facilities and improved access to White Hart Lane railway station. Following approval of the Masterplan and regeneration proposals for High Road West by the Council's Cabinet in December 2014, the council will need to rehouse all of its secure tenants on the Love Lane Estate.
- 2.3 During its consultation with residents, they have sought assurances in relation to what the council will offer them in the event that their homes are demolished.
- 2.4 Where it proves practicable and possible to do so, the council will endeavour to meet the aspirations of local residents. For secure council tenants on the Love Lane Estate, this will include:
- Being offered a new home in the redevelopment area;
 - Continuing to pay an affordable social rent;
 - Being offered a new home to meet their housing need;
 - Ability to move to a council tenancy elsewhere in the Borough if they wish;
 - Ability to move to homes owned by Registered Providers in the Borough;
 - Home Loss compensation, disturbance payment and the cost of removals.
- 2.5 Directly north of the Masterplan area sits Ambrose Court, Cannon Road, N17 8EU and Mallory Court, Cannon Road, N17 8ET. Newlon Housing Trust is currently developing the site and will deliver 222 new homes, a new primary school and some small commercial space. The first new homes are scheduled for completion in March 2015.
- 2.6 Within the s106 Agreement for this site, the council secured nomination rights to a number of properties at Ambrose Court and Mallory Court. This included:

- 16 x 1 bed/2 person units
- 4 x 2 bed/3 person units
- 5 x 2 bed/4 person units
- 4 x 3 bed/5 person units
- 1 x 4 bed/6 person units

- 2.7 The council has also negotiated fixed rent levels and fixed rent increases for these properties. This is available on first let only.
- 2.8 The purpose in securing these properties is to have the opportunity to offer secure council tenants on the Love Lane Estate the opportunity of an early move, following approval of the Masterplan and regeneration proposals for High Road West by the Council’s Cabinet in December 2014..

3. Purpose of this Local Lettings Policy

- 3.1 The purpose of this Local Lettings Policy is to set out how the council will allocate the properties it has secured at Ambrose Court and Mallory Court. These properties will be built, owned and managed by Newlon Housing Trust.
- 3.2 Following approval of the regeneration proposals for the Love Lane Estate by the Council’s Cabinet, this Local Lettings Policy will prioritise secure council tenants living on the Love Lane Estate for the properties at Ambrose Court and Mallory Court, and will set out how the individual households on the estate will be prioritised.
- 3.3 Should the properties secured by the council at Ambrose Court and Mallory Court not all be allocated to secure council tenants living on the Love Lane Estate, the properties will be allocated in line with the council’s Allocation Policy.

4. How this Local Lettings Policy will operate

- 4.1 Homes will not be advertised through the Home Connections website, they will instead be allocated directly to secure council tenants on the Love Lane Estate who express an interest in moving to Ambrose Court and Mallory Court.
- 4.2 All secure council tenants who express an interest will have their housing need assessed. Only households whose housing need and bedroom requirement match the properties available at Ambrose Court and Mallory Court will be eligible for these properties.
- 4.3 For the purposes of this policy secure council tenants living on the Love Lane Estate who express an interest in moving to Ambrose Court and Mallory Court, will be prioritised in the following manner:
- **The ‘Phase’ of the regeneration in which their home is situated** (Applicants in Phase 1 will have priority over applicants in Phase 2);
 - **Any identified ‘critical’ medical or welfare need** that is confirmed by the council, using the assessment criteria in Haringey’s Housing Allocations Policy.
 - **Any identified ‘serious’ medical or welfare need** that is confirmed by the council, using the assessment criteria in Haringey’s Housing Allocations Policy;
 - **Severe overcrowding** (at least 2 bedrooms short, compared to the bedroom standard in the Housing Allocations Policy) if confirmed by the council.
 - **Overcrowding** (at least 1 bedroom short, compared to the bedroom standard in the Housing Allocations Policy) if confirmed by the council.
- 4.4 Where the number of interested applicants still exceeds the number of suitably sized homes available, applicants should then be prioritised on the basis of the length of time that they have been living (as a secure council tenant) on the Love Lane Estate.

5. Monitoring and Review

5.1 As this Local Lettings Policy is time limited to ensure the effective letting of the properties at Ambrose Court and Mallory Court, it will be monitored on a monthly basis by way of a report to the council’s Housing Renewal Executive Board.

SIGNATURE.....

NAME.....

DATE.....

Dear Resident,

During the past three years, hundreds of you have responded to consultation, got involved in workshops and met with our planning and design experts, Arup, to help with exciting proposals for the High Road West area.

Since we presented three masterplan options to you last year, the council has worked alongside the Love Lane Residents' Association and your independent tenant and leaseholder advisor, using your feedback to develop final proposals for your area with Arup.

Please find enclosed a consultation pack asking your views on the final proposal of the masterplan for High Road West. The pack includes improvements to White Hart Lane Station, in partnership with Transport of London and the Greater London Authority.

Developing a masterplan is the best way to ensure we can bring the changes you have told us you want to the area, including more high-quality housing, better jobs and employment opportunities, tackling crime and anti-social behaviour, and improving community and leisure facilities.

The final masterplan contains big and important changes to bring improvements to the High Road West area. We want to hear your views before any final decisions are made, so it's really important you read through your pack and respond to the consultation.

For secure council tenants living on the Love Lane Estate, this consultation also forms the Section 105 Consultation – a statutory process needed when significant changes to homes are made. We will also be consulting with everyone who lives in or owns a property on the Love Lane Estate, as well as residents and business owners in the local and wider area.

If the proposals are approved, they will directly impact the following properties on the Love Lane Estate: Charles House, Ermine Road, Moselle House, 2-32 Whitehall Street, 3 - 89 Whitehall Street, 4-18 Brereton Road, 2-28 Orchard Place, 9-39 White Hart Lane and Kathleen Ferrier Court.

We recognise this will mean significant disruption in the short term. We aim to minimise this and ensure that all residents benefit from the long-term proposals. If proposals are approved, the council will ensure secure council tenants will be offered new homes in the regeneration area at continued social rent. Resident leaseholders will receive full market value, compensation and the opportunity to purchase a new home in the redeveloped area. Private tenants will receive advice on re-housing options. Your pack will provide all the information you'll need including:

- Summary of the masterplan and regeneration proposals
- Secure tenant information guide
- Leaseholder information guide
- Private tenant information guide
- Information on new homes being built on the Old Cannon Rubber site
- Feedback form
- Freepost reply envelope

An Equalities Impact Assessment on the High Road West Masterplan has also been produced and this can be viewed online at www.haringey.gov.uk/highroadwest or can be sent to you at your request. If you would like a copy of the Equalities Impact Assessment please contact Sarah Lovell, Area Regeneration Manager on 020 8489 2025 or email sarah.lovell@haringey.gov.uk

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Within your information pack you will also find information on the new homes being built on the old Cannon Rubber Factory site- Ambrose Court, Cannon Road, N17 8EU and Mallory Court, Cannon Road N17 8ET. The information includes a draft Local Lettings Policy for the new homes which will be available at Ambrose Court and Mallory Court. The draft Local Lettings Policy sets out how we propose to offer properties to secure council tenants on the Love Lane Estate and how tenants will be prioritised. This policy would only be agreed if the High Road West masterplan is agreed. Ahead of any decisions being made, we would welcome your views on this draft policy and a short feedback form is included within the information pack.

Have your say

It's vital you have your say on the masterplan and regeneration proposals. There are lots of ways you can get involved between 13 September and 25 October 2014. Have your say by:

- Reading your consultation pack and completing and returning your feedback form using the freepost envelope
- Visiting the exhibition to view proposals, speak to council officers and give feedback at the Grange Community Hub, 32-34a White Hart Lane, N17 8DP
- Visiting Coombes Croft Library to view proposals and give feedback
- Visiting www.haringey.gov.uk/highroadwest to view proposals and complete an online feedback form
- Writing a letter to Sarah Lovell, Area Regeneration Manager, 7th Floor, River Park House, Wood Green, N22 8HQ
- Emailing feedback to sarah.lovell@haringey.gov.uk

Yours sincerely



Lyn Garner
Director of Regeneration, Planning and Development



Haringey Council

Name and address

Our Ref: Ambrose Court and Mallory Court Local Lettings Policy

Date: 9 December 2014

Direct Dial: 020 8489 5678 or 1000

Email: housing.strategy@haringey.gov.uk

Dear Sir/Madam,

CONSULTATION – ALLOCATION OF SOCIAL HOUSING AT AMBROSE COURT AND MALLORY COURT, CANNON ROAD, N17

We are seeking your views on a proposal to change the way that new social rented homes built as part of the planned development at High Road West in Tottenham are allocated.

You are receiving this letter because you are on Haringey's Housing Register. If the proposal as set out below comes into force it may affect your access to housing.

We ask you to please consider this issue carefully before responding via the enclosed feedback form.

Proposal to implement a Local Lettings Policy for new social rented homes at Ambrose Court and Mallory Court

Haringey Council has been working closely with residents in north Tottenham for more than two years to develop proposals for new high-quality homes, community and leisure facilities and space for new businesses at High Road West - an 11 hectare site west of Tottenham High Road around White Hart Lane Station. The current proposal includes providing over 1,200 new homes, new community and leisure facilities as well as new business and job opportunities.

If this development goes ahead, the current homes on the Love Lane estate would be demolished. All of the 219 secure council tenants living on the estate will be offered a new, modern home at a social rent in the High Road West area.

The High Road West masterplan – a technical document that shows potential street layouts and where key buildings could be – will be considered by the council's Cabinet on Tuesday, 16th December 2014.

In spring 2015, new social rented homes at nearby Ambrose Court, Cannon Road, N17 8EU and Mallory Court, Cannon Road, N17 8ET will be ready. These include:

- 16 x 1 bed/2 person units
- 4 x 2 bed/3 person units
- 5 x 2 bed/4 person units
- 4 x 3 bed/5 person units
- 1 x 4 bed/6 person units

If the High Road West Regeneration proposals are agreed, we propose implementing a Local Lettings Policy for these homes that will prioritise secure council tenants on the Love Lane estate over other applicants on the Housing Register.

As the homes available in this first phase of construction is less than the total number of Love Lane council tenants **we are proposing to prioritise Love Lane applicants using the following criteria:**

- **The phase of the regeneration in which their home is situated** (Applicants in Phase 1 of the High Road West Master Plan will have priority over applicants in Phase 2 etc)
- **Applicants with any identified 'critical' medical or welfare need** that is confirmed by the council, using the assessment criteria in Haringey's Housing Allocations Policy.
- **Applicants with any identified 'serious' medical or welfare need** that is confirmed by the council, using the assessment criteria in Haringey's Housing Allocations Policy;
- **Applicants affected by severe overcrowding** (at least 2 bedrooms short, compared to the bedroom standard in Haringey's Housing Allocations Policy) if confirmed by the council.
- **Applicants affected by overcrowding** (at least 1 bedroom short, compared to the bedroom standard in Haringey's Housing Allocations Policy) if confirmed by the council.
- Where the number of interested applicants still exceeds the number of suitably-sized homes, applicants will be prioritised on the length of time they have been living (as a secure council tenant) on the Love Lane estate.

If any homes are left available after being offered to Love Lane estate tenants they will be let to other applicants on the Housing Register through the Home Connections system.

Your views on these proposals are very important to us. Please respond to this consultation by completing the feedback form enclosed, or by filling in the online feedback form at: www.haringey.gov.uk/llp

You can send the paper feedback form to the council in the freepost envelope also enclosed - there is no need for a stamp.

If you would like to talk to someone about this consultation, you can phone 020 8489 5678. If you want to talk to someone about your housing application, please phone 020 8489 1000.

This consultation ends on Sunday 11 January 2015.

Yours faithfully,



Perry Singh
Head of Housing Needs & Lettings

FEEDBACK FORM

CONSULTATION – ALLOCATION OF SOCIAL HOUSING AT AMBROSE COURT AND MALLORY COURT

Your views are important to us. You can give your views on this draft Local Lettings Policy, which prioritises secure council tenants living on the Love Lane Estate whose homes will be demolished if the High Road West Masterplan is agreed, for the new homes at Ambrose and Mallory Court by completing this Feedback Form. You can also give your views by writing to housing.strategy@haringey.gov.uk.

We would also like to know if you consider that any aspect of the policy would have any particular impact upon you as a result of your age, disability (if any), marital/civil partnership status, race, gender, sexual orientation, religion or beliefs, or as a result of you being pregnant, or being on maternity, or having undergone gender re-assignment then we would encourage you to explain this to us to help inform the development of the Equalities Impact Assessment.

Other comments

1. Is the proposal for letting the social housing units at Ambrose and Mallory Court clear?
Yes No
2. Do you agree with the proposal to prioritise the tenants of the Love Lane Estate, for the units available at Ambrose and Mallory Court?
Yes No
3. Do you agree with the method we are proposing to prioritise Love Lane tenants who wish to move to Ambrose and Mallory Court?
Yes No
4. Units that remain un-let after the tenants of Love Lane have had the option to move will be advertised on Home Connections. Do you agree that this is the correct approach?
Yes No

YOUR INFORMATION

Name: (not compulsory)

Address: (not compulsory)

Age Prefer not to say

Do you consider yourself to have a disability?

Yes No Prefer not to say

Sex

Female Male Prefer not to say

Ethnicity – please tick the box that best describes your ethnic group:

White

British Irish

White other

Greek/Greek Cypriot Turkish
 Turkish/Cypriot Kurdish
 Gypsy/Roma Irish Traveller
 Other (please specify):

Black or Black British

Caribbean African
 Other (please specify):

Asian or Asian British

Indian Pakistani
 East African Asian Bangladeshi
 Other (please specify):

Chinese or Other Ethnic Group

Chinese Any other ethnic background (please specify):

Mixed

White & Black African White & Asian
 White & Black Caribbean Other (please specify):

Prefer not to say

DATA PROTECTION

We will not process information for any purpose other than that for which it was collected and we will not pass it on to third parties other than those delivering services on our behalf (without permission).

Please return your completed feedback form in the freepost envelope enclosed by Sunday 11 January 2015. Alternatively, please respond to this consultation by completing this feedback form online at www.haringey.gov.uk/llp.

Appendix 5 - Ambrose and Mallory Courts LLP - Feedback from Love Lane Tenants - as at 12 January 2015

Question	Yes	No	Total
Question 1: Is the proposal for letting the social housing units at Ambrose and Mallory Courts clear?	9	3	12
Question 2: Do you agree with the proposal to prioritise the tenants of the Love Lane Estate, for the units available at Ambrose and Mallory Courts?	9	3	12
Question 3: Do you agree with the method we are proposing to prioritise Love Lane tenants who wish to move to Ambrose and Mallory Courts?	9	3	12
Question 4: Units that remain un-let after the tenants of Love Lane have had the option to move will be advertised on Home Connections. Do you agree that this is the correct approach?	10	2	12

Age	
18-24	0
25-39	1
40-64	5
65-80	0
80+	2
Prefer not to say	1
Blanks	3
Total	12

Disability	
Yes	5
No	5
Prefer not to say	2
Blanks	0
Total	12

Sex	
Male	5
Female	7
Prefer not to say	0
Blanks	0
Total	12

Appendix 5 - Ambrose and Mallory Courts LLP - Feedback from Love Lane Tenants - as at 12 January 2015

Ethnicity	
Asian or Asian British - Bangladeshi	1
Asian or Asian British - Indian	1
Black or Black British - African	7
Black or Black British - Caribbean	1
Mixed Other	1
White Other - Other - Specify	1
Total	12

Appendix 6 - Ambrose and Mallory Courts LLP - Feedback from Housing Register applicants – as at 27 January 2015

NB: Includes feedback from the 1 applicant who responded out of the 20 applicants who requested and received translated or larger type consultation documents. Their closing date was 25/1/15. Total number of respondents: 725

Question	Yes	No	Total	Yes %	No %
Question 1: Is the proposal for letting the social housing units at Ambrose and Mallory Courts clear?	650	62	712	91%	9%
Question 2: Do you agree with the proposal to prioritise the tenants of the Love Lane Estate, for the units available at Ambrose and Mallory Courts?	594	116	710	84%	16%
Question 3: Do you agree with the method we are proposing to prioritise Love Lane tenants who wish to move to Ambrose and Mallory Courts?	591	119	710	83%	17%
Question 4: Units that remain un-let after the tenants of Love Lane have had the option to move will be advertised on Home Connections. Do you agree that this is the correct approach?	610	95	705	87%	13%

Information about respondents

Age	
18-24	27
25-39	222
40-64	334
65-80	30
80+	1
Prefer not to say	45
Blanks	66
Total	725

Disability	
Yes	130
No	489
Prefer not to say	59

Blanks	47
Total	725

Sex	
Male	269
Female	418
Prefer not to say	9
Blanks	29
Total	725

Ethnicity	
Asian or Asian British - Bangladeshi	9
Asian or Asian British - East African Asian	4
Asian or Asian British - Indian	6
Asian or Asian British - Other - Specify	12
Asian or Asian British - Pakistani	3
Black or Black British - African	205
Black or Black British - Caribbean	57
Black or Black British - Other	1
Black or Black British - Other - Specify	24
Chinese	9
Mixed - Other - Specify	6
Mixed - White & African	7
Mixed - White & Asian	1
Mixed - White & Caribbean	4
White British	87
White Irish	1
White Other - Greek/Greek Cypriot	11
White Other - Gypsy/Roma	1
White Other - Kurdish	25
White Other - Other - Specify	116
White Other - Turkish	44
White Other - Turkish/Cypriot	19
Other Ethnic Group - Specify	18
Prefer not to say	14
Blanks	41
Grand Total	725

Breakdown of White Other - Other	190
EEU countries	123
South American countries	15
Arab and African countries	26
Other	26

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Appendix 7 – Summary of Responses to Additional Comments made by Respondents to the Consultation in respect of the Ambrose and Mallory Court Local Lettings Policy

The additional comments made by respondents, as grouped under 13 points/themes A-M, have been considered and the responses to each point/theme are as follows:

A - People in temporary accommodation should be prioritised for properties

If Housing Register applicants, including those in temporary accommodation, were prioritised for the 30 homes at Ambrose and Mallory Courts, this would be contrary to the proposed Local Lettings Policy which has received support from a substantial majority of Housing Register applicants.

If the proposed Local Lettings Policy was not adopted, this would undermine the policy objective of regenerating the Love Lane Estate.

Under the proposed Local Lettings Policy, Housing Register applicants, including those in temporary accommodation, will be able to bid for properties at Ambrose and Mallory Courts not taken up by Love Lane tenants.

Homeless households in temporary accommodation are awarded priority under the main provisions of the Council's Allocations Policy.

The delays in providing permanent accommodation for Housing Register applicants, including those in temporary accommodation, are a consequence of the acute shortage of affordable housing in the borough, which the High Road West Regeneration Scheme is seeking to address through plans to provide 1,200 new homes, a significant proportion of which will be affordable.

The reason for prioritising Love Lane tenants under the proposed Local Lettings Policy is to enable the regeneration to proceed, including the provision of additional homes.

B - People already on the Housing Register should be prioritised for properties

A number of these comments refer to applicants waiting on the Housing Register for long periods, some for 10 years or more.

The main provisions of the Council's Allocations Policy prioritises Housing Register applicants in bands from an effective date and households who bid for accommodation under Choice Based Lettings are normally allocated properties on the basis of which bidder is in the highest band, with the earliest effective date.

The proposed Local Lettings Policy is being put forward to deal with particular circumstances and the priority awarded to Housing Register applicants in respect of other lettings is unaffected.

The 30 lettings at Ambrose and Mallory Courts only represent about 3% of the total lettings the Council allocates annually to vacancies in its stock and through its nominations to housing association vacancies. Over the 5 year period 2009/14, the Council allocated, on average, 977 homes per annum to households on the Housing Register.

The Housing Register has included 5 bands (A-E), with A being the highest band, but at its meeting on 14 October 2014, the Cabinet decided to remove households in bands D and E from the Housing Register as they have no realistic prospect of re-housing.

The responses under item A above are also relevant.

C - People with a disability should be prioritised/I have disability and should be prioritised

Many of these comments refer to difficult personal circumstances related to disability.

The proposed Local Lettings Policy prioritises Love Lane tenants and then, within this group, gives high priority to critical and serious medical cases, which will include residents with disability/health needs.

The 30 units at Ambrose and Mallory Courts are all built to 'lifetime homes' standard, which can be adapted to meet the needs of disabled households, and 7 (23%) are wheelchair accessible units.

Housing Register applicants with medical needs, including disability, affected by their housing conditions are awarded priority under the main provisions of the Council's Allocations Policy.

D - Agree with the Local Lettings Policy

These are brief comments supportive of the proposed Local Lettings Policy.

E - Residents unhappy with their current housing situation/conditions

These comments report difficult housing situations faced by applicants and a number include requests for re-housing. The responses under items A and B above are relevant.

F - Residents who raised an existing health problem they/family member has

These comments report a range of health problems faced by applicants and a number include requests for re-housing. The response under item C above is relevant.

G - Disagree with the proposed Local Lettings Policy

These are mostly brief comments which disagree with the proposed policy, with some indicating that Love Lane tenants should not be given additional preference over Housing Register applicants. The responses under items A, B and C above are relevant.

H – Other

These include a variety of comments on wider policies, other parts of the borough, other tenures and points of clarification

I - People who are working should be prioritised for properties

The Council's Allocations Policy does not include a priority category for those who are working, however, it does provide for Local Lettings Policies which can be used to help create balanced communities and achieve wider community objectives, such as a broader social mix and supporting and encouraging people into employment. The Local Lettings Policy for Ambrose and Mallory Courts does not include such a priority category.

J - Residents want to be considered for a property/want a new home

These comments relate to specific requests for re-housing and 22 indicate interest in being accommodated at Ambrose and Mallory Courts

K - Concern for older or younger people. Need to support prioritise them.

These comments reflect the concerns of Housing Register applicants whose households comprise/ include older or younger people.

Under its Allocations Policy, the Council accommodates older and younger people living independently or as part of larger households. The Council makes specific provision for older people, for example, in sheltered housing and young people, including care leavers.

The responses under items A, B and C above are relevant.

L - Need more affordable homes in the borough

These comments call for more affordable housing.

This is an important priority for the Council as reflected in planning policy and the housing strategy.

The High Road West Regeneration Scheme, which the proposed Local Lettings Plan is seeking to support, aims to provide additional affordable housing.

M - Overcrowding is a current issue for residents/people in overcrowded accommodation should be prioritised

These comments refer to the overcrowding being experienced by applicants and a number include requests for re-housing.

The Local Lettings Policy prioritises Love Lane tenants and then, within this group, gives priority to those affected by overcrowding.

The Council's Allocations Policy awards priority to households lacking bedrooms and sharing facilities.



Haringey Council

Equality Impact Assessment (EqIA) Name of Project

Local Lettings Policy for Ambrose Court and Mallory Court, Cannon Road, N17

**Cabinet meeting date
If applicable**

Cabinet Member Signing on 5 February 2015

Service area responsible

Chief Operating Officer

Name of completing officer

Perry Singh

Date EqIA created

20 January 2015

Approved by Director / Assistant Director

Date of approval

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

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations

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

Haringey Council also has a 'Specific Duty' to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Stage 1 – Names of those involved in preparing the EqIA		
1. Project Lead	Perry Singh	5.
2. Equalities / HR	Zakir Chaudhry	6.
3. Legal Advisor (where necessary)	Michelle Williams	7.
4. Trade union		8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups

- 2.1 This document assesses a Local Lettings Policy being proposed for the Council's allocations to 30 new homes being constructed by Newlon Housing Association at Ambrose Court and Mallory Court, Cannon Road, N17. The proposed Local Lettings Policy gives priority to Love Lane Estate residents whose homes will be demolished following approval by the Cabinet of the High Road West Masterplan Framework. The new homes at Ambrose Court and Mallory Court are scheduled for completion at the end of March 2015, when they will be ready for letting.
- 2.2 The potential equalities implications arising from the proposed Local Lettings Policy include:
- (a) Whether there are any equalities implications in respect of protected groups, arising from the proposed re-housing of Love Lane Estate tenants, rather than Housing Register applicants, at 30 homes at Ambrose and Mallory Courts.
 - (b) Whether the consultation undertaken has been conducted in accordance with equalities guidance and whether the consultation responses raise any equalities concerns in respect of protected groups.

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment
 Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?
Not applicable	

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment
 This section to be completed where there is a change to the service provided

Data Source (include link where published)	What does this data include?
Approved EqIA:Service Delivery in respect of Proposed Changes to the Allocations Scheme (dated September 2014) submitted to the Cabinet on 14 October 2014, in particular pages 5 – 14.	Gender, ethnicity, religion, sexuality and vulnerability/disability information in respect of Housing Register applicants and their priority banding for the allocation of accommodation by the Council.
Approved EqIA for the High Road West Masterplan Framework (dated December 2014) submitted to the Cabinet on 16 December 2014, in particular pages 7 to 13.	Age, gender, ethnicity, language, religion/belief. and health/disability information in respect of the relevant High Road West ‘census output areas’ (which closely accord with the Love Lane Estate and provide the the lowest scale data available) and which form part of the Northumberland Park ward (as shown on map included on page 7).

**Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:
Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	Details	None – why?
Sex				Table 1 below indicates that households on the Housing Register include a disproportionately high number of females. This is due in part to the Housing Register data only reporting on the head of household, whereas the High Road West records all residents.
Gender Reassignment				Impact unknown due to insufficient data.
Age				Whilst there is data

				available in respect age for of High Road West residents it is not available for Housing Register applicants. Therefore, impact unknown due to insufficient data.
Disability	<p>The information in Table 2 below is incomplete but suggests that a similarly high level of disability/poor health/vulnerability is present in both Housing Register applicants and High Road West residents. The Local Lettings Policy gives a high priority to critical and serious medical cases, which will include residents with disability/health needs. The 30 units at Ambrose and Mallory Courts all meet 'lifetime homes' standard, which can be adapted to meet needs of people with a disability, and include 7 wheelchair accessible units (23%</p>			

	of total).			
Race & Ethnicity				Pre-existing positive impact from re-housing BME groups on Housing Register, broadly unaffected by proposed re-housing of High Road West residents with broadly similar race and ethnicity profile – see table 1 and notes below.
Sexual Orientation				Impact unknown due to insufficient data.
Religion or Belief (or No Belief)				Impact unknown due to insufficient data.
Pregnancy & Maternity				Impact unknown due to insufficient data.
Marriage and Civil Partnership				Impact unknown due to insufficient data.

Table 1 - Gender of Housing Register applicants as compared to High Road West residents

	<u>HOUSING REGISTER</u>	<u>HIGH ROAD WEST AREA</u>
<u>Male</u>	35%	670 (53%)
<u>Female</u>	65%	606 (47%)

Table 2 - Disability Status of Housing Register applicants as compared to High Road West residents

	<u>HOUSING REGISTER</u>	<u>HIGH ROAD WEST AREA</u>
<u>Disabled</u>	17% of households in band A of Housing Register are disabled, together with a further 15% deemed to be vulnerable.	16.7% of people in Northumberland Park ward suffer from long term limiting illness and 7.2% describe their health as bad or very bad.
<u>Not Disabled</u>	unclear	unclear

Table 3 - Ethnicity of Housing Register applicants as compared to High Road West residents and 2011 census

	<u>HOUSING REGISTER</u>	<u>HIGH ROAD WEST AREA</u>	<u>CENSUS 2011</u>
<u>Asian</u>	7.2%	9%	9.5%
<u>Black</u>	40.8%	44%	18.8%
<u>Mixed</u>	2.8%	7%	6.5%
<u>Other</u>	10.2%	5%	4.7%
<u>White</u>	35.9%	35%	60.5%
<u>Not known/Refused</u>	3.1%	0%	0%

Notes on Table 3

Table 3 above shows that both Housing Register applicants and High Road West residents include approximately 65% BME households and 35% white households, as compared to 40% BME households and 60% white households across Haringey as at 2011 Census. Therefore, on this basis, the impact of re-housing High Road West residents in the 30 units at Ambrose and Mallory Courts, rather than Housing Register applicants, is broadly neutral. The re-housing of both groups disproportionately benefits BME households (compared to the wider Haringey population), who are often over represented amongst those in housing need and/or living in disadvantaged areas. Within the overall BME category, the High Road West residents include a higher proportion black and mixed households, whereas the Housing Register includes more 'other' households.

N.B. The Housing Register statistics presented in Table 3 above, relate to all applicants on the Housing Register. Currently, Housing Register applicants are prioritised into 5 bands (A,B,C,D and E) with band A being the highest priority band. The equivalent race and ethnicity data for bands A – C (the only bands with a realistic prospect of re-housing) are – Asian (7%), Black (45%), Mixed (2%), Other (7%), White (35%) and Not known/Refused (3%). These proportions have even greater similarity to the equivalent High Road West figures.

Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups:

Positive and negative impacts identified will need to form part of your action plan.				
	Positive	Negative	Details	None – why?
Sex				Not applicable
Gender Reassignment				Not applicable
Age				Not applicable
Disability				Not applicable
Race & Ethnicity				Not applicable
Sexual Orientation				Not applicable
Religion or Belief (or No Belief)				Not applicable
Pregnancy & Maternity				Not applicable
Marriage and Civil Partnership				Not applicable

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
<p>The analysis conducted in stage 5a above, compares the profiles of Housing Register applicants and High Road West residents, with comparative information available in respect of gender, disability and ethnicity only. This demonstrates that both the Housing Register and High Road West residents include similarly high proportions of disadvantaged groups and that re-housing Love Lane Estate residents under the proposed Local Lettings Policy, rather than Housing Register applicants, will not have a significant impact.</p> <p>Whilst the impact for most groups is assessed as neutral, a positive impact is identified in respect of people with a disability, as the Local Lettings Policy gives a high priority to critical and serious medical cases, which will include people with disability/health needs. Also, the 30 homes at Ambrose and Mallory Courts are built to 'lifetime homes' standards, which means they can be adapted to meet the needs of people with a disability, and 7 (23%) are wheelchair accessible units.</p>	

Stage 7 - Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?

Consultation

- 7.1 The consultation in respect of the Local Lettings Policy for Ambrose and Mallory Courts has been conducted with:
- (a) the Love Lane Estate residents (as part of the section 105 consultation on the High Road West Regeneration proposals) and
 - (b) all households on the Housing Register.
- 7.2 The consultation letters sent to both Love Lane Estate residents and Housing Register applicants included similar information and were accompanied by a copy of the proposed Local Lettings Plan for Ambrose and Mallory Courts, a Feedback Card/Form, a freepost return envelope and a form in six languages for households to request translated, audio, disk, Braille or larger type versions of the consultation documents. The Feedback Card/Form requested responses to 4 consultation questions, provided space for additional comments and requested information on the respondent's age, disability, gender and ethnicity.
- 7.3 The consultation documents were sent to all 297 properties on the Love Lane Estate. The Local Lettings Policy formed part of the wider consultation on the High Road West Masterplan proposals. This consultation took place between 13th September 2014 and 25th October 2014.
- 7.4 The Housing Register consultation letter was sent to over 9,300 households on the Register, with a closing date of 11 January 2015. The Housing Register consultation deadline was extended until 25 January 2015, for the 20 households who requested and received translated or larger type consultation documents.
- 7.5 There were 12 consultation responses from Love Lane Estate. All these responses were sent by post. There were 725 responses from Housing Register applicants. Of these responses, 18 were submitted online and 707 by post.
- 7.6 The 12 Love Lane Estate responses represents a 4% response rate. The 725 Housing Register responses represent a response rate of 7%.

7.7 An analysis has been conducted to assess the degree to which the equalities profile of the respondents reflects the equalities profiles of the wider groups from which they are drawn i.e. Love Lane Estate residents and Housing Register applicants. The results of this analysis are set out below:

(a) Love Lane Respondents

	Proportion of Love Lane consultation respondents by group		Proportion of Love Lane residents by group	
Gender:	Male	5 (42%)	Male	670 (53%)
	Female	7 (58%)	Female	606 (47%)
	Prefer not to say	0	Prefer not to say	
	Blanks	0	Blanks	
Age	18-24	0	20 – 24 *	11%
	25-39	1 (13%)	25-39	37%
	40-64	5 (62%)	40-64	42%
	65-80	0	65-80	8%
	80+	2 (25%)	80+	2%
	Prefer not to say	1	Prefer not to say	
	Blanks	3	Blanks	
Disability	Yes	5 (50%)	Yes	16.7% **
	No	5 (50%)	No	
	Prefer not to say	2	Prefer not to say	
	Blanks	0	Blanks	
Ethnicity	Asian	2 (17%)	Asian	9%
	Black	8 (67%)	Black	44%
	Mixed	1 (8%)	Mixed	7%
	Other	0	Other	5%
	White	1 (8%)	White	35%
	Prefer not to say	0	Prefer not to say	
	Blanks	0	Blanks	

Notes

*Note different to age banding used for consultation responses.

**16.7% of people in Northumberland Park ward suffer from long term limiting illness and 7.2% describe their health as bad or very bad.

(b) Housing Register Respondents

	Proportion of Housing Register consultation respondents by group		Proportion of Housing Register applicants by group	
Gender:	Male	269 (39%)	Male	35%
	Female	417 (61%)	Female	65%
	Prefer not to say	9	Prefer not to say	
	Blanks	29	Blanks	
Age	18-24	27 (4%)	18-24	not available
	25-39	222 (36%)	25-39	"
	40-64	334 (54%)	40-64	"
	65-80	30 (5%)	65-80	"
	80+	1 (1%)	80+	"
	Prefer not to say	44	Prefer not to say	
Disability	Yes	130 (21%)	Yes	17%*
	No	488 (79%)	No	
	Prefer not to say	59	Prefer not to say	
	Blanks	47	Blanks	
Ethnicity	Asian	43 (6%)	Asian	7%
	Black	286 (43%)	Black	41%
	Mixed	18 (3%)	Mixed	3%
	Other	18 (3%)	Other	10%
	White	304 (45%)	White	36%
	Prefer not to say	14	Prefer not to say	
	Blanks	41	Blanks	

Note

*17% of households in band A of Housing Register are disabled, together with a further 15% deemed to be vulnerable.

7.8 The Feedback Form asked both sets of consultees, the same set of 4 questions, with the following summarised results:

Consultation Questions	Love Lane Estate responses	Housing Register responses
1. Is the proposal for letting the social housing units at Ambrose and Mallory Courts clear?	Yes 9 (75%) No 3 (25%)	Yes 650 (91%) No 62 (9%)
2. Do you agree with the proposal to prioritise the tenants of the Love Lane Estate, for the units available at Ambrose and Mallory Courts?	Yes 9 (75%) No 3 (25%)	Yes 594 (84%) No 116 (16%)
3. Do you agree with the method we are proposing to prioritise Love Lane tenants who wish to move to Ambrose and Mallory Courts?	Yes 9 (75%) No 3 (25%)	Yes 591 (83%) No 119 (17%)
4. Units which remain un-let after the tenants of Love Lane have had the option to move will be advertised on Home Connections. Do you agree that this is the correct approach?	Yes 10 (83%) No 2 (17%)	Yes 610 (87%) No 95(13%)

7.9 The consultation responses summarised above should be treated with some caution in respect of Love Lane Estate responses, given the low number of responses received. In summary, the responses received indicate that::

- (1) A significant majority (75%) of the Love Lane responses received and a very substantial majority (91%) of Housing Register respondents found the proposal to be clear.
- (2) A significant majority (75%) of Love Lane responses received and a substantial majority (84%) of Housing Register respondents agreed with the proposal to prioritise Love Lane tenants for the units available.
- (3) A significant majority (75%) of Love Lane responses received and a substantial majority (83%) of Housing Register respondents agreed with the method being proposed within the Local Lettings Policy to prioritise between the Love Lane tenants wishing to move to Ambrose and Mallory Courts.
- (4) A substantial majority (83%) of Love Lane responses received and a very substantial majority (87%) of Housing Register respondents agreed that units which remain un-let after the tenants of Love Lane have had the option to move, should be advertised on Home Connections.

7.10 These consultation results demonstrate a high or very high level of support, from both Love Lane residents and Housing Register applicants, for the proposed Local Lettings Policy for Ambrose and Mallory Courts. However, the low numbers of Love Lane responses means that this conclusion, in respect of Love Lane residents, should be treated with some caution.

7.11 An analysis of the additional comments provided in some consultation responses has been conducted. Additional comments were provided on 289 responses from Housing Register applicants (40% of the total). No additional comments were added on the Love Lane responses.

7.12 The main identifiable issues raised relevant to equalities, were that:

- (a) people with a disability should be prioritised (6% of issues raised)
- (b) the respondent raised an existing health problem in their household (9% of issues raised)
- (c) concern for older or younger people and that they need to be supported/prioritised (1% of issues raised).

Stage 8 - Final impact analysis

This document assesses the potential equalities implications arising from the proposed Local Lettings Policy including:

- (a) Whether there are any equalities implications in respect of protected groups, arising from the proposed re-housing of Love Lane Estate tenants, rather than Housing Register applicants, at 30 homes at Ambrose and Mallory Courts.

The analysis conducted above compares the profiles of Housing Register applicants and High Road West residents, with comparative information available in respect of gender, disability and ethnicity only. This demonstrates that both the Housing Register and High Road West residents include similarly high proportions of disadvantaged groups and that re-housing Love Lane Estate residents under the proposed Local Lettings Policy, rather than Housing Register applicants, will not have a significant impact.

Whilst the impact for most groups is assessed as neutral, a positive impact is identified in respect of people with a disability, as the Local Lettings Policy gives a high priority to critical and serious medical cases, which will include people with disability/health needs. Also, the 30 homes at Ambrose and Mallory Courts are built to 'lifetime homes' standards, which means they can be adapted to meet the needs of people with a disability, and 7 (23%) are wheelchair accessible units.

- (b) Whether the consultation undertaken has been conducted in accordance with equalities guidance and whether the consultation responses raise any equalities concerns in respect of protected groups.

The analysis conducted above, compares the profile of consultation respondents from Love Lane with the wider High Road West population and similarly compares the profile of Housing Register respondents with all households on the Housing Register, where this information is available. This has shown that the consultation respondents from both Love Lane and the Housing Register broadly reflect the wider populations from which they are drawn.

The consultation responses are substantially in favour of the proposed Local Lettings Policy (although this conclusion should be treated with some caution in respect of Love Lane tenants, given the low number of responses). Only a small proportion of the additional comments provided relate to equalities issues, in respect of disability/health, older people and younger people, and mostly seek greater priority for the group the respondent belongs to. It is recognised that the data available in respect of some groups is insufficient and this will be addressed in future Local Lettings Policy consultations.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

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

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