

Broadwater Farm Estate

New Homes

Tangmere, Northolt & former Moselle School sites

Equality Impact Assessment

March 2022



Homes for Haringey

Haringey
LONDON

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on residents with protected characteristics covered by the Equality Act 2010.

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 protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

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 applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Broadwater Farm
Service Area:	Regeneration and Economic Development
Officer Completing Assessment:	Sarah Lovell
Equalities/HR Advisor:	Jim Pomery
Cabinet meeting date (if applicable):	N/A
Director/Assistant Director	Peter O'Brien

2. Executive summary

Background

The Broadwater Farm Improvement Programme ('the scheme' or 'the programme') is a holistic set of investments for the Broadwater Farm Estate in North Tottenham. The estate currently consists of 12 blocks, 9 of which are medium rise (4-6 stories), 2 of which are tower blocks (18 stories) and 1 is a 6-storey block of ziggurat construction. The blocks were built in the late 1960s and early 1970s using a Large Panel System (LPS) method of construction.

Following the discovery of structural issues in 2018, a decision was taken to demolish and replace the two worst affected blocks (one of the tower blocks and the 6-storey ziggurat block – Tangmere and Northolt). Prior to this decision, extensive consultation was undertaken on a Broadwater Farm Rehousing and Payments Policy for affected residents who would need to move. It was decided that the 10 remaining blocks would be refurbished so that they are fully compliant and to deliver benefits to residents.

Following these decisions, Karakusevic Carson Architects (KCA) were appointed in 2019 to develop the design for the replacement and new council homes. As part of this appointment, KCA were also instructed to develop an Urban Design Framework (UDF) to identify wider estate improvements such as to streets, green spaces, and connectivity.

These projects – along with a socio-economic programme and neighbourhood management improvements – will result in a £200 million+ investment into the estate over the next 5 years. This holistic programme is the Broadwater Farm Improvement Programme.

To enable all of these projects to take place further decisions were taken throughout 2020, including an enhanced offer for leaseholders being moved out of Northolt and Tangmere (July 2020) and the beginning of a Compulsory Purchase Order (CPO – November 2020) to ensure vacant possession of these blocks could be achieved in time for the beginning of the demolition and rebuild programme. Finally, in July and September 2021 Cabinet authorised a consultation with 24 properties in a wing block adjacent to the Northolt block (Stapleford North) which led to the decision to include the demolition and replacement of this block in the preferred design scenario.

Equalities

This preferred design scenario, and the decision to present this back to the community in a resident ballot, are the subjects of this EQIA. The EQIA considers the impacts of the key elements of the proposals that have equalities implications. These are:

- 1) Housing
 - a. Over 200 replacement and new high quality council homes.
 - b. Urban Design Framework.
 - c. Rent strategy.
- 2) The ballot
 - a. Ensuring fair and equal access to the ballot.
- 3) Engagement
 - a. Ensuring residents are able to access and respond to the consultations.

All of these decisions and projects have been informed by extensive engagement and consultation with the community – using a series of in person and online

methods, creative engagement techniques, door-knocking and phone calling, open air exhibitions, questionnaires and Section 105 consultations. Creative engagement techniques have been crucial in engaging with residents against the backdrop of Covid 19 related government restrictions on social distancing to ensure wide reach and access.

As part of the previous decisions outlined above, several EQIAs have been undertaken which should be read in tandem with this one. These EQIAs have thoroughly considered the impacts of rehousing for those residents whose blocks are being demolished. This EQIA considers the impacts of the programme on the wider community.

Background EQIAs can be found here:

- 1) **June 2018** - Approve consultation on demolition: <https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?IId=62998&PlanId=0&Opt=3#AI58198>
- 2) **November 2018** - Approval of Demolition: <https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?IId=63663&PlanId=0&Opt=3#AI58796>
- 3) **Oct 2020** - CPO: <https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?IId=71378&PlanId=0&Opt=3#AI65938>
- 4) **July 2021** - Stapleford Consultation: <https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?IId=76048&PlanId=0&Opt=3#AI69147>
- 5) **September 2021** - Stapleford Demolition: <https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?IId=76699&PlanId=0&Opt=3#AI69733>

Overall, it is anticipated that this decision will deliver a positive equalities impact. Where potential negative impacts have been identified, this EqIA sets out the measures the council will take to mitigate them.

3. Consultation and engagement

3a. 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?

The engagement has taken place across several stages, to bring the community along the journey as designs are improved and refined to respond to the priorities and needs identified by residents.

Using a variety of engagement methods and adapting to the restrictions placed on people from covid-19, we have been able to engage hundreds of people since 2019.

Timeline of engagement

1. First engagement survey – August-September 2020
2. Second engagement with residents – October 2020
3. S105 consultation with all residents – March 2021
4. Engagement booklet and exhibitions – May 2021
5. Engagement booklet and exhibitions – July-August 2021
6. Engagement booklet and exhibitions – November 2021
7. Resident ballot – February 2022

At each stage of the engagement, KCA and council officers have produced reports collecting all of the feedback received and, where possible, demonstrated how previous feedback has influenced the proposals for new homes and estate improvements.

Throughout each stage of the consultation, we have captured equalities information of respondents to ensure that a representative sample of residents are having their voices heard.

A fuller summary of the engagement and consultation is included within the statement of community involvement that forms part of this submission.

3b. 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

A fuller summary of the engagement and consultation is included within the statement of community involvement that forms part of this submission.

4. Data and Impact Analysis

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Data

Age groups	BWF Percentage	Borough average (2011 census)
65+	25%	8.7%
50-64	36%	13.1%
35-49	28%	23.7%
20-34	11%	29.6%
<20	0%	24.9%
Total	100%	100%

NB: The above BWF percentage columns included data for named tenants and leaseholders but not their household membership, whilst the column Borough average records the latter. Therefore, this is an indicative practical comparative.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Age data is held for 771 lead tenants and leaseholders. The estate has a higher average age than the borough average (from 2011 census) – however, the data above refers to lead tenants and leaseholders and therefore will not capture the age of children and many younger adults who live on the estate.

Detail the findings of the data.

Broadwater Farm has a higher proportion of elderly residents than the borough average. However, these figures are based on named tenants and leaseholders and therefore does not account for other household members, such as children or family members.

- Housing
 - a. Over 200 replacement and new high quality council homes.

New homes

Given the age profile and housing composition of the estate, and looking at Homes for Haringey data, it is notable that many elderly residents live alone. Further to this, many residents in the younger group are young families with children. New high quality council homes would be available to those residents on the estate that are under-occupying in the first instance (after being offered to those returning from Tangmere, Northolt and Stapleford North) and therefore elderly residents living alone with spare bedrooms (e.g., where a child has grown up and moved away) would benefit positively from the opportunity to get a new home. Further to this, where younger people with children are over-crowded, they would be the third priority for these new homes. Therefore, the new council homes will have a positive impact on people in different age groups depending on their circumstances.

Construction process

Some residents may be negatively impacted by the construction process due to their age. Elderly people with mobility issues or people with young children and need to use buggies may be impacted by the temporary changes to access routes as a result of the building site. Further to this, noise from the demolition and construction may be particularly challenging to those with young children.

To mitigate these impacts, contractors will be required to submit a detailed plan for how to minimise all disruptions and alternative access routes will be provided. This may include using the most suitable modern methods of demolition and construction, ensuring working hours are considerate, and designing site boundaries in the most thoughtful way possible.

Phasing considerations have also been made in order to minimise more intense disruption if all the necessary works were to be carried out at the same time. Phasing of construction works allows anticipated disruption to be spread out both in time and physical location.

b. Urban Design Framework.

Summary

The Urban Design Framework focusses on sustainability, active ground floors, safe & active streets, improving open spaces, and respect for character and scale. By improving the outdoor public space all residents will benefit from this. A new park at the heart of the estate will be designed to be safe and accessible for all household compositions, with improved lighting, play spaces for children, and resting equipment such as benches. These will have a positive impact on the community, ensuring everyone has access to good quality green and public spaces. Children and families, and elderly residents, are particularly likely to benefit from these changes.

Further to this, a new diagonal route will be created through the estate that will not be accessible by cars. This new access route will improve the ability to move around the estate and ensure it is safe for those using buggies and wheelchairs, and those who have mobility issues. Re-provided and wider pavements across the rest of the estate will also improve access and walkability for residents. The improved lighting and visibility across the estate will also make it safer for people to move around, including elderly residents and those with young children.

Car parking

One potential negative impact could be from the reduction in the amount of parking that would result from these interventions. It is acknowledged that having access to a car can be essential for those with young families or elderly individuals who have carers or may otherwise be isolated.

This impact will be mitigated by the introduction of an estate wide parking management plan – which is based on extensive surveys of the car parks and parking need surveys carried out with residents – which will ensure all residents are prioritised for parking access. Presently, there are no restrictions for parking on much of the estate, meaning pressure is added from people using the facilities who do not live on the estate.

There are currently a total of 1,007 parking spaces on the estate. Surveys undertaken on two weekday evenings (in line with industry standards) found that there were around 400 spare spaces in the estate. In addition, a telephone survey of 389 households (above the TfL requirement and a statistically significant sample size) found that 30% of 1-bedroom households owned at least one vehicle, and that 60% of 2-bedroom households owned at least one vehicle. This equates to 0.7 spaces per dwelling. The current parking strategy proposes a provision of 0.7, with 3% reserved for disabled residents. This disabled parking will be strategically located to ensure that residents with mobility issues are not negatively impacted. Due to the current provision mostly not being enforced or regulated, there are currently no dedicated disabled provision on the estate – therefore, this will have a positive impact.

It is noted that the reduction in car parking space is designed to facilitate the active ground floor strategy which it is anticipated will have benefits to the entire community, including those with this protected characteristic.

It is also noted that existing bus service will be maintained, with a longer-term ambition of improving it by introducing two-way running through the estate. The existing bus stop facilities will be improved and re-positioned for better and safer access. This will support connectivity.

Social infrastructure and local economic impact

The full socio-economic benefits of the scheme are detailed in the socio-economic section of this report.

Elderly people are also likely to benefit from the new wellbeing hub, which will see the current GP surgery consolidated into a new space. The new facility will be designed as a combined 'wellbeing hub' that will offer council, NHS, and other public sector services on the estate. We are working with GP practice to design the new space and will ensure it meets their current needs and allow for future expansion of the service. While the medical centre will be in a shared building, the design will ensure that the privacy of anyone visiting the GP will be protected. The waiting areas and reception will be separated from the other services in the building and all consultation rooms will be adequately sound proofed. The new space can also be let to the GP service on better terms than the current health centre, thus providing an incentive to maintain the service. The combination of health and council led services will have a positive impact on people with this protected characteristic.

c. Rent strategy.

All of the 294 new and replacement homes to be built on Broadwater Farm will be council homes at council rents. Current council rents across the borough are a patchwork of historic rents which are dependent on the policy in place when each tenancy started. This includes a significantly lower rent-setting policy being applied in Haringey prior to 2013/14 and changes introduced by the Government to the way rents are set over the years. Currently the council sets new rents at "target rent", and this is the rent that would apply to new tenants allocated secure tenancies on the estate whether to a new or existing home. Whilst these homes will still be council rents, it is likely that they will be more expensive than the average council rent currently paid by residents on the estate. This is a result of a combination of factors:

- Rents on the estate are historically low due to a number of factors, such as old council policies, a large proportion of longer tenancies and low land values on the estate.
- The new properties will be set at 'target rent' which uses a government formula to calculate council rent. As they will be larger than existing properties, this 'target rent' is going to be higher than existing 'target rents' on the estate.

The exact rents would depend on the inputs to the formula at the time and the bedroom size of the property. Service charges on the new homes will be calculated based on the services that are provided, with the aim to ensure that costs are minimised through designing buildings which are easier and more affordable to maintain. The exact level of service charges will be determined at a later date. We will be working closely with residents to understand the type and level of services that tenants and leaseholders want and need, and ensure that these are affordable.

During the consultation with Tangmere and Northolt residents that preceded the rehousing of these residents, the materials indicated that rents would be on the same terms as they currently are for those returning to the estate. This is in line with the Estate Renewal Rehousing and Payment Policy's (ERRPP) commitment to residents not being 'financially worse off' as a result of regeneration. This commitment refers to the cost of moving home and is reflected in the provision of financial support through the Broadwater Farm Rehousing and Payments Policy (BWFRRPP). In addition, the council is committed to providing these new council homes at council rents. However, the council recognises the importance of the new homes being affordable for those who had no choice but to move from their homes (i.e., Tangmere, Northolt and in the future Stapleford North residents).

Those residents that are returning to the estate from Tangmere, Northolt and Stapleford North will be charged no more than 10% more than the average Council rent residents are paying for an equivalent size property on the current Broadwater Farm Estate at the time of their move. The recommendation to Cabinet ensures that households choosing to return to the estate are not being exposed to the higher rents which would apply if the rents were set in line with council formula rents. The rents are proposed to be set at the average BWF rent plus 10% to reflect the fact that residents will be moving to a brand-new home, while limiting the impact on household finances. While these (proposed) rents are higher than the rents in these households' former BWF homes, they are generally less than the current rent that the tenants are paying in their present homes off of the estate.

The council believes that these rents will be at least partially offset by energy bill savings from the new homes' increased energy efficiency (e.g. 'You've Got the Power', HBF, 2017), which will continue to be developed through the design of the new homes, and reflects the fact that residents will be moving to a brand-new home. Officers reviewed the approach to rent-setting across London for regeneration schemes and believe that the approach proposed for Broadwater Farm is comparable and fair.

New homes on the estate allocated to residents under the Allocations Policy or Neighbourhood Moves Scheme will have rents set at formula council rent, as would be the case in any other secure tenancy they are granted in the borough. The council believes this is a fair approach, as people who are not required to move as a result of rehousing will have a choice whether to take up one of the new homes.

Although it is possible that this may have a negative impact on a small number of residents who choose to move, council rents will still be significantly more affordable than private rents and no one will have to move to the new homes if they cannot afford to.

It is understood that residents' household finances will vary depending on age and that some may have been impacted negatively by the pandemic. This approach is felt by the council to be the fairest way to improve the quality of housing without disproportionately impacting anyone due to their age.

Market rents in N17 are significantly higher than council rents on Broadwater Farm. Monthly median market rents for the postcode are set out below:

- 1 bed: £950-1100 pcm
- 2 bed: £1,200 - £1,300
- 3 bed: £1,700 - £2,150
- 4+ bed: £2,250 - £2,800

This is compared to the potential council rents for the Broadwater Farm new homes which are likely to be on average over 50% less costly than private rents.

In addition to these considerations, the Council set out the anticipated weekly rents of the new council homes to all eligible residents in the FAQ as part of the Landlord Offer for the ballot. With 85.1% of eligible residents voting in support of the proposals, with a turnout of 55%. Therefore, the council are confident that residents are supportive of the way rents will be set on the new homes.

The potential negative impact of higher rent costs can be mitigated through a number of means: detailed housing needs assessments (including financials) before being moved to a new home; support via the council such as from the employment and skills team, income collection team, and Discretionary Housing Payments; and the fact that existing properties on the estate (which have lower rents) will become available as a result of residents moving under the Neighbourhood Moves Scheme.

- The ballot
 - a. Ensuring fair and equal access to the ballot.

Due to the higher proportion of elderly residents named as tenants and leaseholders, more elderly people were able to vote in the ballot under the GLA rules. The ballot gave residents multiple voting options – freepost mail, online, and over the phone – to ensure all residents had equal opportunities to participate in the ballot. This information was shared with all eligible households and residents were given clear instructions to ensure they can easily access the vote. This achieved a turnout of 55%, which represents an exceptionally high turnout based on previous engagement levels of 10 -12% on average and boroughwide turnout at local elections of approximately 40%.

An independent tenant and leaseholder advisor (ITLA) has been made available for residents, to provide independent advice and guidance, answering any queries residents may have on how their rights are affected or how to vote. This is to help enable vulnerable elderly residents in particular, as well as all residents generally to make informed decisions, and know how to access voting mechanisms such as postal vote, telephone and online voting.

Every household has been physically door knocked to inform them of the ballot and residents have been left a calling card where they are not able to answer the door. This has meant that vulnerable or elderly residents have been identified for further engagement either through the Broadwater Farm Team or the ITLA as appropriate.

Engagement

- b. Ensuring residents are able to access and respond to the consultations.

Engagement has taken place using a variety of methods – including online, outdoor exhibitions, written questionnaires, and phone calls – to enable all residents to be able to respond and provide feedback.

Impacts

The proposal will have both a positive and negative impact on people due to this protected characteristic as set out above.

4b. Disability¹

Data

Borough Profile ²

4,500 people have a serious physical disability in Haringey.

19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.

1,090 people living with a learning disability in Haringey.

4,400 people have been diagnosed with severe mental illness in Haringey.

Target Population Profile

Disability data is unknown for around 50% of households on Broadwater Farm. Where data is available, it suggests that those with disabilities are under-represented on the estate compared to the borough average (27.5% vs. 34.9%).

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Homes for Haringey resident data and 2011 census data for Haringey.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?
 - Housing
 - a. Over 200 replacement and new high quality council homes.

New homes

¹ In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

² Source: 2011 Census

Homes for Haringey data suggests that there is a lower proportion of disabled residents on the estate than the borough average. New high quality council homes would be available to those residents on the estate that are under-occupying in the first instance (after being offered to those returning from Tangmere, Northolt and Stapleford North) and therefore elderly residents living alone with spare bedrooms (e.g., where a child has grown up and moved away) would benefit positively from the opportunity to get a new home. Similarly, homes will go to those most in need on the Housing Register, so those with disability needs would have a higher priority for the new homes.

Around 10% of the new homes will be adapted and accessible properties, e.g., for those with wheelchairs. This will have a positive impact by increasing the provision of suitable homes on the estate for disabled residents. Access for those with disabilities was an area flagged up in the consultation and which the council have responded to.

In terms of potential returning Tangmere, Northolt and Stapleford North residents, the 10% figure above includes the needs of any residents who have previously indicated a need for adapted or accessible property.

Construction process

There will be some negative impacts from the new homes. Elderly people and those with mobility issues may be impacted by the temporary changes to access routes as a result of the building site. Further to this, noise from the demolition and construction may be particularly challenging to those with particular disabilities. To mitigate these impacts, contractors will be required to submit a detailed plan for how to minimise all disruptions and alternative access routes will be provided. This may include using the most suitable modern methods of demolition and construction, ensuring working hours are considerate, and designing site boundaries in the most thoughtful way possible.

Consideration will continue to be made to the wider neighbourhood community including the needs of the children and families of Brook School, which is attended by children with special educational needs.

b. Urban Design Framework

Summary

As part of the new builds and Urban Design Framework, a new diagonal route will be created through the estate that will not be accessible by cars. This new access route will improve the ability to move around the estate and ensure it is safe for those using wheelchairs or those who have mobility issues. Re-provided and wider pavements across the rest of the estate will also improve access and walkability for residents. It will also increase the provision of accessible green space and seating space, which can be essential for helping people with disabilities access the outdoors.

The re-provision of the GP in the wellbeing hub should improve healthcare and service provision on the estate, positively impacting any disabled people with specific healthcare needs.

Car parking

One potential negative impact could be from the reduction in the amount of parking that would result from these interventions. It is acknowledged that having access to a car can be essential for those with mobility issues or who have carers.

This impact will be mitigated by the introduction of an estate wide parking management plan – which is based on extensive surveys of the car parks and parking need surveys carried out with residents – which will ensure all residents are prioritised for parking access. Presently, there are no restrictions for parking on much of the estate, meaning pressure is added from people using the facilities who do not live on the estate.

There are currently a total of 1007 parking spaces on the estate. Surveys undertaken on two weekday evenings (in line with industry standards) found that there were around 400 spare spaces in the estate. In addition, a telephone survey of 389 households (above the TfL requirement and a statistically significant sample size) found that 30% of 1-bedroom households owned at least one vehicle, whilst 60% of 2-bedroom households did. This equates to 0.75 spaces per dwelling. The current parking strategy proposes a provision of 0.74, with 3% reserved for disabled residents. This disabled parking will be strategically located to ensure that residents with mobility issues are not negatively impacted. Due to the current provision mostly not being enforced or regulated, there is currently no dedicated disabled provision on the estate – therefore, this will have a positive impact.

It is noted that the reduction in car parking space is designed to facilitate the active ground floor strategy which it is anticipated will have benefits to the entire community, including those with this protected characteristic.

It is also noted that existing bus service will be maintained, with a longer-term ambition of improving it by introducing two-way running through the estate. The existing bus stop facilities will be improved. This will support connectivity.

Social infrastructure and local economic impact

The socio-economic benefits of the scheme are detailed in the socio-economic section of this report.

c. Rents

All of the 294 new and replacement homes to be built on Broadwater Farm will be council homes at council rents. Current council rents across the borough are a patchwork of historic rents which are dependent on the policy in place when each tenancy started, with a significantly lower rent-setting policy applying in Haringey prior to 2013/14 and changes introduced by the Government to the way rents are set over the years. Currently the council sets new rents at “target rent”, and this is the rent that would apply to new tenants allocated secure tenancies on the estate

under the Allocations Policy. Whilst these homes will still be council rents, it is likely that they will be more expensive than the average council rent currently paid by residents on the estate. This is a result of a combination of factors:

- Rents on the estate are historically low due to a number of factors, such as old council policies, a large proportion of longer tenancies and low land values on the estate.
- The new properties will be set at 'target rent' which uses a government formula to calculate council rent. As they will be larger than existing properties, this 'target rent' is going to be higher than existing 'target rents' on the estate.

The exact rent would depend on the inputs to the formula at the time and the bedroom size of the property. Service charges on the new homes will be calculated based on the services that are provided, with the aim to ensure that costs are minimised through designing buildings which are easier and more affordable to maintain. The exact level of service charges will be determined at a later date. We will be working closely with residents to understand the type and level of services that tenants and leaseholders want and need, and ensure that these are affordable.

During the consultation with Tangmere and Northolt residents that preceded the rehousing of these residents, the materials indicated that rents would be on the same terms as they currently are for those returning to the estate. This is in line with the Estate Renewal Rehousing and Payment Policy's (ERRPP) commitment to residents not being 'financially worse off' as a result of regeneration. This commitment refers to the cost of moving home and is reflected in the provision of financial support through the Broadwater Farm Rehousing and Payments Policy (BWRPP). In addition, the council is committed to providing these new council homes at council rents. However, the council recognises the importance of the new homes being affordable for those who had no choice but to move from their homes (i.e., Tangmere, Northolt and in the future Stapleford North residents).

Those residents that are returning to the estate from Tangmere, Northolt and Stapleford North will be charged no more than 10% more than the average Council rent residents are paying for an equivalent size property on the current Broadwater Farm Estate at the time of their move. The recommendation to Cabinet ensures that households choosing to return to the estate are not being exposed to higher rent which would apply if the rents were set in line with council formula rents. The rents are proposed to be set at the average BWF rent plus 10% to reflect the fact that residents will be moving to a brand-new home, while limiting the impact on household finances. While these (proposed) rents are higher than the rents in these households' former BWF homes, they are generally less than the current rent that the tenants are paying in their present homes off of the estate. It also recognises that residents have had to move out of Tangmere and Northolt (and Stapleford North in the event of a positive ballot) and therefore restricting rents would be more in line with the principles of the ERRPP noted above.

The council believes that these rents will be partially offset by energy bill savings from the new homes' increased energy efficiency (e.g. 'You've Got the Power', HBF,

2017), which will continue to be developed through the design of the new homes, and reflects the fact that residents will be moving to a brand-new home. Officers have been reviewing the approach to rent-setting across London for regeneration schemes and believe that the approach proposed for Broadwater Farm is comparable and fair.

New homes on the estate allocated to residents under the Allocations Policy or Neighbourhood Moves Scheme will have rents set at council formula rent, as would be the case in any other secure tenancy they are granted in the borough. The council believes this is a fair approach, as people who are not required to move as a result of rehousing will have a choice whether to take up one of the new homes.

Although it is possible that this may have a negative impact on a small number of residents who choose to move to the new homes, council rents will still be more affordable than private rents and no one will have to move to the new homes if they cannot afford to.

It is understood that residents' household finances may vary depending on this protected characteristic, and those with disabilities face disproportionate challenges in the labour market. This approach is felt by the council to be the fairest way to improve the quality of housing for residents whilst ensuring that residents are not financially worse off.

In addition to these considerations, the Council set out the anticipated weekly rents of the new council homes to all eligible residents in the FAQ as part of the Landlord Offer for the ballot. With 85.1% of residents voting in support of the proposals, on a turnout of 55%. Therefore, the council are confident that residents are supportive of the way rents will be set on the new homes.

The potential negative impact of higher rent costs can be mitigated through a number of means: detailed housing needs assessments (including financials) before being moved to a new home; support via the council such as from the employment and skills team, income collection team, and Discretionary Housing Payments; and the fact that existing properties on the estate (which have lower rents) will become available as a result of residents moving under the Neighbourhood Moves Scheme.

- The ballot
 - a. Ensuring fair and equal access to the ballot.

The ballot gave residents multiple voting options – freepost mail, online, and over the phone – to ensure all residents had equal opportunities to participate in the ballot. Residents were provided with the option to request large print and braille versions of all materials to ensure that everyone can partake on an equal basis. This information was shared with all eligible households and residents were given clear instructions to ensure they can easily access the vote. This achieved a turnout of 55%, which represents an exceptionally high turnout based on previous

engagement levels of 10 -12% on average and boroughwide turnout at local elections of approximately 40%.

During the ballot process, resident requiring sign language interpretation were identified and sign language support was provided to these residents so that they can make an informed decision and access the ballot process.

- Engagement
 - a. Ensuring residents are able to access and respond to the consultations.

Engagement has taken place using a variety of methods – including online, outdoor exhibitions, written questionnaires, and phone calls – to enable all residents to be able to respond and provide feedback. Where possible, information has been accompanied with a request form for those that may need materials in braille or large print and contact details have been provided if anyone wished to request this.

Impacts

This proposal will have both a positive and negative impact on people with this protected characteristic.

4c. Gender Reassignment³

Data

Borough Profile

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2000 Haringey residents are Trans.⁴

Target Population Profile

The council does not have local data regarding this protected characteristic. There is no reason to believe that there will be specific impacts for this protected group and will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

³ Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing one's physiological or other gender attributes is a personal process rather than a medical one.

⁴ Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

None available

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic.

However, the following points should be noted:

- The re-provision of the GP in the wellbeing hub should improve healthcare and service provision on the estate, positively impacting any members of this protected characteristic with specific healthcare needs.

It is understood that those who have this protected characteristic may face disproportionate challenges in the labour market. The approach to the rent strategy is felt by the council to be the fairest way to improve the quality of housing for residents whilst ensuring that residents are not financially worse off. Mitigations, as set out in this EqIA, will be in place to support residents.

Impacts

Neutral impact.

4d. Marriage and Civil Partnership

Data

Borough Profile ⁵

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)

In a registered same-sex civil partnership: (0.6%)

Married: (33.3%)

Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)

Single (never married or never registered a same-sex civil partnership): (50.0%)

Widowed or surviving partner from a same-sex civil partnership: (3.9%)

⁵ Source: 2011 Census

Target Population Profile

The council does not hold data on marriage and civil partnership among its residents. The council will need to ensure that it considers the inequalities and discrimination experienced by those who are married or in a civil partnership throughout this Equalities Impact Assessment.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

None available.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic. The impacts on families are dealt with elsewhere in this EqIA.

Impacts

Neutral impact.

4e. Pregnancy and Maternity

Data

Borough Profile ⁶

Live Births in Haringey 2019: 3646

Target Population Profile

The council does not hold data on pregnancy and maternity among its tenants and leaseholders. However, this data will become available for tenants and leaseholders that are due to be moved from Stapleford North when needs assessments are undertaken.

The council will need to ensure that it considers the inequalities and discrimination experienced by those who are pregnant or who are new mothers throughout this Equalities Impact Assessment.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

⁶ Births by Borough (ONS)

Housing needs assessments during rehousing. This is dealt with in the two Stapleford EQIAs (here: **July 2021 - Stapleford Consultation:** <https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?Id=76048&PlanId=0&Opt=3#A169147> and here: **September 2021 - Stapleford Demolition:** <https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?Id=76699&PlanId=0&Opt=3#A169733>)

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
 - b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?
- Housing
 - a. Around 294 replacement and new high quality council homes.

New homes

Of the new and replacement council homes, around 30% will be family homes (3 or more bedrooms). The current housing on the estate contains only 10% family homes, with 90% being 1- and 2-bedroom properties. Through the neighbourhood moves scheme, these will be prioritised for households that are currently over-crowded on the estate (after first being offered to those returning from Tangmere, Northolt and Stapleford North and being offered to those who may wish to downsize). Data suggests that there may be around 200 households currently over-crowded on the Broadwater Farm estate. Therefore, these proposals will have a positive impact on lone parent households with multiple children, as well as all households that are over-crowded. In addition to the new and replacement homes, existing homes will be freed up on the estate through people taking advantage of the Neighbourhood Moves Scheme, further allowing over-crowded households to find suitable housing.

Construction process

It is acknowledged that some negative impacts may be experienced during the demolition and rebuild, with site boundaries and demolition/construction noise impacting those with young children or using buggies on the estate.

To mitigate these impacts, contractors will be required to submit a detailed plan for how to minimise all disruptions and alternative access routes will be provided. This may include using the most suitable modern methods of demolition and construction, ensuring working hours are considerate, and designing site boundaries in the most thoughtful way possible.

- b. Urban Design Framework.

Summary

The Urban Design Framework focusses on sustainability, active ground floors, safe & active streets, improving open spaces, and respect for character and scale. By improving the outdoor public space all residents will benefit from this. A new park at the heart of the estate will be designed to be safe and accessible for all household compositions, with improved lighting, play spaces for children, and resting equipment such as benches. These will have a positive impact on the community, and in particular those with this protected characteristic. Further to this, a new diagonal route will be created through the estate that will not be accessible by cars. This new access route will improve the ability to move around the estate and ensure it is safe for those using buggies. Re-provided and wider pavements across the rest of the estate will also improve access and walkability for residents. The improved lighting and visibility across the estate will also make it safer for people to move around, including those with young children.

Car parking

One potential negative impact could be from the reduction in the amount of parking that would result from these interventions. It is acknowledged that having access to a car can be essential for those with young families or single individuals who may otherwise be isolated.

This impact will be mitigated by the introduction of an estate wide parking management plan – which is based on extensive surveys of the car parks and parking need surveys carried out with residents – which will ensure all residents are prioritised for parking access. Presently, there are no restrictions for parking on much of the estate, meaning pressure is added from people using the facilities who do not live on the estate.

It is noted that the reduction in car parking space is designed to facilitate the active ground floor strategy which it is anticipated will have benefits to the entire community, including those with this protected characteristic.

It is also noted that existing bus service will be maintained, with a longer-term ambition of improving it by introducing two-way running through the estate. The existing bus stop facilities will be relocated and improved to support connectivity and access.

Social infrastructure and local economic impact

The socio-economic benefits of the scheme are detailed in the socio-economic section of this report.

The re-provision of the GP in the wellbeing hub should improve healthcare and service provision on the estate, positively impacting people with this protected characteristic.

c. Rent strategy.

All of the 294 new and replacement homes to be built on Broadwater Farm will be council homes at council rents. Current council rents across the borough are a

patchwork of historic rents which are dependent on the policy in place when each tenancy started, with a significantly lower rent-setting policy applying in Haringey prior to 2013/14 and changes introduced by the Government to the way rents are set over the years. Currently the council sets new rents at “target rent”, and this is the rent that would apply to new tenants allocated secure tenancies on the estate under the Allocations Policy. Whilst these homes will still be council rents, it is likely that they will be more expensive than the average council rent currently paid by residents on the estate. This is a result of a combination of factors:

- Rents on the estate are historically low due to a number of factors, such as old council policies, a large proportion of longer tenancies and low land values on the estate.
- The new properties will be set at ‘target rent’ which uses a government formula to calculate council rent. As they will be larger than existing properties, this ‘target rent’ is going to be higher than existing ‘target rents’ on the estate.

The exact rent would depend on the inputs to the formula at the time and the bedroom size of the property. Service charges on the new homes will be calculated based on the services that are provided, with the aim to ensure that costs are minimised through designing buildings which are easier and more affordable to maintain. The exact level of service charges will be determined at a later date. We will be working closely with residents to understand the type and level of services that tenants and leaseholders want and need, and ensure that these are affordable.

During the consultation with Tangmere and Northolt residents that preceded the rehousing of these residents, the materials indicated that rents would be on the same terms as they currently are for those returning to the estate. This is in line with the Estate Renewal Rehousing and Payment Policy’s (ERRPP) commitment to residents not being ‘financially worse off’ as a result of regeneration. This commitment refers to the cost of moving home and is reflected in the provision of financial support through the Broadwater Farm Rehousing and Payments Policy (BWRFP). In addition, the council is committed to providing these new council homes at council rents. However, the council recognises the importance of the new homes being affordable for those who had no choice but to move from their homes (i.e., Tangmere, Northolt and in the future Stapleford North residents).

Those residents that are returning to the estate from Tangmere, Northolt and Stapleford North will be charged no more than 10% more than the average Council rent residents are paying for an equivalent size property on the current Broadwater Farm Estate at the time of their move. The recommendation to Cabinet ensures that households choosing to return to the estate are not being exposed to the higher rents which would apply if the rents were set in line with council formula rents. The rents are proposed to be set at the average BWF rent plus 10% to reflect the fact that residents will be moving to a brand-new home, while limiting the impact on household finances. While these (proposed) rents are higher than the rents in these households’ former BWF homes, they are generally less than the current rent that the tenants are paying in their present homes off of the estate. The council believes these rents will be partially offset by energy bill savings from the new homes’

increased energy efficiency (e.g. 'You've Got the Power', HBF, 2017), which will continue to be developed through the design of the new homes, and reflects the fact that residents will be moving to a brand-new home. Officers have reviewed the approach to rent-setting across London for regeneration schemes and believe that the approach proposed for Broadwater Farm is comparable and fair.

New homes on the estate allocated to residents under the Allocations Policy or Neighbourhood Moves Scheme will have rents set at council formula rent, as would be the case in any other secure tenancy they are granted in the borough. The council believes this is a fair approach, as people who are not required to move as a result of rehousing will have a choice whether to take up one of the new homes.

Although it is possible that this may have a negative impact on a small number of residents who choose to move to the new homes, council rents will still be more affordable than private rents and no one will have to move to the new homes if they cannot afford to.

It is understood that residents' household finances may vary depending on this protected characteristic, and those who are pregnant may for example face disproportionate challenges in the labour market. This approach is felt by the council to be the fairest way to improve the quality of housing for residents whilst ensuring that residents are not financially worse off.

In addition to these considerations, the Council set out the anticipated weekly rents of the new council homes to all eligible residents in the FAQ as part of the Landlord Offer for the ballot. With 85.1% of residents voting in support of the proposals, on a turnout of 55%. Therefore, the council are confident that residents are supportive of the way rents will be set on the new homes.

The potential negative impact of higher rent costs can be mitigated through a number of means: detailed housing needs assessments (including financials) before being moved to a new home; support via the council such as from the employment and skills team, income collection team, and Discretionary Housing Payments; and the fact that existing properties on the estate (which have lower rents) will become available as a result of residents moving under the Neighbourhood Moves Scheme.

- The ballot
 - a. Ensuring fair and equal access to the ballot.

Due to the higher proportion of women than men as named tenants and leaseholders, more women than men will be able to vote in the ballot under the GLA rules. The ballot gave residents multiple voting options – freepost mail, online, and over the phone – to ensure all residents had equal opportunities to participate in the ballot. This information was shared with all eligible households and residents were given clear instructions to ensure they can easily access the vote. This ensured that people who are pregnant or have young children had different options for how to vote in a way that was easy and accessible for them achieving a turnout of 55%.

- Engagement

- a. Ensuring residents are able to access and respond to the consultations.

Engagement has taken place using a variety of methods – including online, outdoor exhibitions, written questionnaires, and phone calls – to enable all residents to be able to respond and provide feedback.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The proposal will have both a positive and negative impact on residents with this protected characteristic as set out above.

4f. Race

Data

Borough Profile ⁷

Any other ethnic group: **3.9%**

Arab: 0.9%

Asian: 9.5%

Bangladeshi: 1.7%

Chinese: 1.5%

Indian: 2.3%

Pakistani: 0.8%

Other Asian: 3.2%

Black: 18.7%

African: 9.0%

Caribbean: 7.1%

Other Black: 2.6%

Mixed: 6.5%

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 1.9%

Other Mixed: 2.1%

White: 60.5% in total

⁷ Source: 2011 Census

English/Welsh/Scottish/Norther Irish/British: 34.7%

Irish: 2.7%

Gypsy or Irish Traveller: 0.1%

Other White: 23%

Target Population Profile

	Broadwater Farm Tenant/ Leaseholder Data	Borough Average (2011 census)
Black	44.4%	18.7%
Asian	4.3%	9.5%
Turkish and Kurdish	13.9%	N/A
White	16.8%	60.5%
Mixed	N/A	6.5%
Any other ethnicity	6.7%	4.8%
Unknown	13.9%	0%

NB: Column named Broadwater Farm Tenant and Leaseholder Data captures race as self-identified by named tenant or leaseholder, whereas column named Borough Average captures race as self-identified for all residents. Therefore, this is an indicative practical comparison.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

The data held by Homes for Haringey is incomplete, with data only for the lead tenant or leaseholder of 746 households. Furthermore, the categories do not match up directly with the 2011 Census data, which is used to present the borough averages.

The data shows that Black households are over-represented on Broadwater Farm compared to the borough average. Therefore, all proposals will have a disproportionate impact, whether positive or negative, on Black households by virtue of these households being higher in number on the estate. There is also a large Turkish and Kurdish population on the estate. The same potential impact can be said of these households too.

Detail the findings of the data:

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The data shows that Black, Asian and Minority Ethnic people are over-represented on the Broadwater Farm Estate compared to the borough average. Therefore, these

proposals will have a disproportionate impact (either positive or negative) on Black, Asian and Minority Ethnic residents. The Council recognises that for Black, Asian and Minority Ethnic people there may be specific cultural ties, such as businesses locally that cater for the specific cultural needs of residents of a particular race or ethnicity.

- b. Around 294 replacement and new high quality council homes.

New homes

Through the neighbourhood moves scheme, the new council homes will be prioritised for households that are currently over-crowded on the estate (after first being offered to those returning from Tangmere, Northolt and Stapleford North and being offered to those who may wish to downsize). Data suggests that there may be around 200 households currently over-crowded on the Broadwater Farm estate. Therefore, given that Black, Asian and Minority Ethnic residents are overrepresented on the estate, these proposals will have a positive impact on these households with multiple children, as well as all households that are over-crowded. In addition to the new and replacement homes, existing homes will be freed up on the estate through people taking advantage of the Neighbourhood Moves Scheme, further allowing over-crowded households to find suitable housing.

Construction process

It is acknowledged that some negative impacts may be experienced during the demolition and rebuild, with site boundaries and demolition/construction noise impacting residents. To mitigate these impacts, contractors will be required to submit a detailed plan for how to minimise all disruptions and alternative access routes will be provided. This may include using the most suitable modern methods of demolition and construction, ensuring working hours are considerate, and designing site boundaries in the most thoughtful way possible. Contractors will be asked to consider any relevant cultural or language needs such as interpretation facilities for example in Spanish, Somali and Turkish.

- c. Urban Design Framework.

Summary

The Urban Design Framework focusses on sustainability, active ground floors, safe & active streets, improving open spaces, and respect for character and scale. By improving the outdoor public space all residents will benefit from this. A new park at the heart of the estate will be designed to be safe and accessible for all household compositions, with improved lighting, play spaces for children, and resting equipment such as benches. These will have a positive impact on the community, ensuring everyone has access to good quality green and public spaces. Further to this, a new diagonal route will be created through the estate that will not be accessible by cars. This new access route will improve the ability to move around

the estate and ensure it is safe for all. Re-provided and wider pavements across the rest of the estate will also improve access and walkability for residents. The improved lighting and visibility across the estate will also make it safer for people to move around.

Car parking

One potential negative impact could be from the reduction in the amount of parking that would result from these interventions. It is acknowledged that having access to a car can be essential for some residents.

This impact will be mitigated by the introduction of an estate wide parking management plan – which is based on extensive surveys of the car parks and parking need surveys carried out with residents – which will ensure all residents are prioritised for parking access. Presently, there are no restrictions for parking on much of the estate, meaning pressure is added from people using the facilities who do not live on the estate.

It is noted that the reduction in car parking space is designed to facilitate the active ground floor strategy which it is anticipated will have benefits to the entire community, including those with this protected characteristic.

It is also noted that existing bus service will be maintained, with a longer-term ambition of improving it by introducing two-way running through the estate. The existing bus stop facilities will be improved. This will support connectivity.

Social infrastructure and local economic impact

The socio-economic benefits of the scheme are detailed in the socio-economic section of this report.

The relocation of the Enterprise Units – which contains some businesses run by Black, Asian and Minority Ethnic individuals and serves the community, including the large Black, Asian and Minority Ethnic resident population – will ensure the estate continues to have access to affordable workspace and amenities.

Similarly, data shows that health inequalities disproportionately impact Black, Asian and Minority Ethnic people – therefore, re-provision of the GP surgery and improved services will positively impact Black, Asian and Minority Ethnic residents.

d. Rent strategy.

All of the 294 new and replacement homes to be built on Broadwater Farm will be council homes at council rents. Current council rents across the borough are a patchwork of historic rents which are dependent on the policy in place when each tenancy started, with a significantly lower rent-setting policy applying in Haringey prior to 2013/14 and changes introduced by the Government to the way rents are set over the years. Currently the council sets new rents at “target rent”, and this is the rent that would apply to new tenants allocated secure tenancies on the estate under the Allocations Policy. Whilst these homes will still be council rents, it is likely

that they will be more expensive than the average council rent currently paid by residents on the estate. This is a result of a combination of factors:

- Rents on the estate are historically low due to a number of factors, such as old council policies, a large proportion of longer tenancies and low land values on the estate.
- The new properties will be set at 'target rent' which uses a government formula to calculate council rent. As they will be larger than existing properties, this 'target rent' is going to be higher than existing 'target rents' on the estate.

The exact rent would depend on the inputs to the formula at the time and the bedroom size of the property. Service charges on the new homes will be calculated based on the services that are provided, with the aim to ensure that costs are minimised through designing buildings which are easier and more affordable to maintain. The exact level of service charges will be determined at a later date. We will be working closely with residents to understand the type and level of services that tenants and leaseholders want and need, and ensure that these are affordable.

During the consultation with Tangmere and Northolt residents that preceded the rehousing of these residents, the materials indicated that rents would be on the same terms as they currently are for those returning to the estate. This is in line with the Estate Renewal Rehousing and Payment Policy's (ERRPP) commitment to residents not being 'financially worse off' as a result of regeneration. This commitment refers to the cost of moving home and is reflected in the provision of financial support through the Broadwater Farm Rehousing and Payments Policy (BWRFP). In addition, the council is committed to providing these new council homes at council rents. However, the council recognises the importance of the new homes being affordable for those who had no choice but to move from their homes (i.e., Tangmere, Northolt and in the future Stapleford North residents).

Those residents that are returning to the estate from Tangmere, Northolt and Stapleford North will be charged no more than 10% more than the average Council rent residents are paying for an equivalent size property on the current Broadwater Farm Estate at the time of their move. The recommendation to Cabinet ensures that households choosing to return to the estate are not being exposed to the higher rents which would apply if the rents were set in line with council formula rents. The rents are proposed to be set at the average BWF rent plus 10% to reflect the fact that residents will be moving to a brand-new home, while limiting the impact on household finances. While these (proposed) rents are higher than the rents in these households former BWF homes, they are generally less than the current rent that the tenants are paying in their present homes off of the estate. The council believes these rents will be partially offset by energy bill savings from the new homes' increased energy efficiency (e.g. 'You've Got the Power', HBF, 2017), which will continue to be developed through the design of the new homes, and reflects the fact that residents will be moving to a brand-new home. Officers have been reviewing the approach to rent-setting across London for regeneration schemes and believe that the approach proposed for Broadwater Farm is comparable and fair.

New homes on the estate allocated to residents under the Allocations Policy or Neighbourhood Moves Scheme will have rents set at council formula rent, as would be the case in any other secure tenancy they are granted in the borough. The council believes this is a fair approach, as people who are not required to move as a result of rehousing will have a choice whether to take up one of the new homes.

Although it is possible that this may have a negative impact on a small number of residents who choose to move to the new homes, council rents will still be more affordable than private rents and no one will have to move to the new homes if they cannot afford to.

Data shows that Black, Asian and Minority Ethnic households have lower household income on average than white households – therefore, the rent of new homes could have a disproportionate impact on Black, Asian and Minority Ethnic households. However, Black, Asian and Minority Ethnic households are more likely to disproportionately benefit from new council housing at council rents (by virtue of there being proportionally more Black, Asian and Minority Ethnic households), which is the most affordable rent available. Housing needs assessments will be carried out to determine need in such circumstances.

In addition to these considerations, the Council set out the anticipated weekly rents of the new council homes to all eligible residents in the FAQ as part of the Landlord Offer for the ballot. With 85.1% of residents voting in support of the proposals, on a turnout of 55%. Therefore, the council are confident that residents are supportive of the way rents will be set on the new homes.

The potential negative impact of higher rent costs can be mitigated through a number of means: detailed housing needs assessments (including financials) before being moved to a new home; support via the council such as from the employment and skills team, income collection team, and Discretionary Housing Payments; and the fact that existing properties on the estate (which have lower rents) will become available as a result of residents moving under the Neighbourhood Moves Scheme.

- The ballot
 - a. Ensuring fair and equal access to the ballot.

Due to the higher proportion of Black, Asian and Minority Ethnic residents named as tenants and leaseholders, Black, Asian and Minority Ethnic people were disproportionately (compared to the borough average) able to vote in the ballot under the GLA rules. This is by virtue of there being proportionally more Black, Asian and Minority Ethnic households. The ballot gave residents multiple voting options – freepost mail, online, and over the phone – to ensure all residents had equal opportunities to participate in the ballot. These multiple methods of voting options were intended to counter any inequalities – such as access to the internet – that might otherwise have impacted on a resident’s ability to participate in the vote. Ballot turnout was 55%, which represents an exceptionally high turnout based on previous engagement levels of 10 -12% on average and boroughwide turnout at local elections of approximately 40%.

During the ballot process as well as the design engagement process, materials were made available in Turkish as standard and in other languages on request. In addition, residents who indicated a preference were directly communicated in Turkish, Spanish and Somali languages.

- Engagement
 - a. Ensuring residents are able to access and respond to the consultations.

Engagement has taken place using a variety of methods – including online, outdoor exhibitions, written questionnaires, and phone calls – to enable all residents to be able to respond and provide feedback.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This proposal will have both positive and negative impacts.

4g. Religion or belief

Data

Borough Profile ⁸

Christian: 45%

Buddhist: 1.1%

Hindu: 1.9%

Jewish: 3%

Muslim: 14.2%

No religion: 25.2%

Other religion: 0.5%

Religion not stated: 8.9%

Sikh: 0.3%

Target Population Profile

Religion and belief are under-reported in Homes for Haringey data, with only around 30% of households declaring this information. From the data available, there are similar proportions of all major religions on the estate as the borough averages. Therefore, there is no suggestion that any religion or belief is over-represented on the estate.

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

⁸ Source: 2011 Census

Homes for Haringey resident data.

Impacts

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic.

It is understood that residents may have strong local ties to nearby places of worship or other religiously significant sites. The Neighbourhood Moves Schemes ensures that those who would like to will have an opportunity to stay on the estate (where eligible). Those who are not successful in getting a new home through the Neighbourhood Moves Scheme will be able to remain in their existing property unless they chose otherwise.

Under the Broadwater Farm Rehousing and Payments Policy those due to be rehoused (from Stapleford North) would be enabled to remain in the local area wherever possible.

4h. Sex

Data

Borough profile ⁹

Females: (50.5%)

Males: (49.5%)

Target Population Profile

Of the 866 lead tenants and leaseholders where this data is available, 57% are female and 41% are male. Information is not available for the remaining 2%.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Homes for Haringey resident data.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

A higher proportion (57%) of lead tenants and leaseholders on the Broadwater Farm estate are female than male (41% with 2% unknown). In addition to this, census data for the West Green Ward – in which Broadwater Farm is located – shows that

⁹ Source: 2011 Census

92% of lone parent households are headed up by women. This is important, as many of the proposals will impact positively on households with children.

- Housing
 - a. Around 294 replacement and new high quality council homes.

New homes

Of the new and replacement council homes, up to 30% will be family homes (3+ bedrooms). The current housing on the estate contains only 10% family homes, with 90% being 1- and 2-bedroom properties. Through the neighbourhood moves scheme, these will be prioritised for households that are currently over-crowded on the estate (after first being offered to those returning from Tangmere, Northolt and Stapleford North and being offered to those who may wish to downsize). Data suggests that there may be around 200 households currently over-crowded on the Broadwater Farm estate. Therefore, these proposals will have a positive impact on lone parent households with multiple children, as well as all households that are over-crowded. In addition to the new and replacement homes, existing homes will be freed up on the estate through people taking advantage of the Neighbourhood Moves Scheme, further allowing over-crowded households to find suitable housing.

Construction process

It is acknowledged that some negative impacts may be experienced during the demolition and rebuild, with site boundaries and demolition/construction noise impacting those with young children or using buggies on the estate. To mitigate these impacts, contractors will be required to submit a detailed plan for how to minimise all disruptions and alternative access routes will be provided. This may include using the most suitable modern methods of demolition and construction, ensuring working hours are considerate, and designing site boundaries in the most thoughtful way possible.

- b. Urban Design Framework.

Summary

The Urban Design Framework focusses on sustainability, active ground floors, safe & active streets, improving open spaces, and respect for character and scale. By improving the outdoor public space all residents will benefit from this. A new park at the heart of the estate will be designed to be safe and accessible for all household compositions, with improved lighting, play spaces for children, and resting equipment such as benches. These will have a positive impact on the community, ensuring everyone has access to good quality green and public spaces. Further to this, a new diagonal route will be created through the estate that will not be accessible by cars. This new access route will improve the ability to move around the estate and ensure it is safe for those using buggies. Re-provided and wider pavements across the rest of the estate will also improve access and walkability for residents. The improved lighting and visibility across the estate will also make it

safer for people to move around, including lone women and those with young children.

Car parking

One potential negative impact could be from the reduction in the amount of parking that would result from these interventions. It is acknowledged that having access to a car can be essential for those with young families or single individuals who may otherwise be isolated.

This impact will be mitigated by the introduction of an estate wide parking management plan – which is based on extensive surveys of the car parks and parking need surveys carried out with residents – which will ensure all residents are prioritised for parking access. Presently, there are no restrictions for parking on much of the estate, meaning pressure is added from people using the facilities who do not live on the estate.

It is noted that the reduction in car parking space is designed to facilitate the active ground floor strategy which it is anticipated will have benefits to the entire community, including those with this protected characteristic.

It is also noted that existing bus service will be maintained, with a longer-term ambition of improving it by introducing two-way running through the estate. The existing bus stop facilities will be improved. This will support connectivity.

Social infrastructure and local economic impact

The socio-economic benefits of the scheme are detailed in the socio-economic section of this report.

The re-provision of the GP in the wellbeing hub should improve healthcare and service provision on the estate, positively impacting people with this protected characteristic.

c. Rent strategy.

All of the 294 new and replacement homes to be built on Broadwater Farm will be council homes at council rents. Current council rents across the borough are a patchwork of historic rents which are dependent on the policy in place when each tenancy started, with a significantly lower rent-setting policy applying in Haringey prior to 2013/14 and changes introduced by the Government to the way rents are set over the years. Currently the council sets new rents at “target rent”, and this is the rent that would apply to new tenants allocated secure tenancies on the estate under the Allocations Policy. Whilst these homes will still be council rents, it is likely that they will be more expensive than the average council rent currently paid by residents on the estate. This is a result of a combination of factors:

- Rents on the estate are historically low due to a number of factors, such as old council policies, a large proportion of longer tenancies and low land values on the estate.

- The new properties will be set at 'target rent' which uses a government formula to calculate council rent. As they will be larger than existing properties, this 'target rent' is going to be higher than existing 'target rents' on the estate.

The exact rent would depend on the inputs to the formula at the time and the bedroom size of the property. Service charges on the new homes will be calculated based on the services that are provided, with the aim to ensure that costs are minimised through designing buildings which are easier and more affordable to maintain. The exact level of service charges will be determined at a later date. We will be working closely with residents to understand the type and level of services that tenants and leaseholders want and need, and ensure that these are affordable.

During the consultation with Tangmere and Northolt residents that preceded the rehousing of these residents, the materials indicated that rents would be on the same terms as they currently are for those returning to the estate. This is in line with the Estate Renewal Rehousing and Payment Policy's (ERRPP) commitment to residents not being 'financially worse off' as a result of regeneration. This commitment refers to the cost of moving home and is reflected in the provision of financial support through the Broadwater Farm Rehousing and Payments Policy (BWFRPP). In addition, the council is committed to providing these new council homes at council rents. However, the council recognises the importance of the new homes being affordable for those who had no choice but to move from their homes (i.e., Tangmere, Northolt and in the future Stapleford North residents).

Those residents that are returning to the estate from Tangmere, Northolt and Stapleford North will be charged no more than 10% more than the average Council rent residents are paying for an equivalent size property on the current Broadwater Farm Estate at the time of their move. The recommendation to Cabinet ensures that households choosing to return to the estate are not being exposed to the higher rents which would apply if the rents were set in line with council formula rents. The rents are proposed to be set at the average BWF rent plus 10% to reflect the fact that residents will be moving to a brand-new home, while limiting the impact on household finances. While these (proposed) rents are higher than the rents in these households' former BWF homes, they are generally less than the current rent that the tenants are paying in their present homes off of the estate. The council believes that these rents will be partially offset by energy bill savings from the new homes' increased energy efficiency (e.g. 'You've Got the Power', HBF, 2017), which will continue to be developed through the design of the new homes, and reflects the fact that residents will be moving to a brand-new home. Officers have been reviewing the approach to rent-setting across London for regeneration schemes and believe that the approach proposed for Broadwater Farm is comparable and fair.

New homes on the estate allocated to residents under the Allocations Policy or Neighbourhood Moves Scheme will have rents set at council formula rent, as would be the case in any other secure tenancy they are granted in the borough. The council believes this is a fair approach, as people who are not required to move as a result of rehousing will have a choice whether to take up one of the new homes.

Although it is possible that this may have a negative impact on a small number of residents who choose to move to the new homes, council rents will still be more affordable than private rents and no one will have to move to the new homes if they cannot afford to.

It is understood that residents' household finances may vary depending on this protected characteristic, and that (for example) women may face disproportionate challenges in the labour market. This approach is felt by the council to be the fairest way to improve the quality of housing for residents whilst ensuring that residents are not financially worse off.

In addition to these considerations, the Council set out the anticipated weekly rents of the new council homes to all eligible residents in the FAQ as part of the Landlord Offer for the ballot. With 85.1% of residents voting in support of the proposals, on a turnout of 55%. Therefore, the council are confident that residents are supportive of the way rents will be set on the new homes.

The potential negative impact of higher rent costs can be mitigated through a number of means: detailed housing needs assessments (including financials) before being moved to a new home; support via the council such as from the employment and skills team, income collection team, and Discretionary Housing Payments; and the fact that existing properties on the estate (which have lower rents) will become available as a result of residents moving under the Neighbourhood Moves Scheme.

- The ballot
 - a. Ensuring fair and equal access to the ballot.

Due to the higher proportion of women than men as named tenants and leaseholders, more women than men were eligible to vote in the ballot under the GLA rules. The ballot gave residents multiple voting options – freepost mail, online, and over the phone – to ensure all residents had equal opportunities to participate in the ballot. Turnout was 55%, which represents an exceptionally high turnout based on previous engagement levels of 10 -12% on average and boroughwide turnout at local elections of approximately 40%.

- Engagement
 - a. Ensuring residents are able to access and respond to the consultations.

Engagement has taken place using a variety of methods – including online, outdoor exhibitions, written questionnaires, and phone calls – to enable all residents to be able to respond and provide feedback.

Impacts

This proposal will have both a positive and negative impact on people due to this protected characteristic.

4i. Sexual Orientation

Data

Borough profile ¹⁰

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Target Population Profile

Sexual orientation is frequently under-reported in Homes for Haringey data, with fewer than 5% of households reporting this. From the data available, there is no suggestion that LGBTQ+ people are over-represented on the estate.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Homes for Haringey resident data.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic.

However, the following points should be noted:

- The re-provision of the GP in the wellbeing hub should improve healthcare and service provision on the estate, positively impacting any LGBTQ+ people with specific healthcare needs.

It is understood that those who have this protected characteristic may face disproportionate challenges in the labour market. The approach to the rent strategy is felt by the council to be the fairest way to improve the quality of housing for residents whilst ensuring that residents are not financially worse off. Mitigations, as set out in this EqIA, will be in place to support residents.

Impacts

This proposal will have a neutral to positive impact on people with this protected characteristic as set out above

¹⁰ Source: ONS Integrated Household Survey

4j. Socioeconomic Status (local)

Data

Borough profile

Income¹¹

Haringey is the 4th most deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough.

22.4% of the population in Haringey aged 16-65 receive Universal Credit as of March 2021.

29% of employee jobs in the borough are paid less than the London Living Wage. The average wage of someone working in Haringey is £30,452 per year and the average resident wage (including people who travel out of the borough for work) is £35,769 per year.

Educational Attainment¹²

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it performs worse than London.

5.5% of Haringey residents have no qualifications.

Target Population Profile

Historically, Broadwater Farm has been affected by deprivation, with high unemployment in the 1980s. The estate falls across LSOAs including Haringey 013D which, as of 2015, is ranked 1,271 out of 32,844 LSOAs in England; where 1 is the most deprived. This puts residents of Broadwater Farm amongst the 5% most deprived neighbourhoods in the country.

Across Haringey, the majority of the areas that fall within the 10% most deprived nationally category lie within Tottenham. Within this context, Broadwater Farm represents a concentration of deprivation across several categories.

As of 2015, Broadwater Farm falls in a LSOA ranked 4693 out of 32,844 for education, skills and training; among the 20% most deprived for education, skills and training.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

¹¹ Source: Annual Survey of Hours and Earnings, ONS, 2019

¹² Source: Annual Population Survey 2019 (via nomis)

Lower Super Output Area (LSOA) data.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Overall impact

Broadwater Farm residents are disproportionately from lower socio-economic backgrounds (compared to borough, London and national averages). These proposals will overall have a positive impact on people from lower socio-economic backgrounds as they will get an improved neighbourhood that is safer, has upgraded and new green spaces, better amenities, is more accessible to those walking and cycling, and has more family homes. Furthermore, as the new council homes at council rents will be prioritised for returning and existing Broadwater Farm residents under the Broadwater Farm Rehousing and Payments Policy (BWRFP) and Neighbourhood Moves Scheme, households from lower socio-economic backgrounds will benefit from these homes disproportionately.

Construction process

The proposals may have some negative impacts in the short term, as a result of the demolition and building process and associated disruption.

To mitigate these impacts, contractors will be required to submit a detailed plan for how to minimise all disruptions and alternative access routes will be provided. This may include using the most suitable modern methods of demolition and construction, ensuring working hours are considerate, and designing site boundaries in the most thoughtful way possible. This will ensure residents can still access the local bus service on the estate.

Social infrastructure and local economic impact

Further to this, as a result of the large design, demolition, and construction contracts for this project – residents and local people will be able to benefit from jobs, skills and training opportunities that can help them increase their income. The council will have significant leverage as part of this development, such as using ‘social value’ conditions and specifying the need for local job and/or training opportunities in contracts.

For example, as part of the contract with Karakusevic Carson Architects, a young resident was awarded a paid internship opportunity and a number of other young people continue to benefit from part-time paid work (and associated skills training) through the creation of a youth group on the estate. The youth group – the Lost

Blocks Collective – has provided paid opportunities to around 6 young people from the local area and helped them develop skills such as invoicing as self-employed, media and creative skills and training in bid writing and grant submissions.

- Rent strategy.

All of the 294 new and replacement homes to be built on Broadwater Farm will be council homes at council rents. Current council rents across the borough are a patchwork of historic rents which are dependent on the policy in place when each tenancy started, with a significantly lower rent-setting policy applying in Haringey prior to 2013/14 and changes introduced by the Government to the way rents are set over the years. Currently the council sets new rents at “target rent”, and this is the rent that would apply to new tenants allocated secure tenancies on the estate under the Allocations Policy. Whilst these homes will still be council rents, it is likely that they will be more expensive than the average council rent currently paid by residents on the estate. This is a result of a combination of factors:

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The exact rents would depend on the inputs to the formula at the time and the bedroom size of the property. Service charges on the new homes will be calculated based on the services that are provided, with the aim to ensure that costs are minimised through designing buildings which are easier and more affordable to maintain. The exact level of service charges will be determined at a later date. We will be working closely with residents to understand the type and level of services that tenants and leaseholders want and need, and ensure that these are affordable.

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households choosing to return to the estate are not being exposed to the higher rents which would apply if the rents were set in line with council formula rents. The rents are proposed to be set at the average BWF rent plus 10% to reflect the fact that residents will be moving to a brand-new home, while limiting the impact on household finances. While these (proposed) rents are higher than the rents in these households' former BWF homes, they are generally less than the current rent that the tenants are paying in their present homes off of the estate. , The council believes these rents will be partially offset by energy bill savings from the new homes' increased energy efficiency (e.g. 'You've Got the Power', HBF, 2017), which will continue to be developed through the design of the new homes, and reflects the fact that residents will be moving to a brand-new home. Officers have been reviewing the approach to rent-setting across London for regeneration schemes and believe that the approach proposed for Broadwater Farm is comparable and fair.

New homes on the estate allocated to residents under the Allocations Policy or Neighbourhood Moves Scheme will have rents set at council formula rent, as would be the case in any other secure tenancy they are granted in the borough. The council believes this is a fair approach, as people who are not required to move as a result of rehousing will have a choice whether to take up one of the new homes.

Although it is possible that this may have a negative impact on a small number of residents who choose to move to the new homes, council rents will still be more affordable than private rents and no one will have to move to the new homes if they cannot afford to.

This may have a disproportionate impact on those from the lowest socio-economic households who would benefit from the homes but cannot afford them. However, in general households from a lower socio-economic background will disproportionately benefit from the new council homes which will still offer the most affordable and secure tenancy type for renters.

In addition to these considerations, the Council set out the anticipated weekly rents of the new council homes to all eligible residents in the FAQ as part of the Landlord Offer for the ballot. With 85.1% of residents voting in support of the proposals, on a turnout of 55%. Therefore, the council are confident that residents are supportive of the way rents will be set on the new homes.

The potential negative impact of higher rent costs can be mitigated through a number of means: detailed housing needs assessments (including financials) before being moved to a new home; support via the council such as from the employment and skills team, income collection team, and Discretionary Housing Payments; and the fact that existing properties on the estate (which have lower rents) will become available as a result of residents moving under the Neighbourhood Moves Scheme.

Impacts

This proposal will have both a positive and negative impact on those from lower socio-economic backgrounds as set out above

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

Overall, the proposals will have a positive or neutral impact on all groups with protected characteristics – who will benefit from potentially getting a new council home, new green and open spaces, improved security, better accessibility and walkability, improved security and lighting, and more amenities such as shops and workspaces.

Where negative impacts have been identified, the council believes that these can be mitigated successfully to ensure disproportionate impacts are either avoided or minimised.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

Many of the groups identified in this EQIA will fall in to two or more categories of protected characteristics, such as BAME women with disabilities or elderly LGBTQ+ people from lower socio-economic backgrounds. Therefore, the impacts of these proposals cannot be considered in isolation. For example, this EQIA acknowledges that BAME people are disproportionately represented on the estate and that people from lower-socio economic backgrounds are also disproportionately represented – many people will fall into both of these categories. This could mean that they will be impacted by both the positive impacts of the improved estate and the negative impact of the higher rents of new council homes. The mitigations noted throughout this EQIA will ensure that support is available to those that fall into two or more protected categories.

5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

Not applicable.

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- 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?
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The proposal will not result in any direct or indirect discrimination against individuals with protected characteristics. Overall, it is anticipated that the equalities impact of this proposal will be positive but where potential negative impacts have been identified, the mitigations that will be taken have been outlined.

The proposals will help to advance equality of opportunity by creating a fairer, more equal estate with more opportunities, better housing, improved public space, a safer environment and improved green and open spaces. These benefits will improve the sense of community on the estate, ensuring that everyone feels safer and more welcome spending time on the estate. This will improve cross-community relations in the medium- to long-term by empowering the community and creating an improved neighbourhood for people to live.

7. Amendments and mitigations

Where mitigations are relevant, these have been detailed above.

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

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

Please delete Y/N as applicable

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. 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

Y

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below 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

N

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.

N

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action: The actions taken are explained throughout this EQIA.

Lead officer: N/A

Timescale: N/A

Please outline any areas you have identified where negative impacts will happen because 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 the:

The actions taken to mitigate negative impacts are explained throughout this EQIA.

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

The decision related to this EQIA is being taken by the Cabinet in December 2021. Further equalities assessments will be carried out where necessary throughout the delivery of the proposals.

Date of EQIA monitoring review:

This EQIA was originally published on 07.12.2021 as an appendix to the December 2021 Cabinet decision regarding Broadwater Farm. It has been updated to reflect the outcome of the resident ballot and for submission with the planning documentation for the delivery of the proposals outlined.

8. Authorisation

EQIA approved by (Assistant Director/ Director) Peter O'Brien

Date of Update and Approval 08.03.2022

9. 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.