

You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the <u>guidance notes</u> and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: <u>Equality Impact Assessment</u> - sources of statistical information.

Equality Impact Assessment (EqIA)								
Type of Decision:		ther (state)						
Title of Proposal	Grange Farm Estate Regeneration Phases 2 and 3	Date EqIA created 05/10/2022						
Name and job title of completing/lead Officer	Meghan Zinkewich-Peotti, Housing Strategy Project Manager							
Directorate/ Service responsible	Housing Regeneration, Housing Services, Place	Directorate						
Organisational approval								
EqIA approved by EDI Team	Name Zayn Darr Equality, Diversity & Inclusion Project Support Officer	Signature Tick this box to indicate that you have approved this EqIA Date of approval 28/10/2022						

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)

a) What is your proposal?

The regeneration of the Grange Farm estate in South Harrow is underway, with Phase 1 due to be completed by Higgins in early 2023. Phase 1 is made up of 69 social rented homes and 20 shared ownership homes. The original housing on the estate was made up 282 properties, a mix of bungalows and Resiform flats (a unique and non-traditional type of building involving the use of fibreglass panels for external walls). The flats were beyond economic repair and were difficult to heat. Planning permission was granted in March 2019, with detailed consent for Phase 1 (89 homes) and outline consent for Phases 2 and 3 (485 homes). An EQIA was completed for the Grange Farm Regeneration Project in May 2016, following a Housing Needs Assessment carried out in 2014. A separate Health Impact Assessment was also undertaken to track the long term impact of the regeneration scheme. With regards to the HSDP, an EQIA was completed on the 'Harrow Strategic Development Partnership – Contract Close and Establishment' for the Cabinet meeting on 15 July 2021. This EQIA concerns progressing Phases 2 and 3 of the Grange Farm Estate Regeneration project.

Under the current planning approved scheme, the project would deliver 574 new homes to replace the existing properties, providing a total of 1952 bed spaces. There would be 249 new homes for social rent, 25 new homes for shared ownership and 300 new homes for sale, as well as a new community centre and 260 parking spaces. Other amenities include secure cycle spaces, high quality landscaping, improved pedestrian access to Northolt Road, and a new pedestrian link to the adjacent retail park. The additional new homes for market sale help support the cost of regeneration. The regeneration project is creating opportunities such as apprenticeships. Phase 1 is under construction due for completion in Spring 2023. A new planning application will be submitted for Phase 2 and 3 during 2023.

Some empty homes on the estate have been used by the council as temporary accommodation for homeless households, let on non-secure tenancies. These non-secure tenants have been or will be offered alternative temporary accommodation by the Housing Needs service, with the timing dependent on the location of their accommodation on the Grange Farm Estate. Existing secure tenants, leaseholders and freeholders will also be moving from their current homes.

All existing secure tenants were given the choice of a permanent move away from Grange Farm to another rented council property at the beginning of the regeneration to enable Phase 1 to start, or to stay and move into a new Grange Farm rented unit of the right size for their household. This will mean some tenants having to move twice, once into a temporary property and then into their new permanent home. All secure tenants having to be rehoused are receiving a Home Loss and Disturbance payment (currently £7,100) and their direct costs associated with moving will be paid for by the council. Some secure tenants will not be returning to Grange Farm- the reasons for this include moving to alternative council or housing association properties on a permanent basis, moving to sheltered housing for older people, moving into a care home, and moving away from the area. A small number of secure tenants have died since the start of the project.

To regenerate Grange Farm Estate and deliver the associated benefits to Grange Farm Estate residents, the council needs to secure all land interests within the planning site boundary. To ensure that phases 2 and 3 can be delivered, the council has made the London Borough of Harrow Grange Farm Estate Regeneration Phases 2 and 3 Compulsory Purchase Order (CPO) 2020. The CPO authorises the council to compulsory purchase the land described in the CPO for the purpose of delivering Phases 2 and 3 of the approved scheme.

All those who own property on the existing Grange Farm Estate are being fully compensated for the value of their property as the council buys them back whether this be by negotiation or under the CPO process. Resident owners will receive an additional 10% of the property value due to the disturbance involved, for non-resident owners this is 7.5%. Their legal costs will also be met as well as other reasonable associated costs. Leaseholders and freeholders can then either move and buy elsewhere or purchase a new home on the estate.

A Steering Group of local residents living on Grange Farm Estate has been involved in the project, reviewing the plans, and comparing them to other developments both within and outside of Harrow. They will continue to be involved throughout the project. This ensures that the new Grange Farm will be of the highest standard and meet the needs of local people for many years to come. The Steering Group has received independent information from their Independent Tenant Advisor paid for by the council and has been meeting regularly to discuss and be closely involved with the regeneration plans. The Steering Group has a website and there is a dedicated section on the Council website. The Grange Farm Estate Residents' Charter is in place. A newsletter is produced regularly to keep residents up to date. Two Housing Officers are available on site every other Wednesday.

b) Summarise the impact of your proposal on groups with protected characteristics

The previous EQIA completed in 2016 concluded that while there was a risk that the regeneration of the estate could potentially have a disproportionate adverse impact on those existing residents who share the protected characteristics of age and disability due to the disruption of having to move, the evidence showed that the greater likelihood was that the impact on these protected characteristics would be positive because the regeneration project will result in a better mix of affordable rented dwellings than currently exist including one, two, three and four bedroom homes which can meet a wide range of needs. All existing secure tenants are offered the option of a new home or, if they prefer, to move to a suitable dwelling elsewhere in the borough. Existing tenants with disabilities are being offered a new home to meet their needs for adapted or wheelchair accessible housing. Additional assistance is being provided to vulnerable households to facilitate a move into a new dwelling.

The original sub-standard properties, that were beyond economic repair and difficult to heat, are being replaced with brand new homes built to modern standards and high levels denergy efficiency and accessibility. This will benefit all residents on the estate, particularly in the context of cost of living concerns but may have a particularly positive impact on older people and people with disabilities.

10% of the new homes will be built to meet the council's and London Plan requirements for fully accessible wheelchair housing with the remainder to Lifetimes Homes standards as set out in Building Regulations. Existing tenants are being offered a new home based on their current housing need including need for adapted or wheelchair housing. Adaptations will be provided to meet individual household requirements as assessed by an Occupational Therapist (OT). This will have a positive impact on older tenants and tenants with disabilities.

Existing secure tenants have been offered the option of moving into a new home on the estate that meets their current housing needs or moving to another suitable home elsewhere in the borough. Some tenants may need to move temporarily during the building works and assistance is being provided for both temporary and permanent moves. Additional assistance will be provided to vulnerable residents including older people and people with disabilities.

Non-secure tenants living on the estate as temporary accommodation have been or will be required to move. While this may be inconvenient, it is not unusual for temporary accommodation. They will always be offered temporary accommodation that is suitable for the needs of their household.

It is possible that additional social housing homes will become available on the estate at the end of Phase 3, either because the final mix and number of homes provides exceeds the housing needs of those expect to return or because some tenants decide not to return to the estate later in the process. Any homes that become available will have a positive impact on applicants on the housing register, who generally face a long wait for social housing in Harrow.

The new social housing on the estate will be available in perpetuity. When any of the secure tenants move on from their home on the estate, the properties will become available to an applicant on the housing register. This is a positive impact for those applicants and future tenants.

c) Summarise any potential negative impact(s) identified and mitigating actions

Moving house can be disruptive and stressful, and can be more difficult practically for some residents due to age or disability.

Mitigating actions: Each household need is assessed to ensure they receive an offer of a suitable property. Assistance is being provided to secure tenants for both temporary and permanent moves. Additional assistance will be provided to some tenants including older people and people with disabilities, such as help with packing and unpacking. We have a dedicated member of staff assisting with the coordination of the moves etc. Eligible secure tenants are entitled to statutory Home Loss and Disturbance payments to compensate for the cost of moving.

Leaseholders will also be entitled to Home Loss and Disturbance payments and resident leaseholders who are unable to afford a move to suitable accommodation in the local area are also able to take up an equity share option, either on a new home on the estate or elsewhere.

Additionally information is shared and processes agreed with the Steering Group of local residents living on Grange Farm Estate which meets regularly and the Independent Tenant Advisor. The Steering Group has a website, there is a Grange Farm section of the Council website, the Grange Farm Estate Charter, the regular newsletter, and the regular presence of housing staff at the community centre. These factors help to keep residents engaged and informed. The council has also worked with voluntary sector partners to support them providing community activities particularly aimed at supporting children of all ages as well as providing services to assist with food poverty and engaging teenagers. These have all have a positive impact with regard to the Public Sector Equality Duty.

protected chara information, cor what impact (if	d to undertake a detailed analysis of the impact of your proposals on groups with acteristics. You should refer to borough profile data, equalities data, service user insultation responses and any other relevant data/evidence to help you assess and explain any) your proposal(s) will have on each group. Where there are gaps in data, you should boxes below and what action (if any), you will take to address this in the future. For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the	impact y with pro- relevant proposa	/hat does the evidence tell you about pact your proposal may have on graith protected characteristics? Click the elevant box to indicate whether your coposal will have a positive impact, egative (minor, major), or no impact Negative impact		
	outcome of your analysis.	Positive impact	Minor	Major	No impact
Age	It is anticipated that all ages groups will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities on the estate. Of the secure tenants, 39% in Phase 2 and 37% in Phase 3 are aged over 65. It is more likely that this age group may find the process of moving between homes difficult. However, this is not a homogenous group and secure tenants in this age group will have different abilities and support networks. We meet with every resident so we know their needs and can provide assistance where needed. Phase 2 Head of household information- sole and joint tenants Source: Northgate Age Range				

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Between 46-55	1	6	17	24
Between 56-65	2	2	11	15
Less than 25	1	0	0	1
Over 65	2	0	24	26
Grand Total	7	21	61	89

Secure tenant households 0-5 Years 5 children 6-18 Years 12 children

Phase 3

Head of household information- sole and joint tenants Source: Northgate

Age Range	Freehold	Leasehold	Non Secure	Secure	Grand Total
Between 25-35	0	4	2	3	9
Between 36-45	2	1	5	5	13
Between 46-55	2	1	3	13	19
Between 56-65	0	3	1	15	19
Less than 25	2	2	0	0	4
Over 65	0	0	1	24	25
(blank)	0	0	0	5	5

	Grand Total	6	11	12	65		94		
	Secure tenant 0-5 Years 1 6-18 years 25	children							
Disability	to do so. During tenants required This will inform ground floor has anticipated homes, built to the new americans.	ng Phase 1 or ing accessible plans for Phase are produced that tenant o good accessities on the expension of	f the proje e propertion nases 2 are ovided. s with disalesibility and estate.	ct, it was notes was high nd 3 of the publications bilities will dienergy eff	oted than project, benefit ficiency	at the nurn recorded for examination the standard	ds, as well as from		
	Of the secure tenants, 25% in Phase 2 and 20% in Phase 3 have reported that the have a disability. It is more likely that this group may find the process of moving between homes difficult. However, this is not a homogenous group and secure tenants in this group will have different abilities and support networks. Assistance will be provided where needed.								
	Phase 2								
	Head of household information- sole and joint tenants Source: Northgate								
	Disability I	Leasehold No	n Secure S	Secure Gran	nd Total				
	Hearing	0	0	1	1				

Grand Total	7	21	61	89
(blank)	7	20	45	72
Visual	0	0	1	1
Vision	0	0	1	1
Physical	0	0	4	4
Not disclosed	0	0	1	1
Mobility	0	0	4	4
Mental heath	0	1	4	5

Phase 3

Head of household information- sole and joint tenants Source: Northgate

Disability	Freehold	Leasehold	Non Secure	Secure	Grand Total
Hearing	0	0	0	1	1
Mental heath	0	0	0	2	2
Mobility	0	0	0	7	7
Physical	0	0	0	3	3
(blank)	6	11	12	52	81
Grand Total	6	11	12	65	94

Gender reassignment	Tenants are not required to choose not to do so. The datherefore very limited. The not case basis. It is not anticipat specific protected characterinew modern homes, built to well as from the new amen	ata available releads of each hole of each hole of each hole of the each h	lating to this ousehold are ill be any ne ated that thi ibility and e	protected being co gative imp s group w	I characteristic is ensidered on a case pact related to this ill benefit from the	by		
Marriage and Civil Partnership	Tenants are not required to and many choose not to do a case by case basis. It is not to this specific protected characteristic will be accessibility and energy effective estate. Phase 2 Head of household informatical many choose 10 cm.	o so. The needs ot anticipated the gracteristic. It is benefit from the ficiency standa	s of each ho at there will anticipated new mode rds, as well	usehold a be any ne that all gro rn homes as from t	re being considered egative impact relate oups within this s, built to good	l on ed		
	Source: Northgate Marital Status Civil Partnership Cohabiting - opposite gender Married Prefer not to say	Leasehold No 0 0 2 0	n Secure Solution of Secure Solu	ecure Gra	1 1 1 18 4			

`				1	1 2	3 2	5		
	olank)			4 1	17 1	9 4	0		
G	rand Total			7 2	21 6	1 8	9		
He	hase 3 ead of househ ource: Northga		nation- sole	and joint ten	ants		_		
М	larital Status	Freehold	Leasehold	Non Secure	Secure	Grand Total			
C	ivil Partnership	0	0	0	1	1			
M	larried	0	1	0	16	17			
Pi	refer not to say	0	0	0	2	2			
Si	ingle	0	0	1	22	23			
(b	olank)	6	10	11	24	51			
G	rand Total	6	11	12	65	94			

Race/ Ethnicity

Tenants are not required to provide information on race or ethnicity, and many choose not to do so. The needs of each household are being considered on a case by case basis. It is not anticipated that there will be any negative impact related to this specific protected characteristic. It is anticipated that all groups within this protected characteristic will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities on the estate.

Phase 2

Head of household information- sole and joint tenants

Source: Northgate

Ethnicity	Leasehold	Non Secure	Secure	Grand Total
		4		
Afghan	2	1	2	5
Bangladeshi	0	0	2	2
Black African	0	3	10	13
Black Caribbean	0	0	3	3
Black Other	0	0	2	2
Indian	0	0	6	6
Irish	0	0	1	1
Not disclosed	1	6	7	14
Other	0	0	2	2
Other Asian	1	4	7	12
Pakistani	0	3	1	4

Somali	0	1	5	6
Sri Lankan	0	0	2	2
White Other	1	0	3	4
White UK	2	3	8	13
Grand Total	7	21	61	89

Phase 3

Head of household information- sole and joint tenants

Source: Northgate

Ethnicity	Freehold	Leasehold	Non Secure	Secure	Grand Total
Afghan	0	0	2	0	2
Albanian	0	1	0	0	1
Black African	3	0	0	5	8
Black Caribbean	0	0	0	6	6
Black Other	0	0	0	2	2
Indian	0	5	0	8	13
Irish	0	0	0	2	2
Mixed Any other mixed background	0	0	0	1	1
Mixed White/Black Caribbean	0	0	0	1	1

	Not disclosed		2 0	7	13	22		
	Other		0 0	0	1	1		
	Other Asian		1 5	2	2	10		
	Pakistani		0 0	0	1	1		
	Somali		0 0	0	4	4		
	Sri Lankan		0 0	0	3	3		
	White UK		0 0	1	15	16		
	(blank)		0 0	0	1	1		
	Grand Total		6 11	12	65	94		
Religion or belief	Tenants are not required choose not to do so. case basis. It is not an specific protected characteristic will beneat the energy efficiency star. Phase 2 Head of household in Source: Northgate	The needs of each nticipated that there racteristic. It is anticefit from the new mandards, as well as	household are leave will be any negoipated that all godern homes, from the new a	being considuative impactive impacti	dered on of related n this pro d access n the est	a case by to this otected sibility and		
	Religion	Leasehold Non S	ecure Secure	Grand Tota	ıl			
	Agnostic	0	0 2		2			
	Christianity	0	2 11	•	13			

Hinduism				
Islam	2	1	10	13
Jain	0	0	1	1
Judaism	0	0	1	1
No Religion	0	0	3	3
Prefer not to say	0	0	4	4
(blank)	5	18	25	48
Grand Total	7	21	61	89

Phase 3

Head of household information- sole and joint tenants Source: Northgate

Religion	Freehold	Leasehold	Non Secure	Secure	Grand Total
Agnostic	0	0	0	2	2
Agnostic					
Catholic	0	0	0	1	1
Christianity	0	0	0	13	13
Hinduism	0	0	0	11	11
Islam	0	1	2	5	8
No Religion	1	0	0	0	1

Prefer not to say	0	0	C	1	1				
Sikhism	0	0	С	1	1				
(blank)	5	10	10	31	56				
Grand Total	6	11	12	65	94				
It is not anticipate protected charact by case basis. It benefit from the n standards, as we Phase 2 Head of household Source: Northgate	eristic. The needs is anticipated that new modern hom all as from the ne	s of each ho t all groups v es, built to w amenities	usehold are within this po good acces s on the est	being co otected o sibility ar	nsidered on a d haracteristic w	rill			
Gender	Leasehold	Non Secure	e Secure G	irand Tota	ıl				
Male	5	5	5 22		32]	
			16 39		57				
Female	2	-					l		
Female Grand Total	7		21 61		89				

	Male	2	5	4	28	39				
	Female	4	6	8	37	55				
	Grand Total	6	11	12	65	94				
Sexual Orientation	The data available relat some tenants identifiable household are being cowill be any negative impanticipated that all group modern homes, built to as from the new amen	e so the data nsidered on a pact related to ps within this good acces.	has not beer case by cas this specific protected cha sibility and e	n included. ⁻ e basis. It is protected cl aracteristic v	The needs s not antici haracterist will benefit	of each pated that there ic. It is from the new				
	e impact – considerin itive impact on group No					ncil and Harro	w as a wl	hole, cou	ld your pro	oposals
	provide new housing the new housing th								larly in rela	ition to
	impact - considering ould your proposals No							l policies	, socio-ec	onomic
In view of the cur all groups.	rrent concerns about the	cost of living,	new homes	that are bui	It to a high	energy efficien	cy standar	d will have	a positive ir	npact on

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer
Moving temporarily or permanently	Assessment of housing need, offer of suitable accommodation, assistance available	Feedback from residents and Steering Group, review of complaints and compliments	End of Phase 3	Salome Irungu
Difficulty with moving process	Additional assistance available	Feedback from residents and Steering Group, review of complaints and compliments	End of Phase 3	Salome Irungu
Expenses incurred and inconvenience	Home Loss and Disturbance payments	Payments made within agreed timescale	End of Phase 3	Salome Irungu
Expenses incurred	Moving costs paid for by the council	Moves completed and removal costs paid by the council	End of Phase 3	Salome Irungu
Information	These factors help to keep residents engaged and informed: Steering Group of local residents living on Grange Farm Estate which meets regularly, the Independent Tenant Advisor, the Steering Group has a website, the Grange Farm section of the Council website, the Grange Farm Estate Charter, the regular newsletter, and the regular presence of housing staff at the community centre.	Feedback from residents and Steering Group, review of complaints and compliments	End of Phase 3	Alison Pegg

4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

- 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
- 2. Advance equality of opportunity between people from different groups
- 3. Foster good relations between people from different groups

The objective of the Grange Farm Estate regeneration project is to improve the quality and mix of housing on the estate, to benefit residents across all protected characteristics. Modern housing and amenities will support equality of opportunity and better outcomes for residents of the estate and the local area. The resident engagement and involvement on this project foster good relations between residents from different groups. The council is working with voluntary sector partners to support them providing community activities particularly aimed at supporting children of all ages as well as providing services to assist with food poverty and engaging teenagers. The resident community is very diverse and cohesive and their vision for the new community is to continue being open and inclusive to all.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies
☐ Outcome 1 No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed
Outcome 2 Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4
Outcome 3 This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.
Include details here