LB TOWER HAMLETS

EQUALITY IMPACT ASSESSMENT (REFRESH)

HARRIOTT, APSLEY AND PATTISON HOUSES REGENERATION SCHEME

March 2025

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LB Tower Hamlets
Equality Impact Assessment (Refresh)

Harriott, Apsley & Pattison Houses Regeneration Scheme

Independently Reported by Ottaway Strategic Management Ltd

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1 Executive Summary

Introduction and context

1.1 Regeneration programmes need to be managed to ensure that the positive impacts of the regeneration are maximised and correspondingly to ensure that the negative impacts are minimised. In this context, the regeneration of Harriott, Apsley & Pattison Houses has undergone an Equality Impact Assessment (EQIA).

1.2 This independently commissioned Equality Impact Assessment seeks to understand how this regeneration programme will impact on different equality groups and protected characteristics as defined in the Equality Act 2010.

Approach and methods

1.3 This EQIA includes a comprehensive desktop review of core legislation, policy and council papers. These are set out in Appendix 3. The report also reviews local demographic data as per the 2021 census and the equality information specific to housing needs in the borough. Data held by the borough has also been reviewed relating to those living on the estate as well as the borough's common housing register for people seeking a social housing tenancy. This data only includes the equality characteristics of age, gender and ethnicity.

1.4 On this basis, it was agreed with the Housing Regeneration Team that this EQIA would be supplemented with a targeted household survey completed by a survey team. To this end, a full household equalities survey was conducted in February and March 2021.

Key household survey findings

1.5 The survey was undertaken between 24th February and 12th March 2021 and 72 responses were captured. Full details of the household surveys are set out in the main report in Section 4. These survey responses were based on self-declarations by a household member, but the information gathered relates to all the members of that household. In total, 72% of the targeted households were engaged in this survey, or 72 of the estate's 100 units. The key findings of the Harriott, Apsley & Pattison survey comprised of responses from:

- 31 council homes, comprising 43.1% of the survey respondents and 86% of the sample of council owned homes on the site (36 units).
- 23 resident leaseholder homes, comprising 31.9% of the survey responses and 68% of the sample of resident leaseholders on the site (34 units).
- 2 non-resident leaseholders and 16 privately tenanted households, comprising 25% of the survey sample and 60% of the sample of non-resident /privately tenant households on the site (30 units).

1.6 The headline equality findings of the survey were:

- 74 households engaged in this survey, or 74% of the estate (100 units).

- Collectively 76% of residents in the survey sample have lived in their home for more than 6 years.
- From the sample there were 344 people living in the 72 units, 141 of which are council tenants, 112 are resident leaseholders and 91 are non-resident / private tenants.
- BAME populations on the Harriott, Apsley & Pattison House are significant. The white British population in Harriott, Apsley & Pattison House is 7%, leaving a 93% ethnic minority population[1] and a BAME population[2] of 90.6% non-white populations. This compares to a borough ethnic minority population of 66% and a BAME population of 55%. The residential profile of Harriott, Apsley & Pattison House is more diverse than the profile of the borough.
- The Bangladeshi population of the estate is the majority ethnic grouping, with 72.2% of the population overall, 80.1% of council tenants, 79% of resident leaseholders and 52% of non-resident leaseholders and private tenants.
- The gender profile of the estate is comparable with the borough's gender profile with 51% stating they were male, and 49% female compared to 52% male and 48% female in the borough.
- 8.3% of the households were run by lone parents.
- 15.3% of respondents on the estate stated they have a disability.
- Of these, 43.9% stated they had a long standing illness and health condition, 42.4% with physical impairments, 6.1% with mental health conditions, 4.5% learning disability and 3% sensory impairment.
- 6.9% of residents in the sample are registered carers.
- 31.9% of households have family members that look after or support someone else in their home who needs help with their day-to-day life due to a disability, illness, or old age.
- 15.3% of households in the sample stated they had made an adaptation to their home.
- 27% are under 18. The working age population (18-64) of those on the site is 66.9% and the over 65 population is 6.1%.
- None of respondents stated they were gay/lesbian or bisexual, 100% stating they were straight/heterosexual.
- 81% of respondents said they were Muslim, 10% with no religion and 6.1% stated they were Christian.
- Respondents stated that 0.87% of population (3 women) were either pregnant or had given birth in the last 12 months.
- In terms of marriage and civil partnership, 53% of adults over 16 have never been married or in a civil partnership, 41.4% were married, 1.4% separated, 1.4% divorced and 3.2% widowed.
- 80% were economically active, including 42% of household members who are employed full time, 9% employed part time with 12% in full time education and 17% unemployed and available for work. The remaining categories were

[1] Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British

[2] The acronym BAME stands for Black, Asian and Minority Ethnic and is defined as all ethnic groups except White ethnic groups.

economically inactive, including permanent sick and disabled, retired, looking after the home or full time carer, which collectively came to 20%.

- Bangladeshi is spoken as a main household language in 53% of households, English as a main household language is spoken in 40% of responding households. Somali and French is spoken in 2.8% of households respectively and 1.4% of households speak Portuguese. Moreover, of those who had English as a second language all households stated that they have strong written and spoken English.
- Respondents to the survey stated that 25% of households lived in 2 bedrooms, 58.3% in 3 bedrooms, 12.5% in 4 bedrooms and 4.2% in 5 bedrooms. N.B. there are no 5 bedroom units in Harriott, Apsley and Pattison and these responses came from private tenants of leasehold units, who clearly must have been using the living room as a bedroom.
- 44% stated their household has the right number of bedrooms, 56% stated they did not.
- 58% stated their household was overcrowded and 40% stated theirs was not.
- 4.2% stated that their home was under occupied and 93.1% stated that it was not.
- 12% of respondents felt there would be a negative impact on the health and wellbeing needs of their household.
- 8% felt there would be a negative impact on the childcare school provision of members of their household.
- 1% felt there would be a negative impact on the employment and skill needs of members of their households.
- 5% felt there would be negative impacts on the elderly care/support received by members of their households.
- 86% wanted to see improvements to health services, 85% improvements to community facilities, 46% to play areas, 36% to local shops, and 26% to local transport.
- 54% of household residents are on some form of income related benefit.
- 28.7% of households stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty.
- The preferred forms of communication about the regeneration proposals were telephone (75%), letter (42%) and email (29%).

Profile of the Redcoats Community Centre and Mosque

1.7 At the time of this EQIA refresh, the Mosque were approached to request a profile breakdown of those who worship there. Unfortunately, the General Secretary of the Redcoats Community Centre and Mosque declined to provide any information about the equality and diversity profile of its worshipers/congregation, as they were still in negotiations with the council, and they did not want to provide this information until the negotiations were complete.

1.8 It is, however, reasonable to assume that the worshipers at the Mosque are likely to come from a range of ethnic backgrounds and that they represent all age groups and genders. Clearly, there is also a collective association with the Islamic faith.

Perception of impact

1.9 The major issues and concerns raised by residents regarding their perceptions of their current housing and impact of the regeneration proposals are highlighted below:

Perceived concerns

- Car parking – this issue was raised repeatedly and there was great concern about how this was to be addressed following the regeneration of the estate.
- The loss of green space across the estate was also raised by several participants.
- Concerns around the possibility of fewer school places.
- Some general concerns about the uncertainty of regeneration and what it may bring for residents.

Perceived positives

- Many welcomed the regeneration of the estate, feeling that it would improve the look of what some considered to be a rundown estate and welcomed the possibility of a better environment.
- Some residents were experiencing overcrowding and felt that this may be addressed in the new development.
- Some leaseholders stated they couldn't currently sell their flat but, in the future, this would be easier, or they could sell to the council and move.
- A fresh environment and better housing conditions.
- Likelihood of larger properties.
- Reduction in anti-social behaviour.

Summary of positive, negative and neutral equality impacts.

Short term construction and environmental focused impacts include:

- The disruption accompanying the construction phase is expected to have a **negative impact,** particularly for older people, disabled people and those with specific health conditions, pregnant mothers and post birth mothers with young babies.
- The short-term changes to play space provision are expected to have a **negative impact** specifically for younger people.

- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact,** particularly for those who worship at the mosque which will be relocated before it is demolished.
- In the short term, the changes to housing provision are expected to have a neutral impact, particularly as the Council is looking to arrange for moves to new properties to take place as a single move, where possible. This would if achieved, somewhat mitigate the negative impacts of decant for older and disabled residents, and those with health conditions.

Medium to long terms impacts

- The housing needs of a wide range of protected characteristics will be **positively** enhanced through the development of these new units, providing opportunities for housing.
- The housing register in the borough has significantly more people from diverse communities when compared with the population profile of the borough, many of whom are likely to **benefit** from this regeneration scheme.
- Once the process is completed the new replacement housing is expected to have a **positive impact** for all the protected characteristics represented on the 3 blocks**.**
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a **positive impact** for young**,** older and disabled residents, those with health conditions and pregnant and or young mothers.
- The improved opportunities for social interaction provided as part of the completed development are expected to have a **positive impact** for young**,** older and disabled residents, those with health conditions and pregnant and or young mothers.
- The improved and expanded play space provided as part of the completed development is expected to have a **positive impact** for young residents.
- The community facilities provided as part of the completed development are expected to have a **positive impact** for young**,** older and disabled residents.
- The improved access to the site is expected to have a **positive impact** for young**,** older and disabled residents and pregnant and or young mothers.
- There will be more homes designed to a category 2 standard[3] for accessibility which is broadly equivalent to 'lifetime homes' standards. 10% of homes will be built for people with a disability which will have a **positive impact** for older and disabled residents.
- Improving the housing stock will provide homes to higher standards and hence improve the quality of accommodation for residents currently on the estate, potentially having a **positive impact** on residents' health and wellbeing.
- The planning obligations will provide economic benefits to the local community.
- Energy efficient design and improved sustainability should have a **positive impact** of lower running costs for new homes.

[3] Category 2 means a home must be accessible to most people and able to suit older people, those with reduced mobility and some wheelchair users, and is estimated to cost developers an extra £1,400 per home. Requirements include level access front and rear doors, an entrance level bathroom, kitchen and dining area and low height windows.

Summary of Equality Impacts by protected characteristics.

1.10 Summary of key points identified in relation to each protected characteristic, and related priorities of language, socio-economics and health:

Race

- High levels of racial diversity on the estate.
- Critical that the regeneration outcomes are consistent/fair and not influenced by someone's race.
- Regeneration plans as currently proposed are neutral from a race perspective.
- Negative impacts of other protected characteristics will be experienced more by minority ethnic groups given the estate's high levels of diversity; however, these negative impacts relate to other protected characteristics.
- No direct negative impacts identified from a race perspective.

Gender

- Gender profiles are broadly balanced within and outside the site.
- Strong sense that the improvement to housing stock and the provision of new homes would be a strong positive for the regeneration process benefiting families and all genders.
- Regeneration plans are neutral from a gender perspective.
- From the evidence gathered there are no identified negative impacts from a gender perspective.

Transgender

- No individuals are known to have undergone or are undergoing a gender transition on the estate.
- Limited data on the transgender population around the estate.
- The regeneration plans are neutral from a gender reassignment perspective.

Pregnancy/Maternity

Negative and positive impacts identified.

- Disruption during the construction period may negatively impact on pregnant mothers, babies and families with newborn children.
- Efforts to address this disruption will be universal to the whole population of the estate.
- The upgraded and improved social infrastructure and access throughout the site plus the improved

Sexual Orientation

- Limited data available on the sexual orientation of the residential population, as many households chose not to declare.
- Secure by design should afford greater levels of safety for all, which LGBTQ residents may also benefit.
- From the evidence of the scheme plans and the data collected, there are no stated negative impacts from a sexual orientation perspective.

Religion/Belief

- No aspect of the scheme that prevents residents from practicing their religion/faith. Indeed the scheme provided a new mosque, which is a positive improvement to the locality's social infrastructure.
- The rehousing team may need to ask people about how they use their places of worship to see the extent to which disruption to

opportunities for social interaction are likely to have a positive impact for pregnant and or young mothers

resident's lives could be minimised.
- No identified negative impacts from a religion/belief perspective.

Disability

Negative and positive impacts identified.

- Relatively high proportions of residents with disabilities and life limiting illnesses on the estate (15.3%).
- Disturbance of moving home & quality of life particularly if disability is associated with respiratory conditions.
- Potential for those with sensory impairments and issues relating to the nervous system to be affected by construction noise.
- New physical layout will be a challenge to those with visual/mobility impairment.
- People with learning difficulties may need specific forms of engagement to enable their understanding of the scheme.
- More homes will be designed to Cat 2 Standards for accessibility, equivalent to 'lifetime homes' standards will be positive for disabled residents

Age

Negative and positive Impacts identified.

- The estate has many long-standing residents who are older, this is reflected in both secure tenants (11%) and leaseholders (17.7%) over the age of 55.
- The scheme is more likely to negatively impact older people with a disability or health need, particularly during the demolition/ construction period.
- Older people are likely to be more settled and in need of support when moving.
- Disturbance, particularly for those on their own and those who are frail and vulnerable.
- Older homeowners may find it difficult to access financial products.
- For C&YP the loss of amenity and play space during the construction period will apply.
- Potential loss of informal childcare arrangements.
- Upgraded social infrastructure, opportunities for social interaction, improved assess and

Marriage/Civil Partnership

- Marriage and civil partnership status may have implications regarding property ownership and tenure if there have been changes since the initial occupation of the home.
- There are no identified negative impacts from a marriage / civil partnership perspective.

community facilities are likely to benefit older people.
- More homes will be designed to Cat 2 Standards for accessibility, equivalent to 'lifetime homes' standards will be positive for older and disabled residents.
- The improved and expanded play space provided as part of the completed development is expected to have a **positive impact** for young residents.

Language

Possible negative impacts identified.

- Possible lack of ability to communicate and or understand the implications of the regeneration process for some households.
- Understanding may also be connected to mental health, learning disability and age particularly those who are digitally excluded.
- Research suggests that all residents currently on site have good grasp of written and oral English.

Socio-Economic

Possible negative impacts identified.

- Potential increase in costs of rent for social rents in the new units and for leaseholders in shared equity accommodation.
- Potentially higher costs for older people with less earning capability.
- 28.7% of residents with household incomes below £15,000 (i.e. below the 'poverty line'.
- Potential savings due to energy efficient homes, although energy prices are rising steeply.

Health

Possible negative and positive impacts identified,

- Disruption of moving home and uncertainty about the future is likely to cause higher levels of stress, anxiety, and depression.
- Construction exacerbates existing conditions and may cause new health conditions, with likely impacts on respiratory and circulatory disease.
- High levels/prevalence of life limiting long term illness and long-term conditions.
- High levels of self-declared health needs like musculoskeletal pain, suggest a requirement for pathways and walkways to be designed to meet physical mobility needs.
- Improvements to housing stock will provide homes to higher standards and hence improve the quality of

accommodation benefiting their health and wellbeing.
- More homes will be designed to Cat 2 Standards for accessibility, equivalent to 'lifetime homes' standards will be positive for older and disabled residents.

Impacts to residents adjacent and in the vicinity of the scheme.

1.11 It is important in all regeneration schemes to review the impacts likely to be felt by those local communities and businesses who are either adjacent to the site or who are in the vicinity of the scheme. Most of these impacts are likely to be either the loss of open space, the construction and traffic movements to and from the site and the general disruption caused by the regeneration scheme.

1.12 From a business perspective there are 2 businesses within a 300m radius of the site. This includes a food retailer (chicken shop) and a general convenience store. Previous consultation with these businesses has suggested that they are supportive of the scheme as it is likely to provide some business growth during the construction period and beyond, when the additional new units are developed.

1.13 From a residential population perspective, this EQIA has some baseline population data for the Stepney Green Ward. To this end the key population characteristics for the ward are:

- Stepney Green has a proportionally larger younger person's population when compared to the borough and London. In contrast there are proportionately more older people (65+) in Stepney Green than in Tower Hamlets but fewer than in London and England.
- Stepney Green has a high proportion of black, Asian, mixed and minority ethnic populations, more than the borough and London.
- At just under 50%, Stepney Green has the third highest proportion of Muslims compared to other wards in Tower Hamlets.
- The proportion of residents in Stepney Green with disabilities and long term life limiting illness is greater than Tower Hamlets and London.
- The median household income in Stepney Green is below the levels for Tower Hamlets and London.

1.14 From this headline data, it is likely that there will be a higher proportion of older and disabled residents and black, Asian, mixed and other minority ethnic populations that would feel impacts from the construction and development phase of the scheme. This is likely to mean that the council and the scheme's development partner will need to address and consider these populations. This is particularly important in terms of the

environmental and construction impacts of the scheme and to address the needs of residents and businesses in the vicinity as effectively as possible.

Mitigation Priorities

1.15 As part of this EQIA, the following mitigation activity has been highlighted.

Generic mitigation activity

- An EQIA refresh programme to be adopted alongside predicted key milestones in the project lifetime.
- The staff working on this project are experienced and have worked with similar regeneration schemes across the borough, delivering to a diverse community. They have had equality training/briefings on one to one liaisons with residents.

Disability Mitigation activity

- Operationally, early engagement with those residents and households that have a member with a stated disability would be appropriate. This is particularly relevant to the households who identified sensory and physical impairments within their families, and where this would place additional challenges when moving disabled families to new properties. Consulting and engaging with disabled groups before, during and after change to check effects, outcomes and results is a legal requirement under the Equality Act 2010.
- In terms of formal adaptations for disability - some engaged have previously sought social services assessment for adaptations and equipment. In some cases, these assessments should be applied as the design of new homes can more easily accommodate these needs.
- The regeneration team to obtain the support of a dedicated occupational therapist / social services worker to assess the disability needs of residents.
- If leaseholders are seeking to leave the estate, referrals on to other Social Care Services should be made to mitigate any possible negative impacts that disabled people may experience.
- Support with adaptations in units on the new estate, designed specifically for the disabled person's needs should be a prerequisite.
- Disability grants reviewed and accessed for residents in specific need of support with funding of adaptations.

Age Mitigation activity

<u>Children and Young People</u>

- Secure amenity space both during and after the regeneration programme, and C&YP should also be engaged in the design of these future facilities.

<u>Older People</u>

- Ensure that wherever possible tenants, particularly those who are older, only move once into their new homes.
- Support for and recognition of the financial constraints that many older people will experience with an aim to support them to come to terms with the transition to a new home (if a tenant or leaseholder is staying on the estate)

and to support older people (tenants and leaseholders) who are moving away from the estate.

- To support older leaseholders to access the right options for them and to ensure that their support is maintained through to the conclusion of the CPO process and the allocation of new homes.
- Social services should be engaged to support any adaptations to new homes for older people, particularly those with a disability/health conditions as part of the decant process.
- Ensure that the shared ownership option for older people will allow them to transfer the equity in their proportion of their estate to their relatives/spouses.

Socio-Economic Mitigation issues

- Resident homeowners would be compensated by offering them market value, plus 10% home loss for their current home. Non-resident homeowners are being offered market value plus 7.5% for home loss. Disturbance costs including reasonable legal and valuation costs will also be paid, including moving costs, disconnection/reconnection of utilities, post redirection.
- The provision of these costs are also being given to council tenants.
- The regeneration programme will have impacts on residents, tenants and leaseholders alike, who might incur greater costs and hence become a burden for those residents unable to afford the associated costs. The council needs to monitor the potential for a consequential rise in the costs of the new properties both in terms of property value, rent and service charges.
- The council will need to carefully monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.

Language Mitigation

- Ensure the availability of adapted communications, translation and interpretation services for residents and leaseholders, when specific tenant engagement and leaseholder negotiation is being undertaken.

Health Mitigation issues

- Health Needs Assessments will need to be carried out, where required, and dedicated rehousing support provided by the council, including access to mental health support.
- Serious and long-term health conditions should be prioritised, but progressive conditions may need to be addressed.
- OT assessments may need to be established to mitigate negative impacts.

Intersectionality

- When you analyse what different groups are saying - what the young and old, families, disabled people and more vulnerable groups are asking for - a key priority is to restore the communities that they value and that they are currently part of. Rebuilding houses and people's lives must be accompanied by enrichment activities that place Harriott, Apsley & Pattison House communities in control of designing their future communities with all the values and commonality they shared in the past.

Conclusions

1.16 The regeneration of the Harriott, Apsley & Pattison Houses will have generic impacts for the whole community. However, equality impacts are likely to be concentrated through the protected characteristics of disability, age, and related priorities of health, socio-economic inequality and language.

1.17 The implications of the regeneration on disabled people, older and younger people on the estate is likely to be the most significant, both in terms of health and access to amenity provision. Cost implications of the regeneration have also been highlighted, and these are to do with the regeneration process, for example costs of moving from the old property and resettlement into the new home. In terms of cost the council intends to cover all reasonable costs associated with moving to the new home. Moreover, the rehousing offer seeks to protect older leaseholders who may not be able to renew a mortgage with a variety of options.

1.18 The impact of the regeneration process will have a significant bearing on leaseholders both resident and non-resident as the scheme will require the CPO of their properties if voluntary settlements cannot be achieved.

1.19 In some cases, those with less disposable income may have difficulty with maintaining leaseholder status if they decide to stay on the estate. This has been addressed through the leaseholder guarantees, which provide alternative options of shared equity and shared ownership arrangements. The borough will support the housing needs of private tenants displaced through the repurchase of lease holder properties, if they are on the housing register and are in bands 1 and 2. The remaining private tenants will be able to access housing advice or have their housing options assessed, and we understand that the council have been in contact with these private tenants.

1.20 Set out below are the key actions recommended as mitigations of negative impacts as part of this EQIA. These have been put into an action plan laid out in section 9 of this report.

Generic Actions

- Run EQIA briefing sessions, review training needs, and establish training where appropriate.
- Establish training where appropriate equality training / briefing / workshops for housing regeneration liaising teams.

Disability Mitigation Actions

- Arrange relevant occupational therapy/social services assessments for residents where identified.
- Liaison with social care teams in other authorities where residents are seeking to move to.
- Work with residents with complex disability and or health needs and provide services accordingly.
- Support with adaptations in new units on the new estate.

- Commission a repair person service to support additional fixtures and fittings.
- Ensure reasonable adaptations are implemented within the new homes in line with OT assessments.
- Ensure that disability grants are reviewed and that residents with specific need for support are provided with access to funding opportunities.

Age Mitigation Actions

- Engage young people in the design of the future amenity space within the new estate. Ensure existing amenity space is retained where feasible and safe, during the regeneration and construction.
- Provide opportunity for independent financial advice for any resident needing it.
- Commission handy person service to support additional fixtures and fittings.
- Support older leaseholders to access the right options.
- Preventing where possible more than one decant for older people in the development process.
- Engage social services to ensure that modifications and or care needs of older people are accounted for.
- Ensure that the shared ownership option for older people will allow them to transfer the equity from their property, should they die, to their relatives/spouse.

Socio-economic Mitigation Actions

- The council to monitor the potential for a consequential rise in the costs associated with the new properties both in terms of living costs and in terms of rent/mortgages.
- Private tenants will be rehoused if they are on the housing register and if they are in bands 1 and 2. The remaining private tenants will be signposted to the relevant housing options team/service and provided with information as to what their housing options are.
- The council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.
- Facilitate access to Independent Financial Advisors for all residents.

Language Mitigation Actions

- Make alternative formats, translation and interpretation provision available when specific tenant engagement, leaseholder negotiation and wider off-site consultations are undertaken.

Health Mitigation Actions

- Undertake health and medical assessment or OT assessments where required.

Intersectionality Mitigation Actions

- Develop enrichment activities for residents of the estate designed to rebuild communities.

2 Introduction and context

2.1 This Equality Impact Assessment (EQIA) has been commissioned as an independent report by LB Tower Hamlets Housing Regeneration team, and it will focus on the key elements of the housing regeneration proposals for the Harriott, Apsley & Pattison Houses.

Equality Act 2010

2.2 Tower Hamlets council, like all other public bodies, has a duty pursuant to s.149 of the Equality Act 2010 to have due regard to the need to:

(a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act,

(b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it,

(c) Foster good relations between people who share a relevant protected characteristic and persons who do not share it.

Tower Hamlets Equality Policy

2.3 Tower Hamlets is one of the most diverse boroughs in the country and equality is a central priority to the way the borough works for its communities. Moreover, in addition to the nine protected characteristics outlined in the Equality Act 2010, this EQIA will also consider 3 additional priorities of socio-economic inequality, health inequality and language, particularly English as a second language.

Equality Impact Assessments

2.4 This EQIA adopts the borough's model for equality assessments set by the borough's equalities policy leads. Like most other authorities, Tower Hamlet's equality assessments are a self-assessment tool to help look at the likely positive and negative impacts of the borough's work on staff, citizens, partners and communities regarding equality of opportunity, and promoting diversity in employment and service delivery.

2.5 Tower Hamlets is one of the most diverse boroughs in the country and its approach to equality expressed through an ambition of fairness and the guiding values of equal opportunity and social justice. The protected characteristics and Tower Hamlet's priority

characteristics are set out below. Each of these protected characteristics and Tower Hamlet's local priority characteristics will be assessed in this EQIA.

2.6 The EQIA will cover the following areas in the context of the council's general duty to have due regard to the need to:

- Eliminate discrimination.
- Promote equality of opportunity.
- Promote good relations between different people.

2.7 From a methodological perspective, the EQIA will focus on addressing:

- Likely regeneration programme impacts.
- Likely / expected equality impacts (i.e., impacts on protected characteristics/local priorities).
- Direct equality impacts.
- Indirect equality impacts.
- Proportionality of impact across protected characteristics/local characteristics including proportion, and disproportion, thereby assessing proportional positive impacts and negative impacts and or disproportional positive and negative impacts.
- As part of this process it is critical to enable the council to assess what actions it will undertake to address the outcomes of these assessments.
- This analysis will enable a process of highlighting these impacts, which will enable Tower Hamlets to choose options for the mitigation of negative impacts accordingly.

2.8 The housing regeneration scheme for Harriott, Apsley & Pattison Houses will also operate within the council's own policies. To this end the EQIA has reviewed:

- The Tower Hamlets Housing Strategy 2016-2021

- 'Homes for Londoners- A Draft Good Practice Guide to Estate Regeneration' (GLA)
- Strategic Plan 2020-2023
- Local Plan 2031
- The Council and its Common Housing Register Partners' Allocations Scheme (2020)
- London Plan

2.9 This EQIA has sought to address the context of the regeneration programme in Tower Hamlets and the core housing policies and processes which impact on residents.

3 The scheme

3.1 The current site consists of 100 homes based in the three blocks of Harriott House, Apsley House and Pattison House. The current tenure profile of the site is made up of 36 secure council tenancies, 34 residents leaseholders and 30 non-resident leaseholders, the majority of whom are renting their units to private tenants. Within the site there are also three additional non-residential facilities, the Redcoat Community Centre and mosque at 256 Stepney Way and two day care units for people with learning disabilities, the Day Opportunities Service (operated by LBTH) at 260-262 Stephney Way and the Vibrance Day Care unit at 262 Stephney Way (operated privately).

3.2 Like most urban areas, Tower Hamlets is experiencing a housing crisis. The borough is seeking to make the most of land that they already own, including buildings no longer used as they once were, as well as buying additional homes. However, this is not enough.

3.3 Through its options appraisal, the borough identified three options of refurbishment of the existing buildings, the regeneration of existing building and the development of infill sites and the full demolition and redevelopment of the whole site. A ballot was undertaken in 2020 and showed that a substantial majority supported the demolition and redevelopment option.

3.4 Based on the latest planning proposals (see below), the proposed development comprises the demolition of existing buildings (including Harriot House, Apsley House, Pattison House, the Redcoat Centre and Redcoat Community Centre) to provide 407 residential units, together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities.

3.5 63 of the 407 new homes will acts as replacement homes for existing tenants and resident leaseholders (the remaining units will be made up of 106 social rented and 232 private sales). The scheme will also accommodate a new mosque and community centre. The two disability day centres have now been relocated to sites in other parts of the borough and replicate the facilities currently available on the Harriott, Apsley & Pattison House site.

3.6 Planning permission ref. PA/21/02703 was granted on 9 August 2023 in respect of the regeneration of the Estate (the **2023 Permission**). The council submitted a further application on 1 March 2024 allocated reference PA/24/00368 to secure a new location within the Order Land for the Redcoat Community Centre and Mosque so that it is located within a standalone building, rather than being located below residential flats as per the consented 2023 Permission (the **Planning Application**). On 12 June 2024 the Development Committee resolved to grant planning permission pursuant to the Planning Application (the **Planning Permission**).

3.7 The Planning Permission is for the redevelopment of the estate, comprising the demolition of existing buildings (including HAP Houses, the Redcoat Community Centre

and mosque to provide 407 residential units (Class C3) across buildings ranging in height from 4-8 storeys and community centre building of 1,167m2 GIA (Class E (e-f), Class F1 (e-f), Class F.2 (b)), together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities (the **Scheme**). The Scheme and its benefits are explained in more detail below.

3.8 The council will prioritise and maximise the development of genuinely affordable homes, where feasible. In line with the Tower Hamlets Local Plan, the additional homes created will provide 111 genuinely affordable rented housing (32.6%) and 232 homes for private sales (67.4%). The homes for private sale will help to fund the construction of the affordable homes.

3.9 New homes will be a mix of one, two, three and four bedroom properties. They will be both flats and duplexes. The new development will meet the needs of existing residents by providing more new family sized homes as well as smaller sized homes for future residents who are both on the housing register and in housing need.

3.10 In order to proceed with the scheme the council is seeking to use its compulsory purchase powers, which it will use alongside its buy back team to secure the site for development. This EqIA has been drafted alongside a Statement of Reasons and a Cabinet Report seeking agreement to make a compulsory purchase order to facilitate the redevelopment of this site.

4 Summary of equalities evidence held by LB Tower Hamlets.

4.1 This section will set the context by reviewing the borough's equality and diversity profile, the equality and diversity profile of those on the borough's housing register and the equality and diversity profile of those living in Stepney Green Ward.

Borough Profile 2021[4]

4.2 This section is based on a mixture of 2021 census data and 2019 ONS estimates for the borough. Tower Hamlet's population at the time of the last census was 310,303. Tower Hamlets has experienced the fastest growing population nationally, with a 2.2% population increase in past years (from 2018 to 2019). That is the fourth highest after the City of London (11.7%), Camden (3.0%) and Westminster (2.3%). This is an equivalent to 19 additional residents every day in the last year.

4.3 Tower Hamlets has a similar proportion of young people aged 0-15 to England & Wales and London. Just under one in five (18.5%) of the borough's residents are in this age group. This compares to 18.3% for London and 17.7% for England and Wales. The working age population i.e. 16-64 in Tower Hamlets in the 2021 census was 75.9% compared to 69.7% for Greater London and 63.6% for England and Wales. The 65+ population in Tower Hamlets was 5.6% compared to 13.% in Greater London and 18.8% in England and Wales. This suggests a borough with a high younger population with less residents over 65 years of age in Tower Hamlets than Greater London and England & Wales.

4.4 In 2019 there were 4,331 live births in Tower Hamlets. Between 2018 and 2019 the borough experienced a 4.0% decrease in the number of live births compared to 3.1% nationally and 3.8% regionally.

4.5 The borough has around 1,400 more male residents than female residents. The borough has 50.2% male residents and 49.8% female residents, compared to 48.5% male and 51.5% female in London and 49.0% male and 51.0% female in England and Wales.

4.6 According to the Census 2021, Tower Hamlets has a significantly higher proportion of residents who are single (53.8%) compared to London and England & Wales, compared to 46.2% in London and 37.9% in England & Wales.

4.7 The data for the sexual orientation of residents in the borough, based on the 2021 Census, was released in January 2023 and shows that nationally 89.37% are heterosexual. In London this percentage was 86.19%, and in Tower Hamlets this was 83.07%. From the perspective of those who stated they were gay or lesbian the national figure was 1.54%, London was 2.23%, and Tower Hamlets was 3.96%. For those that stated they were bisexual the national figure was 1.29%, London was 2.23%, and Tower Hamlets was 2.52%. The remaining either stated they were pan sexual, asexual, queer or stated they were of another sexual orientation (0.69% in the case of

[4] Borough Profile 2021 Census release July 2022. All statistical outputs from the 2021 Census relate to the population defined as 'usually resident' on census day (21 March 2021). Unfortunately, that date was during a period of COVID-19 lockdown and/or restrictions which affected the number of people living in Tower Hamlets.

Tower Hamlets) or that they 'did not answer' this question (9.76% in the case of Tower Hamlets).

4.8 Nationally, the proportion of the population aged 16 years and over whose gender identity was different from their sex at birth was 0.45%, in London this was 0.78% and in Tower Hamlets this was 0.85%. This is the closest assessment of gender identity available through the 2021 census.

4.9 The two largest ethnic groups in the borough are white British (22.9%) and Bangladeshi (34.6%). Tower Hamlets has the largest Bangladeshi population in the country.

4.10 Across England and Wales, in 2021, 81.7% of the residents were from white backgrounds (down from 86% in 2011) and 74.4% were white British. London is the most ethnically diverse area of the country. Across London there has been an 8.1% decrease in people from white backgrounds, down from 3.7M (44.9% of the total) in 2011 to 3.2M (36.8%) in 2021.

4.11 One in six Bangladeshi residents across England and Wales live in Tower Hamlets. Locally, the Bangladeshi population remains by far the largest in the country in both proportionate (34.6%) and numerical (107,333) terms. The local Bangladeshi population in Tower Hamlets is almost twice the size of the next largest within a local authority area. After Tower Hamlets, Newham with 55,677 Bangladeshi residents, has the second highest local Bangladeshi population.

4.12 At 22.9% the white British population in Tower Hamlets is the fourth smallest in England and Wales behind Newham, Brent and Harrow. In 2021 there were 45,187 white other residents in Tower Hamlets; 14.6% of the overall local population, a significant increase compared to 2011. In 2021, 6,180 residents identified as Somali or Somalilander, this is 2% of the overall population.

4.13 The black African population has increased. 5% of residents of Tower Hamlets identified as black African which, at 5% of the local population is double the proportion of England and Wales as a whole (2.5%) but lower than the rate in London (7.9%).

4.14 The local Chinese population in Tower Hamlets (3.3%) is the third highest proportion in England and Wales, behind City of London and Cambridge. Tower Hamlets has the fourth largest Roma population in England and Wales after Brent, Sheffield and Newham. (2,225 people identified as Roma in Tower Hamlets).

4.15 Nationally, for the first time, the census reports that less than half of residents across England and Wales identify as 'Christian) (46.2%) though this is still the largest single religion nationally. Tower Hamlets has the largest proportion of Muslim residents of any local authority area across England and Wales. In Tower Hamlets, 39.9% of residents (123,912 people) reported that they were Muslim. This is an increase compared to the last census in 2011 when 34.5% stated they were Muslim.

4.16 Just 22.3% of residents in Tower Hamlets stated their religion as Christian which is the lowest proportion of any local authority area across England and Wales. The largest

increase was seen in those reporting 'no religion'. 19.1% of residents stated they had 'no religion' in 2011. The 2021 Census shows 26.6% of Tower Hamlets residents in 2021 describe themselves as having no religion.

4.17 73% of residents in Tower Hamlets reported that English is their main spoken language and an additional 20.7% of residents stated that, whilst it is not their main language, they can speak English well or very well. 6.2% of residents don't speak English well or at all.

4.18 Proficiency in spoken English has improved slightly in the decade between 2011 and 2021. In 2011, 8% of residents could not speak English well or at all, compared to just 6.2% of residents in 2021. After English, Bengali is the most commonly spoken language in Tower Hamlets (11%) then Italian (2.2%) and Spanish (1.7%).

4.19 In England and Wales, 90.3% of residents identified with at least one UK national identity (English, Welsh, Scottish, Northern Irish, British, and Cornish) in 2021 which is a very slight decrease from 2011 (92%). In Tower Hamlets, just 73.5% of residents identified with at least one UK national identity and 26.5% stated non-UK national identities.

Demand for Housing

4.20 The Tower Hamlets Housing Strategy 2016-2021 outlines the major concern over the shortage of affordable housing and that future rents set by the council and housing associations will force people out of the borough. 44% of households live in income poverty and the average cost of a property in LBTH is more than 14 times (£450,000) what a typical essential worker could earn in wages (£35,000). The population of Tower Hamlets is likely to increase by 26% by 2026, adding further pressure.

4.21 The purpose of the Housing Delivery Strategy is to demonstrate how Tower Hamlets is proposing to reduce the current anticipated housing shortfall and deliver housing sustainably, and in a way that meets local housing needs.

4.22 Tower Hamlets has the highest housing target of all London Boroughs (3,473 homes a year[5]). This figure is derived from the Mayor of London's publication of the London Plan (March 2021) and was set following a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified the need for 66,000 additional homes per year in London. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons' accommodation within the overall figure.

4.23 The London Plan target is significantly higher that the borough's Objectively Assessed Need (OAN) of 3,100 homes a year, established by the LBTH SHMA (2017). The OAN

[5] Table 4.1 – 10-year targets for net housing completions 2019/20 – 2028/29

provides an estimate of the borough's housing need, based on the latest population projections.

4.24 Key Housing data shows that:

- The private rent sector is the fastest growing housing sector in the borough.
- There are close to 15,000 ex-council homes which have been bought under the right to buy. An estimated 6,000 of these are now being let, usually as Houses in Multiple Occupation, by private landlords.
- The borough is growing by over 3,000 homes per year, making Tower Hamlets the quickest growing borough in London.
- MHCLG[6] data on dwelling stock records a figure of 121,539 private homes in the borough for 2019. The MHCLG data breaks down the tenure types of these properties, 9% were identified as local authority stock, 26% identified as being private registered provider stock and 64% (78,040 homes) in the private sector (comprising both owner occupier and the private rental market).
- There has been a slight fall in the number of owner occupiers from 24.2% (of households) in 2011 to 23.1% in 2021. In 2021 Tower Hamlets had the lowest proportion of owner occupiers of any area in England and Wales. The ten areas with the smallest proportions of owner occupiers were all inner London boroughs.
- There are 121,539 households in Tower Hamlets, of which council and registered provider homes constitute 35.9%. The number of affordable homes in Tower Hamlets is 42,539.
- There has been a fall in social renting households from 39.6% in 2011 to 35.9% in 2021. Of these, 16,697 (13.9%) of households reported that they rent from the local authority.
- There are 24,639 households on the council's Common Housing Register (CHR) as of 1st May 2024.
- The borough needs to deliver 1,965 affordable homes each year to meet housing needs. This figure has been calculated from the council's Local Plan 2031 that sets out the borough's overall housing supply target of 58,965 new homes to be delivered between 2016 and 2031, of which 50% to be affordable.
- The average level of affordable housing completions over the last 3 years (2017-2020) is 833, significantly less than half the above annual target.

4.25 Summary context:

- Tower Hamlets remains a borough of high housing need.
- There is a sustained increase of net migration into the borough.
- While the borough has a good average income, a significant percentage of the population has incomes of less than £15,000 per year, which has impacted upon their ability to meet their housing costs, particularly as the largest housing tenure available in the borough is the private rented sector.

[6] https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants

- The borough needs to deliver a significant number of affordable homes each year to meet housing need; and:
- A substantial percentage of those homes must be three bedrooms plus, to meet demand from overcrowded households.

Housing Register

4.26 This section describes the profile of Tower Hamlets' housing register applicants. The data is based on a snapshot of the housing register on 1st May 2024. This information was provided by Tower Hamlets.

4.27 Key information:

- 24,639 live applications on the borough's common housing register.

4.28 The borough's housing register holds basic equality information, which is set out below.

Applicants on the housing waiting list

- On 1st May 2024, there were 24,639= applicants on the council's housing register.

Age:

The table below shows the spread and breakdown of the ages of current common housing register applicants as of 1st May 2024.

Age Group Summary	Count of Applications	% of Applications
18 to 25	2,154	9%
26 to 40	10,546	43%
41 to 50	6,323	26%
51 to 60	3,166	13%
Over 60	2,450	10%
Grand Total	**24,639**	**100%**

Gender:

- There are more female (52%) than male (47%) applicants (% other, refused/unknown). This is broadly comparable to the gender profile of the population of Tower Hamlets (aged 18 and over).

Disability:

- A disability was reported in 343 applicants on the housing register, representing 1.4% of all applicants on the housing register. 393 were unknown representing 1.6%. The remaining were not disabled 23,903 (97%).

	Race: ▪ The largest ethnic group represented on the common Housing Register as of 18th August 2023 are those who identify as Asian (56%), with applicants who identified as from white ethnic groups representing 16% of all applicants. 9% of applicants identified as black, 5% were from other ethnic groups and 2% were of dual heritage. 12% either refused to complete this part of the application or their ethnicity is unknown. ▪ Removing those who did not respond or who refused out of the calculations this shows that those on the CHR who stated they were Asian was 63%, black 11%, dual 2%, other 6% and white 18%. ▪ In summary, those with ethnicity records from a black, Asian, mixed and other ethnic heritage represented 82% of applicants.
	Religion or belief: ▪ There is a deficit in the information available on the religion or belief systems that applicants on the Common Housing Register identify with. This is largely because this is a voluntary part of the application, and the majority of applicants (90%) choose not to disclose this information.
	Sexual orientation: ▪ Again, there is a deficit in the information available on the sexual orientation which CHR applicants identify with, the majority of applicants (92%) either choose not to answer or do not disclose this information.

Equalities issues raised by applicants on the Housing Register

4.29 What this data clearly describes is the extreme diversity of people on the borough's housing register. Any provision of social housing is likely to address this diversity and the increase of affordable housing on the Harriott, Apsley & Pattison site is likely to benefit a diverse cross section of those on the Common Housing Register. This is likely to have a positive equality outcome for those seeking new accommodation.

4.30 However, the true measure of this however will only be observed going forward. Indeed, it may be important for the council to monitor the profile of those residents in the newly developed private housing to assess this impact effectively; this will also enable the assessment of the furtherance of the borough wide commitment to community cohesion.

Stepney Green Ward

4.31 The table below summarises data findings for Stepney Green ward, taken from the 2021 census and subsequent research and is collated by the GLA. For consistency purposes both London and England data is based on 2021 census findings. This data provides a

baseline for an understanding of the wider area around which the regeneration scheme will have impact.

Stepney Green Ward	Equalities and diversity data
Population	▪ At the time of the 2021 Census, the population for Stepney Green ward was 12,349 which accounted for 4% of the total population of Tower Hamlets.
Age 2021	▪ The child population (0-15) represents 21.2% of the total population in Stepney Green, this is more than Tower Hamlets 18.5%, London 18.3% and England 17.7%. ▪ Working age population 16-64 in Stepney Green is 70.3% this is less than Tower Hamlets 75.9%, but higher than London 69.7% and England 63.6%. ▪ Older people (65+) in Stepney Green are 8.5% more than the level in Tower Hamlets 5.6%, but less than London 12.0% and England 18.8%.
Gender 2021	▪ At the time of the 2021 Census the ward had 6,251 males and 6,093 females providing a gender split in the ward of 50.6 % male and 49.4 % female. ▪ In comparison the borough profile is 50.2% male and 49.8% female, London is 48.5% male and 51.5% female and for England and Wales it is 49% male and 51% female.
Race 2021	▪ 71% of residents in Stepney Green are from BAME groups, more than Tower Hamlets 67%, London 53% and higher than England 19%. ▪ The Bangladeshi population of the ward at the Census was 52%. ▪ The three largest ethnic groups in the borough (white British, Bangladeshi and white other) accounted for 79% of all residents in this ward.
Main languages spoken	▪ The % for whom English is not their first language in Stepney Green is 39%, higher than 34% for Tower Hamlets and 12.9% for London and higher than 4.4% for England.
Region or belief 2021	▪ The proportion of residents who identified themselves as Christian was 17.9% – lower than the borough average of 24%. At 56.7% of the population, the proportion of Muslim residents was a higher proportion than the 43% of Muslims in the borough. ▪ 16.5% of residents in the Stepney Green ward stated that they had no religion, this is lower than the borough proportion of those stating no religion of 29%.
Gender reassignment 2021	▪ In Tower Hamlets, 90.65% of those asked in the 2021 census stated that their gender identity was the same as sex registered at birth, 0.85% stated their gender identity was different from that registered at their birth, 0.14% stated they were non binary, and 0.6% stated another gender. 8.29% did not respond to this question.
Sexual orientation 2021	▪ In Tower Hamlets 83.07% of those asked in the 2021 census stated their sexual orientation was heterosexual, 3.96% gay or lesbian, 2.52% bisexual, 0.46% pan sexual, 0.06% a sexual, 0.13 queer, 0.04% all other sexual orientations and 9.76% did not answer this question.
Pregnancy and maternity 2019	▪ In 2019 the live births data showed that there were 4,331 live births in Tower Hamlets and there were 164 live births in Stepney Green representing 3.7% of the live births in the borough.
Marriage and civil partnership 2021	▪ In Stepney Green in 2021, 41.6% have never been married, 27.1% are married to someone of a different sex, 0.3% are married to someone of the same sex, 0.2% are in civil partnerships, 1.8% are separated, 4.3% divorced, 3.5% widowed and for 21.1% this question did not apply because of their young age.

Stepney Green Ward	Equalities and diversity data
Health and disability 2021	▪ On census day 2021, 877 residents (7.2%) in Stepney Green had a long term health problem or disability limiting their day to day activities alot, while around 8.2% (991 residents) had a long term health problem or disability limiting the persons day to day activities a little. Collectively there were 15.4% whose day to day activities were limited either a little or a lot. 84.6% of the population of Stepney green did not have a disability under the Equality Act 2010. ▪ In Stepney Green, the rate of people with a long term health problem or disability limiting day to day activities a lot and the rate of people with a long term health problem or disability limiting day to day activities a little were both above London and Tower Hamlets averages. ▪ Those who stated their health was good came to 81.4% (9,871) and those who stated their health was not good came to 18.6% (2,258).
Economic activity	▪ The employment rate for residents in Stepney Green was 47.7% compared to 57.6% for Tower Hamlets, 62.4% for London and 62.1% for England. ▪ The unemployment rate for residents in Stepney Green was 7.1% compared to 6.7% for Tower Hamlets, 5.2% for London and 4.4% for England.
Benefit claimants[7]	▪ The claimant count in Stepney Green ward rose sharply from March 2020 onwards as the impact of the Covid 19 pandemic took effect. As of January 2021, the claimant count was around three times higher than it had been in January 2019. The most affected age group was the 25-49 year old group where the number of claimants was four times higher, whereas the claimant count among 50+ year olds had doubled.
Household Income 2020	▪ Tower Hamlets had a median household income of £28,769 in 2020, slightly below the medium household income in London. In 2020, Stepney Green ward had the 5th lowest median income of any ward in Tower Hamlets, with the average household income being below £23k. 3,700 households had an income below £35k and 1,100 had an income below £15k. (Source: CACI Paycheck 2020)

[7] Department for Work and Pensions 2021.

Stepney Green Ward	Equalities and diversity data
Deprivation – 2019 Indices of Multiple Deprivation.	▪ In 2019, Tower Hamlets was the 50th most deprived local authority area (of 317) based on its Rank of Score[8]. It was the 14th most deprived local authority area based on Income Deprivation Affecting Children and the most deprived area in the country based on Income Deprivation Affecting Older People. ▪ Stepney Green ward has high levels of deprivation compared to the borough as a whole and the London region. According to Greater London Authority analysis of the 2019 Indices of Multiple Deprivation, Stepney Green ward was the 5th most deprived ward in Tower Hamlets (of 20). It was the 69th most deprived ward in London out of 633 based on rank of score, placing it just outside the most deprived decile of wards in the capital. ▪ Stepney Green ward was the 6th most deprived in Tower Hamlets based on Income rank (within the most deprived 1% of wards) and the 38th most deprived in London. It was 6th most deprived ward in Tower Hamlets based on employment rank and the 94th most deprived in London. ▪ In terms of Income Deprivation Affecting Children, Stepney Green ranked as the 140th most deprived ward in London. In terms of Income Deprivation Affecting Older People, it ranked 7th most deprived in both London and Tower Hamlets.

Commentary on these Data sets

4.32 An overall assessment of household information held by housing shows that there are limitations with these recorded datasets from an equality perspective. In all cases, the profile of information is based on the head of household with no way to distinguish between other members of the household. Moreover, not all protected characteristics have been addressed, and the level of health need is not fully stated.

4.33 A case for additional data, and more targeted primary research:

- Need for full household data.
- Need for data on all 9 protected characteristics and additional requirements based on health, socio-economic and language priorities.
- Consideration of alternative data sources to build a fuller picture of the equality impacts from this regeneration process.

4.34 With this case in mind, regeneration managers agreed that a household survey of residents within the development site should be completed to capture the equalities and diversity data for residents affected by this regeneration scheme. This survey's findings are summarised in section 5 of this EQIA. The survey seeks to profile the protected characteristic make up of each household that responded to the telephone survey team and the face to face follow ups.

[8] The 2019 Indices of Multiple Deprivation rank each local authority area and each ward location within local authorities and sets these against national comparators.

5 Primary Research: Summary of Household EQIA Survey Findings 2021

Introduction and rationale

5.1 The data below sets out the findings of the household survey completed in February/March 2021. The survey had 45 questions, which were asked via a telephone survey and followed up by interviewers through a doorstep survey of households on the estate. The recorded data is broken down by the profiles of respondents for the whole estate, council tenants, resident leaseholders, and non-resident leaseholders/private tenants (renting from non-resident leaseholders).

5.2 It was felt that for this refresh this data did not need to be recaptured.

5.3 In 2021 there were 100 properties in the sample for the Harriott, Apsley & Pattison House (the site). In total the survey team completed 72 surveys. This represented:

- 72% of the estate (100 units), comprised of:
- 31 council homes, representing 43.1% of the survey respondents and 86% of council owned homes on the site (36 units).
- 23 resident leaseholder homes, being 31.9% of the survey responses and 68% of the sample of resident leaseholders on the site (34 units).
- 2 non-resident leaseholders and 16 privately tenanted households, representing 25% of the survey sample and 60% of non-resident / privately tenanted households on the site (30 units).

Methodology and approach

5.4 The survey included 45 questions which profile all 9 protected characteristics in the Equality Act 2010 as well as other questions agreed with officers from Tower Hamlets. The equalities characteristics, when broken down, have been defined by both national data sets and categories used by the borough, both of which align to guidance of the Equalities and Human Rights Commission (EHRC).

5.5 The field work was delivered by experienced interviewers and street/household survey practitioners.

5.6 A database of property contact details (telephone numbers and emails) was provided by LB Tower Hamlets and each property was contacted at least once and in some cases several times. Indeed, the residents who did not respond had at least 6 call backs and their household was also visited by a researcher on more than 2 occasions.

5.7 The household data captured through the survey is reliant on the respondents fully describing the make-up of their household. The survey was not an audit of the household profile, but it is a reliable account of the household makeup from the respondents' perspective. With this note in mind the findings of the survey are considered to be the most detailed and reliable summary of household composition. This data has been summarised and is reported below.

Key findings

5.8 The first three survey questions identified the house number, block and the residents' name. The fourth question identified the **tenure** of the occupant's household, the profile of which is set out below.

Which of the following describes how you occupy your home?	Frequency	Percent
Council Tenant	31	43.1
Resident Leaseholder	23	31.9
Non-resident leaseholder	2	2.8
Private tenant	16	22.2
Total	72	100.0

5.9 From those identified as resident and non-resident leaseholders, 48% had a mortgage and 52% were without a mortgage.

If you are the owner occupier, are you an owner occupier	Frequency	Percent	Valid Percent
With a mortgage	12	16.7	48.0
Without a mortgage	13	18.1	52.0
Total	25	34.7	100.0
Missing	47	65.3	
Total	72	100.0	

5.10 The **length of time** people have lived in their homes is varied and differs between the whole sample and among council tenants, resident leaseholders and non-resident leaseholders /private tenants. Collectively 76% of residents in the survey sample have lived in their home for more than 6 years. This rises to 87% for council tenants and 91% for resident leaseholders. However, for non-resident/private tenants the length of time they have lived in their home is lower, at 39%. Nonetheless what this collectively shows is that the majority have lived on the site for a long period of time. Furthermore, just under 50% have lived in their homes for over 20 years.

How long have you lived in your home?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Less than 1 year	4	5.6	0	0			4	22.2
1-5 years	13	18.1	4	12.9	2	8.7	7	38.9
6-10 years	11	15.3	6	19.4	1	4.3	4	22.2
11-20 years	9	12.5	4	12.9	4	17.4	1	5.6
20+ years	35	48.6	17	54.8	16	69.6	2	11.1
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.11 Responses to the **total number of people that live in each household** is set out below. The table beneath that calculates what this means in terms of the total population from the respondents engaged in the survey by tenure type.

How many people live in your household?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
person 1	3	4.2	2	6.5	1	4.3		
person 2	4	5.6	3	9.7	1	4.3		

How many people live in your household?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
person 3	9	12.5	3	9.7	5	21.7	1	5.6
person 4	19	26.4	8	25.8	3	13.0	8	44.4
person 5	13	18.1	5	16.1	4	17.4	4	22.2
person 6	12	16.7	6	19.4	4	17.4	2	11.1
person 7	6	8.3	2	6.5	3	13.0	1	5.6
person 8	3	4.2	1	3.2	1	4.3	1	5.6
person 9	3	4.2	1	3.2	1	4.3	1	5.6
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.12 With these responses it is possible to calculate what this means in terms of the population of these 72 units that responded to the survey. To this end there are some 344 people living in the 72 units, 141 of which are council tenants, 112 are resident leaseholders and 91 are non-resident / private tenants.

Household size	Whole Sample	Council Tenants	Resident Leaseholders	Non Resi/Private Tenants
1	3	2	1	0
2	8	6	2	0
3	27	9	15	3
4	76	32	12	32
5	65	25	20	20
6	72	36	24	12
7	42	14	21	7
8	24	8	8	8
9	27	9	9	9
Total	344	141	112	91

5.13 The next question identified the **gender** profile of each household,

- 50.9% were male.
- 49.1% were female.
- None preferred not to say.

5.14 There were slight variations to this profile by tenants, residential leaseholders and non-resident leaseholders/private tenants. This is set out in the table below.

Gender profile	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Male	174	50.9%	68	48.2%	60	54.1%	46	51.1%
Female	168	49.1%	73	51.8%	51	45.9%	44	48.9%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	342	100.0%	141	100.0%	111	100.0%	90	100.0%

5.15 The full **age** profile of the population living on Harriott, Apsley and Pattison is set out in the table below:

Age Profile	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
	Count	%	Count	%	Count	%	Count	%
0-5 years	23	6.7%	9	6.4%	13	11.6%	1	1.1%
6-11 years	25	7.3%	10	7.1%	5	4.5%	10	11.1%
12-17 years	45	13.1%	22	15.6%	11	9.8%	12	13.3%
18-24 years	49	14.2%	29	20.6%	10	8.9%	10	11.1%
25-34 years	68	19.8%	16	11.3%	22	19.6%	30	33.3%
35-44 years	51	14.8%	16	11.3%	23	20.5%	12	13.3%
45-54 years	41	11.9%	22	15.6%	7	6.3%	12	13.3%
55-64 years	21	6.1%	10	7.1%	10	8.9%	1	1.1%
65-74 years	15	4.4%	5	3.5%	8	7.1%	1	1.1%
75-84 years	5	1.5%	2	1.4%	2	1.8%	1	1.1%
85+ years	1	0.3%		0.0%	1	0.9%	0	0.0%
Total	344	100.0%	141	100.0%	112	100.0%	90	100.0%

5.16 The under 18 profiles of the respondents to the survey within the site is 27%. This shows that 3 in 10 members of the site are under 18. The working age population (18-64) of those on the site is 66.9% and the over 65 population is 6.1%. This is summarised in the table below.

Summary age groups	Whole Sample	Council Tenants	Resident Leaseholders	Non Resi/ Private Tenants
Under 18	27.0%	29.1%	25.9%	25.6%
Working age	66.9%	66.0%	64.3%	72.2%
Over 65	6.1%	5.0%	9.8%	2.2%

5.17 The next question sought to identify those people living on the site who have their day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months. This is as close a proxy there is to understanding the number of people living on the site with a **disability**. To this end 7.2% have a health problem/disability that limits their life a lot and 8.1% had a health problem/disability that limits their life a little. Some 100 people preferred not to disclose

this information. This sample suggests that some 15.3% have a health problem/disability of some form. This is set out in the table below:

Are any person's day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months (include any problems related to old age)?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Yes, limited a lot	24	7.2%	9	9.7%	11	18.0%	5	6.2%
Yes, limited a little	27	8.1%	12	12.9%	12	19.7%	3	3.7%
No	183	54.8%	72	77.4%	38	62.3%	73	90.1%
Prefer not to say	100	29.9%		0.0%		0.0%		0.0%
Total	334	100.0%	93	100.0%	61	100.0%	81	100.0%

5.18 A more detailed breakdown of types of **disability/health problem** is set out below. This accounts for sensory impairment, physical impairment, learning disability, mental health conditions and long standing illness or health condition. This is set out in the table below:

Please state the type of health problem or disability that applies to each person (if applicable)?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Sensory impairment, (such as being blind / having a visual impairment or being deaf / having a hearing impairment)	2	3.0%	1	3.0%	1	4.2%		0.0%
Physical impairment, (such as using a wheelchair to get around and / or difficulty using your arms)	28	42.4%	14	42.4%	11	45.8%	3	33.3%
Learning disability, (such as Downs syndrome or dyslexia) or cognitive impairment (such as autism or head-injury)	3	4.5%	2	6.1%	1	4.2%		0.0%
Mental health condition, (such as depression or schizophrenia)	4	6.1%	2	6.1%	1	4.2%	1	11.1%
Long-standing illness or health condition (such as cancer, HIV, diabetes, chronic heart disease, or epilepsy)	29	43.9%	14	42.4%	10	41.7%	5	55.6%
Total	66	100.0%	33	100.0%	24	100.0%	9	100.0%

5.19 Long standing illness or health conditions represented 43.9% of the cohort of those with health problems and/or disabilities. This was followed by physical impairments at 42.4%, mental health conditions at 6.1%, learning disability at 4.5% and sensory impairment at 3%.

5.20 The table below sets out the numbers and profiles of those who stated that a member of their household is a **registered carer** of someone living at that address. It shows that 6.9% of residents in the sample are registered carers.

Are you, or any member of your household a registered carer to someone living at this address?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Yes	5	6.9	1	3.2	3	13.0	1	5.6
No	43	59.7	24	77.4	14	60.9	5	27.8
Total	48	66.7	25	80.6	17	73.9	6	33.3
Missing	24	33.3	6	19.4	6	26.1	12	66.7
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.21 The table below shows the number and profile of those who are a **volunteer or family carer** that look after or support someone else in their home who needs help with their day-to-day life due to a disability, illness, or old age. 31.9% of households had a family member that fulfils this role.

Are you a volunteer or family carer who looks after or supports someone else in their home who needs help with their day-to-day life due to a disability, illness, or old age?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Yes	23	31.9	12	38.7	9	39.1	2	11.1
No	25	34.7	13	41.9	8	34.8	4	22.2
Total	48	66.7	25	80.6	17	73.9	6	33.3
Missing	24	33.3	6	19.4	6	26.1	12	66.7
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.22 The next question sought to establish, for those that deliver this role, the average weekly number of **hours people undertake in providing care**.

If 'Yes', how many hours a week do you provide care for on average? (Please enter approximate hours per week)	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
10	1	1.4			1	4.3		
14	1	1.4			1	4.3		
20	3	4.2	2	6.5	1	4.3		
25	1	1.4	1	3.2				
30	2	2.8			1	4.3	1	5.6
40	10	13.9	7	22.6	3	13.0		
50	1	1.4	1	3.2	1	4.3		
60	3	4.2	1	3.2	1	4.3	1	5.6
80	1	1.4			1	4.3		
168	1	1.4	1	3.2				
Total	24	33.3	13	41.9	9	39.1	2	11.1
Missing	48	66.7	18	58.1	14	60.9	16	88.9
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.23 The next question sought to identify which of the following **health needs** apply to members of each household.

Which of the following health needs apply to member/s of your household? Self-Declared Health Needs	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Problems with arms, hands	1	1.4%		0.0%	1	3.7%		0.0%
Problems with legs or feet	16	22.5%	7	20.0%	7	25.9%	2	22.2%
Problems with back or neck	2	2.8%		0.0%	1	3.7%	1	11.1%
Difficulty in seeing	1	1.4%		0.0%	1	3.7%		0.0%
Difficulty in hearing		0.0%		0.0%		0.0%		0.0%
Speech impediment		0.0%		0.0%		0.0%		0.0%
Skin conditions, allergies		0.0%		0.0%		0.0%		0.0%
Chest, breathing problems	4	5.6%	2	5.7%	2	7.4%		0.0%
Heart blood pressure, circulation	6	8.5%	3	8.6%	3	11.1%		0.0%
Problems with stomach, liver, kidney, digestion		0.0%		0.0%		0.0%		0.0%
Diabetes	8	11.3%	3	8.6%	4	14.8%	1	11.1%
Depression, bad nerves	4	5.6%	2	5.7%	2	7.4%		0.0%
Epilepsy		0.0%		0.0%		0.0%		0.0%
Learning difficulties	3	4.2%	2	5.7%	1	3.7%		0.0%
Mental illness, phobia, panics	3	4.2%	2	5.7%	1	3.7%		0.0%
Learning disabilities		0.0%		0.0%		0.0%		0.0%
Long term medical condition	19	26.8%	11	31.4%	4	14.8%	4	44.4%
Progressive illness	4	5.6%	3	8.6%		0.0%	1	11.1%
Total	71	100.0%	35	100.0%	27	100.0%	9	100.0%

5.24 Finally, from a health and social care perspective, the survey asked residents if they had made any **adaptations** to their homes providing aids for their health problem/disability. 15.3% of households in the sample stated they had made an adaption to their home. Specific forms of adaptions provided by respondents included adaptations to their bathrooms, including baths and toilets.

Have you had any aids or adaptations made to your home?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Yes	11	15.3	5	16.1	5	21.7	1	5.6
No	36	50.0	19	61.3	12	52.2	5	27.8
Total	47	65.3	24	77.4	17	73.9	6	33.3
Missing	25	34.7	7	22.6	6	26.1	12	66.7
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.25 The table below sets out the **ethnic** profile of the respondents to the survey from within the site. The Ethnic Minority[9] profile of respondents for the site is 93.0%, the BAME[10] population of the estate is 90.6%. Clearly, this shows that there is a significantly strong level of diversity on the site with Bangladeshi residents making up 72% across the whole sample of residents. This can be broken down further to show that 80% of

[9] Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British.

[10] The acronym BAME stands for Black, Asian and Minority Ethnic and is defined as all ethnic groups except White ethnic groups.

council tenants, 78.9% of resident leaseholders and 52% of non-resident leaseholders/private tenants identify as Bangladeshi.

Ethnicity	Whole Sample	Council Tenants	Resident Leaseholders	Non Resi/Private Tenants
Ethnic Minority	93.0%	100.0%	90.8%	84.8%
BAME	90.6%	100.0%	89.9%	77.2%
Bangladeshi	72.2%	80.1%	78.9%	52.2%
Black African	7.6%	11.3%	3.7%	6.5%
White British	7.0%	0.0%	9.2%	15.2%

5.26 A full breakdown of ethnicity is set out in the table below.

Ethnicity	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
White: English/Welsh/Scottish /Northern Irish/British	24	7.0%		0.0%	10	9.2%	14	15.2%
White: Irish		0.0%		0.0%		0.0%		0.0%
White: Gypsy or Irish Traveller		0.0%		0.0%		0.0%		0.0%
White: Roma	3	0.9%		0.0%		0.0%	3	3.3%
White: Other White	5	1.5%		0.0%	1	0.9%	4	4.3%
Mixed/multiple ethnic group: White and Black Caribbean	6	1.8%	6	4.3%		0.0%		0.0%
Mixed/multiple ethnic group: White and Black Africa	5	1.5%		0.0%		0.0%	5	5.4%
Mixed/multiple ethnic group: White and Asian	3	0.9%	2	1.4%	1	0.9%		0.0%
Mixed/multiple ethnic group: Other Mixed		0.0%		0.0%		0.0%		0.0%
Asian/Asian British: Indian	5	1.5%	4	2.8%	1	0.9%		0.0%
Asian/Asian British: Pakistani	6	1.8%		0.0%	6	5.5%		0.0%
Asian/Asian British: Bangladeshi	247	72.2%	113	80.1%	86	78.9%	48	52.2%
Asian/Asian British: Chinese	1	0.3%		0.0%		0.0%	1	1.1%
Asian or Asian British Vietnamese		0.0%		0.0%		0.0%		0.0%
Asian/Asian British: Other Asian	3	0.9%		0.0%		0.0%	3	3.3%
Black/African/Caribbean/Black British: African	26	7.6%	16	11.3%	4	3.7%	6	6.5%
Black/African/Caribbean/Black British: Caribbean		0.0%		0.0%		0.0%		0.0%
Black/African/Caribbean/Black British: Somali		0.0%		0.0%		0.0%		0.0%
Black/African/Caribbean/Black British: Other Black		0.0%		0.0%		0.0%		0.0%
Other ethnic group: Arab		0.0%		0.0%		0.0%		0.0%
Other ethnic group: Any other ethnic group	8	2.3%		0.0%		0.0%	8	8.7%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	342	100.0%	141	100.0%	109	100.0%	92	100.0%

5.27 The **sexual orientation** profile of respondents is set out in the table below:

What is the Sexual Orientation of your household members? (This only applies to residents over 18 years of age)	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Straight/Heterosexual	225	100.0%	87	100.0%	73	100.0%	65	100.0%
Gay or Lesbian		0.0%		0.0%		0.0%		0.0%
Bisexual person		0.0%		0.0%		0.0%		0.0%
Other		0.0%		0.0%		0.0%		0.0%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	225	100.0%	87	100.0%	73	100.0%	65	100.0%

5.28 The data states that 100% of respondents stated that they were straight/heterosexual.

5.29 The **religion/faith** profile of responding households is set out below:

What is the Faith of members of your household?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Atheist/Agnostic		0.0%		0.0%		0.0%		0.0%
Christian	21	6.1%	7	5.0%	1	0.9%	13	14.3%
Buddhist		0.0%		0.0%		0.0%		0.0%
Hindu		0.0%		0.0%		0.0%		0.0%
Jewish		0.0%		0.0%		0.0%		0.0%
Muslim	277	80.8%	128	90.8%	93	84.5%	56	61.5%
Sikh		0.0%		0.0%		0.0%		0.0%
Humanist		0.0%		0.0%		0.0%		0.0%
No Religion	34	9.9%	6	4.3%	12	10.9%	16	17.6%
Other	4	1.2%		0.0%	4	3.6%		0.0%
Prefer not to say	7	2.0%		0.0%		0.0%	6	6.6%
Total	343	100.0%	141	100.0%	110	100.0%	91	100.0%

5.30 The Muslim faith makes up the largest group of respondents at 80.8% of the whole sample, 90.8% of council tenants, 84.5% of resident leaseholders and 61.5% of non-resident leaseholders/private tenants.

5.31 The number of residents who are either **pregnant** or who have given birth in the last 12 months was 3. This represents some 0.87% of the population from the sample. While this does seem quite low it is consistent with the lower proportion of pregnancies during the Covid 19 pandemic.

5.32 There were no responding households that indicated that there were any members of that household who have undergone or were presently undergoing a **gender reassignment** process.

5.33 The responses to the question about the marital or registered civil partnership or cohabitation status is set out below:

What best describes each person's marital, registered civil partnership or cohabitation status? (This only applies to persons over 16 years of age)	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Never married and never registered a same sex civil partnership	116	52.7%	39	45.9%	32	47.1%	45	67.2%
Married	91	41.4%	39	45.9%	32	47.1%	20	29.9%
Separated, but still legally married	3	1.4%	2	2.4%		0.0%	1	1.5%
Divorced	3	1.4%	3	3.5%		0.0%		0.0%
Widowed	7	3.2%	2	2.4%	4	5.9%	1	1.5%
In a registered same-sex civil partnership		0.0%		0.0%		0.0%		0.0%
Separated, but still legally in a same sex civil partnership		0.0%		0.0%		0.0%		0.0%
Formerly in a same-sex civil partnership which is now legally dissolved		0.0%		0.0%		0.0%		0.0%
Surviving partner from a same-sex civil partnership		0.0%		0.0%		0.0%		0.0%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	220	100.0%	85	100.0%	68	100.0%	67	100.0%

5.34 The high proportion of those that have never married and never registered a same sex civil partnership (52.7%) will mostly be young adults. Within the responding households 41.4% of people over 16 were married, 1.4% were separated, 1.4% divorced and 3.2% widowed.

5.35 It is, however, worth noting that in some of these cases the legal status does have an impact when tenure and leaseholder status come into play. This occurs in cases where a marriage ceases and or in situations of divorce and separation and even in the case of death, particularly for cohabiting partners.

5.36 The **employment/economic activity** status of respondents is set out below:

Which of the following applies to members of your household? (This applies to those over 16 years of age)	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Employed Full Time	101	42.3%	29	33.0%	35	42.7%	37	53.6%
Employed Part Time	21	8.8%	7	8.0%	9	11.0%	5	7.2%
Self-employed Full Time or Part Time	2	0.8%		0.0%	2	2.4%		0.0%
On a government supported training programme e.g. Apprenticeship/Training		0.0%		0.0%		0.0%		0.0%
Full time education	29	12.1%	14	15.9%	3	3.7%	12	17.4%
Unemployed available for work	41	17.2%	23	26.1%	12	14.6%	6	8.7%
Permanently sick/disabled	3	1.3%		0.0%	3	3.7%		0.0%
Retired	24	10.0%	7	8.0%	14	17.1%	3	4.3%
Looking after the home	9	3.8%	4	4.5%	2	2.4%	3	4.3%
Full time carer of elderly or disabled person	4	1.7%	3	3.4%	1	1.2%		0.0%
Full time child carer	3	1.3%	1	1.1%	1	1.2%	1	1.4%
Doing something else (please specify?)		0.0%		0.0%		0.0%		0.0%
Prefer not to say	2	0.8%		0.0%		0.0%	2	2.9%
Total	239	100.0%	88	100.0%	82	100.0%	69	100.0%

5.37 42% of household members are employed full time, 9% part time and 12% are in full time education. Additionally, 17% are unemployed and available for work. This is data gathered in 2021 and reflects the estate population during the third Covid-19 lockdown (January 2021). In summary, 81.2% of the estate are economically active and 18.0% are economically inactive and 0.8% preferred not to say.

5.38 The numbers of households where there was currently a **furloughed employee** was 4 (5.6%) of responding households.

5.39 The **status of under 18 year olds** is set out in the table below. What this shows is that 14.9% of children are under school age and intending to enrol in a state school in the borough. 5.3% are under school age and intending to enrol at a state school outside the borough. 67% were currently in a school or nursery in the borough. 4.3% in a state school or nursery outside the borough. 3.2% are in private schools or nursery outside the borough and 3.2% are in post 16-18 colleges and 2.1% are in post 16 employment.

What is each person under 18s status?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Under school age & intend to enrol at a state school in Tower Hamlets	14	14.9%	5	11.6%	9	30.0%		0.0%
Under school age & intend to enrol at a private school in Tower Hamlets		0.0%		0.0%		0.0%		0.0%
Under school age & intend to enrol at a state school outside of Tower Hamlets	5	5.3%	3	7.0%		0.0%	2	9.5%
Under school age & intend to enrol at a private school outside of Tower Hamlets		0.0%		0.0%		0.0%		0.0%
School or nursery pupil enrolled in state school in Tower Hamlets	63	67.0%	30	69.8%	18	60.0%	15	71.4%
School or nursery pupil enrolled in private school in Tower Hamlets		0.0%		0.0%		0.0%		0.0%
School or nursery pupil enrolled in a state school outside Tower Hamlets	4	4.3%		0.0%		0.0%	4	19.0%
School or nursery pupil enrolled in a private school outside Tower Hamlets	3	3.2%	3	7.0%		0.0%		0.0%
Post 16 -18 college student	3	3.2%	1	2.3%	2	6.7%		0.0%
Post 16-18 employment	2	2.1%	1	2.3%	1	3.3%		0.0%
Prefer not to say		0.0%		0.0%		0.0%		0.0%
Total	94	100.0%	43	100.0%	30	100.0%	21	100.0%

5.40 The range of **languages** spoken as a main language in households on the estate is set out below. Bangladeshi is spoken in 52.8% of households and English is spoken in 40.3% of responding households. Somali and French is spoken in 2.8% of households respectively and 1.4% of households speak Portuguese.

Which of the following, is the main language spoken in your household?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
English	29	40.3	10	32.3	13	56.5	6	33.3
Bengali	38	52.8	18	58.1	10	43.5	10	55.6
Somali	2	2.8	2	6.5				
French	2	2.8	1	3.2			1	5.6
Other please specify (Portuguese)	1	1.4					1	5.6
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.41 A supplemental question was asked of those who did not have English as their first language. None of the respondents marked their spoken or written English as being anything less than 5 out of 5. The overall ranking score was 5 for spoken English and 5 for written English. This suggests that written and spoken English is good in all households.

If English is not the main language of people living in your home, please rate on a scale of 1 to 5 your household's ability to converse in English? With 1 being low and 5 being high.	1	2	3	4	5	Total	Average ranking
Spoken English					43	43	5
Written English					42	42	5

5.42 The next question asked respondents how many **bedrooms** were in their home. To this end, 25% of households occupy 2-bedroom units, 58.3% occupy 3-bedroom units and 12.5% occupy 4-bedroom units and 4.2% occupy 5-bedroom units. Nb there are no 5-bedroom units on the estate and these responses came from non-resident leasehold units that were occupied by private tenants, and hence it is assumed are using the living room as a bedroom.

How many bedrooms does your property have?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
2	18	25.0	7	22.6	4	17.4	7	38.9
3	42	58.3	23	74.2	16	69.6	3	16.7
4	9	12.5	1	3.2	3	13.0	5	27.8
5	3	4.2					3	16.7
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.43 The next question asked respondents if they currently consider their household to have the **right number of bedrooms**. 44% stated they did and 56% stated they did not. The detail of this response is set out below.

At the moment, do you consider your household has the right number of bedrooms?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Yes	32	44.4	13	41.9	8	34.8	11	61.1
No	40	55.6	18	58.1	15	65.2	7	38.9
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.44 The next question asked if respondents felt their household was **overcrowded**. 58.33% stated it was and 30% stated it was not. 2 households did not respond to this question.

At the moment, do you consider your household is over-crowded?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Yes	42	58.3	20	64.5	14	60.9	8	44.4
No	29	40.3	11	35.5	9	39.1	9	50.0
Total	71	98.6	31	100.0	23	100.0	17	94.4
Missing	1	1.4					1	5.6
Total	72	100.0					18	100.0

5.45 The next question asked if their home was **under occupied**. 4.2% stated that it was and 93.1% stated that it was not. Once again, 2 households did not respond to this question.

At the moment, do you consider your household is under-occupied?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Yes	3	4.2	2	6.5	1	4.3		
No	67	93.1	29	93.5	22	95.7	16	88.9
Total	70	97.2	31	100.0	23	100.0	16	100
Missing	2	2.8					2	11.1
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.46 The next four questions sought to understand whether residents felt there would be **positive or negative impacts** caused by different aspects of the rebuilding proposals including health and wellbeing, childcare and school provision for young people, employment and skills and elderly care/support. In part, this data would describe people's sense of concern re the proposals.

Perceptions of Impact		Whole Sample	Council Tenants	Resident Leaseholders	Non Resi/Private Tenants
Overall how would the rebuilding of this estate impact on the health and wellbeing of your household?	Positive	67%	77%	57%	33%
	No Impact	20%	10%	17%	61%
	Negative	12%	13%	26%	6%
How will the rebuilding of this estate impact on the childcare and school provision of young people in your household?	Positive	16%	22%	17%	6%
	No Impact	75%	72%	70%	89%
	Negative	8%	6%	13%	6%
How will the rebuilding of this estate impact on the employment and skills needs of those in your household?	Positive	1%	0%	4%	0%
	No Impact	97%	100%	91%	100%
	Negative	1%	0%	4%	0%
How will the rebuilding of this estate impact on the elderly care/ support received by members of your household?	Positive	3%	6%	0%	0%
	No Impact	92%	90%	87%	100%
	Negative	6%	3%	13%	0%

5.47 What is clear is that the levels of perceived negative impacts seem low.

- 12% of respondents felt there would be a negative impact on the health and wellbeing needs of their household.
- 8% felt there would be a negative impact on the childcare school provision of members of their household.
- 1% felt there would be a negative impact on the employment and skill needs of members of their households.
- 5% felt there would be negative impacts on the elderly care/support received by members of their households.

5.48 These questions also gave respondents the opportunity to explain their responses. A summary of these open-ended statements is set out below. N.B. these statements are themes emerging from the responses gathered. Some are supportive or positive statements and others set out people's concerns:

Respondent's perceptions of the impact of the regeneration programme on the following aspects			
Health and well being	Childcare/School Provision	Employment and Skills	Elderly care/support
Stress and fear of the unknown and the construction period	Concerns re children's play facilities and open spaces reducing	No perceived concerns raised	Concern regarding electrical supply due to dialysis
Lack of warmth in current properties	Concerns about the loss of school places		Unknown and carer parking
Reduced Anti-Social Behaviour	More security		
More space, need for bigger property			
Loss of green space, reduced physical space			
Fresh environment			
Loss of parking amenity			

5.49 The next question asked residents to think about the future of their area and identify those **facilities they feel would benefit residents**.

Thinking about the future of your area, what facilities and services would benefit residents? Please tick all that apply:	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	Percent response	Count	Percent response	Count	Percent response	Count	Percent response
Improved health services	62	86%	29	94%	21	91%	12	67%
Improved community facilities	61	85%	28	90%	22	96%	11	61%
Play areas	33	46%	16	52%	15	65%	2	11%
Local shops	26	36%	13	42%	12	52%	1	6%
Local transport	19	26%	11	35%	8	35%		
other	9	13%	6	19%	3	13%	0	0%

5.50 86% wanted to see improvements to health services, 85% improvements to community facilities, 46% to play areas, 36% to local shops, and 26% to local transport. The additional other areas of improvement identified are set out in the table below:

If other, please specify	Frequency	Percent
No suggestions offered	59	81.9
More external space	1	1.4
Bike sheds	1	1.4
Infrastructure challenge and security	1	1.4
More open space	2	2.8
Need green areas	1	1.4
Need to quadruple play space, trashing of community and loss of community infrastructure	1	1.4
Overcrowding in area	1	1.4
Parking	1	1.4
Parking issue	1	1.4
Parking key issue	1	1.4
Reduce anti-social behaviour	1	1.4
Secure areas	1	1.4
Total	72	100.0

5.51 The proportion of those on the site where there are members of a household in receipt of an **income related benefit** is set out in the table below. 54% of household residents who completed this question are receiving some form of income related benefit. The remainder either stated they were not or were not sure.

Are there any members in your household in receipt of income related benefit?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Count	%	Count	%	Count	%	Count	%
Yes	90	54%	49	75%	27	53%	14	27%
No	70	42%	16	25%	21	41%	33	65%
Not sure	7	4%		0%	3	6%	4	8%
Prefer not to say		0%		0%		0%		0%
Total	167	100%	65	100%	51	100%	51	100%

5.52 The annual **household income levels** of respondents for the whole of the estate are set out below:

Which of the following bandings does your annual household income fall within?	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tenants	
	Frequency	Percent	Frequency	Percent	Frequency	Percent	Frequency	Percent
Less than £10,000	12	16.7	6	19.4	2	8.7	4	22.2
£10,000 - £15,000	8	11.1	7	22.6			1	5.6
£15,000 - £20,000	3	4.2	3	9.7				
£20,000 - £25,000	1	1.4	1	3.2				
£25,000 - £30,000	1	1.4			1	4.3		
£30,000 - £35,000	1	1.4	1	3.2				
£35,000 - £40,000	2	2.8	1	3.2	1	4.3		
More than £50,000	3	4.2			3	13.0		
Don't Know	34	47.2	12	38.7	11	47.8	11	61.1
Prefer not to say	7	9.7			5	21.7	2	11.1
Total	72	100.0	31	100.0	23	100.0	18	100.0

5.53 27.8% of households stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty. This suggests there is likely to be a sizeable number across the estate beneath the poverty line as defined by the DWP[11].

5.54 The final question asked residents their **preferred forms of communication** about the regeneration proposals, with telephone, letter and email being the highest preferred options.

Preferred communication methods	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Telephone	54	75.0%	23	74%	16	70%	15	83%
Letter	30	41.7%	15	48%	10	43%	5	28%
Email	21	29.2%	10	32%	9	39%	2	11%
Noticeboard	2	2.8%		0%		0%	2	2%
Newsletter	2	2.8%		0%		0%	2	2%

Contextual concerns raised by residents from Harriott, Apsley & Pattison House.

5.55 The points below represent key concerns that residents have raised and or issues that were felt to be pertinent to this EQIA.

- Many welcomed the regeneration of the estate, feeling that it would improve the look of what some considered to be a rundown estate and welcomed the possibility of a better environment.
- Car parking – this issue was raised repeatedly and there was great concern about how this was to be addressed following the regeneration of the estate.
- The loss of green space across the estate was also raised by several participants.
- Some residents experienced overcrowding and felt that this would be alleviated in the new development.

Profile of the Redcoats Community Centre and Mosque

5.56 At the time of this EQIA, the mosque was approached to request a profile breakdown of their worshipers. Unfortunately, the General Secretary of the Redcoats Community Centre and mosque declined to provide any information about the equality and diversity profile of its worshipers/congregation, as they are still in negotiations with the council, and they did not want to provide this information until the negotiations were complete.

5.57 It is, however, reasonable to assume that the worshipers at the Mosque are likely to come from a range of ethnic backgrounds and that they represent all age groups and genders. Clearly, there is also a collective association with the Islamic faith.

[11] DWP in 2017 put the level of household incomes beneath the poverty line at a weekly average of £288 per week. This equates to an annual income of £16,128. Annual incomes beneath £15,000 per annum would represent households beneath the UK poverty line.

Headline Summary of the Primary Research completed.

5.58 Implications for the EQIA

- In total 72% of households on the estate (100 units) engaged in this survey. These are comprised of:
- 31 council homes, representing 43.1% of the survey respondents and 86% of the sample council owned homes on the site (36 units).
- 23 resident leaseholder homes, 31.9% of the survey responses and 68% of the sample of resident leaseholders on the site (34 units).
- 2 non-resident leaseholders and 16 privately tenanted households, (25% of the survey sample and 60% of the sample of non-resident / privately tenanted households on the site (30 units).
- Collectively 76% of residents in the survey sample have lived in their home for more than 6 years.
- From the sample there were 344 people living in the 72 units, 141 of which are council tenants, 112 are resident leaseholders and 91 are non-resident / private tenants.
- BAME populations on the Harriott, Apsley & Pattison House are significant. The white British population in Harriott, Apsley & Pattison House is 7%, leaving a 93% ethnic minority population[12] and a BAME population[13] of 90.6% non-white populations. This compares to a borough ethnic minority population of 66% and a BAME population of 55%. The residential profile of Harriott, Apsley & Pattison House is more diverse than the profile of the borough.
- The Bangladeshi population of the estate is the majority ethnic grouping, with 72.2% of the population overall, 80.1% of council tenants, 79% of resident leaseholders and 52% of non-resident leaseholders and private tenants.
- The gender profile of the estate is comparable with the borough's gender profile with 51% stating they were male, and 49% female compared to 52% male and 48% female in the borough.
- 8.3% of the households were run by lone parents.
- 15.3% of respondents on the estate stated they have a disability.
- Of these, 43.9% stated they had a long standing illness and health condition, 42.4% with physical impairments, 6.1% with mental health conditions, 4.5% learning disability and 3% sensory impairment.
- 6.9% of residents in the sample are registered carers.
- 31.9% of households have family members that look after or support someone else in their home who needs help with their day-to-day life due to a disability, illness, or old age.
- 15.3% of households in the sample stated they had made an adaptation to their home.
- 27% are under 18. The working age population (18-64) of those on the site is 66.9% and the over 65 population is 6.1%.

[12] Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British

[13] The acronym BAME stands for Black, Asian and Minority Ethnic and is defined as all ethnic groups except White ethnic groups.

- None of respondents stated they were gay/lesbian or bisexual, 100% stating they were straight/heterosexual.
- 81% of respondents said they were Muslim, 10% with no religion and 6.1% stated they were Christian.
- Respondents stated that 0.87% of population (3 women) were either pregnant or had given birth in the last 12 months.
- In terms of marriage and civil partnership, 53% of adults over 16 have never been married or in a civil partnership, 41.4% were married, 1.4% separated, 1.4% divorced and 3.2% widowed.
- 80% were economically active, including 42% of household members who are employed full time, 9% employed part time with 12% in full time education and 17% unemployed and available for work. The remaining categories were economically inactive, including permanent sick and disabled, retired, looking after the home or full time carer, which collectively came to 20%.
- Bangladeshi is spoken as a main household language in 53% of households, English as a main household language is spoken in 40% of responding households. Somali and French is spoken in 2.8% of households respectively and 1.4% of households speak Portuguese. Moreover, of those who had English as a second language all households stated that they have strong written and spoken English.
- Respondents to the survey stated that 25% of households lived in 2 bedrooms, 58.3% in 3 bedrooms, 12.5% in 4 bedrooms and 4.2% in 5 bedrooms. N.B. there are no 5 bedroom units in Harriott, Apsley and Pattison and these responses came from private tenants of leasehold units, who clearly must have been using the living room as a bedroom.
- 44% stated their household has the right number of bedrooms, 56% stated they did not.
- 58% stated their household was overcrowded and 40% stated theirs was not.
- 4.2% stated that their home was under occupied and 93.1% stated that it was not.
- 12% of respondents felt there would be a negative impact on the health and wellbeing needs of their household.
- 8% felt there would be a negative impact on the childcare school provision of members of their household.
- 1% felt there would be a negative impact on the employment and skill needs of members of their households.
- 5% felt there would be negative impacts on the elderly care/support received by members of their households.
- 86% wanted to see improvements to health services, 85% improvements to community facilities, 46% to play areas, 36% to local shops, and 26% to local transport.
- 54% of household residents are on some form of income related benefit.
- 28.7% of households stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty.
- The preferred forms of communication about the regeneration proposals were telephone (75%), letter (42%) and email (29%).

5.59 The key concerns raised by residents regarding their perceptions of the current housing and the impact of the regeneration proposals are highlighted below:

Perceived concerns

- Car parking – this issue was raised repeatedly and there was great concern about how this was to be addressed following the regeneration of the estate.
- The loss of green space across the estate was also raised by several participants.
- Concerns around the possibility of fewer school places.
- Some general concerns about the uncertainty of regeneration and what it may bring for residents.

Perceived positives

- Many welcomed the regeneration of the estate, feeling that it would improve the look of what some considered to be a rundown estate and welcomed the possibility of a better environment.
- Some residents experienced overcrowding and felt that this may be addressed in the new development.
- Some leaseholders stated they could not currently sell their flat but, in the future, this would be easier, or they could sell to the council and move.
- A fresh environment and better housing conditions.
- Likelihood of larger properties.
- Reduction in Anti-Social behaviour.

6 Equality Impact Assessment

6.1 This section incorporates both data and analysis to assess the regeneration proposals and their associated decisions. It strives to consider the impact that the regeneration scheme will have on residents who fall under the protected characteristics of the Equality Act 2010 and the additional priorities that Tower Hamlets seek to assess including, language, health and socio-economic factors.

Aims of the proposal.

6.2 The general aim of this regeneration scheme is to demolish 100 units that make up Harriott, Apsley and Pattison Houses and to rebuild a residential led mixed use scheme including community space. Pursuant to the planning permission, there would be 407 homes, of which 63 will be replacement homes for existing tenants and resident leaseholders. The additional homes created will provide at least 32.6% affordable housing and 67.4% housing for private sale which will support the affordability of the scheme.

6.3 The tenure profile of the existing homes on the site is made up of 36 secure council tenancies, 34 residents leaseholders and 30 non-resident leaseholders - the majority of whom are renting their units to private tenants.

6.4 Within the site there are also three additional non-residential facilities, the Redcoat Community Centre and Mosque at 256 Stepney Way and two day care units for people with physical disabilities, the Day Opportunities Service (operated by LBTH) at 260-262 Stephney Way and the Vibrance Day Care unit at 262 Stephney Way (Operated privately). The new scheme will accommodate a mosque and community centre. However, the two day care centres have now been relocated to sites in other parts of the borough replicating the facilities currently available on the Harriott, Apsley & Pattison House site.

6.5 Through its options appraisal, the borough identified three options of refurbishment of the existing buildings, the regeneration of existing buildings and the development of infill sites as well as the full demolition and redevelopment of the site as a whole. The ballot undertaken in 2020 showed a substantial majority that supported the demolition and redevelopment option.

6.6 A resolution to grant the Planning Permission was made on 12th June 2024 for the redevelopment of the Estate comprising the demolition of existing buildings (including HAP Houses, the Redcoat Community Centre and Mosque to provide 407 residential units (Class C3) across buildings ranging in height from 4-8 storeys and community centre building of 1,167m2 GIA (Class E (e-f), Class F1 (e-f), Class F.2 (b)), together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities in order to facilitate the scheme the council is seeking to undertake a compulsory purchase of the site.

Context of this EQIA

6.7 The regeneration of the Harriott, Apsley & Pattison Houses has been designed to address the needs of a wide range of people with protected characteristics. Regeneration by its very nature can be a disturbing period, particularly for residents directly affected by it. Across regeneration schemes there are always likely to be a range of outcomes, some of which will be negative. However, the aspirations and aims of the regeneration are to maximise the positives for many more people and for a longer period.

6.8 What is critical in this EQIA is the need to ensure that any detriment experienced by residents is not a result of their protected characteristic. Indeed, there will be consequences of the unsettling and disturbing nature of the regeneration, which will include elements that have a direct impact on people within the site and in some cases, these direct/indirect impacts will be felt with more force by some people rather than others.

6.9 A pertinent differentiation is the ownership of each unit. The offer for secure tenants is different to the offer for resident leaseholders and non-resident leaseholders and private tenants of non-resident leaseholders. These offers will generate different impacts on households in each of these tenure types. However, these impacts are a direct result of the regeneration process and are therefore universally applied to tenants, leaseholders and non-resident leaseholders and private tenants of non-resident leaseholders. Nonetheless, some of these impacts may be disproportionately felt by some tenants and leaseholders by dint of their respective protected characteristic. This EQIA will seek to identify options that the council can consider to minimise/mitigate these regeneration impacts.

6.10 To this end, this EQIA has reviewed the regeneration proposals under consideration and seeks to assess plans in terms of their:

- Likely and actual benefits for the regeneration proposals.
- Recognition of the negative impacts of the regeneration process.
- An appraisal of impacts on people with protected characteristics.
- Assessment of the direct and indirect impacts of the regeneration programme and their differential or disproportionate distribution between different protected characteristics.
- Assessment of the specific impacts placed on tenants and leaseholders and those within and outside the CPO area and where protected characteristics have a differential or disproportionate negative impact.

Mapping Impacts

6.11 A central process within this EQIA is to establish the planned activity set out in the Cabinet Report and to assess the impacts for residents in general. It also aims to highlight how these impacts may manifest themselves and how those with some protected characteristics may experience these impacts more than others.

Impacts to residents adjacent and in the vicinity of the scheme.

6.12 It is important in all regeneration schemes to review the impacts likely to be felt by those local communities and businesses who are either adjacent to the site and or who are in the vicinity of the scheme. Most of these impacts are likely to relate to either the loss of open space, the construction and traffic movements to and from the site and the general disruption caused by the regeneration scheme.

6.13 From a business perspective there are 2 businesses within a 300m radius of the site. This includes a food retailer (chicken shop) and a general convenience store. Previous consultation with these businesses has suggested that they are supportive of the scheme as it is likely to provide some business growth during the construction period and beyond when the additional new units are developed.

6.14 From a residential population perspective, this EQIA has some baseline population data for the Stepney Green Ward. To this end the key population characteristics for the ward are:

- Stepney Green has a proportionally larger younger person's population when compared to the borough and London. In contrast there are proportionately more older people (65+) in Stepney Green than in Tower Hamlets but less than London and England.
- Stepney Green has a high proportion of black, Asian, mixed and other minority ethnic populations, larger than the borough and London.
- At just under 50% Stepney Green has the third highest proportion of Muslims compared to other wards in Tower Hamlets.
- The proportion of residents in Stepney Green with disabilities and long term life limiting illness is greater than Tower Hamlets and London.
- Median household income in Stepney Green is below the levels for Tower Hamlets and London.

6.15 When this ward and borough data is compared to resident research findings from the estate it is clear that the estate has a higher proportion of younger, disabled, and Muslim residents, as well as non-white British residents. The concentrations of women and older residents are proportional to the ward populations. Collectively these groups are likely to experience the impact from the construction and development phase of the scheme in greater proportions than those in the surrounding ward population. This is likely to mean that the council and the scheme's development partners will need to address and consider these populations particularly as a result of the environmental and construction impacts of the scheme and to address the needs of residents and businesses in the vicinity as effectively as possible. The specific data for each protected characteristic and its comparison with ward and borough data is set out in sections 6.17 to 6.49 below.

Regeneration activity, programme rationale, regeneration impacts and equality impacts.

6.16 All of the impacts arising from different elements of the scheme will depend on how the proposals are implemented. The table below sets out the key components of the regeneration programme as described in the Cabinet Report. It seeks to describe generic impacts of the regeneration programme and to draw from that any equality impacts. The essence of this table will be drawn into the EQIA assessment that follows.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Reducing the borough housing waiting lists	Council-wide commitment to increase social housing by 2,000 units by 2022.	▪ Increasing opportunities for those on the housing register to access social housing in the borough. ▪ Benefits of enabling more people to access social housing, the waiting list is highly diverse with higher levels of black, Asian, mixed and other minority peoples on the housing waiting list. ▪ Many residents are keen to see new properties, which are built to lifetime home standards, more energy efficient and with potentially less problems.	▪ The housing needs of a wider range of protected characteristics currently represented on the common housing register will be positively enhanced through the development of these new units. ▪ There will be more homes designed to lifetime homes standards and with disability access. ▪ Improving the housing stock will provide homes to higher standards and hence improve the quality of accommodation for residents currently on the site, particularly those with sensory and mobility impairments, and long term health conditions.
Demarcation of CPO area	Central to assemble the development site to commence construction	▪ Highlight which units are included within the development red line area. ▪ Confirm those units that are due for demolition. ▪ Raises potential concerns for residents, particularly those with a leasehold interest in their property. ▪ Demolition places a strain on residents within the development red line area, with the realisation of the 'clock ticking' before they need to leave their old homes.	▪ There may be negative impacts on older leaseholders who are less able to afford their new home. ▪ General sense of stress, anxiety and disturbance for residents within the development red line area. This would be generic but is likely to have greater impact on those with existing health conditions.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Design	New energy efficient homes built to Lifetime homes standards	▪ Transferring tenants/leaseholders will have access to the specification and designs of their new homes. ▪ Improved housing - better insulated, more energy efficient and removing current housing maintenance shortfalls. ▪ Design incorporates secure by design (SBD) principles which should improve safety and reduce anti-social behaviour, and the landscape design ensures the open spaces are of a superior quality and more useable.	▪ The needs of older people and people with disabilities will be enhanced by the development of properties built to lifetime homes standards. ▪ Families with dependent children and or adults with specific needs will have units that are in much better condition than currently. ▪ The new units are likely to be better insulated and cheaper to heat, hence reducing the risk of fuel poverty. ▪ The new units are also safer by design particularly benefiting women, girls and vulnerable people and even the LGBTQ community.
Planning	Planning applications to release the development process	▪ The planning of the scheme sets out the project masterplan, unit design and compliance with local and national planning regulations.	▪ The planning process itself should be equalities neutral.
Development programme	The construction programme itself.	▪ Impact on residents within the site as well as those outside it. ▪ Impact of development for properties outside the CPO but immediately adjacent to the regeneration itself include: • Disruption, noise, dust, traffic and construction disturbance. • Potential parking issues on site during the period of the regeneration. • Daylight/sunlight impacts	▪ Potential negative health impacts of the construction process including noise, dust, construction debris and environmental impacts that negatively impact on health and disability. ▪ Households with children, older people and people with disabilities may find the regeneration process and the related construction harder to live with.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Decant	Decanting of those on the site to new units built on open land within the site.	▪ At this stage in the development the decant proposals have yet to be established. It is perceived that there will be an element of decant to enable the development, but this will be defined following the current consultation programme.	▪ The decant process will need to address the equality needs of residents. Those are most likely to be affected negatively are those who are older, younger, disabled and/or have health conditions. ▪ Wellbeing is a critical factor, as is the support network previously available pre-regeneration. ▪ Some residents may lose immediate neighbours in the transfer to new accommodation which may have negative impacts on residents reliant on a local/neighbour care network. The council have stated that they will look to rehouse neighbours together especially if there is a relationship/responsibility of care expressed.
Allocations of new housing	The site specific allocations policy has yet to be developed/ drafted for this regeneration scheme	▪ While effort will be made to ensure there is as close to a like for like replacement of their homes, there may be some residents who will not get what they had before.	▪ Effort is needed to ensure that the regeneration implications do not affect certain protected characteristics disproportionally, but also, and critically, it is important that the key needs of these protected characteristics are considered in the reallocation process, and there may be a need for specialist OT and support staff.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Transfer to new housing	Based on the allocation policy, the transfer will, for tenants and resident leaseholders wishing to remain on the estate, be to a new home.	▪ The designs of the new homes are finalised. ▪ The improved quality of homes will ensure greater energy efficiency, better design and will be built to lifetime homes standards. ▪ The details for future rents has yet to be defined.	▪ New homes should better meet resident's needs. ▪ Transfers to new homes and the allocations/negotiation process, needs to be set against the resident's equality needs. ▪ Staff undertaking this work need to recognise these equality implications. ▪ Affordability of the new homes will impact more on those with less disposable income.
Phasing	The phasing of the development has been proposed in outline (subject to developer partner input)	▪ The development process has currently identified 2 phases of regeneration activity. If adopted, this would allow residents of future phases to move only once into new homes ▪ Creating opportunity to move (in a single move) residents to new properties to free up their previous unit/block to commence second and third phases of the development process. ▪ Minimising the number of moves is part of the aims of the regeneration programme.	▪ Older/disabled people/those with children may be less able to manage with multiple moves, should the two phase proposal not happen ▪ Clarity and communication of the phasing process is critical, and residents have stated their concerns, frustration and the associated stress and anxiety around this.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Landlord Offer: Rights for Secure Tenants – the principles	All secure tenants will have the right to a tenancy of a newly built, social rented home in the new development. They will continue to be a tenant of Tower Hamlets Council with their existing tenancy rights such as the right to buy and succession rights retained.	▪ Secure tenants will be charged 'social' rents. ▪ Council tenants are entitled to home loss payments and disturbance allowances. ▪ Tenants will be entitled to a home loss payment, which is currently set by law at £8,100. ▪ The council will also pay a disturbance allowance to ensure that tenants are not financially disadvantaged by the regeneration. ▪ Tenants can apply for the size of home that meets the housing needs of their household. ▪ An additional bedroom may be requested on a discretionary basis for carers both within and outside the family. ▪ Some tenants may experience a move out of the estate before returning to a new home on it.	▪ The principles behind this offer seem to be equality neutral. The council should ensure that they are not applied differently for people with different equality characteristics. ▪ Many of the potential impacts are likely to become visible once residents are in detailed discussions with Tower Hamlets teams about their own personal circumstances including financial, physical and social, as they explore the options available to them. ▪ Staff completing this work will need to be mindful of the location's diversity and to address the needs of each household appropriately.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Landlord Offer: Rights to homeowners – the principles	The document explains the council's approach to buying back their property when demolition or redevelopment is proposed and the options, they will have to buy a replacement home.	▪ Provides for the option of: • Purchasing a replacement home. • Purchasing a new shared equity property at no extra cost. • Part-shared equity and part-rent. • Lease swap to a council property elsewhere in Tower Hamlets. • Sell to the council and buy a property elsewhere. ▪ Council offer options to discuss and hear leaseholder concerns. ▪ Following cabinet approval, the council will arrange an initial valuation of their property. ▪ The council would pay (within certain legal limits) for: • Home loss payments • Claiming fees for professional adviser • Valuation fees • Negotiation fees • Legal fees for the sale of their home • Legal fees for buying a replacement home • Removal fees • Surveyor's fees on new home purchases (off site) • Stamp Duty Land tax ▪ Succession rights are defined for the leaseholders' spouse or immediately family member living at the property to inherit it under the same financial/rental arrangements.	▪ The principles behind this offer seem to be equality neutral. ▪ The key equality implications relate to older people, particularly those who are no longer earning, which may place a burden of financial hardships on those needing to raise further mortgage. ▪ Furthermore, some leaseholders, especially if they speak English as a second language, may experience difficulty in understanding the implications of the negotiation process. N.B. evidence from the survey has suggested that from the sample all those who do not speak English as a first language believe they have a good grasp of written and spoken English.

Activity planned	Programme Rationale	Regeneration impacts	Likely Equality impacts (Positive and Negative)
Rights for Non-Resident Homeowners – the principles.	Non-resident homeowners, (not living in the property for the last 12 months), will be offered the full market value by the council to purchase their property. They will also be paid a 7.5% basic loss compensation payment (subject to 75k cap) as well as reimbursements.	▪ Reimbursements include reasonable fees and taxes incurred for both the sale of the property and for the purchase of a replacement property for a limited period, including independent valuation and legal support. ▪ Owners should engage with the council for an initial valuation, to discuss concerns and to negotiate a settlement. ▪ The council valuer will arrange an appointment to make an initial valuation of the property. ▪ The council will pay (within certain limits) for: • Basic loss payments • Repaying arrears • Fees for independent surveyor • Negotiation fees • Valuation fees • Legal fees for the sale of their home • Legal fees for buying another property • Removal fees • Stamp Duty Land tax (for the onward purchase of one property) ▪ The council does not have an automatic responsibility to rehouse people who may be occupying a property. If these 'private' tenants or other occupiers require housing advice, they can contact the council to obtain this, but that does not imply they will have any entitlement to relocation support.	▪ The principles behind this offer seem to be equality neutral.

HARRIOT, APSLEY & PATTISON HOUSE
Equality Impact analysis in summary

6.17 Set out below is the equality impact analysis of each protected characteristics and local equality characteristics assessing impact in terms of, positive, negative, positive and negative, none/neutral, or unknown.

Race: EQIA Finding: None/neutral

Context:

6.18 Tower Hamlets has the highest Bangladeshi population in London (34.6% at the time of the 2021 census). The number of those from white British backgrounds is 22.9%. The black, Asian, mixed and other minority[14] ethnic population for Stepney Green Ward at the time of the 2021 census was 73%, compared to 60.7% for Tower Hamlets, 46.2% for London and 19.9% for England. 82% of those on the borough's housing register with ethnicity recorded are from black, Asian, mixed and other minority ethnic communities and applicants from the Bangladeshi community represent 52% of those on the register. Black, Asian, mixed and other minority ethnic households have higher levels of housing need compared to white British households.

Race profile of the site

6.18.1 The white British population in Harriott, Apsley & Pattison House is 7%, leaving a 93% ethnic minority population and a black, Asian, mixed and other minority population of 90.6% non-white populations. Bangladeshi residents make up 72% of the site population, and 80% of council tenants, 78.9% of resident leaseholders and 52% of nonresident leaseholders/private tenants. The population on the site therefore has a higher BAME and Bangladeshi population than the local ward and borough population profiles.

Assessment

6.18.2 The positive impacts for this group relate to the same impacts that a successful regeneration of the estate will have. Homes will be available to all communities in the same way. The diversity of the local community is significant. A critical factor is the need to enable those wanting to stay on the estate to do so and to work to ensure that the relocation of residents is consistent and fair and not influenced by someone's ethnicity.

6.18.3 The EQIA survey undertaken in 2021 indicated that residents did not raise the issue of race as a concern.

[14] NB this does not include White British, White Irish, Gypsy and Traveller and White Other.

6.18.4 Moreover, from the evidence gathered, there are no stated negative impacts from a race perspective and regeneration plans were seen as broadly positive from a race equality perspective.

6.18.5 It is critical to ensure that council tenants, resident leaseholders, and non-resident leaseholders and their private tenants have positive experiences from this regeneration proposal, irrespective of their race. There is clearly a majority of minoritised people living in Harriott, Apsley & Pattison. Nonetheless, there may be some groups that will have a higher likelihood of negative impacts. This is particularly true of those who are older, with lower socio-economic status and those with health conditions and disabilities. It's likely that many of these people will also be from black, Asian and minoritized communities. There is therefore a risk of indirect negative impacts on black, Asian and minoritized populations.

6.18.6 A central characteristic of Harriott, Apsley & Pattison is its diversity, and it is important to ensure that the black, Asian and minoritized residents and indeed all residents are effectively engaged through the regeneration process.

6.18.7 It is likely that the proportional benefits of the regeneration programme will be felt by these ethnic minority and black, Asian and minoritized populations, given the high proportions on the estate. It is equally critical that where negative impacts are identified for other protected characteristics or identified priorities, that these are addressed, thereby mitigating any indirect negative impacts felt by black, Asian and minoritized populations who also have those other protected characteristics.

6.18.8 From the evidence gathered there are no direct negative impacts from a race perspective, and the regeneration plans are therefore broadly neutral from a race equality perspective.

Gender: EQIA Finding: None/neutral

Context

6.19 Tower Hamlets' gender split is 50.2% male and 49.8% female. In Stepney Green the gender profile is 50.6 % male and 49.4 % female. However, on the housing register there are more female (52%) than male (47%) applicants. Indeed regarding housing need, women applying for housing are more likely to have dependent children and therefore require family-sized homes, while men applying for housing more likely to

require studios or 1-bedroom homes. The gender split therefore has a bearing on the need for different property sizes.

Gender profile of the site

6.19.1 Based on the primary research carried out, the gender profile of Harriot, Apsley and Pattison shows a 50.9% male population and a 49.1% female population.

6.19.2 8.3% respondents to the survey indicated they were single parent families. The majority of these households were headed up by women.

Assessment

6.19.3 There was a clear sense that the improvement to housing stock and the provision of new homes would be a strong positive of the regeneration process. This should benefit both men and women and as such gender should not be a factor in the allocation of these social housing units going forward as the allocation policy should take over and hopefully secure equitable distribution of tenancies.

6.19.4 From the evidence gathered, there are no stated negative impacts from a gender perspective, thus plans are broadly neutral from a gender perspective.

Gender re-assignment: EQIA Finding: None/neutral.

Context:

6.20 Based on the 2021 census, nationally, the proportion of the population aged 16 years and over whose gender identity was different from their sex at birth was 0.45%, in London this was 0.78% and in Tower Hamlets this was 0.85%. This is the closest assessment of gender re-assignment available through the 2021 census.

6.21 Borough wide housing data is not available for people who have undergone or who are undergoing a gender reassignment process. Applicants are given priority according to the scheme criteria, not gender. Services are customer-focused and there is discretion within the proposed scheme to respond to individual circumstances if necessary.

Gender re-assignment profile of the site

6.21.1 Based on the primary research carried out there are no known individuals who have undergone or are undergoing a gender transition process.

Assessment

6.21.2 From the evidence gathered there are no stated or perceived negative impacts from a gender re-assignment perspective and plans are broadly neutral from a gender re-assignment perspective.

Disability: EQIA Finding: Positive and Negative

Context

6.22 15% of Tower Hamlets' working age population have been identified as having some form of disability. The regeneration scheme is committed to supporting residents with a disability through medical and OT assessments to inform adaptations needed for units prior to residents with needs moving in.

6.23 On Census Day 2021, 877 residents (7.2%) in Stepney Green had a long term health problem or disability limiting their day to day activities alot, while around 8.2% (991 residents) had a long term health problem or disability limiting the persons day to day activities a little. Collectively, there were 15.4% whose day to day activities were limited either a little or a lot. 84.6% of the population of Stepney Green did not have a disability under the Equality Act 2010.

6.24 In Stepney Green, the rate of people with a long term health problem or disability limiting day to day activities a lot and the rate of people with a long term health problem or disability limiting day to day activities a little were both above London and Tower Hamlets averages.

6.25 Those who stated their health was good came to 81.4% (9,871) and those who stated their health was not good came to 18.6% (2,258).

Disability profile of the site

6.25.1 Based on the primary research carried out, the disability profile of the estate shows:

- 7.2% had a health problem/disability which limited their life a lot and 8.1% had a health problem/disability that limited their life a little. This suggests that some 15.3% have a health problem/disability of some form.

6.25.2 Several respondents to the open-ended health and age questions referenced members of their households with levels of disability.

6.25.3 A more detailed response of the types of perceived additional needs of residents is set out below:

- 44% had a long-standing illness or health condition (such as cancer, HIV, diabetes, chronic heart disease, or epilepsy).
- 42% had a physical impairment (such as using a wheelchair to get around and/or having difficulty using their arms).
- 6.1% had a mental health condition (such as depression or schizophrenia).
- 4.5% had a learning disability (such as Down's syndrome or dyslexia) or cognitive impairment (such as autism or head-injury).
- 3% had a sensory impairment (such as being blind / having a visual impairment or being deaf / having a hearing impairment).

6.25.4 Responses suggest that there are some equality impacts which will impact either negatively or positively for residents with disabilities. These include:

Potential negative impacts:

- The disturbance of moving may have a disproportionate impact on disabled residents (66 residents from the survey sample).
- The quality of life of some residents will be affected by the regeneration programme itself, particularly if their disability is accompanied by a respiratory condition, which will be affected by construction dust in particular (29 residents have a long-standing illness).
- Residents with a sensory impairment may be particularly affected by loud noise or construction machinery.
- The new physical layout of the estates will be challenging to those with visual impairment (2 households with sensory impairment).
- It would be important, wherever possible, to move people with a disability only once in the process and preferably into homes with readily set up adaptations (28 residents have a physical impairment).
- People with learning difficulties, subject to the intensity of their condition, will also be affected by the construction process and may need separate forms of communication and engagement to enable their understanding of the reality of their situation (3 residents from the survey).

Potential Positive Impacts

- All new homes will be built to lifetime homes standards.
- Tower Hamlets have made the commitment to ensure that at least 10% of properties are being built for disabled people and will have relevant adaptations and equipment built in. All existing tenants and leaseholders can complete a health assessment form, and this will be reviewed by the occupational health team and appropriate modifications will be made to the new units.
- Access and egress from the new homes will be supported with lifts and dedicated disabled parking supported by secure design principles.
- Greater choice for disabled people who cannot achieve independent living due to lack of suitable housing in the borough's housing stock.
- Whilst not having a positive impact the application of Considerate Contractor requirements would work to minimise negative impacts during the construction period.

Age: EQIA Finding: Positive and Negative

Context

6.26 The child population (0-15) represents 21.2% of the total population in Stepney Green, this is more than Tower Hamlets 18.5%, London 18.3% and England 17.7%

6.27 Working age population 16-64 in Stepney Green is 70.3% this is less than Tower Hamlets 75.9%, but higher than London 69.7% and England 63.6%

6.28 Older people (65+) in Stepney Green are 8.5% more than the level in Tower Hamlets 5.6%, but less than London 12.0% and England 18.8%

Age profile of the site

6.29 The under 18 profile of the respondents to the survey within the site is 27%. This shows that 3 in 10 occupants of the site are currently under 18. The working age population (18-64) of those on the site is 66.9% and the over 65 population is 6.1%.

Assessment

6.29.1 The assessment suggests that there are some equality impacts (both negative and positive) for different age groups particularly children, young people and older people.

Potential negative impacts:

- Older people with disabilities are likely to have varying negative impacts potentially because of this regeneration programme.
- In general, older people have been living on the estate for a longer period than other residents and will be more settled and are likely to require more support when moving.
- For people of all ages, the regeneration programme is likely to cause disturbance, which is particularly likely to apply to older people if they are living on their own, are frail and/or vulnerable.
- For children and young people, the loss of the estate's amenities and play space can be significant during the construction period.
- There may also be disruption to school life, particularly for young people trying to study at home during the construction period itself.
- There may be an impact on childcare arrangements, particularly if there are informal arrangements with other residents who may be moving off the estate. Access to childcare, nurseries, creches and schools will need to be addressed to minimise any disruption.

Specific issues for older Leaseholders

- The profile of age by tenure type shows that there is a slightly higher proportion of resident leaseholders who are over 65.
- Older leaseholders may find it difficult to raise any additional mortgage on their new properties. The shared ownership/equity option seeks to address this, but this still may cause older leaseholders to feel their aspirations of owning 100%

their own home is being undermined, although they will own an asset of the same value as that previously owned.

- All these aspects are likely to cause residential leaseholders, particularly older leaseholders' greater levels of anxiety and stress, and can lead to depression and ill health.

Potential Positive Impacts

- All new homes will be built to lifetime homes standards to improve accessibility.
- Tower Hamlets are committed to ensuring that 10% of properties are being built for disabled people and will have relevant adaptations and equipment built by design, many of these disabled people are also older people and this would benefit this community too. All existing tenants and leaseholders are able to complete a health assessment form, and this will be reviewed by the occupational health team and appropriate modifications will be made to the new unit/s.
- Key guarantees provide options for both tenants and residential leaseholders to relocate into new homes on the estate.

Sexual Orientation: EQIA Finding: None/neutral.

Context:

6.30 The data for the sexual orientation of residents in the borough, based on the 2021 Census, was released in January 2023 and shows that nationally 89.37% are heterosexual, in London this percentage was 86.19%, and in Tower Hamlets this was 83.07%. From the perspective of those who stated they were gay or lesbian the national figure was 1.54%, London was 2.23%, and Tower Hamlets was 3.96%. For those that stated they were bisexual person the national figure was 1.29%, London was 2.23%, and Tower Hamlets was 2.52%. The remaining either stated they were pan sexual, asexual, queer or stated they were of another sexual orientation (0.69% in the case of Tower Hamlets) or that they 'did not answer' this question (9.76% in the case of Tower Hamlets).

6.31 There is only a limited amount of information on sexual orientation available, regionally and nationally. Guidance from the Equality and Human Rights Commission states to collect it where relevant and sexual orientation is not relevant to the majority of housing services, with the exception of tackling harassment. Sexual Orientation details are not recorded for those in the borough's Common Housing Register.

Sexual orientation profile of the site

6.32 The sexual orientation profile of residents responding to the survey shows that 100% of respondents stated that they were straight/heterosexual.

Assessment

6.32.1 In reviewing the current proposals for the regeneration of Harriott, Apsley and Pattisson there are no discernible negative impacts identified for LGBTQ groups. The design of the new homes and spaces will create a place that is secure by design and can be policed more easily. The public realm will offer a greater level of security to all which may be relevant to LGBTQ residents who are more likely to be subject to hate crime and harassment.

6.32.2 During the course of the engagement interviews with 72 householders on the site (72% of those on the site) there were no raised concerns regarding sexual orientation and the regeneration process.

Religion and belief: EQIA Finding: None/Positive.

Context:

6.33 The proportion of residents who identified themselves as Christian in Stepney Green was 17.9% – lower than the borough average of 24%. At 56.7% of the population, the proportion of Muslim residents was a higher proportion than the 43% of Muslims in the borough. 16.5% of residents in the Stepney Green ward stated that they had no religion, this is lower than the borough proportion of those stating no religion of 29%.

Religion and belief profile of the site:

6.33.1 The Muslim faith makes up the largest group of respondents from HAP at 80.8% of the whole sample, 90.8% of council tenants, 84.5% of resident leaseholders and 61.5% of non-resident leaseholders/private tenants.

6.33.2 The scheme also includes the demolition and rebuild of the Redcoat community center and mosque.

Assessment

6.33.3 There were no discernible negative impacts raised by residents in the engagement process. Moreover, there are no aspects which would prevent residents from practicing their religion/faith.

6.33.4 To this end, the council will consider people's ability to practice their faith through the different stages of the project. The rehousing team will ask people about their use of places of worship to see the extent to which disruption to their lives can be minimised.

6.33.5 A strong positive emerging from the scheme is the extension of the mosque's lease. which would enable the mosque and its worshippers the benefit from a new purpose built 'standalone' building rather than the temporary units it currently operates from within. The proposal to develop a new standalone 3 to 4 story mosque is a positive impact for worshipers of the Redcoats Community

Centre and mosque. These additional amendments were included in the June 2024 planning application.

Pregnancy and maternity: EQIA Finding: Positive and negative.

Context:

6.34 In 2019 there were 4,331 live births in Tower Hamlets. There were 164 live births in Stepney Green representing 3.7% of the live births in the borough.

Pregnancy and maternity profile of the site:

6.35 From the survey sample of residents the number of those who are either pregnant or who have given birth in the last 12 months was 3. This represents some 0.87% of the population from the survey sample. While this does seem quite low, it is consistent with the lower pregnancy rates since the Covid-19 pandemic.

Assessment

6.35.1 From previous analysis and engagement of partners with newborn children on regeneration estate schemes it is likely that there will be both negative and positive impacts. These include:

Negative impacts

- There is likely to be disruption during the construction period and the council may wish to provide access routes through the estate during this time. This may negatively impact on pregnant mothers or families with new-born children.
- Efforts to address this disruption will be universal to the entire population of the estate but are more likely to have an impact on people with buggies and wheelchairs.
- Pregnant women more likely to be sensitive to disruption from moving/construction.
- Those who have to move as a result of the regeneration programme may lose the on-hand support of carers neighbours/family and friends in the area as a result of the move. Where possible, the council will seek to move neighbours with each other where this is requested.

Positive Impacts

- New housing will have greater accessibility and will support parents of newborn babies or mothers in periods of pregnancy and maternity.
- The design and layout of the new homes will consider access, lift and stairs so that larger family homes are either accessible by lift or not above four storeys high without a lift. The design of the public realm will consider accessibility for people moving around the estate, pushing buggies etc.
- Any affected council tenants who are pregnant at the time of rehousing may be entitled to a larger property as per the allocations policy.
- The design will meet modern space standards with provision for buggy storage at ground floor level in blocks with no lift.

Marriage & Civil Partnership: EQIA Finding: None/neutral.

Context:

6.36 According to the Census 2021, Tower Hamlets has a significantly higher proportion of residents who are single (53.8%) compared to London and England & Wales, compared to 46.2% in London and 37.9% in England & Wales.

6.37 In Stephey Green in 2021, 41.6% have never been married, 27.1% are married to someone of a different sex, 0.3% are married to someone of the same sex, 0.2% are in civil partnerships, 1.8% are separated, 4.3% divorced, 3.5% widowed and for 21.1% this question did not apply because of their young age.

6.38 The council recognises same-sex relationships and civil partnerships with respect to household composition. There are no known negative impacts on these groups. Nonetheless there are other married or legal partnership statuses that will have some implications particularly where property ownership and tenure matters are concerned.

Marriage and civil partnership profile of the site:

6.39 The high proportion of those that have never married and never registered a same sex civil partnership (52.7%) will mostly be young adults. Within the responding households 41.4% of people over 16 were married, 1.4% were separated, 1.4% divorced and 3.2% widowed.

Assessment

6.39.1 It is worth noting that in law, marital status does have an impact, particularly, with regard to property tenure, ownership rights and access to finance/lending/pensions. This could apply in a number of ways:

- Tenancy rights for parties who are residents but who are not named as either the head of household and or not named on the tenancy agreement, but who are either separated or divorced from that person.
- Unmarried couples and those who are not named on property deeds.
- Financial problems with couples who have separated (reduction in joint earnings etc.).
- Financial difficulties in raising loans and mortgages.
- Splitting statutory loss payments.

6.39.2 Indeed, the stress and anxiety of regeneration schemes can be accentuated for people where their marital status has changed and/or if a partner has left or died. For example, some bereaved residents may experience higher levels of vulnerability in a regeneration environment particularly if they were not married to their partner who has died.

6.39.3 Support and advice may be required for tenants and leaseholders who have undergone either a divorce or bereavement to enable them to understand the

implication of the regeneration process on their housing ownership, tenure rights and accessibility to obtaining a mortgage.

6.39.4 The scheme itself does not present a direct negative impact on the grounds of marriage or civil partnership and is thus seen as equality neutral. Nonetheless it may generate some indirect negative impacts for people where their marriage or civil partnership status affects their tenancy agreement and ownership of property. In these cases, support and advice may be required to secure the necessary agreement on which to progress the transfer/ transaction and to mitigate any negative impacts of the scheme. These complexities are relevant in many regeneration schemes and will need to be addressed as they arise.

Socio Economic Inequality: EQIA Finding: Positive and negative.

Context:

6.40 While the borough has a good average income, a significant percentage of the population have incomes of less than £15,000 per year. The borough needs to deliver a significant number of affordable homes each year to meet housing need.

6.41 The employment rate for residents in Stepney Green was 47.7% compared to 57.6% for Tower Hamlets, 62.4% for London and 62.1% for England. The unemployment rate for residents in Stepney Green was 7.1% compared to 6.7% for Tower Hamlets, 5.2% for London and 4.4% for England.

Socio-economic profile of the site:

6.42 42% of household members are employed full time, 9% part time and 12% in full time education and 17% unemployed and available for work. This is data gathered in 2021 and reflects the estate population during the 3rd Covid-19 lockdown (January 2021). In summary 81.2% of the estate are economically active and 18.0% are economically inactive and 0.8% preferred not to say.

6.43 The proportion of those on the site where there are members of households who receive an income related benefit was asked as part of the survey. 54% of household residents who completed this question are in receipt of some type of income related benefit. The remainder either stated they were not or were unsure.

6.44 In the EQIA survey, 27.8% of households stated that their annual household income was less than £15,000 per annum, which suggests a high level of poverty. This suggests there is likely to be a sizeable number across the estate beneath the poverty line as defined by the DWP.[15]

Assessment

6.44.1 The regeneration programme will have impacts on residents, tenants and leaseholders alike, which might incur greater costs and hence become a burden for those residents unable to afford the associated costs, for example there may be a consequential rise in the value of the new properties in terms of rent levels. Many of the direct costs associated with the scheme are being addressed including legal costs, disturbance and moving costs. The points below highlight some of these potentially negative impacts.

Negative impacts

- Perception of increasing cost and affordability of living on the new development.
- Increased rental cost may have a negative impact on those on lower and fixed incomes including older people.
- Higher proportion of estate residents on income related benefits.

[15] DWP in 2017 put the level of household incomes beneath the poverty line at a weekly average of £288 per week. This equates to an annual income of £16,128. Annual incomes beneath £15,000 per annum would represent households beneath the UK poverty line.

- Older people with less earning capability.
- Resident and non-resident leaseholders have no choice but to sell, however rehousing is available for resident leaseholders on the estate if they can afford the new home and/or the option of shared equity or shared ownership if they cannot. In short, they will be offered a property on a like for like basis. However, if they want a larger unit, they will need to demonstrate they have a housing need for any additional bedroom.
- For resident leaseholders wishing to remain on the estate, it is recognised that the value of similar sized new homes would be more than their current home and therefore it could be difficult for them to buy a new home on the estate outright. However, the provision of shared ownership/equity options does seek to mitigate this by giving them the ability to retain the same level of financial investment in a new home on the estate.
- It is recognised that there may be some leaseholders who may have re-mortgaged their homes, spent the money from equity release and may also be unemployed. In these circumstances, it may be difficult for leaseholders to either remain on the estate or buy elsewhere. The shared ownership option could cater for these circumstances.

Positive impacts

- The acute shortage of homes and rising population is adding extra pressure on the need to provide affordable and socially rented homes in the borough, which this regeneration programme seeks to achieve.
- Regeneration of an estate and increasing supply of council housing stock will benefit the increasing number of Tower Hamlets' residents who cannot afford to buy or rent in the private sector.
- Improved energy efficiency of homes and use of sustainable technologies should lead to lower running costs.
- Planning obligations will provide employment and training opportunities.

Language: EQIA Finding: Positive and negative

Context:

6.45 73% of residents in Tower Hamlets reported that English is their main spoken language and an additional 20.7% of residents stated that, whilst it is not their main language, they can speak English well or very well. 6.2% of residents don't speak English well or at all.

6.46 Proficiency in spoken English has improved slightly in the decade between 2011 and 2021. In 2011, 8% of residents could not speak English well or at all, compared to just 6.2% of residents in 2021. After English, Bengali is the most commonly spoken language in Tower Hamlets (11%) then Italian (2.2%) and Spanish (1.7%).

6.47 The impact of the regeneration proposals on people who do not speak English as a primary language is likely to be significant. Alternative formats of the proposals are available upon request (such as audible copies for blind people) as well as being made

available in different languages. At every stage of the regeneration, the council has sought to use plain English and avoid jargon.

6.48 The estate's regeneration website, where residents can review the proposals, is translated into different community languages and support is available to those unable to use the system.

Language profile of the estate:

6.48.1 The range of languages spoken as a main language in households on the estate is set out below. Bangladeshi is spoken in 52.8% of households and English is spoken in 40.3% of responding households. Somali and French is spoken in 2.8% of households respectively and 1.4% of households speak Portuguese.

6.48.2 Moreover, of those who had English as a second language all households stated that they have strong written and spoken English.

Assessment

6.48.3 Language on its own is not likely to have any significant equality impacts from the regeneration programme itself other than the ability for residents to communicate and understand the implications of the regeneration process as it applies to different households. Most households have someone who does speak English although English is in many cases a second language in a home.

Key negative impacts

- Capacity and ability to understand is not always about language, it may also be connected to issues of mental health, learning disability and age.

Positive Impacts

- Robust engagement with residents through the scheme design process via the Residents Panel, newsletters, events, visits to other schemes and presentations.
- Input from residents into the scheme proposals and design and eventual planning submission.

Health: EQIA Finding: Positive and negative

Context:

6.49 Health and housing are intricately linked. Poor quality housing and homelessness can affect a person's health and wellbeing. As noted above with respect to disability, the reduction in priority given to homelessness leads to a corresponding increase in priority to those who need to move due to illness or disability.

Health profile of the estate:

6.49.1 The following health needs apply to members of each household.

Which of the following health needs apply to member/s of your household? Self-Declared Health Needs	Whole Sample		Council Tenants		Resident Leaseholders		Non Resi/Private Tens	
	Count	%	Count	%	Count	%	Count	%
Problems with arms, hands	1	1.4%		0.0%	1	3.7%		0.0%
Problems with legs or feet	16	22.5%	7	20.0%	7	25.9%	2	22.2%
Problems with back or neck	2	2.8%		0.0%	1	3.7%	1	11.1%
Difficulty in seeing	1	1.4%		0.0%	1	3.7%		0.0%
Difficulty in hearing		0.0%		0.0%		0.0%		0.0%
Speech impediment		0.0%		0.0%		0.0%		0.0%
Skin conditions, allergies		0.0%		0.0%		0.0%		0.0%
Chest, breathing problems	4	5.6%	2	5.7%	2	7.4%		0.0%
Heart blood pressure, circulation	6	8.5%	3	8.6%	3	11.1%		0.0%
Problems with stomach, liver, kidney, digestion		0.0%		0.0%		0.0%		0.0%
Diabetes	8	11.3%	3	8.6%	4	14.8%	1	11.1%
Depression, bad nerves	4	5.6%	2	5.7%	2	7.4%		0.0%
Epilepsy		0.0%		0.0%		0.0%		0.0%
Learning difficulties	3	4.2%	2	5.7%	1	3.7%		0.0%
Mental illness, phobia, panics	3	4.2%	2	5.7%	1	3.7%		0.0%
Learning disabilities		0.0%		0.0%		0.0%		0.0%
Long term medical condition	19	26.8%	11	31.4%	4	14.8%	4	44.4%
Progressive illness	4	5.6%	3	8.6%		0.0%	1	11.1%
Total	71	100.0%	35	100.0%	27	100.0%	9	100.0%

Assessment

6.49.2 The regeneration programme is likely to have both positive and negative implications for people's health and wellbeing. This will affect households equally across the estate.

Negative impacts

- Negative health and well-being outcomes would be associated with disruptions to existing households on the estate and the inevitable stress this causes.
- Impacts in the short-term associated with the disruption of moving home and uncertainty about the future stress, anxiety and depression are issues that residents have stated will impact negatively on their health.

- The construction environment can exacerbate existing health conditions and may be, for some, the cause of new health conditions. Currently there are

relatively high levels of Limiting Long Term Illness and Long-term conditions present on the estate (29 people).

- Resident's health can be negatively impacted by the development through respiratory and circulatory disease, asthma etc.
- Potential health impact when the demolition and construction activity starts will necessitate the requirement to assess and diagnose those that have indicated their conditions are likely to be affected.
- The interview team uncovered residents with self-declared health needs describing particularly ailments/pain associated their legs, feet, neck and backs. This suggests that there is a need to address physical mobility/access as priorities in the regeneration of walkways and pathways.

Positive impacts

- Longer term, positive impacts can be expected from providing additional and much better-quality homes and reducing overcrowding.
- Quality homes are designed according to best practice in urban design, producing a high-quality home and urban environment and a safe and secure new neighbourhood which will contribute positively to resident's quality of life.
- Application of Considerate Contractor requirements to minimise negative impact during construction period.

7 Key Findings

7.1 The regeneration of Harriott House, Apsley House & Pattison House is a major undertaking, which will have a range of impacts applicable to all the residents living on the site. In several cases these regeneration impacts will have a potentially greater bearing on certain equality groups. The protected characteristics of disability, age (particularly older and younger people), and related priorities of health, socio- economic inequality and language have been highlighted through this EQIA as having the most significance of impact.

7.2 The council and its housing regeneration team will need to work to address these equality impacts and to build in safeguards and mitigation activity in the programme they are designing.

7.3 The scheme is seeking approval to move to its next stage and to seek approval to make a CPO, to progress and finalise the Statement of Reasons, to prepare and male the order and schedule of the order, publicise and serve notices associated with the order, and to pay costs associated with making the order, and to prepare and present the Council's case at a public Inquiry (if required), amongst other things.

7.4 To date the scheme has achieved ballot approval from residents to demolish 100 existing units and build 407 new residential units on the site. A resolution to grant the Planning Permission exists, which would provide for demolition of the existing buildings on the site (including HAP Houses, the Redcoat Community Centre and Mosque) to provide 407 residential units across buildings ranging in height from 4-8 storeys and community centre building, together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities

CPO process

7.5 Much of the engagement with residents (tenants and leaseholders) has been based on the design and phasing process to date. The Cabinet report sets out a request to make the CPO. To this end, much of the proposed CPO activity is governed by the CPO legislation and guidance nationally. However, there are some impacts that are a direct and indirect result of the CPO process, which are identified below. Where feasible this EQIA has sought to distinguish between generic regeneration impacts and equality specific impacts:

Generic Regeneration Impacts

- The CPO process does have a direct impact on leaseholders (resident and non-resident) as their homes will be compulsorily purchased. This is universal to all leaseholders and is not in itself an equality impact.
- What resident leaseholders chose to do next will be based on the options set out in the right for resident leaseholder document. In short, they have the options of taking their sale value (subject to an independent valuation) and buying elsewhere or porting their mortgage and purchasing a home in the new

estate or entering a shared equity arrangement (not paying rent) or a shared ownership arrangement (part paying rent).

- Non-Resident leaseholders are being offered the sale of their property back to the council subject to an independent valuation.
- The CPO process may have a disproportionate negative impact on leaseholders who are less able to afford their new home.
- For some, the offer of porting mortgages and entering shared ownerships may place financial burdens particularly for people with low earning capability.

Equality specific impacts

- Some burden may arise from households where their marital status has changed since the property has been purchased and this may cause legal costs to clarify ownership and to agree the way forward for that household.
- The CPO process may have disproportionately negative impacts for leaseholders who are either older people, disabled and or single parent families or where they have less financial capacity to meet the increased value. Similarly, this will have impacts on all leaseholders who find difficulty in meeting the increased cost of home ownership on the estate.

Regeneration programme (design, and construction)

7.6 The regeneration of any physical space creates its own impacts, not simply because of the development process itself but also the associated impact that has on people living in or close to the development site itself. Particularly this relates to:

Equality specific impacts

- The inevitability of change and movement to a new home may place a burden on people who are settled and have established lives, particularly where care networks and support are based on neighbours and family members living close by. The council will work closely with residents to keep support networks together.
- Potential negative health impacts of the construction process including noise, dust, construction debris, increased construction traffic movement, and environmental impacts, often negatively impacting more disproportionately on people with poor health and disability.
- Households with children, older people and disabled people may find the regeneration process and construction harder to live with.

Resident engagement

7.7 Critical to any regeneration process is the need to ensure that engagement with residents is maximised. There has been much work delivered on the estate by tenant liaison and advisors which has established some productive work. Moreover, since Covid

there has been much effort placed on remote and virtual engagement which has been supported with videos and graphical illustrations of design options.

Equality specific impacts

- Language is potentially an issue for residents (leaseholders and tenants alike) and residents who did not speak English as their first language could feel that their understanding of the impact of the regeneration scheme had suffered because of this. However, through the survey undertaken, all those engaged - even those that did not speak English as their first household language felt their written and spoken English was good.
- Much of the interaction with residents will be through housing staff and those negotiating with tenants and leaseholders. In these cases, there is a real need to ensure that the borough's equalities commitments are maintained in the negotiations process, particularly with the training of staff to recognise equalities issues of those in negotiation. We should note that the council has ensured that a Bengali translator has been made available at every engagement event held to date.

Decant and housing allocations process.

7.8 Elements of this EQIA are focused on activity that will happen in time. This includes the phasing of the scheme, the decanting of residents and the rehousing/allocation of housing for the new estate.

Equality specific impacts

- The decant process must address the equality needs of residents. These are most likely to be affecting those who are older, disabled and or who have specific health conditions.
- Wellbeing is a critical factor, as is the support network previously available pre-regeneration. Some of these networks are based on neighbours and, where feasible efforts should be made to enable neighbours to live close to one another.
- The loss of sense of community, particularly among those who are friendly with their immediate neighbours could have negative impacts on residents reliant on a local/neighbour care network. Potentially, this is most likely to impact on households with children, older people, disabled residents and those with health conditions. Where feasible the decant process is seeking to cluster residents from Harriott, Apsley and Pattison in new units together with those they had previously lived close to.

Positive Impacts

7.9 There is a counter-balance to these possible negative impacts as the regeneration programme has several positive impacts which many residents have bought into. These include:

Equality specific impacts

- The housing needs of a wide range of protected characteristics will be positively enhanced through the development of these new units providing new housing opportunities.
- The housing register in the borough has significantly more people from diverse communities when compared with the population profile of the borough, proportionally those from diverse communities are likely to benefit from this regeneration scheme.
- There will be more homes designed to Category 2 standard[16] for accessibility, which is broadly equivalent to 'Lifetime' homes standards.
- 10% of the new properties are being built for disabled people and will have relevant adaptations and equipment built in.
- Improving the housing stock will provide homes to higher standards and hence improve the quality of accommodation for residents currently on the estate, potentially improving residents' health and wellbeing.
- Energy efficient design and improved sustainability should lead to lower running costs for new homes.
- Families will have units which are in much better condition than those they currently occupy.
- The planning obligation will provide economic benefits to the local community.

Summary of positive, negative and neutral equality impacts.

7.10 The lists below seek to summarise the equality impacts identified in this EQIA particularly those relating to the construction phase of the scheme and its environmental impacts as to the more permanent longer term impacts the majority of which are positive.

Short term construction and environmental focused impacts include:

- The disruption accompanying the construction phase is expected to have a **negative impact,** particularly for older people, disabled people and those with specific health conditions, pregnant mothers and post birth mothers with young babies.
- The short-term changes to play space provision are expected to have a **negative impact** specifically for younger people.

[16] Category 2 means a home must be accessible to most people and able to suit older people, those with reduced mobility and some wheelchair users, and is estimated to cost developers an extra £1,400 per home. Requirements include level access front and rear doors, an entrance level bathroom, kitchen and dining area and low height windows.

- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact,** particularly for those who worship at the mosque which will be relocated before it is demolished.
- In the short term, the changes to housing provision are expected to have a neutral impact, particularly as the Council is looking to arrange for moves to new properties to take place as a single move, where possible. This would if achieved, somewhat mitigate the negative impacts of decant for older and disabled residents, and those with health conditions.

Medium to long terms impacts

- The housing needs of a wide range of protected characteristics will be **positively** enhanced through the development of these new units, providing opportunities for housing.
- The housing register in the borough has significantly more people from diverse communities when compared with the population profile of the borough, many of whom are likely to **benefit** from this regeneration scheme.
- Once the process is completed the new replacement housing is expected to have a **positive impact** for all the protected characteristics represented on the 3 blocks**.**
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a **positive impact** for young**,** older and disabled residents, those with health conditions and pregnant and or young mothers.
- The improved opportunities for social interaction provided as part of the completed development are expected to have a **positive impact** for young**,** older and disabled residents, those with health conditions and pregnant and or young mothers.
- The improved and expanded play space provided as part of the completed development is expected to have a **positive impact** for young residents.
- The community facilities provided as part of the completed development are expected to have a **positive impact** for young**,** older and disabled residents.
- The improved access to the site is expected to have a **positive impact** for young**,** older and disabled residents and pregnant and or young mothers.
- There will be more homes designed to a category 2 standard[17] for accessibility which is broadly equivalent to 'lifetime homes' standards. 10% of homes will be built for people with a disability which will have a **positive impact** for older and disabled residents.
- Improving the housing stock will provide homes to higher standards and hence improve the quality of accommodation for residents currently on the estate, potentially having a **positive impact** on residents' health and wellbeing.
- The planning obligations will provide economic benefits to the local community.
- Energy efficient design and improved sustainability should have a **positive impact** of lower running costs for new homes.

[17] Category 2 means a home must be accessible to most people and able to suit older people, those with reduced mobility and some wheelchair users, and is estimated to cost developers an extra £1,400 per home. Requirements include level access front and rear doors, an entrance level bathroom, kitchen and dining area and low height windows.

8 Mitigation Recommendations

8.1 The points set out below list the core mitigation activity that is recommended to address the impacts highlighted through the EQIA.

Generic Actions

- Run EQIA briefing sessions, review training needs, and establish training where appropriate.
- Establish training where appropriate equality training / briefing / workshops for housing regeneration liaising teams.

Disability Mitigation Actions

- Arrange relevant occupational therapy/social services assessments for residents where identified.
- Liaison with social care teams in other authorities where residents are seeking to move to.
- Work with residents with complex disability and or health needs and provide services accordingly.
- Support with adaptations in new units on the new estate.
- Commission a repair person service to support additional fixtures and fittings.
- Ensure reasonable adaptations are implemented within the new homes in line with OT assessments.
- Ensure that disability grants are reviewed and that residents with specific need for support are provided with access to funding opportunities.

Age Mitigation Actions

- Engage young people in the design of the future amenity space within the new estate. Ensure existing amenity space is retained where feasible and safe, during the regeneration and construction.
- Provide opportunity for independent financial advice for any resident needing it.
- Commission handy person service to support additional fixtures and fittings.
- Support older leaseholders to access the right options.
- Preventing where possible more than one decant for older people in the development process.
- Engage social services to ensure that modifications and or care needs of older people are accounted for.
- Ensure that the shared ownership option for older people will allow them to transfer the equity from their property, should they die, to their relatives/spouse.

Socio-economic Mitigation Actions

- The council to monitor the potential for a consequential rise in the costs associated with the new properties both in terms of living costs and in terms of rent/mortgages.
- Private tenants will be rehoused if they are on the housing register and if they are in bands 1 and 2. The remaining private tenants will be signposted to the

relevant housing options team/service and provided with information as to what their housing options are.
- The council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity.
- Facilitate access to Independent Financial Advisors for all residents.

Language Mitigation Actions
- Make alternative formats, translation and interpretation provision available when specific tenant engagement, leaseholder negotiation and wider off-site consultations are undertaken.

Health Mitigation Actions
- Undertake health and medical assessment or OT assessments where required.

Intersectionality Mitigation Actions
- Develop enrichment activities for residents of the estate designed to rebuild communities.

9 Action Plan

9.1 The key mitigation activity set out in section 9 below detailing when and by whom actions should be undertaken to mitigate any potential negative impacts of this regeneration scheme. A large proportion of these mitigation actions are construction related and or relevant to the initial phasing of the scheme. To this end they have been identified as short term, medium term and longer term actions. This will need to be refined by the borough regeneration team in due course.

Mitigation Issue	Actions	Outcome	Date	Responsibility
Generic Mitigation				
Ensure all frontline staff and contractors are briefed on the findings of the EQIA and where appropriate undertake equality training	• Run EQIA briefing sessions. • Review training needs • Establish training where appropriate.	• All front-line staff able to address and identify the priorities to equality as set out in the EQIA.	Ongoing	LBTH
Ensure staff consulting with residents understand the equality impacts of the scheme	• Equality training / briefing / workshops for housing regeneration liaising teams.	• Recognition and understanding of equality impacts and issues as highlighted in this EQIA.	Ongoing	LBTH
Disability Mitigation Activity				
Early engagement with people with a disability on the estate between the decant team and specialist social care staff	• Arrange relevant Occupational Therapy/Social Services assessments for residents where identified. This is in place and will need to continue where relevant. • Where necessary consideration should be given to residents that may need to be moved from the estate during the construction period because of their disability.	• Reasonable adjustments identified in new and future properties.	Ongoing	LBTH
Ensure disability needs are picked up for residents who may opt to leave the estate under the key guarantees	• Liaison with social care teams in other authorities where residents are seeking to move to.	• Disabled residents leaving the estate are supported and are flagged to the relevant authorities.	Ongoing	LBTH

Mitigation Issue	Actions	Outcome	Date	Responsibility
Ensure that all disability needs are picked up where reasonable adjustments are identified.	• Support with adaptations in new units on the new estate • Commission repair person service to support additional fixtures and fittings.	• Disability issues built into home designs on the new estate.	Ongoing	LBTH
Ensure that the cost of adjustments and needs of disabled people are addressed	• Ensure reasonable adaptations are implemented within the new homes in line with OT assessments as set out in the key guarantees.	• Required adaptations are completed by the council in line with OT Assessment.	Ongoing	LBTH
Disability grants to reviewed and accessed for residents in specific need of support with funding of adaptations.	• Ensure that disability grants are reviewed and that residents with specific need for support are provided with access to funding opportunities.	• Ensuring that benefit support for Disabled People is up to date and appropriate to their needs.	Ongoing	LBTH
Age Mitigation Activity				
Address age impacts of regeneration as they apply to young people	• Engage young people in the design of the future amenity space within the new estate. Ensure existing amenity space is secure during the regeneration and construction.	• Young people engaged in the design of amenity space within the new estate.	Ongoing	LBTH
Need to address age impacts of regeneration as they apply to older people	• Provide opportunity for independent financial advice for any resident needing it.	• Residents enabled to make informed financial decisions.	Ongoing	LBTH
Need to support older people through their move and settling into their new home	• Commission repair person service to support additional fixtures and fittings.	• Older residents given support in settling into their new homes.	Ongoing	LBTH
Need to support older leaseholders through the regeneration process	• Support older leaseholders to access the right options.	• Direct engagement with older leaseholders.	Ongoing	LBTH

Mitigation Issue	Actions	Outcome	Date	Responsibility
Need for social support services for any adaptation to new homes for older people and those with a disability / health conditions	• Engage social services to ensure that modifications and or care needs of older people are accounted for. • Secure a Social Worker/Occupational Health practitioners to work with Regeneration team.	• Older people and people with disabilities supported through the engagement of health and social care.	Ongoing	LBTH
Ensure that wherever possible tenants, particularly those who are older, only move once into their new homes.	• Preventing where possible more than one decant for older people in the development process.	• Ensuring that Decants remain no more than one per household wherever possible	Ongoing	LBTH
Ensure that the shared ownership option for older people will allow them to transfer the equity in their proportion of their estate to their relatives/spouses.	• When considering shared ownership options for older people will allow them to transfer the equity from their property, should they die, to their relatives/spouse.	• Equitable return on investment for those considering shared ownership options	Ongoing	LBTH
Socio-economic Mitigation Activity				
Recognise and understand the cost impacts for individual households within the regeneration programme.	• The council to monitor the potential for a consequential rise in the costs associated with the new properties both in terms of living costs and in terms of rent/mortgages.	• Robust estimates of future costs and values for new and existing properties provided to enable informed decision making.	Medium Term	LBTH
Assess the potential impacts on Private tenants living in properties which is due for development	• Review Regeneration policy and identify ways to support private tenants made vulnerable.	• Consideration of options for private tenants	Ongoing	LBTH
Recognise and understand the cost impacts for individual households within the regeneration programme.	• The council to monitor how the proposals affect older leaseholders or leaseholders with reduced financial capacity. • Facilitate access to Independent Financial Advisors for all residents.	• Robust estimates of future costs and values for new properties allowing informed discussions about financial options under the rights for homeowners.	Medium term	LBTH

Mitigation Issue	Actions	Outcome	Date	Responsibility
Language Mitigation Activity				
Ensure residents and wider consultees have adequate translation provision as part of the negotiation phase of the regeneration programme.	• Cake alternative formats, translation and interpretation provision available when specific tenant engagement and leaseholder negotiation is being undertaken.	• Alternative formats, translation and interpretation identified and readily available.	Ongoing	LBTH
Health Mitigation Activity				
Address the presented health needs of residents transferring from their existing home to any new property as part of the Regeneration	• Undertake health and medical assessment or OT assessments where required. • Where necessary consideration should be given to residents that may as a result of their health condition need to be moved from the estate during the construction period.	• Implement recommendations of assessments and prioritisation of serious / progressive conditions.	Ongoing	LBTH
Intersectionality Mitigation Action				
Support to restore communities on the estate during and post regeneration	• Develop enrichment activities for residents of the estate designed to build communities.	• Empower residents to promote, celebrate and harness community cohesion and shared values.	Ongoing	LBTH

9.2 Suggested Future EQIAs and EQIA refreshes.

EQIA Subject	Date	Responsible Body
Regeneration phasing and housing transfer / allocation plans		
Construction management plan		
Post Development EQIA and evaluation		

10 Appendix 1: Key Definitions

Key Definitions

10.1 **Diversity** equals difference:

The concept of diversity encompasses acceptance and respect. This means understanding that every person, family and group in the Tower Hamlets Estates Regeneration project is unique and has specific needs. The skill when offering services to individuals and groups is to take account of these characteristics sensitively and positively throughout this project.

10.2 **Equality** is the concept of knowing when to 'treat people the same' in this regeneration project and when to 'treat them differently'.

Often, we have policies, guarantees and standards which guide us to treat people the 'same' so that they receive their entitlements. But regularly in 2017 we are also faced with challenges to deliver individualised and tailored housing services to individuals, families and groups. The skill is to know when 'sameness or difference' applies and having a rationale to explain your actions.

10.3 **Inclusion** has been described as a sense of belonging.

A feeling of being respected, valued for who you are; feeling a level of support and commitment from others who consult and negotiate with you over important matters, so that your voice is heard as a tenant, leaseholder or owner of a property and you can then help, shape and make important decisions.

10.4 **Human Rights** are the basic rights and freedoms that belong to all of us from birth until death. Our right to live, eat, be clothed and to be respected for private and family life.

The act protects ordinary people's freedom, safety and dignity and helps us hold authorities to account when things go wrong. In Britain, these important international rights are protected by the Human Rights Act 1998, which is now enshrined as part of UK domestic law.

10.5 **Ethnic Minority**: Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as white British.

10.6 **BAME**: The acronym BAME stands for Black, Asian, mixed and other minority ethnic populations and is defined as all ethnic groups except white ethnic groups. NB this term is not currently used locally.

11 Appendix 2: The Landlord Offer

Rights for Secure Tenants – the principles:

Remaining and returning:

11.1 All tenants will have the right to a tenancy of a newly built social rented home in the new development. They will continue to be a tenant of Tower Hamlets Council with their existing tenancy rights such as the right to buy and succession rights retained.

11.2 If tenants don't wish to remain in the new development, they will have a choice of permanent rehousing by bidding through the Choice Based Lettings Scheme for:

- An existing council home elsewhere in Tower Hamlets, still as a secure tenant of the council with the same tenancy rights. Those who choose this option will not be able to return to the new development.
- A home with a housing association either in Tower Hamlets or another London borough (if available). Existing council tenancy rights would not be protected under this option. If a temporary move away from the estate is necessary, residents would still be entitled to a new home once the development has been completed. This is a right to return.

Rent and service charges.

Rents for your new home:

11.3 Existing secure tenants who accept the offer of a newly built home on the estate with Tower Hamlets Council will be charged social rents. This means that rents for the new council properties will be comparable with rents for council properties of a similar type and size, but they will reflect the fact that these are new homes. Rent levels may increase slightly and tenants will be made aware of rent levels prior to agreeing on any move.

Service charges (included in social rent):

11.4 Residents can only be recharged for services that they benefit from. The law is clear that only the actual cost of services can be passed on by the landlord. We are committed to making sure any charges are kept as low as possible and conduct regular reviews to ensure value for money.

Compensation

11.5 Council tenants who have been secure tenants for at least 12 months before a decant is agreed are entitled to home loss payments and disturbance allowances.

Home loss payment:

11.6 Tenants will be entitled to a home loss payment which is currently set at £6,400. The amount is set by the government and not by the council.

Disturbance allowance:

11.7 The council will also pay a disturbance allowance to ensure that you are not financially disadvantaged by the regeneration.

11.8 The disturbance allowance covers reasonable expenses for items such as removal costs, disconnection and reconnection of services including gas, electricity, telephone and re-direction of post for three months.

Hidden households

11.9 The redevelopment will also allow the council to identify and rehouse 'hidden households' provided they meet certain criteria. 'Hidden households' are typically considered to be adult children of the tenant who are known by the council to have been living with the tenant or leaseholder for over a year.

11.10 Depending on their circumstances, these 'hidden households' will have the option to remain living as part of their parent(s) household, or to be registered independently on the council's housing register with additional priority for their own home as part of the rehousing process.

Specific points raised in the Guide for Secure tenants.

Housing need – number of bedrooms

11.11 The council will work with you to ensure that your rehousing preferences are met as far as is possible. Tenants can apply for the size of home that meets the housing needs of their household, with the appropriate number of bedrooms, as defined in the council's lettings policy (which is available on the council's website).

11.12 If a resident receives care and support from someone who is not in their immediate family, an additional bedroom may be requested on a discretionary basis and in accordance with the council's lettings policy.

11.13 If a tenant currently lives in a home larger than the standard size defined by the council's lettings policy (i.e. when the tenant is under-occupying their current home), an application can be made for a property with a bedroom size that matches their needs, plus one additional bedroom, to recognise existing living arrangements. This is sometimes called 'housing need plus one.' It is subject to the following restrictions:

11.13.1 It must be a flat or maisonette on the same floor level or above as current home.

11.13.2 It cannot be for a property of four or more bedrooms as there is a significant shortage of homes of this size in Tower Hamlets.

11.14 Where the current property size is larger than the household requires, council officers will re-assess tenant needs, and an appropriate alternative property will be offered. In that situation, an incentive payment would be offered for downsizing, in addition to the statutory home loss payment they will receive. The incentive amount will be discussed with each individual tenant in detail at a one to one meeting.

Double decanting – having to move twice.

11.15 Depending on the progress of the new build housing programme it is possible that some tenants, with specific needs may only have a restricted choice of home. As a result, there may need to be a temporary move to another home outside of the estate whilst the new home is being built. This process is known as 'double decanting.' It is expected that it will be limited to only a few tenants.

11.16 If such double decanting becomes necessary, those impacted will be given a clear assurance of their entitlement to a new home on the estate in the newly built homes, as well as the reasonable costs of both moves being reimbursed (details of reimbursements are given elsewhere in this document). If they decide not to exercise their option to return to the estate, the council will still be required, by law, to provide a suitable alternative permanent home.

Rights for Homeowners – the principles.

11.17 The borough has developed a guide for homeowners who live in the property they own as their main home and have done so for more than a year prior to the issuing of the Landlord Offer Document in February 2020. It explains the Council's approach to buying back their property when demolition or redevelopment is proposed and the options, they will have to buy a replacement home.

11.18 This includes the option of purchasing a new shared equity property at no extra cost on the new estate once it is ready. Other options include 'part-shared equity

and part-rent' on the estate or a lease swap to a Council property in the area or elsewhere in Tower Hamlets (subject to meeting the required criteria).

11.19 Alternatively, the leaseholder may prefer to sell to the Council and make their own arrangements to find another property to buy elsewhere, including out of the borough. All these options are explained in this guide.

11.20 The proposal for redevelopment is at an early stage. The Council will organise drop-ins, one-to-one surgeries and other events where leaseholders can discuss their options and raise any specific concerns they have.

11.21 Resident leaseholder will be invited to meet with Council officers to confidentially discuss their particular circumstances and any concerns that you may have about the process.

11.22 Once a redevelopment scheme is approved by Cabinet in 2021, the Council will contact leaseholder to arrange an initial valuation of their property. The assessment of full market value (FMV) is undertaken by a Council valuer.

11.23 The Council advises all leaseholders to get their own independent advice, including their own independent valuation done by a surveyor recognised by the Royal Institute of Chartered Surveyors. The cost of obtaining this independent advice from one qualified surveyor will be covered by the Council. The guide explains the process of the Borough and their surveyors negotiating an agreed value for the property. This could go to an Upper Tribunal should agreement not be made, the costs for which would be decided by the Tribunal.

Temporary decant.

11.24 The guide explains the possibility for some residents to first move out of their existing homes so work can take place. Where this cannot be avoided, affected residents will have priority for rehousing.

11.25 Resident leaseholders on the estate will have an option to return to a permanent new replacement home on the estate if this is their preference. If the resident leaseholder choses the option to return, the Council will buy their existing property from them at the full market value and simultaneously enter into a contract to hold this money on their behalf until the purchase of their new property can be conducted. Leaseholders will not be charged rent during their stay at the temporary property, although they will be asked to pay the service charges. Any reasonable moving costs would also be covered by the Council for both moves.

11.26 The guide then sets out the fees the council would pay (within in certain limits) for:

- Home loss payments
- Claiming fees for professional adviser
- Valuation fees
- Negotiation fees

- Legal fees for the sale of their home
- Legal fees for buying a replacement home.
- Removal fees
- Surveyor's fees on new home purchases (off site)
- Stamp Duty Land tax.

11.27 The guide then sets out the options for buying a new home in the development, this includes:

- Option A - Buying a new home built by the Council outright.
- Option B – Shared Equity (Guarantee) - Buying a new shared equity home where the resident pays no rent on the remaining unpurchased equity.
- Option C –Shared Equity (Flexi) - Buying a new shared equity home where the resident pays no rent on the remaining unpurchased equity.
- Option D – Part Shared Equity / Part Rent) - Buying a property where you part- own and part rent the new home.
- Option E - Leasehold swap (to another property of similar age and value as their existing home, providing they can acquire the full value of the new home.
- Option F - Where home ownership is no longer a feasible option: Where a homeowner is unlikely to obtain a new mortgage or cannot financially manage the ownership of a new home, they should notify the Council immediately. The Council will work with homeowners to explore different options until a reasonable solution has been found.

Succession rights

11.28 The Guide also sets out succession rights for the leaseholders' spouse or other immediately family member living at the property as their permanent home to inherit it under the same financial/rental arrangements.

11.29 The Councils definition of immediate family member is defined as a person living in continuous occupation with the owner for a period of at least 12-months prior to their death, as part of their household, i.e. A spouse/civil partner, son/daughter, brother/sister, parent/grandparent, or in the case of another relative, having been similarly in continuous occupation as an acknowledged carer.

Compulsory Purchase Order (CPO)

11.30 The guide then explains the CPO process. It confirms that any potential development site may comprise multiple land interests, including leaseholders, freeholders, commercial interests, access rights etc. Before it can start a development, the Council must acquire these interests from their legal owners.

11.31 Whilst the Council aims to purchase properties through negotiated settlements, it is normal practice to consider making a CPO to ensure the Council can obtain vacant possession of the buildings and land needed to commence with the redevelopment. The decision to request permission from the Secretary of State to make a CPO is

taken by the Mayor for the Council, after weighing up the need for the regeneration proposals and the impact these will have on those affected.

11.32 A CPO process has several stages:

- Information gathering
- Making of the order
- Objections
- Public local inquiry
- Decision
- Further challenge
- Taking possession of the property

11.33 This section finally confirms that the Council would keep residents informed throughout all the stages of a CPO and it will continue to negotiate with residents even if there is an ongoing public inquiry.

Rights for Non-Resident Homeowners – the principles:

11.34 Non-resident homeowners will be offered the full market value by the council to purchase their property. They will also be paid at a 7.5% 'basic loss' compensation payment as well as reimbursements. These include reasonable fees and taxes incurred for both the sale of your property and for the purchase of a replacement property for a limited period, including independent valuation and legal support.

11.35 The Council encourages owners to come forward and talk to them so that they can arrange an initial valuation of the non-resident homeowner's property, discuss any concerns they may have and start to negotiate a satisfactory settlement for all parties. The Council valuer will arrange an appointment to make an initial valuation of the property.

11.36 The Council also recommends leaseholders to obtain their own valuation completed by a RICS (Royal Institute of Chartered Surveyors) qualified surveyor, the costs for which can be claimed back from the Council.

11.37 The Council will **not** acquire properties with tenants in occupation as they will be buying the property in the open market with vacant possession. If non-resident leaseholders rent their property, it will be their responsibility as the landlord to ensure that they give appropriate and timely notice to their tenants or other occupiers, in line with good practice and legal requirements, to secure vacant possession before completion of the sale to the Council. The Council cannot assist non-resident leaseholders in this process. The Council does not have an automatic responsibility to rehouse people who may be occupying your property. If these 'private' tenants or other occupiers require housing advice, they can contact the

Council to obtain this, but that does not imply they will have any entitlement to relocation support.

11.38 The guide then sets out the fees the council would pay (within in certain limits) for:

- Basic loss payments
- Repaying arrears
- Fees for independent surveyor
- Negotiation fees
- Valuation fees
- Legal fees for the sale of their home
- Legal fees for buying another property.
- Removal fees
- Stamp Duty Land tax (for the onward purchase of one property)

11.39 The guide then explains the CPO process as set out above.

12 Appendix 3: Policy Backdrop.

12.1 This appendix of the EQIA sets the legislative and policy context of the Equalities Impact Assessments for London Borough of Tower Hamlets Estate Regeneration Programme. Of central importance is the Equality Act 2010, which sets out the public sector equality duty.

12.2 The section sets out the legislation and policy directly relevant to housing regeneration and lists the desk research that has been completed to set the context for this Equality Impact Assessment:

- Equality Act 2010
- Tower Hamlets equality objectives
- Equal Life Chances for All, the Mayor's equality strategy revised in June 2014.
- Mayor of London's Equality, Diversity and Inclusion Strategy
- London Plan 2016 and December 2021
- Localism Act 2011
- Tower Hamlets Equality Commission
- Homelessness Reduction Act 2017 and its implications for Tower Hamlets temporary accommodation
- 2021 census releases up to and including July 2023
- National Estate Regeneration strategy and Good Practice
- Mayor's Estate Regeneration Good Practice Guide
- Tower Hamlets Housing Strategy 2016-2021
- Tower Hamlets Strategic Plan 2020 -2023
- The Tower Hamlets Local Plan 2031
- Estate Regeneration National Strategy DCLG December 2017
- Mayor of London: The London Strategic Housing Market Assessment (SHMA) 2017.
- Tower Hamlets Common Housing Register (2024)