

**HIGH PATH**



# **Merton Estates Regeneration**

**EQUALITIES IMPACT ASSESSMENT (EqIA)**

**HIGH PATH ESTATE**

**Compulsory Purchase Order (CPO)**

on behalf of  
**Clarion Housing Group and the London Borough of Merton**  
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# EXECUTIVE SUMMARY

- ES.1** This document has been prepared by **Jam Consult Ltd** on behalf of **Clarion Housing Group**. Clarion Housing Group (Clarion) is part of the wider Circle Housing Group – one of the largest housing associations in the UK.
- ES.2** This report provides an Equalities Impact Assessment (EqIA) for the High Path Estate. The overall regeneration programme includes the Eastfields, High Path and Ravensbury Estates.
- ES.3** The EqIA report considers the equalities impacts for the High Path Estate proposals to support the Compulsory Purchase Order (CPO), in accordance with the Equalities Regulations.

## REGULATIONS

- ES.4** The Equality Act 2010 (the Act) provides the framework to protect the rights of individuals against unlawful discrimination to advance equality opportunities for all. The Act replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection by setting out the different ways in which it is unlawful to treat someone.
- ES.5** At the decision making stage local authorities are required to assess how changes to policies and service delivery will affect different people. In 2010, the Act extended protection against discrimination to nine 'Protected Characteristics', which includes the following:
- Age
  - Disability
  - Gender Reassignment
  - Marriage and Civil Partnership
  - Pregnancy and Maternity
  - Ethnicity
  - Religion or belief
  - Sex/Gender
  - Sexual Orientation.
- ES.6** Section 149 of the Equality Act 2010 also introduced the Public Sector Equality Duty (PSED), which requires local authorities to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
  - Advance equality of opportunity between people who share a protected characteristic and those who do not
  - Foster good relations between people who share a protected characteristic and those who do not.

# EXECUTIVE SUMMARY

- ES.7 The above requirements are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:
- ❑ Removing or minimising disadvantages suffered by people due to their protected characteristics
  - ❑ Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
  - ❑ Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- ES.8 In addition the Act sets out that:
- ❑ Meeting different needs involves taking steps to take account of disabled people's disabilities
  - ❑ Fostering good relations includes tackling prejudice and promoting understanding between people from different groups
  - ❑ Compliance with the duty may involve treating some people more favourably than others.

- ES.9 In addition to the above requirements, the EqIA also references additional factors, which may be having an impact on the area such as Brexit and the Coronavirus, where data is available, as well as the potential cumulative impacts of the regeneration programme within Merton.

## REGENERATION PROPOSALS

- ES.10 Clarion acquired the ownership and management of the Estates in 2010 as part of a Housing Stock Transfer Agreement (HSTA) containing all the Council housing stock within Merton, totalling circa 9,500 units. Clarion is the majority landowner of the estates, owning about 60% of the three estates.
- ES.11 Clarion will deliver any regeneration proposals as part of their requirement to achieve better housing standards on the three estates, known as Decent Homes.
- ES.12 As a result of initial stock condition surveys and financial planning work, Clarion discovered that significant refurbishment and maintenance work, as well as financial investment, was required to achieve the necessary improvements in standards. This was as a consequence of a history of reactive repairs rather than proactive or comprehensive refurbishment.

- ES.13 Clarion therefore began a comprehensive review exercise across all their estates within the Borough to determine whether it might be more beneficial and sustainable to replace homes in the poorest condition with new properties. Consideration was given to the condition of the properties over a 50 year period, which was based on the length of Clarion's financial modelling.
- ES.14 The review clearly identified Eastfields, High Path and Ravensbury as the three estates within Clarion's ownership with the most viable regeneration potential, offering the opportunity for Clarion to explore the potential for creating new, high quality and sustainable affordable housing for the people of Merton.

# 1 INTRODUCTION

- 1.1 This document has been prepared by Jam Consult Ltd on behalf of Clarion Housing Group and provides an Equalities Impact Assessment (EqIA) of the High Path Estate Regeneration programme.
- 1.2 The EqIA report considers proposals for the High Path Estate to support the Compulsory Purchase Order (CPO), in accordance with the Equalities Regulations.
- 1.3 A separate overarching EqIA has been prepared for the Merton Estates Regeneration programme as a whole, which includes the Eastfields, High Path and Ravensbury Estates. This document should be read alongside this report.



Source: PRP Architects LLP

# 2 REGULATIONS

## 2.1 EQUALITY ACT 2010

2.1.1 The Equality Act 2010 (the Act) is a major piece of UK legislation, which provides the framework to protect the rights of individuals against unlawful discrimination to advance equality opportunities for all. The Act replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection by setting out the different ways in which it is unlawful to treat someone.

2.1.2 At the decision making stage local authorities are required to assess how changes to policies and service delivery will affect different people. In 2010, the Act extended protection against discrimination to nine 'Protected Characteristics', which includes the following:

- ❑ Age
- ❑ Disability
- ❑ Gender Reassignment
- ❑ Marriage and Civil Partnership
- ❑ Pregnancy and Maternity
- ❑ Ethnicity
- ❑ Religion or belief
- ❑ Sex/Gender
- ❑ Sexual Orientation.

## 2.2 PUBLIC SECTOR EQUALITY DUTY

2.2.1 Section 149 of the Equality Act 2010 introduced the Public Sector Equality Duty (PSED), which requires local authorities to have due regard to the need to:

- ❑ Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- ❑ Advance equality of opportunity between people who share a protected characteristic and those who do not
- ❑ Foster good relations between people who share a protected characteristic and those who do not.

2.2.2 The above objectives are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- ❑ Removing or minimising disadvantages suffered by people due to their protected characteristics
- ❑ Taking steps to meet the needs of people from protected groups where these are different from the needs of other people

- ❑ Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

2.2.3 In addition the Act sets out that:

- ❑ Meeting different needs involves taking steps to take account of disabled people's disabilities.
- ❑ Fostering good relations includes tackling prejudice and promoting understanding between people from different groups
- ❑ Compliance with the duty may involve treating some people more favourably than others.

2.2.4 The Duty does not require the need to avoid all harmful effects but to recognise them, eliminate them wherever possible (and always with regard to unlawful discrimination or harassment) and mitigate any remaining consequences.

# 2 REGULATIONS

## 2.3 COMPULSORY PURCHASE ORDER (CPO) REQUIREMENTS

2.3.1 Compulsory Purchase powers are provided to enable acquiring authorities to compulsorily purchase land to carry out a function, which Parliament has decided is in the public interest. Anyone who has land acquired is generally entitled to compensation. Local authorities have CPO powers under the Acquisition of Land Act 1981, the Town and Country Planning Act 1990 and other specific Acts of Parliament in order to promote development regeneration.

2.3.2 The CPO process comprises a number of stages, including Resolution, Inquiry, Decision and Compensation stages. The acquiring authority does not have the powers to compulsorily acquire land until the appropriate Government Minister confirms the CPO. However, the authority can acquire by agreement at any time and should attempt to do so before acquiring by compulsion.

2.3.3 Section 237 of The Town and Country Planning Act 1990 also includes a process for the local authority and the developer to enter into a Section 237 scheme to override private rights, including the right to light, where the land to be acquired by the Authority is actually required for development, which will promote or improve the economic, social or environmental well-being of the area or contributes to the purpose which it is necessary to achieve for the proper planning of the area.

**Further information on other relevant regulations and planning policies is set out in the Overarching EqIA Report for the Merton Estates Regeneration Programme.**



# 3 EQUALITIES IMPACT ASSESSMENT (EQIA)

## 3.1 EQIA OBJECTIVES

The specific objectives of the EQIA are to:

- 1. Identify any potential equality effects that might arise from the planned development**
- 2. Identify potential positive equality effects.**
- 3. Assess whether any negative equality effects would give risk to unlawful discrimination for an identified group**
- 4. Identify further measures to reduce any negative equality effects that may arise**

## 3.2 COMPULSORY PURCHASE ORDERS

3.2.1 The EqIA considers how the Compulsory Purchase Order (CPO) process would contribute to the realisation of equality effects associated with the planned development, and any specific equality effects of the CPO process itself.

3.2.2 Separate EqIA reports have been prepared for the properties affected by the CPO process, on the Eastfields and Ravensbury Estates as well as an overarching EqIA for the regeneration programme as a whole.

See **SECTION 6** for further information.

# 4 ESTATES REGENERATION



EASTFIELDS

HIGH PATH

RAVENSBURY

# 4 ESTATES REGENERATION

## 4.1 OVERVIEW OF REGENERATION PROGRAMME

4.1.1 Clarion Housing Group (Clarion) is part of the wider Circle Housing Group – one of the largest housing associations in the UK. Clarion acquired the ownership and management of the Estates in 2010 as part of a Housing Stock Transfer Agreement (HSTA) containing all the Council housing stock within Merton, totalling circa 9,500 units. Clarion is the majority landowner of the estates, owning about 60% of the three estates. Clarion will deliver any regeneration proposals as part of their requirement to achieve better housing standards on the three estates, known as Decent Homes.

4.1.2 As a result of initial stock condition surveys and financial planning work, Clarion discovered that significant refurbishment and maintenance work, as well as financial investment, was required to achieve the necessary improvements in standards. This was as a consequence of a history of reactive repairs rather than proactive or comprehensive refurbishment.

4.1.3 Clarion therefore began a comprehensive review exercise across all their estates within the Borough to determine whether it might be more beneficial and sustainable to replace homes in the poorest condition with new properties. Consideration was given to the condition of the properties over a 50 year period, which was based on the length of Clarion's financial modelling.

4.1.4 All the Clarion Estates in Merton were assessed to determine the impact of upgrading homes to the Decent Homes Merton Standard. This included consideration of:

- ❑ Capacity of existing stock to meet current and future housing needs e.g. overcrowding, older people, demand for adapted properties, etc.
- ❑ Condition of the existing stock and historic / projected maintenance issues and costs
- ❑ Community safety and reported crime
- ❑ Indices of deprivation, including super output area level identification of areas in decline.

4.1.5 The above work was augmented by further reviews based on the deliverability of potential regeneration programmes on each of the estates.

This review included:

- ❑ Scope for increasing the number of homes on site
- ❑ Access and site constraint issues
- ❑ Income generation potential and future sales values and demand
- ❑ Contribution to future housing supply
- ❑ Proximity to public transport and other infrastructure.

4.1.6 These two work streams were combined and clearly identified Eastfields, High Path and Ravensbury as the three estates within Clarion's ownership with the most viable regeneration potential. The regeneration of the estates offers the opportunity for Clarion to explore the potential for creating new, high quality and sustainable affordable housing for the people of Merton. As a result, the lives of the residents on the Estate could be significantly enhanced, by overcoming inequalities faced by those living within the existing poor quality housing. The delivery of wider regeneration benefits to the surrounding area could also be realised.

# 4 ESTATES REGENERATION

## MERTON ESTATES LOCAL PLAN (ELP) 2017

4.1.7 The Merton Estates Local Plan was adopted in 2017 and contains site specific policies covering land use, townscape, street networks, movement and access, environmental protection, landscape and building heights for the regeneration of the Estates. A number of options were considered in the preparation of the ELP, with regard to the regeneration of the Estates.

The options considered included:

- » **Issues and Options Sept 2014**  
options for the redevelopment or refurbishment of the estates, including the type of housing and facilities that were required for each estate.
- » **The Case for Regeneration (CfR) Savills, Sept 2015 (updated October 2016)** set out the different issues and options considered for the estates
- » **Draft Estates Local Plan, Feb 2016**  
The proposed policies for the plan.

4.1.8 The options were subject to public consultation through the Issues and Options and Sustainability Appraisal (SA), the Draft Estates Local Plan and SA and further consultation carried out by Clarion.

4.1.9 The following Options were considered in the Case for Regeneration prepared by Savills, September 2015 (updated October 2016), which were then assessed in the Sustainability Appraisal (SA).

- ❑ **OPTION 1:**  
Refurbishment to Decent Homes (Merton Standard)  
Refurbish all existing properties owned and managed by Clarion to Decent Homes (Merton Standard) as defined within the terms of the Housing Stock Transfer Agreement. This would involve (predominantly internal) works, such as new kitchens, bathrooms, plumbing, electrics and insulation) to improve the quality of the existing accommodation.
- ❑ **OPTION 2:**  
Refurbishment to an Enhanced Standard  
Refurbish all existing properties owned and managed by Clarion to a standard above Decent Homes. This would involve a programme of works both internal improvements (such as new kitchens and bathrooms) and external works (such as new building cladding and roofs to improve thermal performance).
- ❑ **OPTION 3:**  
Full Redevelopment of the High Path Estate  
Demolition of all existing properties on the High Path Estate and redevelopment of the site to deliver up to 1,400 modern, energy efficient and high quality homes, alongside a new community space, open space, landscaping and car parking.

4.1.10 As a result of the consultation on the Plan and the SA the following options were rejected going forward:

- ❑ **DO NOTHING**  
The option was not considered a realistic alternative as Clarion is legally bound to refurbish the condition of the stock under the provision of the Stock Transfer Agreement with the Council.

- ❑ **PARTIAL DEVELOPMENT OF HIGH PATH ESTATE**  
The option would not offer the best opportunity to deliver a high quality residential development that optimises the use of the land to deliver a high quality residential development.

4.1.11 **OPTION 3** was selected as the preferred option for the High Path Estate for the following reasons:

“The redevelopment of the **HIGH PATH ESTATE** enables the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The redevelopment offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards and improve the urban design, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.”

# 4 ESTATES REGENERATION

4.1.12 In 2017 Clarion submitted an outline planning application to the London Borough of Merton (LBM) for the redevelopment of:

- The Eastfields Estate, Mitcham
- High Path Estate, South Wimbledon
- Ravensbury Estate, Morden

Outline planning permission was granted in 2019 for High Path subject to reserved matters. Reserved matters were approved on 03 October 2019 for High Path Phase 2, to which the Order relates, for the construction of 113 new homes.

In respect of High Path Phase 3, a revised outline planning permission for this element of the Scheme was obtained on 21 January 2022 (subject to receipt of a revised decision notice) and reserved matters are due to be submitted in the Summer of 2022.

Under the first phase of works construction is underway for 134 new homes at High Path with completion of these anticipated in early 2022, providing better quality homes and alleviating overcrowding.

Details for each estate are provided below.

## Planning Application Overview

ESTATE	TOTAL NO. OF PHASES	PLANNING APPLICATION / PHASE		
		Full Permission	Outline	Reserved Matters
Eastfields	4	-	Phases 1-4	Phase 1
High Path	7	Phase 1	Phase 2	Phase 2
Ravensbury	4	Phase 1	Phases 2-4	Phases 2-4

EASTFIELDS			
APPLICATION TYPE	LPA REFERENCE	DATE REGISTERED	DECISION
Outline Planning Permission	<a href="#">17/P1717</a>	16/11/2017	Grant Permission 29/04/2019
Revised Outline PP	<a href="#">21/P4078</a>	02/12/2021	PENDING
Reserved Matters	<a href="#">21/P4430</a>	13/12/2021	PENDING

HIGH PATH			
APPLICATION TYPE	LPA REFERENCE	DATE REGISTERED	DECISION
Full Planning Permission	<a href="#">16/P3738</a>	03/10/2016	Grant Permission 05/10/2017
Outline Planning Permission	<a href="#">17/P1721</a>	16/11/2017	Grant Permission 29/04/2019
Full Planning Permission	<a href="#">18/P1921</a>	04/07/2018	Grant Permission 17/01/2019
Reserved Matters	<a href="#">19/P1852</a>	04/06/2019	Approve 03/10/2019
Variation of Conditions	<a href="#">21/P2806</a>	22/08/2021	Grant Variation 21/01/2022

RAVENSBURY			
APPLICATION TYPE	LPA REFERENCE	DATE REGISTERED	DECISION
Full Planning Permission	<a href="#">16/P1968</a>	27/05/2016	Grant Permission 09/05/2017
Outline Planning Permission	<a href="#">17/P1718</a>	16/11/2017	Grant Permission 29/04/2019
Reserved Matters	<a href="#">19/P1845</a>	04/06/2019	Grant Permission 09/12/2019

# HIGH PATH



# HIGH PATH

## 4.2 HIGH PATH ESTATE

- 4.2.1 High Path Estate is located towards the centre of the London Borough of Merton (LBM), within the Abbey ward, to the south and east of South Wimbledon Tube Station. Much of the existing Estate was built between the 1950s and 1980s and is the largest of the estates within this portfolio.
- 4.2.2 The Estate area totals approximately 7.2 hectares and currently comprises 608 residential dwellings in a mixture of tower blocks, flats, maisonettes and terraced houses. Accommodation forms a mix of tenures including private ownership (as a result of right to buy) and social rent. The number of storeys across the site ranges from 1 to 12. Parking on the estate is provided by surface parking courts and garages.

- 4.2.3 Merton High Street establishes the northern boundary of the site, comprising various commercial and retail units. There are two storey residential dwellings to the east of the site, and adjacent to the south-eastern boundary of the site are part single and part-two storey industrial / commercial buildings (The Old Lamp Works). South of the site, on the opposite side of High Path, is a community resource centre and east of this is a two-storey church. Merton Abbey Primary School and a church are also located to the south of the site adjacent to High Path road. To the west are two to four storey houses, with South Wimbledon station located at the north-western corner.



# HIGH PATH

## REGENERATION PROPOSALS

- 4.2.4 The High Path regeneration will create a green neighbourhood that provides a wide range of new homes as well as a new park and community facilities.
- ❑ 1,704 new homes each with private outdoor space
  - ❑ New neighbourhood park with a play trail for children
  - ❑ New community centre with facilities for everyone.
- 4.2.5 An Outline Planning Application [Ref: [17/P1721](#)] was submitted to Merton Council on 16 November 2017 for the comprehensive regeneration of the estate.
- 4.2.6 Permission was granted on 29 April 2019 subject to reserved matters. All matters were reserved including layout, access, scale, appearance and landscape.
- 4.2.7 Reserved matters for the development of Phase 2 of the High Path Estate were granted on 3 October 2019 [Ref: [19/P1852](#)]. Reserved matters for Phase 3 are expected to be submitted to the Council for approval in the Summer of 2022.

**“Outline planning application (with all matters reserved, except in relation to parameter plans) for the comprehensive phased regeneration of the High Path Estate comprising:**

- ❑ **the demolition of all existing buildings and structures**
- ❑ **erection of new buildings ranging from 1 to a maximum of 10 storeys providing up to 1570 residential units (C3 Use Class)**
- ❑ **provision of up to 9,900 sqm of commercial and community floorspace (including replacement and new floorspace, comprising:**
  - » **up to 2,700 sqm of Use Class A1 and/or A2, and/or A3 and/or A4 floorspace,**
  - » **up to 4,100 sqm of Use Class B1 (Office) floorspace,**
  - » **up to 1,250 sqm of flexible work units (Use Class B1)**
  - » **up to 1,250 sqm of Use Class D1 (community) floorspace**
  - » **up to 600 sqm of Use Class D2 (Gym) floorspace)**
- ❑ **provision of new neighbourhood park and other communal amenity spaces, including:**
  - » **children’s play space**
  - » **new public realm, landscaping works and new lighting**
  - » **cycle parking spaces (including visitor cycle parking) and car parking spaces (including within ground level podiums), together with associated highways and utilities works.”**

- 4.2.8 The overall regeneration of High Path will be delivered in seven phases. Phase 1 of the development was subject to a separate planning application [Ref: [16/P3738](#)], which was granted in October 2017.

- 4.2.9 The Phase 1 application included:
- “Demolition of existing structures associated with the old lamp works, all garages (74 in total) and marsh court play area to provide residential accommodation (134 units - class c3) in buildings of three - nine storeys, provision of car parking (31 spaces including 5 disabled spaces), cycle parking (249 spaces), landscaping and public realm works together with associated utilities and infrastructure.”**

Work commenced in 2020 and is due to be completed in early 2022.



# HIGH PATH

## DEMOLITION

4.2.10 The outline planning application proposes the demolition of all buildings and structures within the red line boundary, comprising 608 residential dwellings and approximately 148 garages. A schedule of the existing homes to be demolished is provided in the table below. The existing convenience store will also be demolished. The outline planning application also allows for the demolition of the St John Divine Church Hall. Demolition will be phased.

## HOUSING

4.2.11 All homes are to be designed so that they meet the Mayor's minimum space standards, the National Technical Standards, and the relevant Building Regulation standards as set out within the Minor Alterations to the London Plan. 10% of the homes will be designed to be wheelchair homes. The building layout parameters ensure that the new homes can be designed having regard to these standards and the Mayors Housing SPG.

## Housing Mix Proposal

Dwelling Size	% of Private Tenure	Affordable Homes	
		% of Rent Tenure	Intermediate Tenure
Studio	0-15	0-10	Housing mix to be considered at Reserved Matters Stage if provision of intermediate housing is triggered by the viability review.
1 bed	25-45	30-50	
2 bed	30-50	30-50	
3 bed +	5-20	10-30	

## Illustrative Scheme

Tenure	Studio	1 bed	2 bed	3 bed	4 bed	Total Units	Total Hab Rooms	% Affordable and Private Homes on a Unit Basis	% Affordable and Private Homes on a Habitable Room Basis
Affordable (Rent)	0	100	123	49	5	277	790	18	20
Private	159	437	543	107	4	1250	3110	82	80
<b>Total</b>	159	537	666	156	9	<b>1527</b>	<b>3900</b>	-	-
% of Unit Size	10	35	44	10	1	-	-	-	-

## Indicative Maximum Accommodation Mix

Tenure	Studio	1 bed	2 bed	3 bed	4 bed	Total Units	Total Hab Rooms	% Affordable and Private Homes on a Unit Basis	% Affordable and Private Homes on a Habitable Room Basis
Affordable (Rent)	0	100	123	49	5	277	790	18	20
Private	163	452	563	111	4	1293	3220	82	80
<b>Total</b>	163	552	686	160	9	<b>1570</b>	<b>4010</b>	-	-
% of Unit Size	10	35	44	10	1	-	-	-	-

# HIGH PATH

## NON-RESIDENTIAL USES

- 4.2.12 The outline proposal will deliver up to 9,900 sqm of flexible use class commercial and community floorspace (including replacement and new floorspace). This includes replacement floorspace for the existing convenience store and Church Hall. Non-residential floorspace will be located primarily along Merton High Street and Morden Road, with additional potential along the Neighbourhood Park.

## LANDSCAPE, PUBLIC OPEN SPACE + AMENITY SPACE

- 4.2.13 As part of the masterplan it is proposed to provide a new Neighbourhood Park centrally linking High Path to Merton High Street. This will provide approximately 7,500 sqm of publically accessible open space. Communal amenity spaces are proposed within the perimeter blocks providing semi-private amenity for residents. In addition, private amenity space will be provided to all new homes in the form of balconies, terraces or gardens. Children's play space will be incorporated within the new park and in the communal courtyards. A new landscaped public realm will also be provided throughout the masterplan areas, including along Merton High Street where the existing London Plane trees are to be retained.



Source: [PRP Architects LLP](#)

# HIGH PATH

## ACCESS, PARKING + SERVICING

- 4.2.14 The proposals seek to re-connect the Estate with the wider street network, prioritising pedestrian and cyclist movements. Pedestrian routes and cycle routes are to be improved across the site with high quality new and retained streets and shared surface areas. The routes created will provide north to south and east to west routes through the neighbourhood improving permeability. The proposals will provide numerous access points from High Path, Merton High Street, Morden Road and Abbey Road for pedestrians and cyclists, with direct and legible routes created, in contrast to the poor connectivity on the existing estates.
- 4.2.15 It is proposed to retain existing vehicular access points into the site along High Path, Merton High Street and Abbey Road. The environment around the existing and new streets will be improved by the passive surveillance provided by the new development, which will front onto these streets and provide ground level activity with non-residential uses, front doors to the residential units, and residential core entrances.

- 4.2.16 269 car parking spaces are proposed to be provided on-street, within podium parking areas or on-plot. 20% of these spaces will be provided with electric vehicle charging points, and 20% will have passive provision so that charging points can be provided in the future. The parking provision will include disabled car parking bays. Cycle parking is to be provided in line with policy requirements.
- 4.2.17 It is intended to provide Underground Refuse Systems (URS) throughout the masterplan for the use of resident's general waste and recycling. Some houses on the site where a URS cannot be implemented will instead have a standard collection. The proposed non-residential uses are likely to have their general waste and recycling collected by standard refuse vehicles via LBM or a separate private contractor.

## ENERGY + SUSTAINABILITY

- 4.2.18 A number of initiatives are proposed to ensure that a sustainable development is delivered:
- ❑ The incorporation of passive design and energy efficiency measures, a single energy centre comprising a Combined Heat and Power (CHP), and roof mounted solar photovoltaic cells

(PV). These measures will ensure that a CO<sub>2</sub> reduction of 35% can be achieved against Building Regulations 2013.

- ❑ Use of materials with low environmental impact
- ❑ Sustainable transport measures including provision of cycle parking, car club bays, electric vehicles charging points
- ❑ Reduced water consumption of 105 litres per person per day
- ❑ Provision of adequate waste and recycling storage
- ❑ Provision of brown/green roofs
- ❑ Ecological enhancements
- ❑ Comprehensive landscape strategy to enhance biodiversity and ecology value of the site.

## RESERVED MATTERS

- 4.2.19 Reserved matters applications have been made in relation to Phase 2 for the following:

### DEMOLITION

Demolition of all buildings on the Phase Two site (Marsh Court and Lovell House). 78 existing homes to be demolished in this phase of works.

# HIGH PATH

## HOUSING

The proposals will provide new homes for existing residents. 105 dwellings will be provided in the apartment Blocks A and B at the corner of High Path and Pincott Road. 8 dwellings will be provided in the houses on Abbey Road.

All homes are provided with private amenity space in the form of balconies, terraces or gardens providing at least 5 sqm for two person dwellings, and an additional 1 sqm per additional permission in accordance with the Mayors minimum space standards. The Abbey Road houses have gardens approximately 70 sqm in size. The residents of the apartment blocks will also have access to the communal amenity gardens providing 211 sqm in Phase Two and this will link into Phase One to complete a larger courtyard of 691 sqm.

## LANDSCAPE

Tree planting will respond to the different environmental conditions within the courtyard and streetscape. The amenity courtyard will provide 211 sqm of play space for under-5 children with informal play installations such as stepping logs and stone seating. This forms part of a comprehensive overarching play strategy which will be implemented as each phase of the masterplan proposals is completed.

## Housing Mix Proposal

	1 bed flat	2 bed flat	2 bed maisonette	3 bed flat	3 bed duplex	3 bed house	4 bed flat	4 bed maisonette	Total Units	Total Hab Rooms
<b>Affordable</b>	51	27	2	7	2	2	1	1	93 (82.3%)	243 (80.5%)
<b>Market</b>	7	7	0	0	0	6	0	0	20 (17.7%)	59 (19.5%)
<b>Total</b>	58	34	2	7	2	8	1	1	113	302

## ACCESS

All ground floor dwellings facing the street have individual entrances accessed directly from Pincott Road, High Path and the Mews. These homes have been assigned to vulnerable, elderly residents who require easy access to their homes. More than 10% of the dwellings (12 no.) are designed to meet Building Regulations M4(3) standards.

## SUSTAINABILITY + ENERGY

Clarion's aspiration is that by 2025, all new homes will be delivered to at least a net zero carbon compatible standard. This means that any home not built to net zero carbon standards will be capable of becoming so in the future

To start this journey, Clarion will be excluding fossil fuel heating from all new designs, making use of the rapid de-carbonisation of the UK electricity grid.

On High Path, the site-wide energy strategy is currently being developed for the phases 3-7, however it is proposed that air source heat pumps powered by electricity will be used to provide heat and hot water to the future new homes.

- 4.2.20 A revised outline planning application has been submitted for Phase 3 and reserved matters are expected to be made in Summer 2022.
- 4.2.21 A separate application [Ref. [18/P1921](#)] was also granted on 07/01/19 for the following:

**“Erection of a five storey building to provide a school, with sixth form facilities, associated parking, play area and landscaping, following demolition of existing community and commercial buildings on site.”**

# 5 SECTION 106 AGREEMENTS

## 5.1 S106 AGREEMENTS

5.1.1 A deed of agreement under Section 106 of the Town and Country Planning Act 1990 was agreed on the 26 April 2019 in relation to the developments at the three estates. The agreement sets out general provisions for:

- Affordable housing
- Highway works
- Bus stop Improvement works
- Parking Management
- Estate Roads (Delivery and Management, Maintenance and Access)
- Parking Controls
- Delivery and Service Management Plan
- Car Club
- Utility Diversions
- Carbon Offsets
- Noise and Air Quality during construction
- Open Space (Delivery and Management, Maintenance and Access)
- Lifts.

5.1.2 Specific obligations are also detailed for the High Path Estate, including:

### HIGH PATH

- Waiting and Loading Bays
- High Path Bus Stop Relocation
- Bus Capacity Improvements
- High Path Pedestrian and Cycle Routes Improvements
- Primary Care Needs Assessment
- Re provision of high Path Community Centre
- Replacement of High Path Ball Court / provision of High Path Recreational Facility
- Refuse Strategy
- District Heating Network
- Transport Impact Assessment
- Residential and Workplace Travel Plan
- Electric Vehicle Charging Points.

5.1.3 Provision is also made for:

- Scheme Linking** - No more than 607 new market units are to be occupied until at least 100 units have been constructed an area available for occupation on the Ravensbury Estate and 131 on the Eastfields Estate.
- Build to Rent** - Details of the build to rent for each phase of the development for High Path shall be submitted with each phase.
- Flood Plain Mitigation Strategy (Ravensbury)** - Ensure that all works are carried out in accordance with the flood mitigation strategy.

# 6 COMPULSORY PURCHASE ORDERS

## 6.1 COMPULSORY PURCHASE ORDERS

- 6.1.1 Compulsory purchase is a legal mechanism by which certain bodies (known as ‘acquiring authorities’) can acquire land without the consent of the owner.
- 6.1.2 Compulsory purchase powers are an important tool to use as a means of assembling the land needed to help deliver social, environmental and economic change.
- 6.1.3 A Residents’ Offer was made by Clarion in 2015 to the existing homeowners and affordable housing tenants, which was updated in 2018. The majority the residents were in favour of the offer but a small minority (around 5%) did not like the proposal.
- 6.1.4 All of Clarion’s existing social/affordable tenure tenants and resident homeowners will be given the opportunity to stay in new homes in the newly regenerated Estate. This is the case on all three Estates. This ‘offer’ is consistent with the Residents’ Offer published in May 2015 and updated in 2018.

## 6.2 SUMMARY OF PROPOSED COMPULSORY PURCHASE ORDERS

- 6.2.1 On 15 January 2018, the Council’s Cabinet resolved ‘in-principle’ for the Council to use its compulsory purchase powers, if necessary, to bring forward the Estates Regeneration Programme. This resolution was ratified by full Council on 7 February 2018.
- 6.2.2 The Council’s purpose in making the Compulsory Purchase Order (CPO) is to enable the Council to acquire compulsorily the land and the new rights over land included in the Order to facilitate the regeneration and construction of the High Path Estate Phases 2 + 3 (High Path Phases 2+3).
- 6.2.3 The High Path Estate regeneration forms part of the wider Merton Estates Regeneration Programme. The development seeks to deliver the redevelopment of the estates, which includes the Eastfields and Ravensbury Estates.
- 6.2.4 The Council is exercising its compulsory purchase powers because it has not been possible for Clarion to acquire by agreement all interests that are required to deliver Phase 2 and Phase 3 of the High Path Estate regeneration, and it is not certain that Clarion will be able to acquire the remaining land by agreement.
- 6.2.5 Although the owners of the interests have been approached on a number of occasions by Clarion with a view to purchasing their interests, agreement for purchase has not been reached because the owners have either not yet decided which of the options available to them they wish to exercise or they are waiting for as long as possible before selling their interests to Clarion.
- 6.2.6 In order to secure the delivery of the development the Council intends to make a number of CPOs for the acquisition of third party property and rights on the Estates. The CPOs will be phased to reflect the Developer’s proposed construction programme of the estates from 2022 – 2034.
- 6.2.7 The Council is also bringing forward the London Borough of Merton (Ravensbury No.1) Compulsory Purchase Order 2022 (the Ravensbury Order) and The London Borough of Merton (Eastfields No. 1) Compulsory Purchase Order 2022 (the Eastfields Order) (together with this Order, the 2022 CPOs) as part of the next phase of redevelopment across the three Estates.

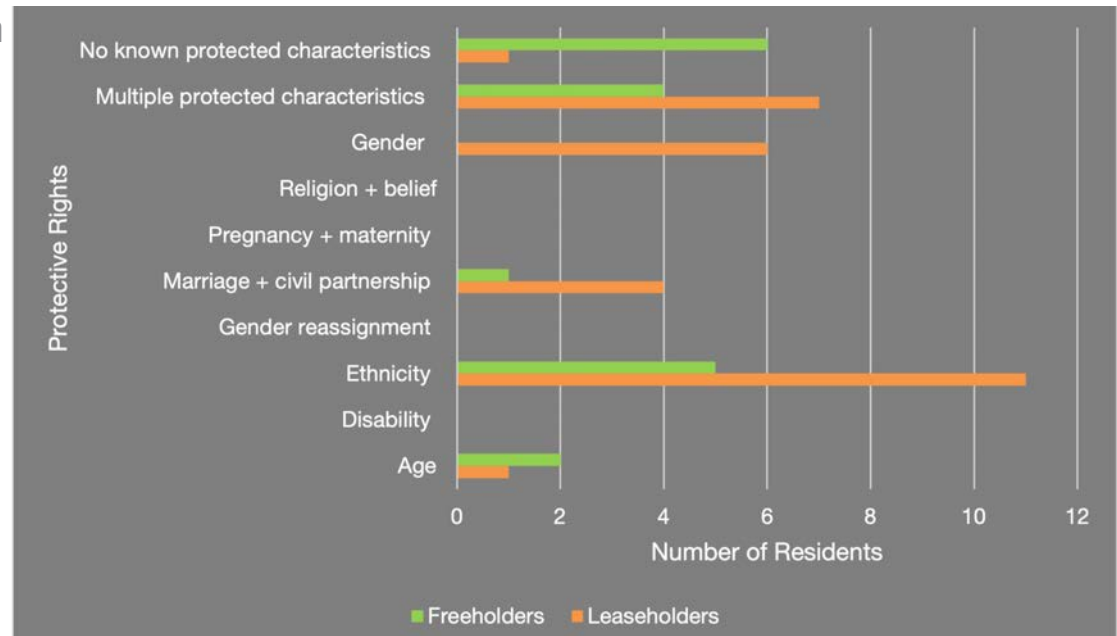
# 6 COMPULSORY PURCHASE ORDERS

6.2.8 The High Path Order forms parts of the first CPOs brought forward in respect of the development, in conjunction with the Ravensbury Order and Eastfields Order. The Order relates to Phase 2 and 3 of the High Path Estate and includes all of the new homes being proposed as part of Phase 2 and 3, together with the replacement ball-court and recreational facility agreement required pursuant to the section 106 agreement entered into in respect of the outline planning permissions.

- ❑ Phase 1 (the Kickstart Site) did not require a CPO and has already commenced.
- ❑ Phase 2 will facilitate the delivery of 113 new homes of which 93 (82.3%) new homes will be affordable rented/social rented and 20 new homes will be private homes to replace existing private homes for resident homeowners.
- ❑ Phase 3 will facilitate delivery of 369 new market homes, the proceeds from which shall be used to help support the financial viability of Phase 2 of High Path; Eastfields Phase 1; and Ravensbury Phases 3 and 4, which shall be delivered as part of the next phase of redevelopment across all three estates.

6.2.9 As of February 2022, Clarion has acquired 229 freeholds and long leases across the estates regeneration area through voluntary sales under the terms of the 2015 Residents' Offer.

## High Path



Of these acquisitions, 130 are at High Path, 88 at Eastfields and 11 at Ravensbury. In order for the regeneration programme to be delivered, Clarion will need to acquire a further 135 freeholds and long leases at High Path.

6.2.10 The Council considers that the use of its CPO powers to acquire both the outstanding interests and the new rights is necessary, since Clarion has not been able to achieve this by agreement, and it is unlikely that it would be able to do so within an acceptable timescale without the Order. The High Path Estate regeneration cannot proceed unless these interests are acquired. The Council is satisfied that the acquisition

of these interests will facilitate the proposed regeneration, which will lead to the redevelopment and will contribute to economic, social and environmental improvements to the area.

6.2.11 Steps are being taken to ensure that the acquisition and relocation processes are applied in a fair and non-discriminatory manner. Steps will also be taken to minimise the adverse effects on protected groups during construction and any such effects suffered by surrounding ethnic minority businesses. The proposals will bring a range of benefits to disabled and other protected groups including in relation to enhanced access, housing provision and lifetime homes.

# 7 VIABILITY

## 7.1 VIABILITY STATEMENT

- 7.1.1 Clarion has considerable experience and resources and manages over 125,000 homes across 176 local authorities. As the largest housing association in the UK and one of the country's leading housebuilders, Clarion is set to build a high volume of high quality homes of all tenures during the next ten years.
- 7.1.2 Clarion has shared with the Council details of projected costs and revenues and its financial strategy for delivery of the 2022 Scheme as well as the Merton Estates Regeneration Programme as a whole pursuant to the planning permissions.
- 7.1.3 To support the Merton Estates Regeneration Programme as a whole, which as things stand is not viable, the Council and Clarion have entered into a legally binding contract to vary the existing Stock Transfer Agreement dated 22 March 2010, in particular the Development and Disposals Clawback Agreement also dated 22 March 2010, to suspend clawback payments unless the Merton Estates Regeneration Programme achieves a surplus.

7.1.4 Clarion has provided a resolution of its board committing to the delivery of the 2022 Scheme irrespective of the viability position. The Council, having taken independent professional advice, is satisfied that the strategy is based on realistic and reasonable assumptions and that therefore the 2022 Scheme is deliverable having regard to the Clarion's resources by reference to the CPO Guidance. The Council is also satisfied that there are sufficient resources to both acquire the necessary Order Land and to implement the 2022 Scheme, and that Clarion has the necessary track record to undertake the development.

7.1.5 Officers are satisfied Clarion has the resources and commitment to effectively deliver Phase 1 of Eastfields Estate, Phase 2 and 3 of the High Path Estate, and Phases 3 and 4 of the Ravensbury Estate, as well as future phases of the Merton Estates Regeneration Programme.

7.1.6 Clarion has entered into an indemnity agreement with the Council dated 7 February 2019, which fully indemnifies and provides protection for the Council in relation to all costs associated and arising in the preparation and making of the Order, acquisition of Order Land and the payment of compensation arising from such acquisition.



# 8 COMMUNITY ENGAGEMENT

## 8.1 OVERVIEW

8.1.1 This section provides a summary of the consultation undertaken to date with local stakeholders and the wider community. Clarion and their project team have undertaken a series of consultation events in order to understand the aspirations of the Estate residents. A range of topics have been explored with the residents and this engagement process has been ongoing throughout the design of the masterplan.

### INCLUSIVE CONSULTATION

8.1.2 The need for inclusive consultation was an overarching consideration to ensure that the whole community was reached. The following strategies were adopted:

- A wide circulation of invitations
- The venues for the consultation events had to have level access and wide enough doors and corridors for ease of access
- Accessible WC available
- Activities offered for children at events
- For all events, a register was taken, so that an accurate record could be kept of who attended and the total attendance figures, so that any obvious omissions might be identified for targeting later
- Reports were drawn up for each event, highlighting key feedback.



# 8 COMMUNITY ENGAGEMENT

## 8.2 HIGH PATH – OUTLINE

The Applicant has undertaken a series of public events since 2013 including a series of public consultation events:

- ❑ ‘Have Your Say Day’ – Public Exhibition – 2 & 8 August 2013
- ❑ Public Exhibition – June 2014
- ❑ Residents’ Site Visit to Haggerston and Orchard Village – Site Visit – July 2014
- ❑ Residents’ Workshop – August 2014; Homes & Park Workshop – Public Workshop – 18 March 2015
- ❑ Residents’ Offer Event – Public Exhibition – 30 May, 4 & 10 June 2015
- ❑ Kickstart Workshop – Workshop – July 2016
- ❑ Have Your Say Day – Public Exhibition – 5 & 7 November 2016
- ❑ Final Exhibition – 7 & 9 December 2016.

Newsletters have also been used to keep residents up to date.

The feedback received from these events was considered and fed back into the design process. Additional analysis and design testing was undertaken, where required, which influenced the design evolution. Where feasible, amendments were made to the scheme, allowing for the proposals to evolve iteratively taking account of the matters raised.



## HIGH PATH – RESERVED MATTERS PHASE 2

High Path Phase 2 was presented to residents and the local community in October 2018 and February 2019.

- ❑ **COMMUNITY ENGAGEMENT EVENTS**  
The first set of engagement events were held on 17th and 20th October 2018. Elevation proposals, block arrangements, internal homes’ layouts and landscape proposals were presented to High Path residents as well as the wider community, asking for their views on the designs.

Residents welcomed the playful and original designs and felt that it represented the character of their local area. The key feedback for improvement was focused on internal layouts, parking and materials.

The second round of engagement events were held on 13th, 16th and 18th of February 2019. Updated design proposals were presented to the community, showing how their feedback has influenced the design.

# 8 COMMUNITY ENGAGEMENT

## ❑ OTHER ENGAGEMENT

In addition to residents engagement events Clarion also consulted with local stakeholders. In February 2019 an event was held for non-High Path resident stakeholders. This was aimed specifically at residents from neighbouring communities and interest groups.

Groups invited included:

- » The Wimbledon Civic Society
- » Battle Road Residents Association
- » Local churches.

Clarion ran 'Regeneration Week' from 5th – 7th March 2018 with Abbey Meadows Primary School, which included debate, discussion and feedback from young people on the plans for High Path. This was the fourth Regeneration Week at Abbey Primary School.



# 9 EQUALITIES DATA

## 9.1 EQUALITIES DATA

9.1.1 The Equalities Analysis undertaken by Clarion in 2015 identified that the 'protected characteristics' of: Age, Disability and Ethnicity were particularly relevant to the regeneration proposals and there was the potential for these groups to be negatively affected. The assessment therefore focussed on these issues.

9.1.2 Clarion has advised that residents of Eastfields, High Path and Ravensbury have provided information about the problems with their homes and outside spaces, which included:

- homes that are expensive to heat
- leaking roofs
- poor noise insulation
- condensation and damp
- issues with refuse collection
- unsafe pathways.

9.1.3 Some of these issues were also raised in both Council consultations in 2014 and 2016, particularly concerns around unsafe pathways, damp and poor internal conditions. As set out in the policies in the Council's Estates Local Plan, regeneration will be expected to provide a range of choices and benefits including:

- high quality well designed neighbourhoods
- wider housing mix
- more private space for residents
- better quality green spaces and community facilities
- job creation opportunities.

9.1.4 The regeneration will also be an opportunity to provide much needed new homes by making more efficient use of brownfield land, improving the quantity, quality and mix of new homes on each of the three estates. A key expectation of any regeneration proposals that come forward will be a commitment to keeping the existing community together in each neighbourhood, and for existing residents to have a guaranteed right to return to a new home in their regenerated neighbourhood.

9.1.5 The Equalities Analysis undertaken in 2015 identified that the greatest impact on equalities would be the mechanics of the delivery of the regeneration programme including:

- the Residents' Offer
- moving existing residents into new homes
- addressing overcrowding
- minimising disruption during this extensive process.

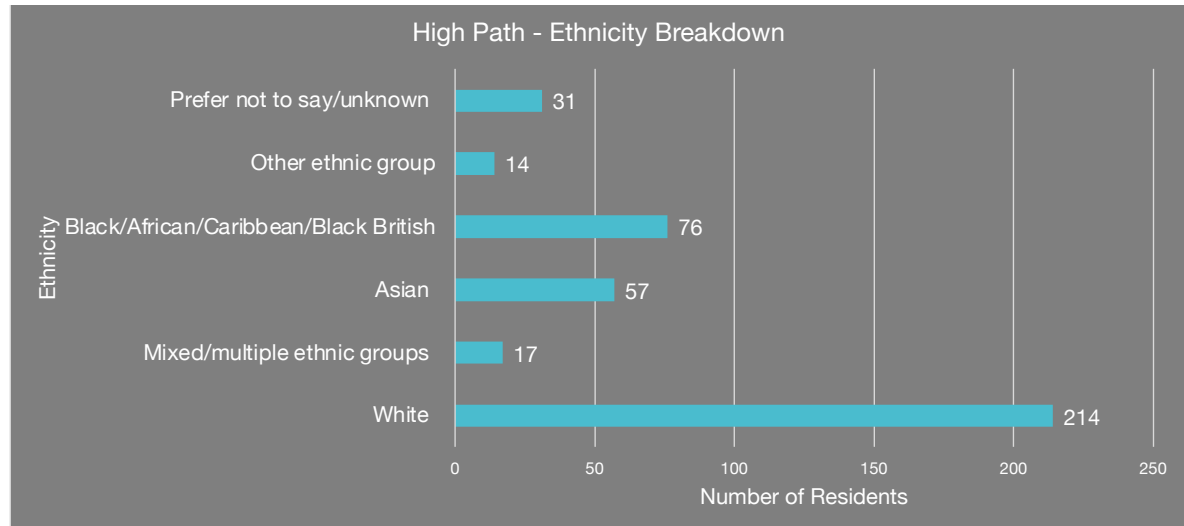
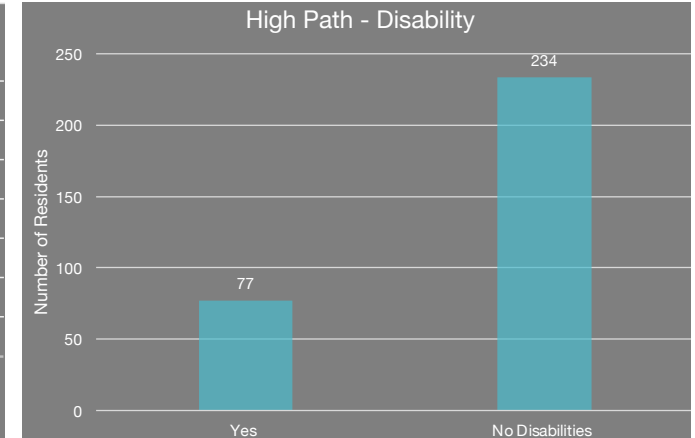
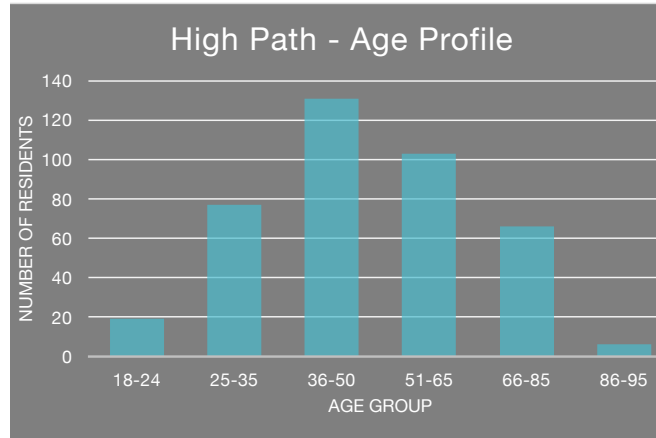
# 9 EQUALITIES DATA

## 9.2 EQIA DATA 2015

9.2.1 Clarion undertook an Equalities Impact Assessment to determine the potential impacts of the deliver of the Estates Regeneration against those residents with protected characteristics, as set out below.

9.2.2 To aid comparison of data with the ONS, the ethnicity categories have been grouped into five categories:

- Black/African/Caribbean/Black British
- Asian
- Mixed/multiple ethnic groups
- White
- Other.



# 9 EQUALITIES DATA

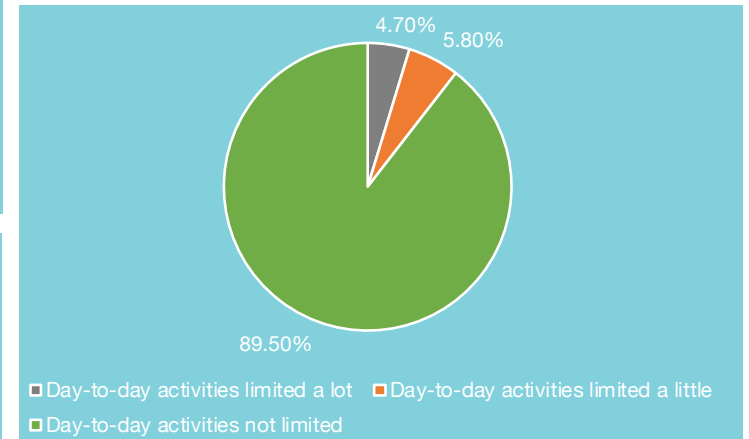
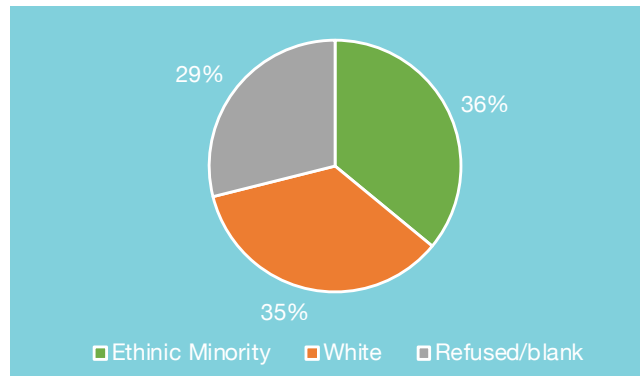
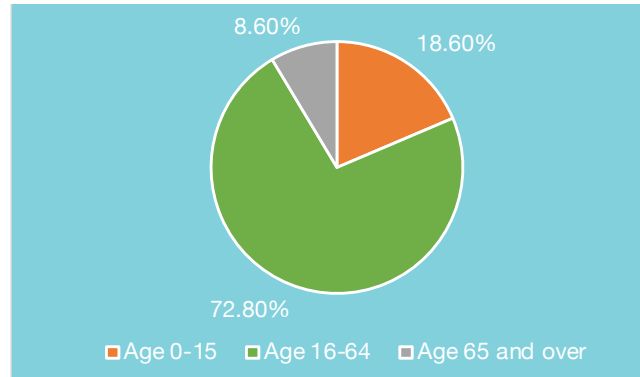
## 9.3 EQIA DATA 2020/21

9.3.1 Data has been drawn from the following sources:

- Clarion Estate Profiling, 2021
- GLA Data, 2020

9.3.2 The Equality Analysis has identified that the 'protected characteristics' of: Age, Disability and Ethnicity are particularly relevant to the regeneration proposals and there is the potential for these groups to be negatively affected. The assessment has therefore focussed on these issues.

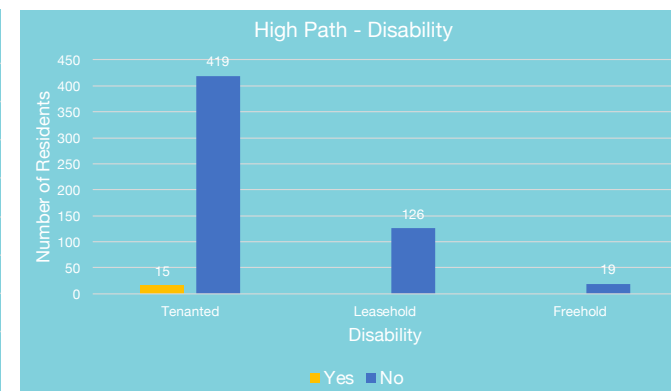
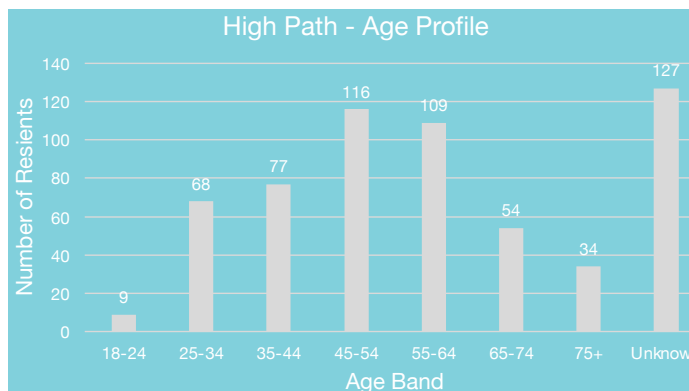
### CORE CHARACTERISTICS OVERVIEW



# 9 EQUALITIES DATA

## AGE

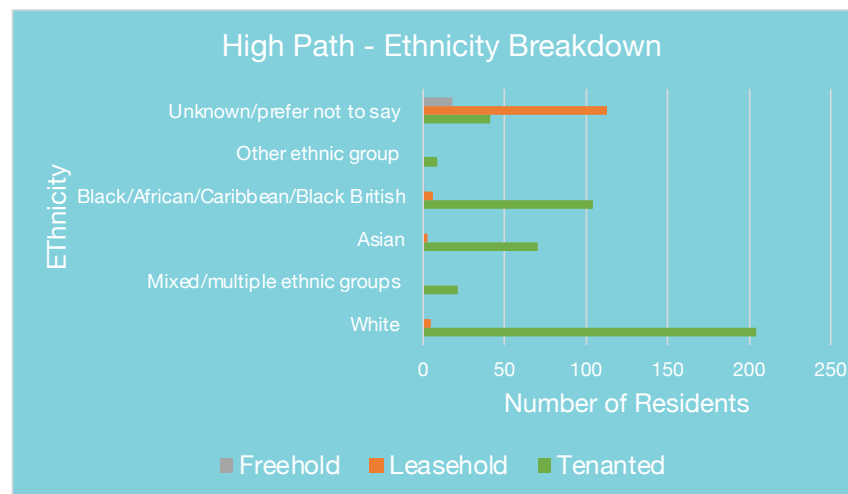
9.3.3 The data indicates that, in general, High Path has a slightly younger population profile in comparison with Merton and London. It is notable that there is also a slightly lower proportion of residents aged 0-15 which suggests that, although the area may be popular with young and middle-aged adults, it is less popular among those with young families.



## DISABILITY

9.3.4 Disability can be defined as a physical or mental impairment that has a substantial and long-term negative effect on the ability to do normal daily activities.

9.3.5 10.5% of people in High Path state that they have a long-term disability or health problem that limits their day-to-day activity either 'a lot' or 'a little'.



## ETHNICITY

9.3.6 The proportion of ethnic minority residents on the High Path estate is 36% and 35% of residents are White British. 29% of residents either refused or did not answer the question on ethnicity.

# 9 EQUALITIES DATA

## 9.4 CURRENT HOUSING OFFER

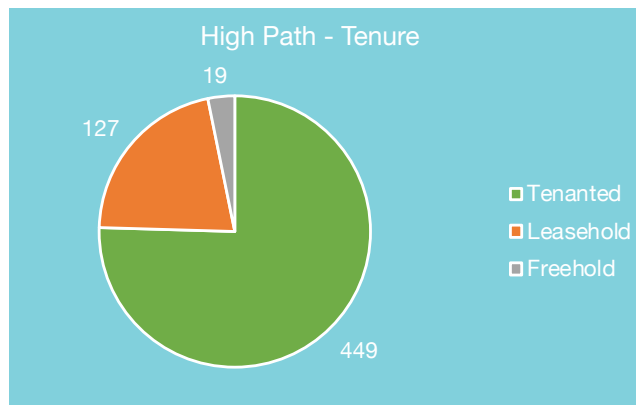
### TENURE

9.4.1 High Path Estate has the highest proportion of tenanted residents of the three estates (75%).

### OVERCROWDING

9.4.2 Population density is a measure of the average outdoor space per resident. All else being equal, higher population density will mean more overcrowding. A household is considered overcrowded when there are at least 1 bedroom too few as defined by the ONS.

9.4.3 There is considerable overcrowding in all three neighbourhoods but particularly Eastfields and High Path.



## 9.5 MERTON REGENERATION

9.5.1 Clarion has committed to re-provide homes so that existing residents can enjoy the same tenancy rights that they have now.

9.5.2 Clarion has also committed to ensuring no family returns to overcrowded conditions. Every home will be at least as large as the home it replaces and in reality most will be larger.



# 10 EQUALITIES ASSESSMENT

## 10.1 EQUALITIES ASSESSMENT METHODOLOGY

### REVIEW OF 2016/17 EQIA

10.1.1 A review was undertaken of the 2016/17 EQIA which was prepared as part of the Estates Local Plan Sustainability Appraisal process. This involved reviewing and updating relevant policy and baseline information and comparing the findings against new data provided by Clarion. An appraisal of equality effects was then undertaken to make a judgment on how the Estates Regeneration will affect people with protected characteristics.

The approach taken to data collection has changed between 2015 and 2021 which makes it difficult to directly compare the data. For instance, the categories for age have changed slightly to include a broader age range within each group. For disability and ethnicity, the proportion of residents that would prefer not to disclose whether they have a disability or share their ethnicity has increased.

### APPRAISAL OF EFFECTS

10.1.2 Regeneration and change, particularly in the physical environment of the areas that people live, is likely to have impacts that are both positive and negative for different groups. In any process of change, some people or groups are likely to gain more benefits than others. To this end, all 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. The assessment sets out a number of recommendations to strengthen, secure or enhance positive equality impacts and to mitigate for potential negative equality impacts.

10.1.3 The Council intends to make a number of CPO's to facilitate the regeneration of the estates. In some cases residents will be required to relocate against their will. Amongst the occupants of affected households, those that may be particularly sensitive to the impact of the CPO are:

- ❑ Households that include older people who may be more vulnerable to disruption and other adverse impacts associated with the requirement to move away from their current home. The implications of the regeneration on older and younger people on the estate may also be significant

in terms of health and access to amenities.

- ❑ Households that include disabled residents may also be more vulnerable to the immediate impact of the regeneration particularly with respect to the noise and disruption caused. This disruption would be temporary and there will be potential for disabled residents to obtain better and more suitable accommodation because of the regeneration.
- ❑ Households that include ethnic minority residents may lose important social and community ties if they need to move away from the area. It is considered likely that suitable alternative affordable accommodation will be available on the regenerated estate.
- ❑ The regeneration could have both a positive and negative impact for the pregnancy and maternity group: negatively in terms of upheaval during a very sensitive period of childbearing/rearing, but potentially positively if new accommodation is better suited to their needs.

# 10 EQUALITIES ASSESSMENT

## 10.2 ASSESSMENT OF POTENTIAL EQUALITY EFFECTS

10.2.1 The Equalities Impacts Assessment is structured under the following objectives:

1. Identify any potential equality effects that might arise from the planned development
2. Identify potential positive equality effects
3. Assess whether any negative equality effects would give risk to unlawful discrimination for an identified group
4. Identify further measures to reduce any negative equality effects that may arise.

10.2.2 The EqIA has taken each of the nine protected characteristics in turn, as well as other characteristics that can be affected by discrimination, and considered them against each of the objectives to determine the likely effects.

PROTECTED CHARACTERISTICS	POSITIVE EFFECTS	
	Direct	Indirect
Age	<ul style="list-style-type: none"> <li>» Providing the right type of housing for different households of all age groups including older residents and families with young children.</li> <li>» Any necessary accessibility adaptations can be fitted in the replacement home from the outset.</li> </ul>	<ul style="list-style-type: none"> <li>» A decanting matrix tool was used to help place residents within the proposed development based on their needs.</li> <li>» All new homes will have a private outdoor space. This may be of particular benefit to older residents and families with children who may not have outdoor space now.</li> </ul>
Disability	<ul style="list-style-type: none"> <li>» Provision of lifetime homes and adapted properties for resident and household members with specific needs.</li> </ul>	<ul style="list-style-type: none"> <li>» 10% of homes adaptable to be fully wheelchair accessible.</li> <li>» Improved external environment will create more accessible and usable open spaces.</li> <li>» Disabled parking bays that comply with the minimum disability standards will be provided.</li> <li>» Inclusive play spaces will be provided that are accessible and welcoming to disabled and non-disabled children.</li> </ul>
Pregnancy and maternity	<ul style="list-style-type: none"> <li>» Clarion will rehouse tenants in suitable sized accommodation to reduce overcrowding where possible.</li> <li>» This includes rehousing some 'hidden households' and non-dependant adult children separately to alleviate overcrowding.</li> </ul>	<ul style="list-style-type: none"> <li>» New development designed to accommodate pushchairs and play facilities.</li> <li>» All new homes will have private outdoor space.</li> </ul>

# 10 EQUALITIES ASSESSMENT

PROTECTED CHARACTERISTICS	NEGATIVE EFFECTS	
	Indirect	Direct
Age	<ul style="list-style-type: none"> <li>» Clarion recognises that older residents or households that have older members may find moving to a new home more challenging. Residents with younger children in the household may also need additional help and support.</li> <li>» Disturbance particularly if on their own, frail and vulnerable. Age related ill health or frailty may make the prospect of moving more difficult for older homeowners.</li> <li>» Older homeowners may not raise mortgage on new properties/ Older residents may find it difficult to access funding or credit.</li> <li>» Families with children of pre-school and school age could be disrupted if they have to move temporarily potential increased journey times to school or childcare</li> </ul>	<ul style="list-style-type: none"> <li>» No direct negative impacts identified.</li> </ul>
Disability	<ul style="list-style-type: none"> <li>» Potential for residents with disabilities to find it more challenging to move home than residents without a disability due to the nature of their disability.</li> <li>» Disturbance of moving and quality of life, particularly if disability associated with breathing conditions.</li> <li>» Sensory impairment and nervous system conditions – particularly construction machinery noise.</li> <li>» New physical layout will be challenging to those with visual impairment</li> <li>» People with learning difficulties may need separate forms of communication and engagement to enable their understanding of the reality of their situation.</li> <li>» Potential negative impact on individuals with mental health issues.</li> </ul>	<ul style="list-style-type: none"> <li>» No direct negative impacts identified.</li> </ul>
Pregnancy and maternity	<ul style="list-style-type: none"> <li>» Disruption during construction period may negatively impact on pregnant mothers or families with new born children e.g. noise, dust, access issues.</li> <li>» Disruption during decanting/moving home.</li> <li>» Allocated home may no longer be suitable for needs - double decanting.</li> </ul>	<ul style="list-style-type: none"> <li>» No direct negative impacts identified.</li> </ul>

# 10 EQUALITIES ASSESSMENT

PROTECTED	POSITIVE EFFECTS	
CHARACTERISTICS	Direct	Indirect
Ethnicity	» No direct positive impacts identified.	» There is evidence that households from the ethnic minority community on the three estates where regeneration is being considered are more likely to be overcrowded than all households on the estates. Regeneration deals with overcrowding within Circle's tenanted properties on the estates by rehousing each household in the right size property for them. » All existing Clarion tenants and resident homeowners will have the option to stay in their neighbourhoods if they wish to, this will promote community cohesion and build on the strength of the existing very diverse communities in the existing neighbourhoods.
Marriage and Civil Partnership	» No direct positive impacts identified.	» No indirect positive impacts identified.
Gender reassignment	» No direct positive impacts identified.	» No indirect positive impacts identified.

# 10 EQUALITIES ASSESSMENT

PROTECTED CHARACTERISTICS	NEGATIVE EFFECTS	
	Indirect	Direct
Ethnicity	<ul style="list-style-type: none"> <li>» Language barriers could limit the ability of some residents who are members of ethnic minority communities to participate in ongoing consultation regarding their housing needs or their rights under the Residents' Offer.</li> <li>» Lack of written and oral English may have affected some residents' awareness of the proposals and capability to negotiate outcomes for tenants and leaseholders.</li> <li>» Negative impacts of other protected characteristics will be experienced by ethnic minority groups given the estate's diversity.</li> </ul>	<ul style="list-style-type: none"> <li>» No direct negative impacts identified</li> </ul>
Marriage and Civil Partnership	<ul style="list-style-type: none"> <li>» No indirect negative impacts identified.</li> </ul>	<ul style="list-style-type: none"> <li>» No direct negative impacts identified.</li> </ul>
Gender reassignment	<ul style="list-style-type: none"> <li>» No indirect negative impacts identified.</li> </ul>	<ul style="list-style-type: none"> <li>» No direct negative impacts identified.</li> </ul>

# 10 EQUALITIES ASSESSMENT

PROTECTED	POSITIVE EFFECTS	
CHARACTERISTICS	Direct	Indirect
Religion or Belief	» No direct positive impacts identified.	<ul style="list-style-type: none"> <li>» No aspects that prevent residents from practicing their religion/faith</li> <li>» 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</li> <li>» Religious and cultural requirements for specific washing facilities and separate kitchens and living areas have become apparent</li> <li>» Homeowners of any religion and belief will be affected in exactly the same way and as everyone else will have the same compensation and housing options.</li> </ul>
Sex/Gender	» No direct positive impacts identified.	» No indirect positive impacts identified.
Sexual Orientation	» No direct positive impacts identified.	» No indirect positive impacts identified.

# 10 EQUALITIES ASSESSMENT

PROTECTED CHARACTERISTICS	NEGATIVE EFFECTS	
	Indirect	Direct
Religion or Belief	» No indirect negative impacts identified.	» No direct negative impacts identified.
Sex/Gender	» No indirect negative impacts identified.	» No direct negative impacts identified.
Sexual Orientation	» No indirect negative impacts identified.	» No direct negative impacts identified.

# 10 EQUALITIES ASSESSMENT

## 10.3 OTHER CHARACTERISTICS

### DEPRIVATION

10.3.1 Deprivation is not a protected characteristic. However, people possessing certain protected characteristics (e.g. disabled people and ethnic minority children) are at greater risk than other people of experiencing deprivation or of living in areas of high deprivation. An understanding of where deprivation is focused can, therefore, help to identify where people who possess protected characteristics may be at greater risk of inequality.

### EMPLOYMENT AND ECONOMIC ACTIVITY

10.3.2 Employment and economic activity data for Merton and the three Estates is included at **APPENDIX 6** of the overarching EQIA report. LB Merton mirrors the relatively high level of key out-of-work benefit claimants across London, at 7% and 8% of the working age population respectively, compared to just 6.4% nationally. The percentage of economically active residents on all three estates is lower than the ward average. 73% of the residents on the High Path estate are economically active.

10.3.3 The High Path Estate regeneration will help to address the socio-economic inequalities of the area. High Path has a distinct socio-economic profile compared to the borough as a whole and generally contrasts with the socio-economic conditions of the borough as a whole. Specifically, the following characteristics have been identified as worsening in respect of High Path Phases 2 and 3 without development:

- ❑ The projected increase in the child population, alongside low levels of income and high unemployment in the area will heighten concerns over child poverty
- ❑ High levels of youth unemployment constrain the skills and occupational profile of the local population which will impede access to higher value employment opportunities.
- ❑ The poor quality living environment, limited housing opportunities and affordability issues will also adversely affect economic and social prospects contributing to poor levels of health; higher levels of deprivation; further health risks associated with overcrowded dwellings; an unattractive living environment; and reduce social cohesion.

The economic consequences of the ongoing COVID-19 pandemic have not yet been fully captured by local statistics but it is likely that this will exacerbate the existing issues faced by the local community.

## 10.4 IMPACTS ON MULTIPLE CHARACTERISTICS OR GROUPS

10.4.1 A small number of residents on the High Path estates have multiple protected characteristics. While some characteristics will be intrinsically linked (such as age and disability) others have no bearing on one another (e.g. age + ethnicity).

Estate	FH/LH	Protected Characteristics
High Path [11 residents]	FH	Age + Disability
	FH	Age + Disability
	FH	Age + Disability
	LH	Age + Disability
	LH	Age + Disability
	LH	Ethnicity + Disability
	LH	Ethnicity + Gender
	LH	Ethnicity + Gender
	LH	Age + Marriage
	LH	Sexual Orientation/Civil Partnership
LH	Age + Gender	



# 11 PHASING AND DELIVERY

## 11.1 PHASING AND DELIVERY

11.1.1 The redevelopment of the High Path Estate will come forward in seven phases and deliver a total of 1,704 homes. The phases have been designed to ensure minimum disruption to existing residents. The proposed phasing is as follows:

- ❑ Phase 1: 134 units (kickstart)
- ❑ Phase 2: 113 units
- ❑ Phase 3: 369 units
- ❑ Phases 4-7: 1,088 units

11.1.2 Clarion is in discussions with residents and the Council about amending the regeneration in respect of Phases 4-7 of High Path. However, Clarion has confirmed its commitment to delivering redevelopment pursuant to the 2022 CPOs and delivery of such is not contingent on any new or revised planning permission being granted for Phases 4-7.



# 11 PHASING AND DELIVERY

## 11.2 PHASING STRATEGY

### HIGH PATH

11.2.1 The proposed Phasing Plan for the High Path estate is set out in the table below.

HIGH PATH		
Phase	Start on Site	Practical Completion
HPP1	2019	2022 Q1
HPP2	2024	2026 Q3
HPP3	2024	2027 Q3
HPP4	2027	2029 Q3
HPP5	2027	2031 Q4
HPP6	2032	2035 Q1
HPP7	2035	2038 Q1

11.2.2 The 2015 Housing Needs Study found that 357 household within the High Path Estate lived within unsuitable housing, primarily because of overcrowding.

11.2.3 There are a number of overcrowded households in Phases 2 and 3 at High Path. In Phase 2 thirteen households are overcrowded and need one additional bedroom, two further households need two additional bedrooms. These housing needs have been taken into account in planning the replacement homes and those households will move into a new home that is the right size for them.

11.2.4 In Phase 3 six households will move into a new home that has one more bedroom. There are four households who will be rehoused in Phase 3 in two separate new homes thus allowing Clarion to deal with 'hidden households' and rehouse adult non-dependants separately.

11.2.5 The current affordable housing mix and tenures on the Estate also do not meet housing needs, with 1 and 2 bed units comprising 78.3% of the affordable dwellings and there being no intermediate tenures.

# 11 PHASING AND DELIVERY

## 11.3 DECANTING STRATEGY

- 11.3.1 Moving house can be difficult so the Merton Estates Regeneration Programme is predicated on keeping the number of household moves that residents have to make to a minimum. The regeneration of the three estates has been planned so that all Clarion tenants and leaseholders and freeholders who want to stay in the neighbourhood will be able to.
- 11.3.2 Wherever possible residents will move straight into their new permanent replacement home regardless of whether they are tenants, leaseholders or freeholders. The first phases of regeneration on High Path will all be replacement homes for existing residents. High Path as a phased regeneration schemes to enable homes on parts of the estates to be emptied, then demolished and rebuilt over time.
- 11.3.3 At High Path, Clarion has built a 'kick start' phase before any homes are emptied and demolished, to reduce the number of residents that have to move elsewhere until their new home is ready.
- 11.3.4 The early phases of regeneration are all replacement homes for existing residents, the first two phases at High Path, will all be replacement homes for existing Clarion tenants and resident homeowners. The only phase planned

for sale is phase 3 at High Path, which is being used to improve the overall viability of the Merton regeneration business plan.

- 11.3.5 It is recognised that social housing is a scarce resource. Clarion has the largest social housing stock in Merton but will, wherever possible, use the decant capacity within the regeneration estates themselves to minimise disruption to residents and minimise the impact of regeneration on the supply of social housing in the London Borough of Merton.
- 11.3.6 Clarion will therefore use properties that it has bought back from private owners in later phases on the three estates to rehouse those who need to move temporarily rather than housing them in Clarion housing stock that would otherwise have been available to the local authority for nomination.

### CREATING DECANT CAPACITY

- 11.3.7 Since the launch of the Residents' Offer in 2015 Clarion has acquired over 220 homes from homeowners by negotiation. Some of these homes have been used by the London Borough of Merton as temporary housing for households in housing need. Clarion proposes to use bought

back homes in later phases to rehouse residents who will have to move from early phases to allow vacant possession and demolition of the next phases of development.

- 11.3.8 On High Path, Clarion has used land in their ownership, which did not have housing on it, and have bought adjacent sites to build the first replacement homes for residents: 134 replacement homes in the first phase at High Path.
- 11.3.9 Where residents need to move off site into another Clarion property in Merton, before they move to their permanent home to which LB Merton has nomination rights, it will be with the informed consent of LB Merton.

### INCREASE IN SOCIAL /AFFORDABLE HOUSING CAPACITY

- 11.3.10 The Merton regeneration programme will replace all of the social/affordable housing currently provided. Clarion has committed in their Residents' Offer that no household will be moved into an overcrowded home, even if they were overcrowded in their old home. As a consequence, some of the new homes built will be larger than the ones that they replace, where the residents are currently overcrowded.

# 11 PHASING AND DELIVERY

- 11.3.11 Some of the replacement homes will have more bedrooms than the homes which they replace. In some cases grown up children will be rehoused as separate households. There will be an overall increase in the number of social/affordable homes and an increase in the number of bed spaces where larger homes have been built to address overcrowding.
- 11.3.12 In line with the viability agreement with LB Merton, more social/affordable homes for rent will be provided in the later phases at High Path.

## REPLACEMENT HOMES AND CLARION'S RESIDENTS' OFFER

- 11.3.13 Clarion's Residents' Offer commits to replacing resident homeowners' homes with a property of the same type (house /flat/ maisonette) with a new home of the same type and size as their old home.

## 11.4 DECANTING IMPACTS

- 11.4.1 Clarion is committed to alleviating overcrowding on the regeneration estates. At High Path there is capacity within the housing stock inside the estate boundary so most residents will move straight into their new home. Some households who are overcrowded have chosen to move to a larger property on High Path temporarily until their new home is ready.

## PHASE 1

- 11.4.2 At High Path, Clarion has completed the first phase of 134 replacement homes for existing residents. The 134 Phase 1 homes will provide sufficient decant capacity for most of the existing residents of Phases two and three to move straight into their new homes and allow the phase two and three sites to be demolished for the new housing to be delivered.
- 11.4.3 All of the homes are replacement homes for existing Clarion tenants and homeowners, mainly those from phases 2 and 3. Phase 1 was achieved through the development of a garage site and an adjacent industrial site that Clarion bought on the open market.

## PHASE 2

- 11.4.4 Phase 2 will provide replacement homes for High Path residents. Some of the first homes to be delivered in Phase 2 will be replacement houses built to replace the remaining Phase 3 residents who currently live in houses. This approach is in line with the Residents' Offer to provide a home of the same size and type as the old home.

## PHASE 3

- 11.4.5 Phase 3 will be built as housing for sale to offset some of the cost of replacing all of the social/ affordable housing on the three estates and contribute towards the overall viability of the regeneration programme. Clarion anticipates that all existing residents will be rehoused by the time Phase 4 is complete in Q3 2029.
- 11.4.6 As residents move into their new homes Clarion plans to use the old homes as temporary housing whether as decant capacity for residents or for temporary housing for Council nominees to assist the London Borough of Merton in meeting their statutory housing obligations. Where demolition is imminent other meanwhile uses may be found including providing temporary housing for property guardians.

# 12 EFFECTS OF REGENERATION

## 12.1 EFFECTS OF REGENERATION

12.1.1 The regeneration will deliver a range of benefits including:

- A significant proportion of affordable housing, including re-provision of the existing affordable accommodation with significantly higher quality housing.
- An increase in the mix of dwelling types to cater for a broader range of family sizes and address overcrowding, having specific regard to the needs of estate residents.
- Provision of new market units to encourage greater social interaction in order to create a more diverse community
- High standard of accommodation, including residential units built to exceed Building Regulation minimum space
- Significant improvements to the quality of the public realm with improved links to surrounding open spaces.
- High quality urban design and architecture.

BENEFIT	HIGH PATH
<b>Construction impacts</b>	
Creation of temporary construction jobs per annum	60
Construction Gross Value Added	£12.4 million
Construction Net Value added to Merton	£3 million
<b>Economic impact of housing</b>	
Net expenditure increase per annum	£1.5 million
Additional Council Tax Revenue per annum	£175,000
<b>Economic impacts of commercial development</b>	
Job Creation	n/a
Estimated gross added value per annum	n/a

# 13 CONCLUSIONS

13.1 This report provides an update to the initial Equalities Impact Analysis work undertaken between 2015-17 in relation to the regeneration of the High Path Estate.

13.2 The Equalities Analysis undertaken by Clarion in 2015 identified that the 'protected characteristics' of: Age, Disability and Ethnicity were particularly relevant to the regeneration proposals and there was the potential for these groups to be negatively affected. The assessment has therefore focussed on these issues.

13.3 The Equalities Analysis undertaken in 2015 also identified that the greatest impact on equalities would be the mechanics of the delivery of the regeneration programme including:

- The Residents' Offer
- Moving Existing residents into New Homes
- Addressing Overcrowding
- Minimising Disruption during the Regeneration Process.

## THE RESIDENTS' OFFER

13.4 The Residents' Offer was published on 27 May 2015 to the existing homeowners and affordable housing tenants, followed up by an independent survey to gauge residents' responses to the Offer and the plans for the regeneration of the area. The Residents' Offer details the Replacement Home Option, which is offered to those resident homeowners who were living on one of the three neighbourhoods at the time.

13.5 During the Estate Local Plan consultations and throughout 2015 and 2016, homeowners raised concerns with the Council about the Residents' Offer and in particular what 'like for like' actually meant. Whilst this was set out in the 2015 Residents' Offer, the Council exercised its due diligence to residents in seeking clarification from Clarion on this important matter. Clarion provided clarification and an updated Offer in 2018.

13.6 Clarion has carried out extensive consultation in developing the proposals for the estates and obtaining planning permission for the redevelopment of the Estates. The feedback received from these events was considered and where required additional analysis and design testing was undertaken. Where possible, revisions were made to the emerging proposal to address the matters raised.

## MOVING EXISTING RESIDENTS INTO NEW HOMES

13.7 Wherever possible residents will move straight into their new permanent replacement home regardless of whether they are tenants, leaseholders or freeholders. The first phases of regeneration will all be delivered to enable homes on parts of the estates to be emptied, then demolished and rebuilt over time.

## ADDRESSING OVERCROWDING

13.8 Clarion is committed to alleviating overcrowding on the regeneration estates. The Merton regeneration programme will replace all of the social/affordable housing currently provided. Clarion has committed in their Residents' Offer that no household will be moved into an overcrowded home, even if they were overcrowded in their old home. As a consequence, some of the new homes built will be larger than the ones that they replace, where the residents are currently overcrowded. Some households who are overcrowded have chosen to move to a larger property temporarily until their new home is ready.

# 13 CONCLUSIONS

## MINIMISING DISRUPTION DURING THE REGENERATION PROCESS.

13.9 At High Path a 'kick start' phase has been built before any homes are emptied and demolished, to reduce the number of residents that have to move elsewhere until their new home is ready. The first two phases at High Path will all be replacement homes for existing Clarion tenants and resident homeowners.

## EQUALITIES ANALYSIS

13.10 The Equalities Analysis has identified that the 'protected characteristics' of: Age, Disability and Ethnicity are particularly relevant to the regeneration proposals and there is the potential for these groups to be negatively affected. The assessment has therefore focussed on these issues.

13.11 The assessment has identified a total of 100 residents with protected characteristics in the current Phases, within the three estates. The assessment sets out a number of recommendations to strengthen, secure or enhance positive equality impacts and to mitigate for potential negative equality impacts.

13.12 A small number of residents on the High Path estate have multiple protected characteristics. Whilst some characteristics will be intrinsically linked (such as age and disability) others have no bearing on one another (e.g. age + ethnicity).

13.13 Overall, the impacts of the regeneration will be positive. The Merton Estates Regeneration Programme will provide an opportunity to reduce overcrowding amongst its tenanted households. Overcrowding is proportionately more likely to affect households from the BAME community and so the regeneration provides an opportunity to address inequality in this area. Significant amenity and size improvements will be provided for residents, with all new homes built to current space standards with private outdoor space.

13.14 The regeneration is also an opportunity to provide new lifetime homes for all tenants, this will enable older tenants (and homeowners) to remain independent in their own homes for longer. New homes can be adapted to meet the specific needs of disabled residents, 10% of all new homes will be fully accessible and adaptable for wheelchair users.

# APPENDICES

**APPENDIX 1:**  
**IMPACT ANALYSIS +**  
**MITIGATION** **A2**

**APPENDIX 2:**  
**DATA SOURCES** **A8**



# APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
<b>Ethnicity</b>	<ul style="list-style-type: none"> <li>There is evidence that households from the ethnic minority community on the three estates where regeneration is being considered are more likely to be overcrowded than other households on the estate. Regeneration deals with overcrowding within Clarion's tenanted properties on the estate by rehousing each household in the right size property for them.</li> <li>All existing Clarion tenants and resident homeowners will have the option to stay in their neighbourhoods if they wish to, this will promote community cohesion and build on the strength of the existing very diverse communities in the existing neighbourhoods.</li> </ul>	<ul style="list-style-type: none"> <li>Language barriers could limit the ability of some residents who are members of ethnic minority communities to participate in ongoing consultation regarding their housing needs or their rights under the Residents' Offer.</li> <li>Lack of written and oral English may have affected some residents' awareness of the proposals and capability to negotiate outcomes for tenants and leaseholders.</li> <li>Negative impacts of other protected characteristics will be experienced by ethnic minority groups given the estate's diversity.</li> </ul>	<ul style="list-style-type: none"> <li>Clarion has put in place measures to ensure that no homeowners of any ethnicity will be disproportionately affected by the proposals. Everyone will be treated in the same way and will have the same compensation and housing options as everyone else.</li> <li>Clarion holds information on the ethnicity of resident homeowners. Clarion officers know each of the resident homeowners, their family circumstances and whether written information needs to be provided in languages other than English. Clarion provide written information in different languages for both residents and absentee homeowners. Their communications use a standard translation request section.</li> <li>Clarion does not hold information on the ethnicity of absentee owners (landlords), except where absentee owners (landlords) have requested that written information is provided in languages other than English.</li> <li>Clarion has recorded each contact and interaction with every homeowner since the regeneration was first proposed.</li> <li>Clarion has undertaken face to face consultation and meetings with homeowners throughout the regeneration preparation including formal consultation events and informal meetings with individual homeowners. Where requested Clarion has used translators or third parties for face to face or telephone meetings with homeowners who require that service.</li> <li>Clarion understand that there will be residents and homeowners who have more than one protected characteristic. The mitigation measures set out under the specific protected characteristics will be applied to residents who may have multiple protected characteristics across different categories.</li> </ul>

# APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
<b>Gender</b>	There is no evidence that homeowners of any gender will be disproportionately affected by the proposal. Everyone will be treated in exactly the same way and will have the same compensation and housing options as everyone else.	There is no evidence that homeowners of any gender will be disproportionately affected by the proposal. Everyone will be treated in exactly the same way and will have the same compensation and housing options as everyone else.	<ul style="list-style-type: none"> <li>Whilst there is no evidence that homeowners of any gender will be disproportionately affected by the proposals, there is a greater proportion of single person households at High Path than in the London Borough of Merton. The single person is more likely to be female than male and more likely to be older than the average tenant or homeowner. Some households may be single person households where household members have died or moved away over time.</li> <li>Clarion recognise the importance of providing appropriate replacement homes for single person households. For tenants the residents offer recognises that downsizing to a smaller home might be a challenge and have agreed that the 'needs plus 1' offer means that no one will have to move from a larger home to a one bedroom flat.</li> <li>For homeowners Clarion will work with individuals to make sure that replacement homes meet the needs of single person households as closely as possible, for example at Eastfields there will be both two and three storey houses and some homeowners may choose to move to a flat with level access rather than a house.</li> <li>Where any household needs help to move to their new home Clarion will provide help and assistance to make the move as smooth as possible.</li> </ul>
<b>Gender Reassignment</b>			There is no evidence that homeowners undergoing or who have undergone gender reassignment will be disproportionately affected. Everyone will be treated in exactly the same way and will have the same compensation and housing options as everyone else.

# APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS		MITIGATION	
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS		POTENTIAL NEGATIVE IMPACTS
<b>Disability</b>	<ul style="list-style-type: none"> <li>• Provision of lifetime homes and adapted properties for residents and household members with specific needs.</li> <li>• Proportion of homes designed and built specifically to meet the needs of disabled residents.</li> <li>• 10% of homes adaptable to be fully wheelchair accessible.</li> <li>• A better living environment is conducive to better health and well-being.</li> <li>• Improved external environment will create more accessible and usable open spaces.</li> <li>• Disabled parking bays that comply with the minimum disability standards will be provided.</li> <li>• Inclusive play spaces will be provided that are accessible and welcoming to disabled and non-disabled children.</li> <li>• There will be seating provided to assist disabled parents/carers to supervise play in the spaces provided.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential for residents with disabilities to find it more challenging to move home than residents without a disability due to the nature of their disability.</li> <li>• Disturbance of moving and quality of life, particularly if disability associated with breathing conditions.</li> <li>• Sensory impairment and nervous system conditions – particularly construction machinery noise.</li> <li>• New physical layout will be challenging to those with visual impairment</li> <li>• People with learning difficulties may need separate forms of communication and engagement to enable their understanding of the reality of their situation.</li> <li>• Potential negative impact on individuals with mental health issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Homeowners with disabilities will have the same compensation and housing entitlement under Clarion's residents' offer as everyone else.</li> <li>• Clarion recognises that the replacement homes offered will have to meet the specific requirements of homeowners with disability or impairments (or members of their households with disability or impairments) and this has been accounted for in the design of the new homes at High Path. All of the homes in the first phase of development will be replacement homes for existing residents.</li> <li>• All of the of the new homes are designed to the Lifetime Homes Standard with wide doors and circulation spaces. In the houses the ground floor WC is designed so that it can be adapted to include an accessible shower.</li> <li>• All homes will have level access either at ground level or at entry level, with lift access where it is above the ground floor.</li> <li>• At least 10% of the homes in the new High Path development will be fully wheelchair adaptable, a far greater proportion than currently provided.</li> <li>• There will be 12 fully wheelchair accessible homes in phase 2 and a further 45 in phase 3 at High Path. A total of 57 fully wheelchair accessible homes in the two phases.</li> <li>• Clarion have already built the first phase homes, all of the houses and ground floor flats have level access, are adaptable and built to the lifetime homes standard. Homes above the first floor have level access at entry level, with lifts where they are above the ground floor, some apartments have internal stairs. Houses have access level cloakrooms that are sized so that they can, if necessary, be converted into an accessible ground floor wet room.</li> <li>• Where necessary the homes in phases 2 and three at High Path will be adapted to meet the needs of current residents with a range of disabilities and impairments. Clarion will work with those residents and professional advisors to ensure that the necessary adaptations are made as the homes are fitted out.</li> <li>• Clarion recognise that moving home may be particularly challenging for residents with impairments, or where household members have an impairment, and we will work with individuals and their families to support them through the moving process. This will include commissioning occupation therapy reports to ensure that accessibility needs are properly considered and provided for, a packing and unpacking service and a handyman service when residents move into their new homes.</li> </ul>

# APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
<b>Disability</b>	Cont.	Cont.	<ul style="list-style-type: none"> <li>• Where a resident suffers sensory impairment and nervous system conditions and may be particularly adversely affected by construction machinery noise during construction, Clarion will work with the residents to find the best available solution to minimise the impact on them whether this is moving to a new home away from subsequent construction work or a temporary move away until work is complete.</li> <li>• Regeneration construction is phased and any constructor will work within pre-agreed set hours and will be expected to mitigate any negative impacts of their activities. This is expected to include minimising disruptive noise, dust and vehicle movements as far as is possible.</li> <li>• Clarion is aware that there may be residents with mental ill health or capacity issues. Clarion will continue to work with the resident, any family members or professional support services to understand the specific support that an individual may require. This will include consideration of how best to communicate with the individual to ensure they understand what is happening when.</li> <li>• Ensure that tenants only move once into their new homes. One resident who uses a wheelchair lives in phase 1 and will move temporarily to a home that has been adapted to meet her needs. She has moved already and Clarion supported her through the move.</li> </ul>

# APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
Age	<ul style="list-style-type: none"> <li>Providing the right type of housing for different households of all age groups including older residents and families with young children.</li> <li>Shared outdoor leisure space for all ages and play spaces specifically for younger and older children have been designed into the new High Path.</li> <li>Any necessary accessibility adaptations such as grab rails or accessible electrical outlets can be fitted in the replacement home from the outset.</li> <li>All new homes will have private outdoor space; a garden, terrace or balcony this may be of particular benefit to older residents and families with children who may not have outdoor space now.</li> <li>Good access and views will be provided to green and ecologically valuable spaces, which will help to improve and support health and well-being of occupants, in particular of elderly house bound occupants.</li> <li>A decanting matrix tool was used to help place residents within the proposed development based on their needs. The tool captured the needs of residents such as preference for a ground floor flat, or wet room, which enabled placing of residents.</li> <li>Walking routes will account for the needs of the whole community, for example those with vision impairment and those with mental disabilities (including dementia).</li> </ul>	<ul style="list-style-type: none"> <li>Clarion recognises that older residents or households that have older members may find moving to a new home more challenging. Residents with younger children in the household may also need additional help and support.</li> <li>Older people are more settled and require support when moving.</li> <li>Disturbance particularly if on their own, frail and vulnerable. Age related ill health or frailty may make the prospect of moving more difficult for older homeowners.</li> <li>Older homeowners may not raise mortgage on new properties/ Older residents may find it difficult to access funding or credit.</li> <li>Age related ill health or frailty may make the prospect of moving more difficult for older homeowners.</li> <li>There is the potential for both older and vulnerable residents to be worried about change and the impact on them. There is also the potential for older residents not to participate or to refuse to or worry about giving candid feedback.</li> <li>Families with children of pre-school and school age could be disrupted if they have to move temporarily potential increased journey times to school or childcare.</li> </ul>	<ul style="list-style-type: none"> <li>Homeowners of any age will have the same compensation and housing options as everyone else.</li> <li>Support for older residents and those residents with younger children in the household will include commissioning occupation therapy reports to ensure that accessibility needs are properly considered and provided for, providing a packing and unpacking service and a handyman service when residents move into their new homes.</li> <li>If families with young children need to move temporarily until their new home is ready Clarion will arrange for moves to be within a reasonable distance of school and childcare to minimise disruption to these families.</li> <li>Older residents may find it difficult to access funding or credit. Clarion's Residents' Offer mitigates the need to access additional credit for homeowners as they are able to transfer the equity in their existing home into a new replacement home at no additional cost.</li> <li>New homes are Lifetime Homes. Homeowners are less likely to have to move as their needs change due to age, increasing frailty or age related impairment.</li> <li>Ensure that tenants, particularly those who are older, only move once into their new homes.</li> </ul>

# APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
<b>Sexual Orientation</b>			Homeowners of any sexual orientation will have the same compensation and housing options as everyone else.
<b>Religion and belief</b>			<ul style="list-style-type: none"> <li>Homeowners of any religion and belief will have the same compensation and housing options and everyone else.</li> <li>No aspects that prevent residents from practicing their religion/faith</li> <li>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.</li> <li>All facilities will be available to people of all cultures and faiths.</li> </ul>
<b>Pregnancy and Maternity</b>	<ul style="list-style-type: none"> <li>Clarion will rehouse tenants in suitable sized accommodation to reduce overcrowding where possible. This includes rehousing some 'hidden households' and non-dependant adult children separately to alleviate overcrowding.</li> <li>New development designed to accommodate pushchairs and play facilities.</li> <li>All new homes will have private outdoor space.</li> </ul>	<ul style="list-style-type: none"> <li>Disruption during construction period may negatively impact on pregnant mothers or families with new born children e.g. noise, dust, access issues.</li> <li>Disruption during decanting/moving home.</li> <li>Allocated home may no longer be suitable for needs - double decanting.</li> </ul>	<ul style="list-style-type: none"> <li>Homeowners who are pregnant or who have very young children will have the same compensation and housing options as everyone else.</li> <li>Where it is known that a baby is expected Clarion will work with the homeowner to ensure that this is taken into account when considering the allocation of a replacement home subject to a suitable home being available.</li> <li>If Clarion is aware that a homeowner from whom they are buying a property is pregnant or has a very young child they will offer assistance with moving. This might include a packing and unpacking service and help with putting up curtains/fitting light bulbs.</li> <li>All new homes will have private outdoor space for children to play</li> <li>Each of the new neighbourhoods will have high quality play space for children of different ages.</li> </ul>
<b>Marriage and Civil Partnership</b>			<ul style="list-style-type: none"> <li>Homeowners who are married or in a civil partnership will be affected in exactly the same way and will have the same compensation and housing options as everyone else.</li> </ul>

# APPENDIX 2: Data Sources

SECTION	PAGE REF.	SOURCE
9 Equalities Data	28	<ul style="list-style-type: none"><li>• Clarion Equalities Analysis (2015)</li><li>• Clarion Estate Profiling (2021)</li><li>• <a href="#">LSOA Data for Index of Multiple Deprivation (2021)</a></li><li>• <a href="#">GLA Data (2020)</a></li><li>• <a href="#">ONS Census Data (2011) and 2018 update</a></li></ul>



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