

EASTFIELDS

jam

Merton Estates Regeneration

EQUALITIES IMPACT ASSESSMENT (EqIA)

EASTFIELDS 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 Eastfields Estate. The overall regeneration programme includes the Eastfields, High Path and Ravensbury Estates.
- ES.3** The EqIA report considers the equalities impacts for the Eastfields 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 2011, 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.

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- 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 Eastfields Estate Regeneration programme.
- 1.2 The EqIA report considers proposals for the Eastfields 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: [Levitt Bernstein Associates](#)

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 2011, 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

2.1.3 Section 149 of the Equality Act 2011 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.

2.1.4 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.

2.1.5 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.

2.1.6 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 High Path and Ravensbury Estates, as well as an overarching EqIA for the regeneration programme as a whole.

See **SECTION 6** for details.

4 ESTATES REGENERATION



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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 Eastfields Estate.
Demolition of all existing properties on the Eastfields Estate and redevelopment of the sites to deliver new modern, energy efficient and high quality homes (up to 700), 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 EASTFIELDS 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 Eastfields Estate for the following reasons:

“The redevelopment of the **EASTFIELDS 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 outline planning applications 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 Eastfields and permission was also granted for High path and Ravensbury (subject to reserved matters).

In respect of Eastfields Phase 1, a revised outline planning application for this element of the development was submitted on 2 December 2021. Reserved matters for Eastfields Phase 1 was submitted on 13 December 2021, for the construction of 201 new homes.

Under the first phase of works at Ravensbury, 21 new homes were handed over to existing residents in summer 2020, providing better quality homes and alleviating overcrowding. Construction is also underway for 134 new homes at High Path with completion of these anticipated in 2022.

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

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APPLICATION TYPE	LPA REFERENCE	DATE REGISTERED	DECISION
Outline Planning Permission	17/P1717	16/11/2017	Grant Permission 29/04/2019
Revised Outline PP	21/P4078	2/12/21	PENDING
Reserved Matters	21/P4430	13/12/21	PENDING

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

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

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4.2 EASTFIELDS ESTATE

- 4.2.1 The Eastfields Estate is located towards the east of the London Borough of Merton (LBM), within the Figges Marsh ward. Broadly rectangular in shape, the Estate sits to the north west of Streatham Park Cemetery and is bounded by Acacia Road / Mulholland Close to the north west and Clay Avenue to the east, south and west. Mitcham Eastfields Railway Station is around 5 minutes walk to the west of the Estate.
- 4.2.2 The estate area totals approximately 6.87 hectares. Originally constructed in the late 1960s to early 1970s, the estate currently comprises 466 dwellings, comprising a mix of three storey town houses and flatted blocks. The site is laid out with residential blocks on the perimeter of the rectangular site and communal amenity space to the centre. The properties include a mix of tenures including private ownership (as a result of right to buy) and social rent.

- 4.2.3 The estate is in a predominantly residential area, where the scale of built development surrounding the site varies considerably. The exceptions to this are the two storey St Marks Academy and playing areas, located to the north of the site, and the Cemetery to the south. The built development to the west of the site is predominantly terraced and detached houses of two to three storeys. There are no non-residential land uses on the site at present.



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Source: [Levitt Bernstein Associates](#)

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REGENERATION PROPOSALS

4.2.4 The redevelopment in Eastfields will create 800 new homes in addition to new retail, leisure, office and community spaces:

- ❑ 800 new flats, maisonettes and terrace houses
- ❑ Central green space with tree-lined streets and areas
- ❑ Improved access to surrounding areas and facilities.

An Outline Planning Application [Ref: [17/P1717](#)] was submitted to Merton Council on 16 November 2017 for the regeneration of the estate. Permission was granted on 29 April 2019 subject to S.106 Obligations.

4.2.5 The regeneration proposals for the Eastfields Estate (as set out in the Planning Statement 2017, Savills) comprise the demolition of all existing buildings and the construction of up to 800 units including both flats and houses, up to 275 sqm of flexible non-residential floorspace, associated landscaping, highways and public realm works.

4.2.6 The proposed development comprises the demolition of all existing building on site, comprising 466 residential units (219 private and 247 affordable units).

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

- ❑ **the demolition of all existing buildings and structures**
- ❑ **erection of new buildings ranging from 1 to a maximum of 9 storeys providing up to 800 residential units (C3 Use Class)**
- ❑ **provision of up to 275 sqm of non-residential floorspace (flexible use class A1 and/or A2 and or A3 and/or A4 and/or B1 and/or D1 and/or D2) provision of new public open space and communal amenity spaces including children’s place space**
- ❑ **new public realm, landscaping works and new lighting**
- ❑ **cycle parking space (including new visitor cycle parking) and car parking spaces (including within ground level podiums), together with associated highways and utilities works.”**

HOUSING

4.2.7 The proposals will deliver up to 800 new homes in a mix of houses and flats. Two illustrative accommodation schedules have been provided to demonstrate how the development of the estate might come forward.

4.2.8 Based on the illustrative schemes, the proposal could provide for approximately 33% to 34% affordable housing (calculated on a unit basis). This could increase to up to 50% affordable housing on the Eastfields Estate if the viability of the Merton Estates Project improves. All of the existing affordable housing, which comprises rented housing will be re-provided, with no net loss of affordable habitable rooms or floorspace.

4.2.9 All homes are to be designed so that they meet the Mayor’s minimum space standards, the National Technical Standards, and the relevant Building Regulations standards as set out in the London Plan.

4.2.10 The regeneration is 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.)

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Housing Mix Proposal

Dwelling Size	% of Private Tenure	Affordable Homes	
		% of Rent Tenure	Intermediate Tenure
Studio	0-10	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	25-45	30-50	
3 bed +	15-35	10-30	

Illustrative Scheme (773 unit scheme)

Tenure	Studio	1 bed	2 bed	3+ 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	107	111	44	262	742	34	32
Private (sale or rent)	0	194	178	139	511	1606	66	68
Total	0	301	289	183	773	2348	-	-
% of Unit Size	0	39	37	24	-	-	-	-

Indicative Maximum Accommodation Mix

Tenure	Studio	1 bed	2 bed	3+ 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	107	111	44	262	742	33	31
Private (sale or rent)	0	208	208	122	538	1649	67	69
Total	0	315	319	166	800	2391	-	-
% of Unit Size	0	39	10	21	-	-	-	-

NON-RESIDENTIAL USES

4.2.11 Non-residential floorspace, extending up to 275 sqm is to be located on the Mulholland Road frontage. This will provide flexible floorspace within use classes A1 (Shops) and/or A2 (Financial and Professional Services) and/or A3 (Restaurant & Cafes) and/or A4 (Drinking Establishments) and/or B1 (Business) and/or D1 (Non-residential Institutions) and/or D2 (Assembly and Leisure).

PUBLIC OPEN SPACE AND AMENITY SPACE

4.2.12 The proposals provide for 1.71ha of public open space, which includes a central linear park (approximately 8,830sqm) running east to west through the site. All units will be provided with private amenity space in the form of balconies, terraces and gardens to meet the London Housing SPG standards. Semi-private communal amenity space will also be provided in the form of podium and courtyard gardens.

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ACCESS, PARKING + SERVICING

- 4.2.13 Six pedestrian, cyclist and vehicular accesses will be provided into the site from Acacia Road and Mulholland Close, which link into a network of streets within the development. Cycle parking is to be provided in line with the London Plan requirements for the new homes (1 space for 1 bed units, and 2 spaces for units with 2 bedrooms or more). Visitor cycle parking spaces will also be provided, together with spaces for the non-residential uses in accordance with the London Plan standards. Up to 360 car parking spaces will be provided as integral garages, within undercroft podiums, within parking courts and as on-street bays.
- 4.2.14 Appropriate refuse and recycling storage and collection provision will be made on site. Both Underground Refuse Systems (URS) and conventional methods could be utilised subject to further investigation.

ENERGY + SUSTAINABILITY

- 4.2.15 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.
- 4.2.16 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 Eastfields, the site-wide energy strategy is currently being developed, 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.
- 4.2.17 Good practice environmental design will be incorporated into the proposals, including the use of:
- ❑ water efficient sanitary ware
 - ❑ maximisation of recycling
 - ❑ provision of safe and secure cycle storage
 - ❑ electric vehicle charging points
 - ❑ promotion of sustainable travel behaviour through a travel plan
 - ❑ incorporation of sustainable urban drainage measures
 - ❑ ecological enhancements
 - ❑ sustainable construction site management.

REVISED APPLICATION

- 4.2.18 In respect of Eastfields Phase 1, a revised outline planning application for this element of the development was submitted on 2 December 2021. Reserved matters for Eastfields Phase 1 was submitted on 13 December 2021, for the construction of 201 new homes.

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EXISTING CONDITIONS

4.2.19 In the summer of 2021 there were a number of press and media stories about the condition of the Eastfields estate where residents were living in very poor quality homes, which were not being maintained. Clarion undertook an internal review and found the following:

- ❑ The buildings on the Eastfields estate were poorly designed and nearing the end of their life.
- ❑ Clarion's focus on the regeneration programme meant that they got the balance wrong in terms of investing in existing properties. The regeneration has taken significantly longer than expected and in recent years Clarion has taken a responsive, rather than a proactive, approach.
- ❑ Clarion had not engaged with residents sufficiently over recent months.
- ❑ Problems with pests and vermin were exacerbated by waste collection moving to a fortnightly rather than a weekly cycle.

Eastfields: Lessons Learned

Clarion has a major £1.3bn regeneration programme underway, which is set to transform the estate into the high quality and sustainable housing that their residents need and deserve. Clarion is committed to making sufficient investment in the estate while the regeneration progresses. This investment includes assessing the need through a programme of stock condition surveys and developing a medium-term investment plan from the findings. Residents will be kept informed of all developments that affect them.

Clarion has attempted to speak to every household on the estate with 72% of households spoken to in June 2021 and asked for details of any outstanding or unreported repairs. In the weeks since, more than 400 repairs have been completed - including 145 raised by residents during the door-knocking exercise. Clarion now has full-time staff and a dedicated office on the estate, so that residents can report any repairs or problems in person.

A programme of regular checks will be made on homes on the estate to pick up on any problems at an earlier stage. A pest control company has also been brought in to deal with problems across the estate.

To ensure that the situation at Eastfields does not occur elsewhere, Clarion will take a number of actions across the Group to learn and improve from recent events. Measures include:

- ❑ Building more opportunities for residents to share their views before decisions are taken.
- ❑ Completing an ongoing programme of Housing Association service reviews including the repairs customer journey - residents are involved in the process.
- ❑ Ensuring the regeneration projects have medium-term investment plans so that Clarion continues to maintain homes effectively.
- ❑ Communicating with customers to ensure that they understand how to report repairs and raise complaints, whilst exploring the reasons for under reporting issues.
- ❑ Reviewing the scope and presentation of reporting and management information.
- ❑ Reviewing leadership responsibilities ensuring there are separate executive leads for the Asset Strategy and the Customer Strategy.
- ❑ Reviewing the approach taken to tackle damp, mould and pest problems.
- ❑ Reviewing wider asset investment requirements and revising budgets accordingly.

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 Eastfields Estate, including:

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- Residential Travel Plan
- Refuse Strategy
- Replacement of Eastfields Ball Court / provision of Eastfields Recreational facility
- Traffic Calming Measures
- District Heating Network.

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 of 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 CPOS

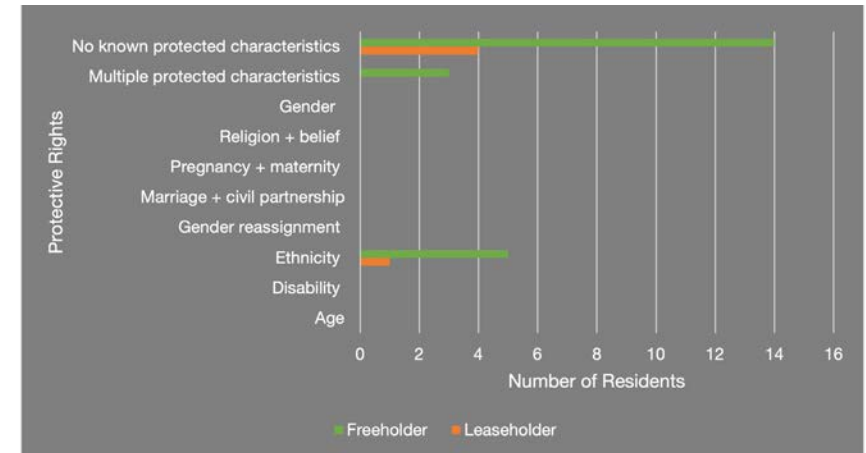
- 6.2.1 On 15 January 2018, the Council’s Cabinet resolved ‘in-principle’ for the Council to use its compulsory purchase powers, if necessary, to bring forward the Scheme. This resolution was ratified by full Council on 7 February 2018.
- 6.2.2 The Council’s purpose in making the Compulsory Purchase 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 Eastfields Estate Phase 1 (Eastfields Phase 1).
- 6.2.3 The Eastfields Estate regeneration forms part of the wider Merton Estates Regeneration Programme. The development seeks to deliver, which includes the Ravensbury and High Path Estates.
- 6.2.4 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.
- 6.2.5 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 (High Path No. 1) Compulsory Purchase Order 2022 (the High Path Order) (together with this Order, the 2022 CPOs) as part of the next phase of redevelopment across the three Estates.
- 6.2.6 Redevelopment of the Eastfields Estate has not yet commenced. Unlike both Ravensbury Estate and High Path Estate, there is no kick-start element to the proposed regeneration of the Estate.
- 6.2.7 Eastfields Phase 1 will facilitate the delivery of 201 new homes on the Eastfields Estate of which 143 (71%) new homes will be affordable rented/ social rented and 58 new homes will be private homes to replace existing private homes for resident homeowners. All 201 homes being provided as part of Phase 1 are 100% replacement homes. None of these new homes will be for sale.

6 COMPULSORY PURCHASE ORDERS

6.2.8 If the relevant interests are not able to be acquired the redevelopment of the Eastfields Phase 1 element of the Scheme would be severely compromised as all of the units to be acquired lie within the main redevelopment area of this part of the Estate. Seeking to construct new development around these few outstanding interests would not only compromise the construction process but it would also compromise the Council's aims to deliver the wider regeneration benefits of the comprehensive redevelopment of the estate. It would severely impact on the place-making benefits, the wider social benefits, the delivery of affordable housing, the delivery of higher quality homes.

6.2.9 As of February 2022, Clarion has acquired 229 freeholds and long leases across the regeneration area through voluntary sales under the terms of the 2015 Residents' Offer. Of these 130 are at the High Path Estate, 88 at the Eastfields Estate and 11 at the Ravensbury Estate. In order for the development to be delivered, Clarion will need to acquire a further 133 freeholds and long leases at Eastfields Estate.

Eastfields CPO - Phase 1A



Eastfields CPO - Phase 1B



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 EASTFIELDS – OUTLINE

❑ COMMUNITY EVENT – 14TH JUNE 2014

The first public event provided residents with the opportunity to provide feedback on what they liked and disliked about the Estate, as well as make suggestions on the possibilities for refurbishment and regeneration.

❑ WORKSHOP ON TYPES OF HOMES – 26TH JUNE 2014

This workshop, attended by 52 people, gave residents the opportunity to provide feedback on the types of homes that they would like to see on the estate if it were to be regenerated.

Some of the key comments raised indicated preferences for:

- » At least the same size or larger properties
- » A more traditional design, potentially constructed from brick
- » More private amenity space.

❑ COMMUNITY EVENTS AND WORKSHOP – OPEN SPACES, STREETS AND HOMES – 12TH JULY 2014 AND 23RD JULY 2014

The purpose of these events was again to gain feedback from residents focussed around three key themes: open space, streets and homes.

Some of the key comments drawing out of this event indicated:

- » Support for the central green space and landscape
- » Concerns around safety of public spaces and play areas
- » A dislike for wood and metal panelling as a cladding material.

❑ WORKSHOPS ON HOUSE LAYOUTS – 2ND AUGUST 2014 AND 9TH SEPTEMBER 2014

The purpose of these events was to gain an understanding of what the current residents wanted to see from the internal layouts of new properties and to provide comments on some initial layout options.



8 COMMUNITY ENGAGEMENT

Clearly, the diverse range of housing needs as well as individual preference meant that there was unlikely to be consensus on such an issue, however, some of the key points included:

- » Many residents supported a variety of house types to provide choice within the Estate
 - » A number of residents also expressed interest in the flexibility of 'multi-generation homes' to have separate annex for children or elderly relatives within the home
 - » Mixed views towards open plan living
 - » Strong support for more storage
 - » Support for private amenity space to be separated and away from public spaces
 - » Support for adequate parking levels and appropriate controls to make sure non-residents do not use it.
- ❑ **DRAFT MASTERPLAN LAUNCH – 18TH, 20TH, 21ST AND 22ND OCTOBER 2014**
This series of four workshops tabled the emerging masterplan vision for the full regeneration of the Estate. A total of 123 people attended the event with 30 feedback forms completed in detail.



❑ OTHER WORKSHOPS

Further sessions were held to provide an opportunity for the communities to be involved in the scheme development, including a workshop to discuss options for landscape and parking (5th March 2015), with a subsequent workshop to discuss options for house types and layouts (26th March 2015).

❑ OTHER CONSULTATION

A Residents' Offer was issued in late May 2015 and further public consultation was undertaken as part of this process to give residents the opportunity to discuss the contents of the Offer. These sessions were held on the 4th, 6th and 9th June 2015.

In addition in 2016 there were three events including:

- » Previous and current masterplans (1 & 3 November)
- » Your Homes and Open Spaces (15 & 19 November)
- » Final Proposals Exhibition (6 & 8 December).

Clarion is committed to continuing this process of community engagement through the Reserved Matters and construction stages.

❑ NEWSLETTERS

Quarterly newsletters are sent to all existing residents to ensure that the existing residents are kept up to date and informed about the progress of the regeneration proposals.

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.

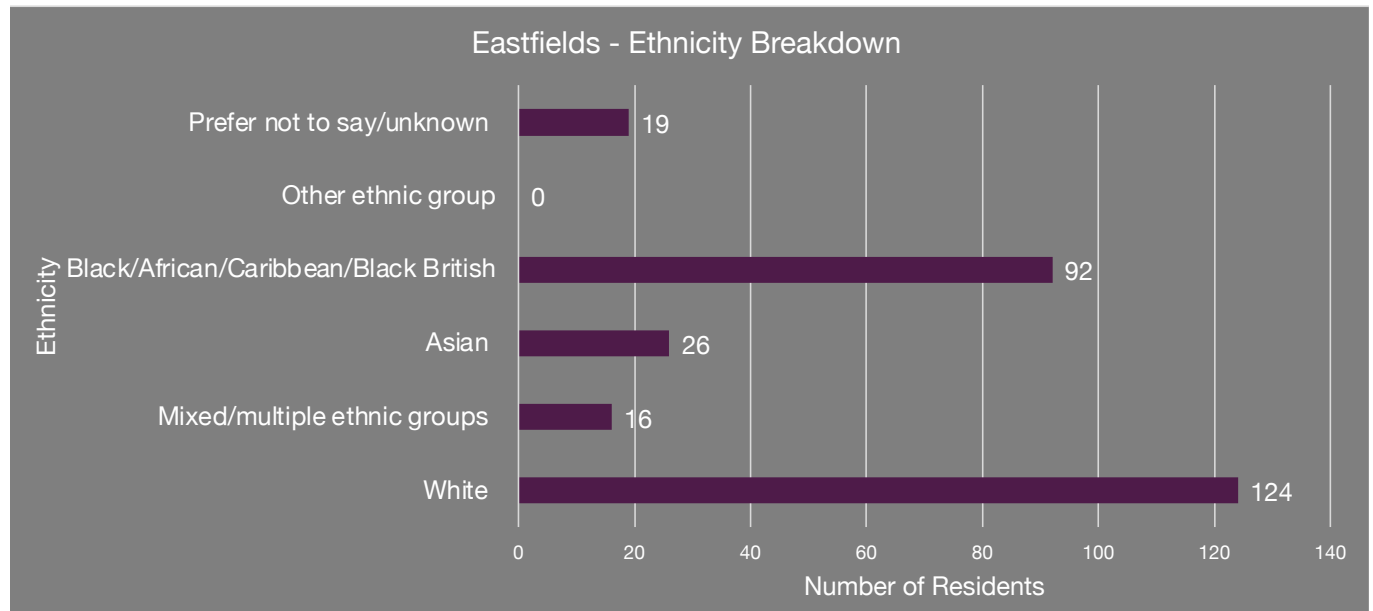
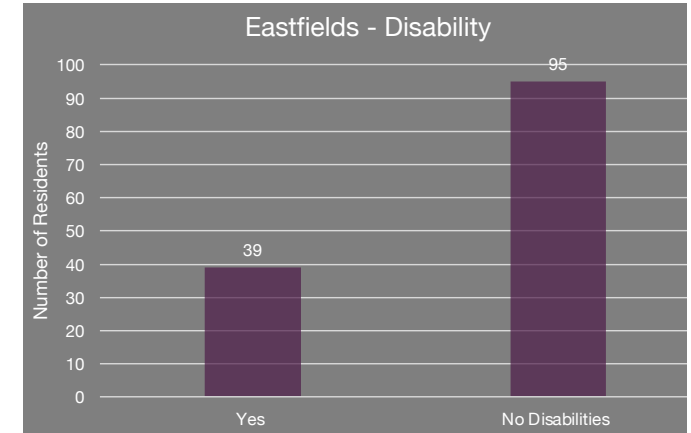
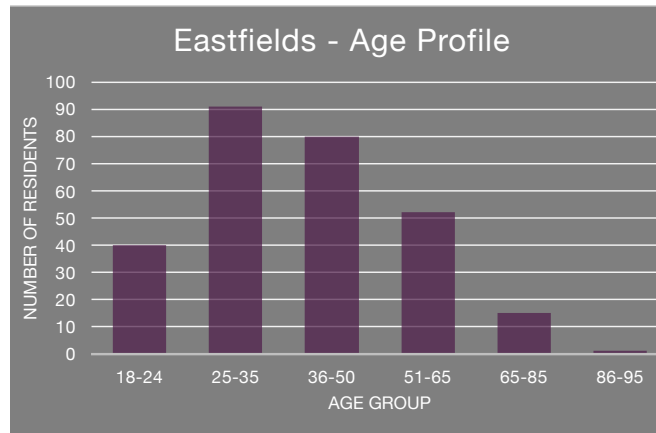
9 EQUALITIES DATA

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

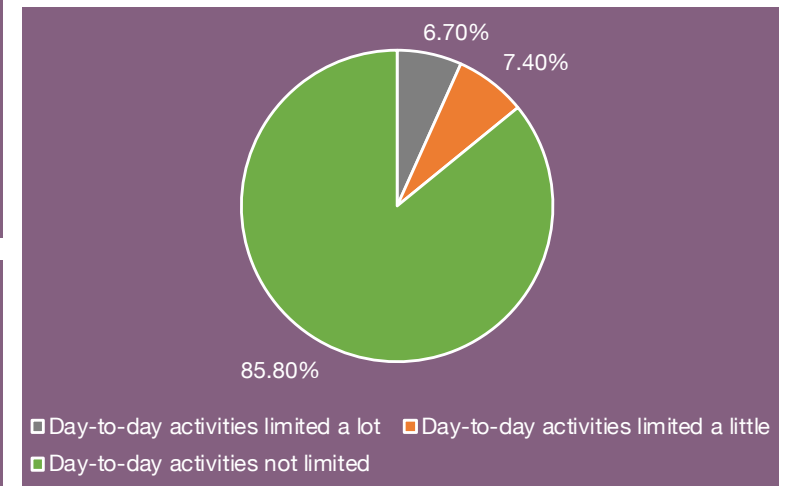
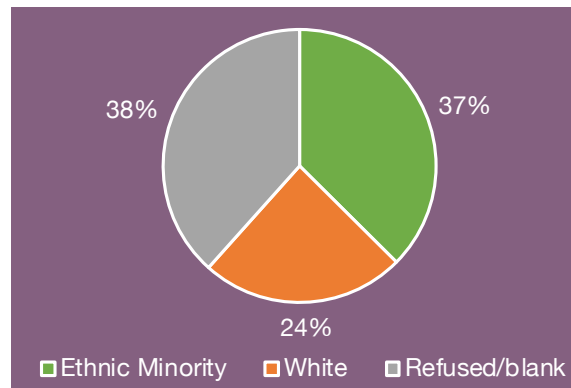
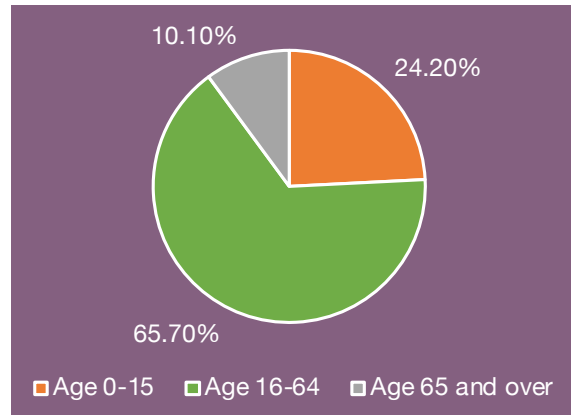
9.3 EQIA DATA 2020/21

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 Race 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.

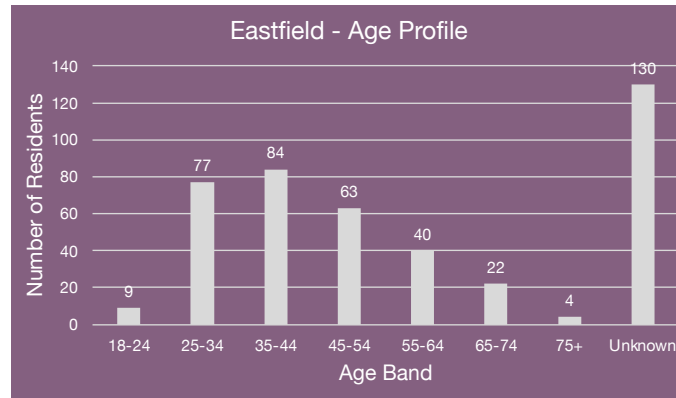
CORE CHARACTERISTICS OVERVIEW



9 EQUALITIES DATA

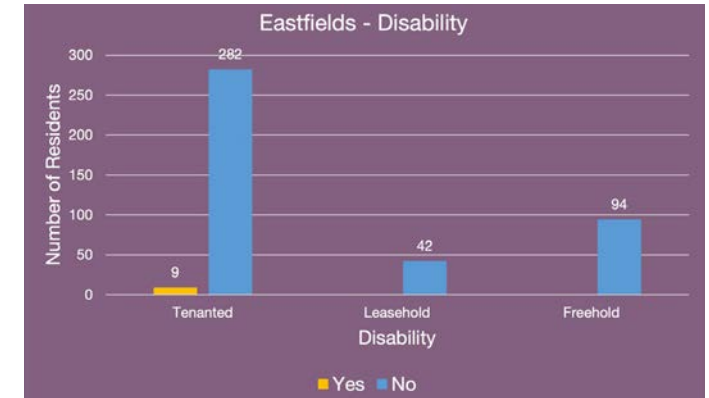
AGE

9.3.3 The existing population in and around the Eastfields Estate area is characterised by a slightly younger population/age profile compared to the rest of the Borough, particularly in the 0-15 age bracket.

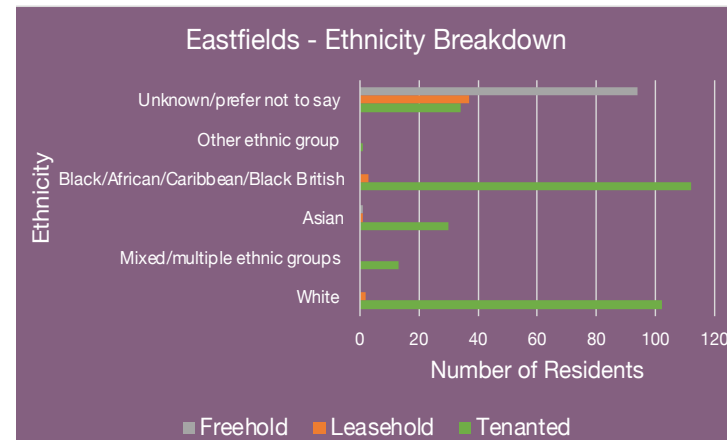


DISABILITY

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 14.1% of people in Eastfields state that they have a long-term disability or health problem that limits their day-to-day activity either 'a lot' or 'a little'. These figures are broadly in line with the London average of 14.1%. In Merton the proportion is 12.6%.



ETHNICITY

9.3.6 24% of residents in Eastfields are White British which is less than the proportion of people from an ethnic minority group (37%).

9 EQUALITIES DATA

9.4 CURRENT HOUSING OFFER

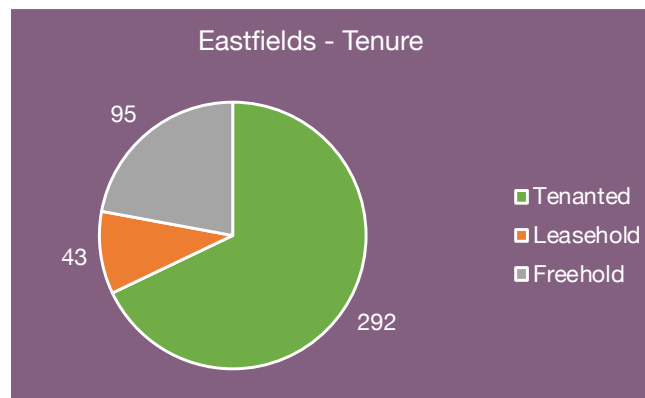
TENURE

9.4.1 Eastfields Estate has the highest proportion of freeholders of the three estates (22%). Freeholders own both the land and the building that it sits on.

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"> » Providing the right type of housing for different households of all age groups including older residents and families with young children. » Any necessary accessibility adaptations can be fitted in the replacement home from the outset. 	<ul style="list-style-type: none"> » A decanting matrix tool was used to help place residents within the proposed development based on their needs. » 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.
Disability	<ul style="list-style-type: none"> » Provision of lifetime homes and adapted properties for resident and household members with specific needs. 	<ul style="list-style-type: none"> » 10% of homes adaptable to be fully wheelchair accessible. » Improved external environment will create more accessible and usable open spaces. » Disabled parking bays that comply with the minimum disability standards will be provided. » Inclusive play spaces will be provided that are accessible and welcoming to disabled and non-disabled children.
Pregnancy and maternity	<ul style="list-style-type: none"> » 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. 	<ul style="list-style-type: none"> » New development designed to accommodate pushchairs and play facilities. » All new homes will have private outdoor space.

10 EQUALITIES ASSESSMENT

PROTECTED CHARACTERISTICS	NEGATIVE EFFECTS	
	Indirect	Direct
Age	<ul style="list-style-type: none"> » 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. » 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. » Older homeowners may not raise mortgage on new properties/ Older residents may find it difficult to access funding or credit. » 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 	<ul style="list-style-type: none"> » No direct negative impacts identified.
Disability	<ul style="list-style-type: none"> » 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. » Disturbance of moving and quality of life, particularly if disability associated with breathing conditions. » Sensory impairment and nervous system conditions – particularly construction machinery noise. » New physical layout will be challenging to those with visual impairment » People with learning difficulties may need separate forms of communication and engagement to enable their understanding of the reality of their situation. » Potential negative impact on individuals with mental health issues. 	<ul style="list-style-type: none"> » No direct negative impacts identified.
Pregnancy and maternity	<ul style="list-style-type: none"> » Disruption during construction period may negatively impact on pregnant mothers or families with new born children e.g. noise, dust, access issues. » Disruption during decanting/moving home. » Allocated home may no longer be suitable for needs - double decanting. 	<ul style="list-style-type: none"> » No direct negative impacts identified.

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"> » 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. » Lack of written and oral English may have affected some residents' awareness of the proposals and capability to negotiate outcomes for tenants and leaseholders. » Negative impacts of other protected characteristics will be experienced by ethnic minority groups given the estate's diversity. 	<ul style="list-style-type: none"> » No direct negative impacts identified
Marriage and Civil Partnership	<ul style="list-style-type: none"> » No indirect negative impacts identified. 	<ul style="list-style-type: none"> » No direct negative impacts identified.
Gender reassignment	<ul style="list-style-type: none"> » No indirect negative impacts identified. 	<ul style="list-style-type: none"> » No direct negative impacts identified.

10 EQUALITIES ASSESSMENT

PROTECTED	POSITIVE EFFECTS	
CHARACTERISTICS	Direct	Indirect
Religion or Belief	» No direct positive impacts identified.	<ul style="list-style-type: none"> » No aspects that prevent residents from practicing their religion/faith » 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 » Religious and cultural requirements for specific washing facilities and separate kitchens and living areas have become apparent » 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.
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 this 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.

10.3.3 The Eastfields Estate regeneration will help to address the socio-economic inequalities of the area. Eastfields Estate 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 Eastfields Phase 1 without development:

- ❑ Increased unemployment and a large proportion of residents in receipt of out-of-work benefits relating to poor health
- ❑ Low quality housing and residential environments which is likely to heighten concerns over child poverty
- ❑ Levels of youth unemployment constraining the skills and occupation profile and long-term employability of the local population.

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 Eastfields estate 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
Eastfields [4 residents]	FH	Age + Possible Mental Health
	FH	Age + Ethnicity
	FH	Age + Limited English
	FH	Age + Ethnicity

11 PHASING AND DELIVERY

11.1 PHASING AND DELIVERY

11.1.1 The redevelopment of the Eastfields Estate will come forward in three phases. The phases have been designed to ensure minimum disruption to existing residents. The phasing proposed is:

- Phase 1 201 Units
- Phase 2 125 Units
- Phase 3 474 Units

In total, Eastfields Phases 1-3 will provide up to 800 homes. Redevelopment of the Eastfields Estate has not yet commenced. Unlike both Ravensbury Estate and High Path Estate, there is no kick-start element to the proposed regeneration. The proposed Phasing Plan for Eastfields is set out in the table below.

EASTFIELDS		
Phase	Start on Site	Practical Completion
EP1	2023	2026 Q4
EP2	2026	2028 Q3
EP3	2028	2031 Q3
EP4	2031	2033 Q2

Key

-  Site boundary
-  Maximum development zone
-  Phase 1a
-  Phase 1b
-  Phase 2
-  Phase 3
-  Phase 4



11 PHASING AND DELIVERY

11.2 DECANTING STRATEGY

- 11.2.1 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.
- 11.2.2 Wherever possible residents will move straight into their new permanent replacement home regardless of whether they are tenants, leaseholders or freeholders. The first phase of regeneration on Eastfields will be replacement homes for existing residents. Eastfields will be delivered as phased regeneration schemes to enable homes on parts of the estates to be emptied, then demolished and rebuilt over time.
- 11.2.3 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.

- 11.2.4 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

- 11.2.5 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.
- 11.2.6 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

- 11.2.7 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.
- 11.2.8 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.
- 11.2.9 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

- 11.2.10 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 PHASING AND DELIVERY

11.3 DECANTING IMPACTS

EASTFIELDS

- 11.3.1 Clarion has not been able to build a kick start phase to provide a supply of new replacement homes at the start of the regeneration of the Eastfields Estate because there is no land available. The first phase can therefore only be built once residents move out temporarily whilst the first homes are built. This is now underway.
- 11.3.2 Wherever possible those who have to move temporarily will move into homes in the later phases. The temporary accommodation will be mostly homes that have been acquired from homeowners who sold their homes and moved away. These homes will be brought up to a lettable standard and used until the permanent replacement homes are completed. The first of these new homes will be ready in 2026.
- 11.3.3 By using homes that have been acquired, rather than those that LB Merton has nomination rights to under the terms of the stock transfer agreement, Clarion can minimise the impact on the supply of social/affordable housing whilst regeneration is underway. It also means that residents can stay in their neighbourhood and maintain their family, work, school, social and services links and networks.
- 11.3.4 The decant strategy at Eastfields means that some of the acquired homes that are being used as temporary housing now will have to be taken back by Clarion. Where possible and with the agreement of LB Merton the households that have been housed in temporary accommodation will be moved to other homes in the regeneration area that are available because their former occupants have now moved to their permanent replacement homes. These residents are housed on the basis of Shorthold Assured Tenancies (AST's). These AST's are offered by the London borough of Merton. Any decision to relocate these residents will need to be confirmed with the London borough of Merton.
- 11.3.5 At Eastfields 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. All of the existing residents at Eastfields will have moved to their permanent replacement home once Phase 2 is complete.

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 standards
- Significant improvements to the quality of the public realm with improved links to surrounding open space
- Improvement to existing community facilities such as new place spaces
- High quality urban design and architecture.

BENEFIT	EASTFIELDS
Construction impacts	
Creation of temporary construction jobs per annum	130
Construction Gross Value Added	£42.5 million
Construction Net Value added to Merton	£10.2 million
Economic impact of housing	
Net expenditure increase per annum	£7.5 million
Additional Council Tax Revenue per annum	£880,000
Economic impacts of commercial development	
Job Creation	115
Estimated gross added value per annum	£5.3m

13 CONCLUSIONS

- 13.1 The report provides an update to the initial Equalities Impact Analysis work undertaken between 2015-17 in relation to the regeneration of the Eastfields 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 on Eastfields will all be replacement homes for existing residents. The regeneration will be delivered in phases to enable homes 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 Clarion has not built a 'kick start' phase at Eastfields as there was no land available. The early phases of regeneration 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 Eastfields 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.

13.15 Steps are being taken to ensure that the acquisition and relocation process are applied in a fair and non-discriminatory manner. However, it is acknowledged that the process of redeveloping the Estates itself may have a negative impact on older, disabled and vulnerable residents, due to the requirements to move house, potentially more than once, if temporary accommodation is necessary during the construction period. The EqIA will be monitored and reviewed throughout the progression of the proposals in order to ensure that any future impact can be measured and mitigated against as necessary

13.16 In delivering Phase 1 of the Eastfields Estate redevelopment, Clarion will seek to keep the existing community together with existing residents having a guaranteed right to return to a new home in their regeneration neighbourhood.

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
Ethnicity	<ul style="list-style-type: none"> 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. 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. 	<ul style="list-style-type: none"> 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. Lack of written and oral English may have affected some residents' awareness of the proposals and capability to negotiate outcomes for tenants and leaseholders. Negative impacts of other protected characteristics will be experienced by ethnic minority groups given the estate's diversity. 	<ul style="list-style-type: none"> 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. 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. 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. Clarion has recorded each contact and interaction with every homeowner since the regeneration was first proposed. 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. 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.

APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
Gender	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"> • 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 Eastfields 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. • 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. • 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. • 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.
Gender Reassignment			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	
Disability	<ul style="list-style-type: none"> • Provision of lifetime homes and adapted properties for residents and household members with specific needs. • Proportion of homes designed and built specifically to meet the needs of disabled residents. • 10% of homes adaptable to be fully wheelchair accessible. • A better living environment is conducive to better health and well-being. • Improved external environment will create more accessible and usable open spaces. • Disabled parking bays that comply with the minimum disability standards will be provided. • Inclusive play spaces will be provided that are accessible and welcoming to disabled and non-disabled children. • There will be seating provided to assist disabled parents/carers to supervise play in the spaces provided. 	<ul style="list-style-type: none"> • 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. • Disturbance of moving and quality of life, particularly if disability associated with breathing conditions. • Sensory impairment and nervous system conditions – particularly construction machinery noise. • New physical layout will be challenging to those with visual impairment • People with learning difficulties may need separate forms of communication and engagement to enable their understanding of the reality of their situation. • Potential negative impact on individuals with mental health issues. 	<ul style="list-style-type: none"> • Homeowners with disabilities will have the same compensation and housing entitlement under Clarion's residents' offer as everyone else. • 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 Eastfields. All of the homes in the first phase of development will be replacement homes for existing residents. • 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. • All homes will have level access either at ground level or at entry level, with lift access where it is above the ground floor. The only exception to this at the first phase on Eastfields are three upper maisonettes where access is via stairs to the entrance at the second floor level. • 10% of the homes in the new Eastfields development will be fully wheelchair adaptable, a far greater proportion than currently provided (3 homes). • There are only three wheelchair accessible homes on Eastfields now and Clarion want to move those residents into their new homes at the earliest opportunity. Those 3 are 3 of the 10 that will be built in phase 1. • There are 10 wheelchair accessible homes in Phase 1. At present only a small number of ground floor flats have been adapted to be accessible with a wheelchair. • A number of the homes in the first phase at Eastfields 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. Three of the existing residents who use a wheelchair will have homes designed specifically to meet their needs. • 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.

APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
Disability	Cont.	Cont.	<ul style="list-style-type: none"> 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. 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. 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. 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.

APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
Age	<ul style="list-style-type: none"> Providing the right type of housing for different households of all age groups including older residents and families with young children. Shared outdoor leisure space for all ages and play spaces specifically for younger and older children have been designed into the new Eastfields. Any necessary accessibility adaptations such as grab rails or accessible electrical outlets can be fitted in the replacement home from the outset. 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. 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. 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. Walking routes will account for the needs of the whole community, for example those with vision impairment and those with mental disabilities (including dementia). 	<ul style="list-style-type: none"> 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. Older people are more settled and require support when moving. 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. Older homeowners may not raise mortgage on new properties/ Older residents may find it difficult to access funding or credit. Age related ill health or frailty may make the prospect of moving more difficult for older homeowners. 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. 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. 	<ul style="list-style-type: none"> Homeowners of any age will have the same compensation and housing options as everyone else. 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. 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. 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. 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. Ensure that tenants, particularly those who are older, only move once into their new homes.

APPENDIX 1: Impacts + Mitigation

IMPACT ANALYSIS			MITIGATION
PROTECTED CHARACTERISTICS	COMMENTARY		
	POTENTIAL POSITIVE IMPACTS	POTENTIAL NEGATIVE IMPACTS	
Sexual Orientation			Homeowners of any sexual orientation will have the same compensation and housing options as everyone else.
Religion and belief			<ul style="list-style-type: none"> Homeowners of any religion and belief will have the same compensation and housing options as everyone else. No aspects that prevent residents from practicing their religion/faith 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. All facilities will be available to people of all cultures and faiths.
Pregnancy and Maternity	<ul style="list-style-type: none"> 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. New development designed to accommodate pushchairs and play facilities. All new homes will have private outdoor space. 	<ul style="list-style-type: none"> Disruption during construction period may negatively impact on pregnant mothers or families with new born children e.g. noise, dust, access issues. Disruption during decanting/moving home. Allocated home may no longer be suitable for needs - double decanting. 	<ul style="list-style-type: none"> Homeowners who are pregnant or who have very young children will have the same compensation and housing options as everyone else. 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. 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. All new homes will have private outdoor space for children to play Each of the new neighbourhoods will have high quality play space for children of different ages.
Marriage and Civil Partnership			<ul style="list-style-type: none"> 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.

APPENDIX 2: Data Sources

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



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