

Equalities Analysis Assessment

1. Proposal Summary Information

EAA Title	South Acton Regeneration Programme
Please describe your proposal?	Project
Is it HR Related?	No
Corporate Purpose	Officer Decision

1. What is the Scheme looking to achieve? Who will be affected?

The South Acton regeneration programme is a holistic redevelopment project that aims to replace 1,860 life-expired Council properties with circa 3,400 new mixed tenure accessible homes. Extensive new infrastructure, commercial and community facilities will be developed in tandem with this multi-phased 18-year project.

The proposals have place residents at their heart and extensive resident consultation has taken place during the selection of a developer partner to carry-out the project, whilst developing a 'masterplan' to steer the physical design improvements and in the design of each 'reserved matters' planning consent by phase. An elected South Acton Community Board with a resident majority and chair guides the development, and holds the developer and Council to account. All existing Secure Tenants are given priority for the new homes, and leaseholders can choose to move to one of the new shared equity homes – thus keeping the resident community intact.

This EAA comes at approximately the mid-point of the project. Previously, a full EIA was conducted to evaluate any potential impact of the scheme on groups with protected characteristics in 2008. Initial EIA screenings were also carried-out in 2009 and 2010 to examine any differential impacts prior to decanting phases 3 and 5 of the project. No potential impacts were identified at that stage.

Aside from formalised assessments of this type the Council and developer, Acton Gardens LLP, commissioned the Social Studies Faculty of Reading University in 2014 to conduct a ground-breaking longitudinal study of the effects of the regeneration programme as it progresses. This involves in-depth interviews of a representative sample of residents living on or near to the Estate, both living in properties earmarked for redevelopment, and those who have already moved to the new homes constructed as part of the scheme. Repeated bi-annually, the survey highlights areas, both positive and negative, where the regeneration programme has influenced:

- Well-being and sense of community & neighbourliness
- Views and opinions about the regeneration programme
- How effectively residents feel they are able to exercise their voice to influence the regeneration proposals
- A comparative measure of the quality and quantum of open spaces, amenities and social infrastructure.

The results of the reports are analysed by the resident-led Community Board and an action plan based on feedback is produced to ensure the proposals for the estate are in accord with the views and feelings of residents.

Equalities Analysis Assessment

2. What will the impact of your proposal be?

The 52 existing blocks of varying design typology are being replaced on a phased basis with new homes in four distinct neighbourhoods. Each neighbourhood is being constructed around a brand new or refurbished park or open space. All new homes will be built to Homes for Life accessibility standards (with 10% being fully wheelchair adaptable), good space standards (London Design Guide) and very good levels of sustainability (equivalent to Eco Homes Level 4 rating).

In addition to new housing, there will be additional community facilities, including:

- A brand-new community centre including GP and dental surgeries, a new youth centre, nursery premises and an improved range of shops, including a Sainsburys Local store.
- Three existing, life expired sheltered blocks are to be replaced by a flexible development for older people with better facilities.
- Transport – replacing cul-de-sacs and some of the existing/confusing road network with a more traditional street pattern, with an active street frontage and extensive traffic calming. A new avenue linking north-south with Acton High Street will improve connectivity. A new bus service is also being funded to run through the development.

The scheme is being delivered in phases over an 18-year period to 2027. All existing residents will have been moved (or decanted) by late 2026.

2. Impact on Groups having a Protected Characteristic

AGE: *A person of a particular age or being within an age group.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

According to LSOA data from the 2011 census, the ward of South Acton (the majority of which is comprised of the South Acton Estate) has a higher percentage of young people (0-14 years and 14-24 years) compared to the LB Ealing, London and national averages, and a lower percentage of those aged over 65 years.

Positive – the three poor quality sheltered blocks will be replaced by a brand new Over 55s scheme of mixed tenure. This will be a fully-accessible development with additional features as guided by residents at detailed design stage. As a minimum, there will be a more intensive housing management service with health & wellbeing advisors to assist older people with everyday lives and activities and a building that is designed with the needs of older people in mind. There will be a specific dementia care service.

All the new homes being built at the 'new' South Acton will be built to high accessibility standards irrespective of tenure type, and ten percent will be fully wheelchair adaptable.

Positive – the scheme includes for the recruitment of local apprentices to assist young people into the construction industry.

Negative – in line with the expectation of residents, much of the process for moves is now conducted online. It is appreciated that many older people do not have the skill set to complete forms digitally, or have access to the internet or hardware required to do this.

Equalities Analysis Assessment

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

Describe the Mitigating Action

Every resident is given access to a named site-based Regeneration Officer who is available to visit in person or via the phone to assist with the moving process. One-to-one assistance is given using tablet PCs and home visits can be arranged by appointment.

DISABILITY: A person has a disability if s/he has a physical, mental or sensory impairment which has a substantial and long term adverse effect on their ability to carry out normal day to day activities¹.

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Although direct information relating to disability is unavailable, the data for Long Term Limiting Illness can be used as a proxy for this measure. The latest Ward level data available shows South Acton to have fewer residents reporting their 'daily activities limited a lot' as 8%. This compares to 7% in the borough as a whole and 9% in England and Wales.

Positive – All new homes are built to high levels of accessibility, irrespective of tenure type. Ten percent of all new homes are fully wheelchair adaptable.

Negative – People with a physical or mental disability are likely to require a higher level of practical support throughout the move process.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

Describe the Mitigating Action

Individuals with disabilities are identified as part of an initial Housing Needs Survey. Home visits are provided where requested.

Named site-based Regeneration Officers are available to assist people with disabilities at a practical level, liaising with care managers and occupational therapists to ensure moves go smoothly. Any aids and adaptations are provided from when a person moves to one of the new homes following an OT assessment. The cost of providing aids and adaptations is met by the scheme, except in the case of very specialised pieces of equipment. In such cases, staff assist individuals to apply for funding from various sources.

On move day, a person with disabilities can be provided with as much practical assistance as they require. This can include help with packing and unpacking if needed.

¹ Due regard to meeting the needs of people with disabilities involves taking steps to take account of their disabilities and may involve making reasonable adjustments and prioritizing certain groups of disabled people on the basis that they are particularly affected by the proposal.

Equalities Analysis Assessment

GENDER REASSIGNMENT: <i>This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
No specific information relating to the number or percentage of people who have reassigned gender is available for the South Acton Ward, the borough or England & Wales. Neutral - No specific differential affects are anticipated.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
<i>(Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.)</i>

RACE: <i>A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
According to LSOA data, 57% of residents in the South Acton Ward identify themselves as being white, 15% Asian and 16% black. This compares with 49% as white, 16% black and 30% Asian in the wider borough, and 60%, 18% and 13% respectively in London. Fifty percent of residents were born in the UK. This compares to 52% in the borough as a whole and 87% nationally. A total of 26% of people not born in the UK were from EU states, plus 3% from Ireland. Sixteen percent of residents in the South Acton Ward reported arriving within the last 10 years. This compares with 24% in the borough as a whole and 7% nationally. In relation to languages, 66% report English as their first language, the same as for the borough as a whole, and 92% nationally. The two most commonly-spoken languages after English are Polish (9%) and Somali (4%). Positive: As with the borough as a whole South Acton ward has a diverse population with approximately 40 percent of resident being non-UK born, with particularly high percentages of people from the former EU accession states and of Somali origin. The aim of the regeneration programme from the outset has been to ensure the current community at South Acton are able to stay living in the area should they choose to do so. Positive: The extensive nature of community consultation undertaken at South Acton to date has put great emphasis on the requirement for language translation, both written and oral.

Equalities Analysis Assessment

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

Describe the Mitigating Action

The scheme ensures that existing residents have priority for all new homes being constructed. The aim is that residents can simply move to their new homes without having to be double-decanted. Similarly, existing leaseholders (many of whom bought under the Right to Buy and are no longer economically active) are able to move to a choice of one of the new homes on a 'shared equity ownership' basis. This enables a leaseholder to purchase a new home of the same size as they currently live by putting down the agreed value of their existing home. No 'rent' or interest is payable on the outstanding sum, which is held by the housing association as a second charge on the property.

Extensive use of translators was made during the public consultation events when developing the masterplan for the new Acton Gardens. Key publications and letters all contained a translation panel in seven of the community languages with a number to contact should written translation be required. The bespoke website www.yoursouthacton.co.uk can be translated into many languages uses Google Translate.

RELIGION & BELIEF: *Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

According to census data, 49% of the population of the South Acton Ward are of Christian belief. This compares to 44% in the wider borough and 59% nationally. The most common religion after Christianity is the Muslim faith, equal to No Faith at 19%. This compares to 15% and 5% nationally respectively.

Overall neutral - No differential impact on people of a particular religion or belief is anticipated.

Positive – Residents from some religions culturally tend to have larger families. The bedsize mix for the new development will be more geared towards larger family-sized homes than currently exists at South Acton. Whereas around one-third of homes are currently family-sized, this will increase to approximately two-thirds family-sized (2-bed, 4 person) accommodation once the scheme has been completed.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

Describe the Mitigating Action

(Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.)

Equalities Analysis Assessment

SEX: <i>Someone being a man or a woman.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
Neutral - No specific differential affects are anticipated.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
<i>(Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.)</i>

SEXUAL ORIENTATION: <i>A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes, covering including all LGBTQ+ groups.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact
No specific information relating to the number or percentage of people who are gay, lesbian, bi-sexual or transgender is available for the South Acton Ward, the borough or England & Wales. Neutral - No specific differential affects are anticipated.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
<i>(Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.)</i>

PREGNANCY & MATERNITY: <i>Description: Pregnancy: Being pregnant. Maternity: The period after giving birth - linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact

Equalities Analysis Assessment

No specific information relating to the number or percentage of people who are pregnant is available for the South Acton Ward, the borough or England & Wales.

Neutral - No specific differential affects are anticipated.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

Describe the Mitigating Action

(Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.)

MARRIAGE & CIVIL PARTNERSHIP: *Marriage: A union between a man and a woman, or of the same sex, which is legally recognised in the UK as a marriage*
Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Neutral - No specific differential affects are anticipated.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

Describe the Mitigating Action

(Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.)

3. Human Rights²

4a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?

Yes No

² For further guidance please refer to the Human Rights & URNC Guidance on the Council Equalities [web page](#).

Equalities Analysis Assessment

A property owner has the right to respect for his/her private and family life and home and there shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary for the economic well-being of the country (Article 8). The exercise of powers of compulsory purchase by the Council in accordance with statute is considered a proportionate course of action to secure the extensive social and economic benefits which will follow from the implementation of this major housing scheme.

A person is entitled to the peaceful enjoyment of his/her possessions and no one shall be deprived of his/her possessions except in the public interest and subject to the conditions provided for by law (Article 1 of the First Protocol). The Council is permitted to control the use of property in accordance with the general interest and the exercise of powers of compulsory purchase in accordance with statute is considered a proportionate course of action to secure in the general interest the implementation of this major housing scheme.

4b. Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?

Yes No

(If yes, please describe the effect and any mitigating action you have considered.)

4c. Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the rights of persons with disabilities?

Yes No

(If yes, please describe the effect and any mitigating action you have considered.)

4. Conclusion

The regeneration of South Acton is intended to transform this existing life-expired and largely mono-tenure neighbourhood into a thriving mixed community. The quality of accommodation, open spaces, commercial and community assets will be transformed. The estate will become an area where people choose to live rather than one where they are allocated a Council home, often against their wishes.

The scheme is intended to raise the quality of life and opportunities of all those who live at South Acton currently, irrespective of their protected characteristics.

4a. What evidence, data sources and intelligence did you use to assess the potential impact/effect of your proposal? Please note the systems/processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.

The South Acton Estate largely covers the entirety of the South Acton electoral ward. For the purposes of this exercise data has been utilised from Census LSOA data.

Equalities Analysis Assessment

5. Action Planning: *(What are the next steps for the proposal please list i.e. when it comes into effect, when mitigating actions linked to the protected characteristics above will take place, how you will measure impact etc.)*

Action	Outcomes	Success Measures	Timescales/ Milestones	Lead Officer <i>(Contact Details)</i>

Additional Comments:

6. Sign off: *(All EAA's must be signed off once completed)*

Completing Officer Sign Off:	Service Director Sign Off:	<i>HR related proposal (Signed off by directorate HR officer)</i>
Signed: <i>David Colley</i> Name (Block Capitals): David Colley Regeneration Manager Date: 23 rd February 2021	Signed:  Name (Block Capitals): Philip Browne Director of Housing Development Date: 26 th February 2021	Signed: Name (Block Capitals): Date:

For EAA's relating to Cabinet decisions: received by Committee Section for publication by (date):

Equalities Analysis Assessment

Appendix 1: *Legal obligations under Section 149 of the Equality Act 2010:*

- As a public authority we must have due regard to the need to:
 - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- The protected characteristics are: AGE, DISABILITY, GENDER REASSIGNMENT, RACE, RELIGION & BELIEF, SEX, SEXUAL ORIENTATION, PREGNANCY & MATERNITY, MARRIAGE & CIVIL PARTNERSHIP

- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
 - a) Remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - b) Take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the persons who do not share it.
 - c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.

- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.