

Cabinet

Tuesday 7 January 2025
11.00 am

Walworth Town Hall, 151 -155 Walworth Road, London SE17 1RS

Supplemental Agenda No. 2

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Date: 6 January 2025

Legal Concurrent for Corporate Parenting Annual report for 2023-24**SUPPLEMENTARY ADVICE FROM OTHER OFFICERS****Assistant Chief Executive: Governance and Assurance (JH ON 6.01.2025)**

1. The purpose of this report is to provide cabinet with a report in accordance with paragraph 9 of Part 3J of the council's constitution, relating to the Corporate Parenting Committee, describing one of its roles and functions to report to the council's cabinet on an annual basis.
2. Definitions for children looked after and local authority responsibilities are set out in Sections 1 of the Children and Social Work Act 2017, Part 3 of the Children Act 1989, The Care Planning, Placement and Case Review (England) Regulations 2010 as amended and the Care Planning, Placement and Case Review and Fostering Services (Miscellaneous Amendments) Regulations 2013.
3. Section 1 (1) of the Children and Social Work Act 2017 introduces seven core principles that local authorities as the corporate parent must have regard to when exercising their functions in relation to looked after children and young people,
 - to act in the best interests, and promote the physical and mental health and wellbeing, of those children and young people
 - to encourage those children and young people to express their views, wishes and feelings
 - to take into account the views, wishes and feelings of those children and young people
 - to help those children and young people gain access to, and make the best use of, services provided by the local authority and its relevant partners
 - to promote high aspirations, and seek to secure the best outcomes, for those children and young people
 - for those children and young people to be safe, and for stability in their home lives, relationships and education or work; and
 - to prepare those children and young people for adulthood and independent living.
4. Section 1 (2) of this Act defines looked after children and young people as those in local authority care, relevant children and young people under 25 years old who are continuing education and training.

“Section 1 (2) stipulates that the children and young people being referred to in the corporate parenting principles are;

- *(a)children who are looked after by a local authority, within the meaning given by section 22(1) of the Children Act 1989;*
- *(b)relevant children within the meaning given by section 23A(2) of that Act;*
- *(c)persons aged under 25 who are former relevant children within the meaning given by section 23C(1) of that Act.”*

5. Pursuant to the principles under Section 1, the role and function of the Corporate Parenting Committee in Southwark is to review and monitor the council's role as a corporate parent.
6. Part 3J of the Southwark's constitution sets out the specific roles and responsibilities of the Corporate Parenting Committee [3J Corporate Parenting Mar 2023.pdf \(southwark.gov.uk\)](#). In particular, paragraph 9 stipulates that the Committee is to *“report to the council's cabinet on an annual basis”*.
7. Whilst the constitution does not stipulate the format or what information must be contained in that report; the annual report should be aligned with the core principles under the Children and Social Work Act 2017 and should set out how Southwark has met those statutory requirements over the financial year. This can also include consideration of the impact of Southwark's Corporate Parenting Strategy.

(2)The children and young people mentioned in this subsection are—

- (a)children who are looked after by a local authority, within the meaning given by section 22(1) of the Children Act 1989;
- (b)relevant children within the meaning given by section 23A(2) of that Act;
- (c)persons aged under 25 who are former relevant children within the meaning given by section 23C(1) of that Act.

8. 2)The children and young people mentioned in this subsection are—

9. (a)children who are looked after by a local authority, within the meaning given by section 22(1) of the Children Act 1989;
10. (b)relevant children within the meaning given by section 23A(2) of that Act;
11. (c)persons aged under 25 who are former relevant children within the meaning given by section 23C(1) of that Act.

Agenda Item 15

Meeting Name:	Cabinet
Date:	7 January 2025
Report title:	Tustin Estate Update and Phase 2 Compulsory Purchase Order
Cabinet Member:	Councillor Helen Dennis, Cabinet Member for New Homes and Sustainable Development
Ward(s) or groups affected:	Old Kent Road
Classification:	Open
Reason for lateness (if applicable):	Not applicable

FOREWORD - COUNCILLOR HELEN DENNIS, CABINET MEMBER FOR NEW HOMES AND SUSTAINABLE DEVELOPMENT

Following on from a successful resident ballot in 2021 (to redevelop the Tustin Estate) and the Cabinet resolution on 16 September 2024 (to use, in principle, compulsory purchase powers) this Cabinet report:

- (a) provides an update on the further progress made on the Tustin Estate regeneration to date; and
- (b) seeks the Cabinet's approval to use compulsory purchase powers to facilitate the delivery of Phase 2 of the proposed Tustin Estate regeneration project.

Over the course of the phased regeneration of the Tustin Estate, a total of 690 homes will be delivered, including replacement council homes, 220 additional council and keyworker homes, and 220 homes for sale. Wider estate improvements will be delivered including additional greening, walking and cycling routes, connection to SELCHP and EV charging points, resulting in significant carbon reductions.

I am pleased that the Tustin Estate regeneration project is keeping to programme with phase 1 well underway and the reserved matters planning application (in respect of Phase 2 of that project) was submitted in August 2024.

As the second phase of the rebuild requires the demolition of some of the old blocks on the Tustin Estate, we are taking reasonable steps to buy back leaseholder properties by agreement. In September 2024, Cabinet resolved that it be agreed, in principle, to use the Council's compulsory purchase powers under section 226 (1)(a) of the Town and Country Planning Act 1990 and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 for the acquisition of all outstanding land and interests. This report now asks Cabinet to approve the use of the Council's compulsory purchase powers to acquire outstanding land and interests, so as to enable the continued delivery of the Tustin Estate regeneration including the delivery of 295 new homes in Phase 2.

I want to thank the Tustin Estate Community Association and the Resident Project

Group for all their input and support.

RECOMMENDATION(S)

Recommendation(s) for the Cabinet

1. That the Cabinet note:
 - 1.1. the current position in relation to the delivery of 295 new homes at Phase 2 of the Tustin Estate redevelopment;
 - 1.2. As referred to in the 16 September 2024 Cabinet Report
 - 1.2.1 A development partnership with BY Development Ltd (trading as Linkcity) to deliver the Estate Redevelopment, along with the financial plan to deliver the scheme, was agreed by cabinet in October 2022;
 - 1.2.2 The council appointed BY Development Ltd (trading as Linkcity) to bring forward the phased rebuilding of the Tustin Estate under a Development Agreement dated 8 November 2022;
 - 1.3. A planning application for Phase 2 was submitted in August 2024, with an expected target date for planning permission in January 2025;
 - 1.4. The council has now successfully acquired 13 leaseholder interests in Heversham House;
 - 1.5. Only 15 leaseholder interests now remain outstanding in Heversham House;
 - 1.6. The council is taking and will continue to take reasonable steps to acquire remaining leaseholder interests situated within Heversham House by agreement; and
 - 1.7. The council is offering to rehouse all resident leaseholders who want to stay on the rebuilt Tustin Estate, a new leasehold home on a shared ownership or shared equity loan basis in Phase 1 or 2. Phase 1 is anticipated to complete in April 2025.
2. That the Cabinet agree to use its compulsory purchase powers under Section 226(1)(a) of the Town and Country Planning Act 1990 ("the 1990 Act") and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 for the acquisition of all land and interests (which are not already owned by the Council) within the area of land shown edged black and bold on the plan at Appendix 2 ("the CPO Land") for the purposes of facilitating the redevelopment, development and improvement of the land and securing the delivery of new homes on the site in line with the planning application for Phase 2 and thereby securing the continued redevelopment of the Tustin Estate.
3. That the Cabinet agree that the Director of Planning and Growth, in consultation with the Managing Director of Southwark Construction, be authorised on behalf of the Council to:
 - 3.1. Take all necessary steps to secure the making, confirmation, and implementation of the Compulsory Purchase Order ("CPO"), including land

referencing, serving any requisitions for information, preparing all necessary documentation (including the CPO, the Order Plan and Statement of Reasons), the submission of the CPO to the Secretary of State, the publication and service of all notices and the presentation of the Council's case at public inquiry should one be called.

- 3.2. Acquire for planning purposes all land and interests in land and new rights (which are not already owned by the Council) within the CPO Land and wider masterplan area as may be necessary to facilitate the Scheme either by agreement or compulsorily, including entering into negotiations with any third parties for the acquisition of the land interests and/or for new rights over their land (as appropriate), the payment of compensation and dealing with any blight notices served in connection with the CPO;
- 3.3. Dealing with objections to the CPO including approving agreements with land owners setting out the terms for the withdrawal of objections to the CPO, including where appropriate seeking the exclusion of land or new rights from the CPO or giving undertakings as to the enforcement of the terms of the CPO;
- 3.4. Remove from the CPO any plot or interest therein no longer to be acquired compulsorily and to then amend the interests in the scheduled CPOs (if so advised);
- 3.5. Make any minor additions, deletions, or amendments to the extent of the land as shown on the plan at Appendix 2 should the need arise, to include all land and interests in land and rights required to facilitate the construction, maintenance, and use of the Scheme;
- 3.6. Take all necessary actions in relation to any legal proceedings relating to the CPO, including defending or settling (as appropriate) any compensation claims referred to the Lands Chamber of the Upper Tribunal due to the making, confirmation or implementation of the CPO, and to take all necessary steps in respect of any other legal proceedings that relate to the making, confirmation or implementation of the CPO;
- 3.7. Appoint and/or retain such external professional advisors and consultants as are necessary to assist the council in facilitating the Scheme, including in the promotion of the CPO and the settlement of any compensation claims;
- 3.8. Make any amendments to the Statement of Reasons annexed at Appendix 5 to this Report as are considered necessary prior to its submission to the Secretary of State;
- 3.9. Confirm the CPO if granted the power to do so by the Secretary of State;
- 3.10. Exercise the compulsory purchase powers authorised by the CPO by way of General Vesting Declaration(s) and or notice(ss) to treat.

4. That the Cabinet agree to delegate to the Director of Planning and Growth:
 - 4.1 To negotiate and enter into off-plan sales agreements in Phases 1 and 2 of

the new development with resident leaseholders on the Estate who qualify for a new council home.

5. That Cabinet resolves to:
 - 5.1. Approve the commencement of statutory consultation with secure tenants, pursuant to Part 5 of Schedule 2 to the Housing Act 1985, regarding the proposal to seek the Secretary of State's approval for the redevelopment Scheme for the purpose of Ground 10A, Schedule 2 Housing Act 1985;
 - 5.2. Agree to obtain vacant possession of Heversham House [and Kentmere House] pursuant to Ground 10/10A of Schedule 2 of the Housing Act 1985 in order to deliver the Scheme.

REASONS FOR RECOMMENDATIONS

6. There are various third party interests in the land at Phase 2 of Tustin Estate. The Council will need to acquire those interests in order to secure vacant possession of Heversham House at Tustin Estate (which it is contractually obliged to do) so as to enable the Scheme, including the demolition works scheduled to commence in summer 2025, to proceed.
7. The use of compulsory purchase powers is crucial to the Scheme's success and Cabinet is therefore being asked to approve the use of compulsory purchase powers.

ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

8. If the council did nothing, there would be no certainty that vacant possession would be delivered and there would be no certainty the scheme would be delivered. Under the Development Agreement, there would be additional costs for delays to start on site if vacant possession cannot be secured in time.

POST DECISION IMPLEMENTATION

Key Activity	Target completion date
Make the CPO, serve and publicise	January 2025

PROPOSALS

BACKGROUND INFORMATION

9. The Cabinet at its meeting dated 16 September 2024 resolved to agree, in principle, to use its compulsory purchase powers under Section 226(1)(a) of the Town and Country Planning Act 1990 ("the 1990 Act") and section 13 of the Local Government Act (Miscellaneous Provisions) 1976 for the purposes of facilitating the redevelopment, development and improvement of the land and securing the delivery of 295 new homes on the site in line with the planning application for Phase 2 ("the Scheme") and thereby securing the continued redevelopment of the Tustin Estate subject to a formal resolution to make a

CPO.

10. This report is supplemental and additional to the report dated 16 September 2024 and requests the Cabinet to resolve formally to make a CPO.
11. As referred to in the report to Cabinet dated 16 September 2024 the Tustin Estate Low Rise Redevelopment Programme is the outcome of a resident-led investment decision into low-rise homes on the Tustin Estate following a detailed feasibility study undertaken by the council between 2019 and 2021 and a resident ballot in March 2021. 87% of the residents voted in favour of the proposal for the redevelopment.
12. The current wider programme comprises:
 - 12.1. Demolition of 250 homes (200 council rented and 51 leasehold);
 - 12.2. Construction of 690 new homes including 199 replacement council homes, 443 additional affordable homes (345 social rent homes and 98 key worker homes), 27 shared equity homes and 220 homes for private sale;
 - 12.3. Refurbishment of council homes in Manor Grove;
 - 12.4. Development of a new park in the centre of the estate;
 - 12.5. Demolition and replacement of Pilgrims' Way School; and
 - 12.6. Construction of new commercial spaces.
13. The Tustin Estate was constructed in the 1960s following the clearance of bomb damaged terraced houses and small industrial premises post the second world war. There is no vehicular route through the estate and the area has limited dedicated cycle paths. It comprises 250 Council homes 51 of which have been purchased under the right to buy regime. The site falls within an area of higher deprivation and the housing is generally considered poor quality due to its poor energy efficiency.
14. As referred to in the 16 September 2024 Cabinet Report it is considered that the redevelopment of the low rise homes will bring about significant economic, social and environmental benefits, including improvements in the quality of homes on the Tustin Estate.
15. A hybrid planning permission was granted for the redevelopment of the Tustin Estate on 27 October 2022 (i.e. being part full (in respect of Phase 1) and part outline in respect of the later phases (phases 2-4) (the "Original Hybrid Permission").
16. Due to changes in building fire safety requirements, particularly on taller buildings, a minor material amendment was proposed to the Original Hybrid Permission to address those fire safety requirements as well as well as resolve minor issues with phasing and land uses. That minor material amendment was

approved on 11 August 2024 (under planning reference 23/AP/3474) pursuant to an application made under section 73 of the Town and Country Planning Act 1990 (the “S73 Permission”).

17. The Scheme for which powers of compulsory acquisition are sought by this Cabinet Report represents the second phase of the Tustin Estate regeneration project and comprises the eastern part of the Tustin Estate and includes the demolition of Heversham House and Kentmere House to facilitate the construction of four buildings (Blocks F1, F2, G2 and H) ranging between 5 and 20 storeys, containing 295 homes as well as amenity space, parking, landscaping and ancillary infrastructure.
18. Due to the nature of the hybrid permissions (i.e. being part full (in respect of Phase 1) and part outline in respect of the later phases (phases 2-4) of the Tustin Estate redevelopment) an application seeking approval of all of the reserved matters in respect of Phase 2 was submitted to the local planning authority in August 2024 for approval. That application is compliant with planning policy (as set out in the draft Statement of Reasons appended to this report) and is pending approval. It is therefore considered that there is no planning impediment to the delivery of the Scheme. Further details about the Scheme and the planning position are referred to in the draft Statement of Reasons appended to this Report.

PURPOSE FOR USING COMPULSORY PURCHASE POWERS

19. Compulsory purchase of the legal interests of the leaseholders, together with any other third party express or implied rights or interests will enable the continued redevelopment of the Tustin Estate in line with the agreed development programme [as set out in the Development Agreement]. The making of the CPO is essential to mitigate the risk that the continued redevelopment of the Tustin Estate is delayed. Whilst the Council will take reasonable steps to seek to acquire any outstanding interests by agreement, it needs to have the power to compulsorily acquire all of the interests in the land shown on the plan appended to this report at Appendix 2 in order to facilitate the timely delivery of the Scheme which forms part of the wider redevelopment of the Tustin Estate.
20. Whilst the Council holds some residential freehold and leasehold interests in the land there are some residential leasehold interests in residential properties on the CPO Land where former council tenants have purchased their properties by Right to Buy under the Housing Act 1985, some of which were transferred subsequently to investment owners.
21. Council officers have taken reasonable steps to contact the persons who hold long leasehold interests in order to secure the purchase of their interests by agreement wherever possible.
22. The continued redevelopment of the Tustin Estate and the construction of Phase 2 thereof can only sensibly be achieved within a reasonable timescale through the Council’s use of its powers of compulsory acquisition. Having considered the relevant policy and guidance, Council officers are satisfied that there is a compelling need in the public interest for compulsory purchase powers

to be used to secure the delivery of the Scheme to deliver economic, social and environmental improvements to the Tustin Estate and the surrounding area.

23. A draft Statement of Reasons setting out the justification, policy background and powers for making the CPO is attached as Appendix 5 to this report.

CONFIRMATION OF THE CPO

24. It is necessary for the Council to resolve formally to use compulsory purchase powers before it can make a CPO. The final decision on the CPO rests with the Secretary of State for Housing Communities and Local Government on recommendation from one of her Inspectors / an Inspector appointed on her behalf who will decide whether to confirm the CPO having considered the justification for the CPO and any objections, if necessary by way of public inquiry.

25. Once the Council has made the CPO it will be lodged with the Secretary of State for confirmation. Notices will be served on any occupier that may have a legal interest in the land in question and notice of the CPO will be advertised for two weeks in a local newspaper, published on the Council's website and by notice affixed on the land. Any objection to the CPO must be made within 21 days of the date of notification of the CPO. In the event that objections are made and not negotiated away, the Secretary of State shall hold a public inquiry unless the objectors and the Council agree that the matter can be dealt with under the "written representations" procedure.

Community, equalities (including socio-economic) and health impacts

Community impact statement

26. As referred to in the 16 September 2024 Cabinet Report and the draft Statement of Reasons (at Appendix 5 of this report), the redevelopment brings about significant benefits which together contribute to a significant increase in the social, economic, and environmental well being of the site itself, the wider estate, and the borough.

27. The Scheme will address the poor quality of existing physical environment. Existing buildings are of poor quality, using poor quality building materials, employing outdated construction methods, severely in need of costly repair, and representing inefficient land use with a low density of residential accommodation.

28. The redevelopment of the Scheme Site will bring about a significant improvement of the physical environment within the Scheme Site as referred to in the draft Statement of Reasons. It will deliver a broad range of community facilities, replacing existing facilities with new purpose-built facilities, and extending these. The Scheme will also provide new high quality homes, contributing towards an increase in both the quantum and quality of residential accommodation on the Scheme Site and contributing to corresponding improvements in the wider area. The homes that will be built will see significant improvement on the existing stock.

29. There are 15 leaseholder interests that remain outstanding in the Scheme site. In

line with the Guidance, leaseholders will receive market value for the purchase of their property, plus a home loss payment of 10% if a resident leaseholder, or 7.5% if a non-resident leaseholder, as well as a disturbance payment to cover the reasonable costs of moving and professional fees. Where properties are purchased by agreement, the council acquires them at market value in accordance with compulsory purchase legislation. Resident leaseholders who do not choose a replacement property in Phase 1 or 2 will have the option to purchase a new property on the open market.

30. To mitigate any potential issues that may be caused by differences between the existing value of leasehold interests in their current properties, compared to potential value of new build properties being built or other properties in the surrounding area, the council has put in place a range of rehousing options for resident leaseholders. These will ensure that leaseholders are able to remain in the area to access services, employment opportunities and to preserve community ties. The options for leaseholders depend on the individuals' specific financial circumstances, can result in the offer of a council tenancy on a council-owned property, the purchase of a council property on either shared ownership (where rent is paid on the unowned portion) or through a shared equity loan (where unowned equity is gifted to leaseholders in exchange for a charge on the property equal to the gifted equity). The combination of these options aim to mitigate any negative impact on resident leaseholders caused by the use of compulsory purchase powers. Details of the offers made to leaseholders are set out in the draft Statement of Reasons appended to this report.
31. The Council has sought to mitigate any disbenefits through a range of reasonable and proportionate measures focused on rehousing and compensation options, to realise the public benefits associated with the redevelopment. The council has considered the potential disproportionate impacts that could potentially arise and has identified and implemented measures to mitigate such impacts as far as possible. It is therefore considered that there is a compelling case in the public interest for the Scheme to proceed and therefore for the council to use its compulsory purchase powers.

Equalities (including socio-economic) impact statement

32. As referred to in the 16 September 2024 Report, section 149 of the Equality Act 2010 lays out the Public Sector Equality Duty (PSED) which requires public bodies when taking decisions, to have due regard to the need to:
 - 32.1. Eliminate discrimination, harassment, victimisation or other prohibited conduct;
 - 32.2. Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it;
 - 32.3. Foster good relations between those who share a relevant characteristic and those that do not share it.
33. The Council through a process of regular review has been considering the

impact on all protected groups throughout the development of the council's proposals for all regeneration projects within the borough. This has led to the Council developing rehousing policies for tenants and leaseholders affected by regeneration proposals in the borough.

34. These have identified that the council has a range of measures in place to mitigate any potential impacts of regeneration proposals, including:
 - 34.1. Rehousing policies through the Council which provide a range of local re-housing opportunities that enable residents to move locally (if they choose to do so) to a new home that meets the needs of their family and financial position.
 - 34.2. A dedicated team of officers which supports both tenants and leaseholders through the rehousing process.
 - 34.3. Providing support and guidance about a range of routes to all residents affected by regeneration but with particular focus on those that may be vulnerable or in need of additional support.
 - 34.4. The development of new homes in the borough which will provide high quality homes to modern standards for residents in the borough to move to.
35. Therefore, the Council considers that the potential impacts of the Scheme are fully addressed through the operation of its rehousing policies and provision of dedicated support and guidance available through council officers and local independent organisations that provide support and guidance to Tustin Estate residents.
36. Through the consultation process, the Council has also sought to update its understanding of the demographic of residents with protected characteristics affected by the rehousing and process. The Council will continue to monitor any resulting impacts. The Council will also seek to update and expand upon this information throughout the ongoing process as it continues to discharge its public sector equality duty.
37. In addition, the Equality Health and Impact Assessment (EqIA) has been updated since the 16 September 2024 report to ensure the impacts of the re-development of the estate have been independently assessed. This has been updated and provided at Appendix 3.
38. It identifies differential or disproportionate effects, both positive and negative, on those with protected characteristics from the development proposals and sets out mitigation or enhancement measures that the council can put in place. It looks at these factors ahead of confirming decisions and policy. Relevant mitigation measures are identified and are embedded into the redevelopment programme.
39. The equalities impact assessments were conducted in accordance with the Equality Act 2010 and the council's Public Sector Equality Duty.

- 40. The assessment will be shared with the consultants engaged to work on this programme to inform their resident engagement process alongside the council's.
- 41. The compulsory acquisition of land and interests will interfere with Article 1 First Protocol Convention Rights. However, Article 1 of the First Protocol allows such interference if it is in the public interest and in accordance with the law. The use of CPO powers is lawful in Article 1 terms provided that the Council strikes a fair balance between the public interest and the private rights of individuals which are protected by Article 1. It is also relevant that compensation is available to persons affected by compulsory acquisition in certain circumstances. It is considered that the compelling benefits of the Scheme in the public interest justify the interference with Article 1 rights in this case when weighed against the private rights of individuals.
- 42. As regards Article 6 Convention Rights, there are well established statutory procedures that will give all those likely to be affected by a CPO the right to be notified and the opportunity to object. Any such objections may cause a public inquiry to be held where those objections can be heard. Compensation disputes can be referred for hearing by the Lands Chamber of the Upper Tribunal. For these reasons Article 6 is complied with.

Health impact statement

- 43. The updated EqIA sets out the potential health impacts of the overall development.

Climate change implications

- 44. The redevelopment of the Scheme would enable homes of the highest environmental standard to be developed. The current homes are inefficient in energy terms.
- 45. As part of the reserved matters application, the developer submitted an Energy Assessment Report which addressed the requirements of Southwark Plan Policy P70. Overall, the Phase 2 proposals will reduce carbon emissions by 85% beyond Part L 2021 Building Regulations.

Resource implications

- 46. The acquisition process continues to be met within existing resources within the Council, supplemented with external professional advice as required. Sharpe Pritchard are providing legal advice and support in relation to the CPO.

Legal/Financial implications

Legal

- 47. The Council has various powers to compulsory purchase land, for example, the power under section 226(1) of the Town and Country Planning Act 1990 (as amended) and the power under section 17 of the Housing Act 1985 etc.

48. Section 226(1)(a) of the 1990 Act provides that “....A local authority [to whom this section applies] shall, on being authorised to do so by the Secretary of State, have power to acquire compulsorily any land in their area:

if the authority think that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to the land.”

49. The power in section 226(1)(a) of the 1990 Act is subject to section 226(1A) of the 1990 Act which provides that an authority must not exercise the power under section 226(1)(a) of the 1990 Act unless they think that the development, re-development or improvement is likely to contribute to the achievement of any one or more of the following objects:-

49.1. the promotion or improvement of the economic well-being of their area;

49.2. the promotion or improvement of the social well-being of their area;

49.3. the promotion or improvement of the environmental well-being of their area

50. This report recommends that the Cabinet approves the use of compulsory purchase powers under Section 226(1)(a) of the 1990 Act and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 for the acquisition of all land and interests (which are not already owned by the Council) within the area of land shown for identification purposes edged black and bold on the plan at Appendix 2. It is considered that the use of this section is the most appropriate having regard to the aims sought to be achieved by the redevelopment and regeneration of the Scheme and the Tustin Estate. Consideration has been given to the well-being objectives under section 226(1) (a) of the 1990 Act in relation to the Council’s aspirations for the Scheme which forms part of the Tustin Estate. It is considered that the Scheme will assist the Council in promoting and improving the economic, social and environmental well-being of the area.

51. Section 13 of the Local Government (Miscellaneous Provisions) Act 1976 provides a power for a local authority to purchase compulsorily such new rights as are specified in the compulsory purchase order.

52. The guidance issued by the Ministry for Housing, Communities and Local Government titled - Guidance on the Compulsory Purchase Process (October 2024) (“the Guidance) provides guidance on the use of compulsory purchase powers stating that acquiring authorities should use compulsory purchase powers where it is expedient to do so and where there is a compelling case in the public interest to make a compulsory purchase order.

53. The Guidance further states that reasonable steps should be taken to attempt the acquisition of all land and rights included in the compulsory purchase order and that the “reasonable steps” to be taken will depend on the particular circumstances of each case.

54. The Human Rights Act 1998 incorporated the provisions of the European Convention on Human Rights into UK law. The following Convention rights are relevant to the CPO:-

- (First Protocol Article 1) the right of everyone to peaceful

enjoyment of their possessions which can only be interfered with if in the public interest and lawful;

- (Convention Article 6) the right to a fair and public hearing in determination of a person's civil and political rights;
- (Convention Article 8) the right to a private and family life, home and correspondence which can only be interfered with in accordance with the law and where it is necessary in the interests of (inter alia) economic well-being of the country and for the protection of health.

55. Having regard to the significant public benefit which would arise from the Scheme which forms part of the wider regeneration of the Tustin Estate, it is considered that there is a compelling case for the compulsory acquisition of the land to be included in the CPO and that the public interest requires that the CPO be made. Should it be necessary to compulsorily acquire any land, the persons affected will be entitled to object to the making of the CPO and have their objection considered at a fair and public hearing. Also, appropriate compensation under the relevant provisions of the Compensation Code will be available to those entitled to claim it. Therefore, having considered the balance to be struck between individual rights and the wider public interest, it is considered that any interference with any individual's human rights will be justified in order to secure the social, physical and environmental regeneration that the redevelopment of the Scheme will bring to the community as a whole.

Financial

56. The required budgets to fully implement the Scheme including the cost of acquiring the land and building out the scheme were agreed by cabinet in October 2022. These costs will be funded from resources supporting the Housing Investment Programme, including borrowing and GLA grant.

57. The costs associated with the use of compulsory purchase powers can be managed within existing budgets, through the use of contingency in the project budget. Further details can be found in the draft Statement of Reasons appended to this report at Appendix 5.

Consultation

58. As referred to in the 16 September 2024 report consultation is taking place with all affected leaseholders and tenants. In addition, this issue has been discussed with the Residents Project Team and the Tustin Estate Community Association. Further details of the consultation that has taken place is contained within the draft Statement of Reasons at Appendix 5 of this report.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive, Governance and Assurance (HR010/137640/NK)

59. The purpose of this report is to recommend the use of compulsory purchase powers under Section 226(1)(a) of the 1990 Act and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 for the acquisition of all land and interests (which are not already owned by the Council) within the area of

land shown edged black and bold on the plan at Appendix 2.

60. Section 226(1)(a) of the 1990 Act gives local authorities the power to compulsorily acquire land in their area if the authority think that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to the land. The use of the power is limited by s226(1A) which provides that a local authority must not exercise the power unless they think that the development, re-development or improvement is likely to contribute to the achievement of any one or more of three objects, namely the promotion or improvement of the economic, social or environmental well-being of their area.
61. The draft Statement of Reasons (at Appendix 5 of this report) sets out the economic, social and environmental well-being benefits the implementation of the Scheme will bring to the area.
62. Appendix 5 provides further detail on the legal powers available to the Council in connection with the use of its compulsory purchase powers, the curbs on the use of those powers and further detail on the Human Rights and Equalities implications of the use of those powers. There is also detail of the CPO process including the entitlement of affected parties to compensation.
63. Section 120(1) of the Local Government Act 1972 ("the 1972 Act") authorises local authorities to acquire any land by agreement for the purposes of a) any of their statutory functions or b) for the benefit, improvement or development of their area. By virtue of section 120(2) of the 1972 Act, local authorities may acquire by agreement any land for any purpose for which they are authorised by the 1972 Act or any other Act to acquire land, notwithstanding that the land is not immediately required for the purpose and, until it is required for that purpose, it may be used for the purpose of any of a local authority's functions.
64. Section 227 of the 1990 Act also enables local authorities to acquire land by agreement for any purpose for which a local authority may be authorised to acquire land under section 226 of the 1990 Act.
65. In this report the recommendation is that land is being acquired by agreement in order to facilitate the development of the area, which falls within the purposes set out in section 120(1) of the 1973 Act and section 226 of the 1990 Act.
66. Accordingly, local authorities have power to acquire land and interests by agreement as recommended in this report.
67. Persons with a qualifying legal interest who are displaced from the blocks subject to demolition, such as tenants and leaseholders, will be eligible for mandatory or discretionary statutory compensation and disturbance payments. These will be made in line with the applicable legislation and local authority policy at the appropriate time.
68. As Phases 1 and 2 of the new development fall within the Council's Housing Portfolio, any disposals of this land can only proceed in accordance with Section 32 of the Housing Act 1985 for which purposes the consent of the Secretary of State is required.

69. A number of General Consents have been issued in the General Housing Consents 2013.

70. Consent A3.1.1 of the General Consent for the Disposal of Land held for the purposes of Part II of the Housing Act 1985-2013 enables a local authority to dispose of land for a consideration equal to its market value subject to exceptions in paragraph A3.1.2. The exceptions in paragraph A3.1.2 are disposals to a body owned or partly owned by the local authority, disposals that fall into a separate consent for reversionary interest in houses and flats and disposals that would result in a local authority tenant becoming the tenant of a private landlord.

71. The report confirms that the properties will be vacant and provided that the properties are sold at a price which is equal to their market value then the exceptions to Consent A3.1.1 will not apply.

72. If Cabinet is satisfied that the requirements of the General Consent will be satisfied and that the sale of the properties will be at a price which is equal to their market value, Cabinet may proceed with the approval of the recommendation.

Strategic Director, Resources (H&M 24/078)

73. This report seeks Cabinet approval to the use of compulsory purchase powers under Section 226 (1)(a) of the Town & Country Planning Act 1990 and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 for the acquisition of all land and interests (which are not already owned by the Council) within the area of land shown edged black and bold on the plan at Appendix 2 to facilitate the continued redevelopment of the Tustin Estate. As outlined in the financial implications section of this report, any costs associated with securing vacant possession can be contained within the existing financial budget approved for the regeneration of Tustin Estate. Any such costs, should they arise will be met from funds available to the council's Housing Investment Programme for the delivery of the new homes programme.

REASONS FOR URGENCY

74. To secure vacant possession of Heversham House at Tustin Estate (which it is contractually obliged to do) so as to enable the Scheme, including the demolition works scheduled to commence in summer 2025, to proceed.

REASONS FOR LATENESS

75. Further legal advice received, and paragraphs added.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Tustin Estate Phase 2 Compulsory Purchase Order https://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?AId=71341	Housing, New Homes Directorate, Third Floor, Hub 2 160 Tooley Street, London, SE1 2QH	Cat Janman 020 7525 0659

APPENDICES

No.	Title
Appendix 1	Site plan showing Phase 2 sites
Appendix 2	CPO Plan Tustin Estate
Appendix 3	Equality and Health Impact Assessment, November 2024
Appendix 4	Legal Report
Appendix 5	Draft Statement of Reasons

AUDIT TRAIL

Cabinet Member	Councillor Helen Dennis, Cabinet Member for New Homes and Sustainable Development
Lead Officer	Hakeem Osinaike, Strategic Director of Housing
Report Author	Cat Janman, Senior Project Manager
Version	Final
Dated	6 January 2025
Key Decision?	Yes

CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER

Officer Title	Comments Sought	Comments Included
Assistant Chief Executive, Governance and Assurance	Yes	Yes
Strategic Director, Resources	Yes	Yes
List other officers here	N/A	N/A
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team	6 January 2025	

APPENDIX 1

TITLE.

TUSTIN ESTATE PHASE 2.
PHASE 2 SITE PLAN

DRAWING No.

LBS_4228

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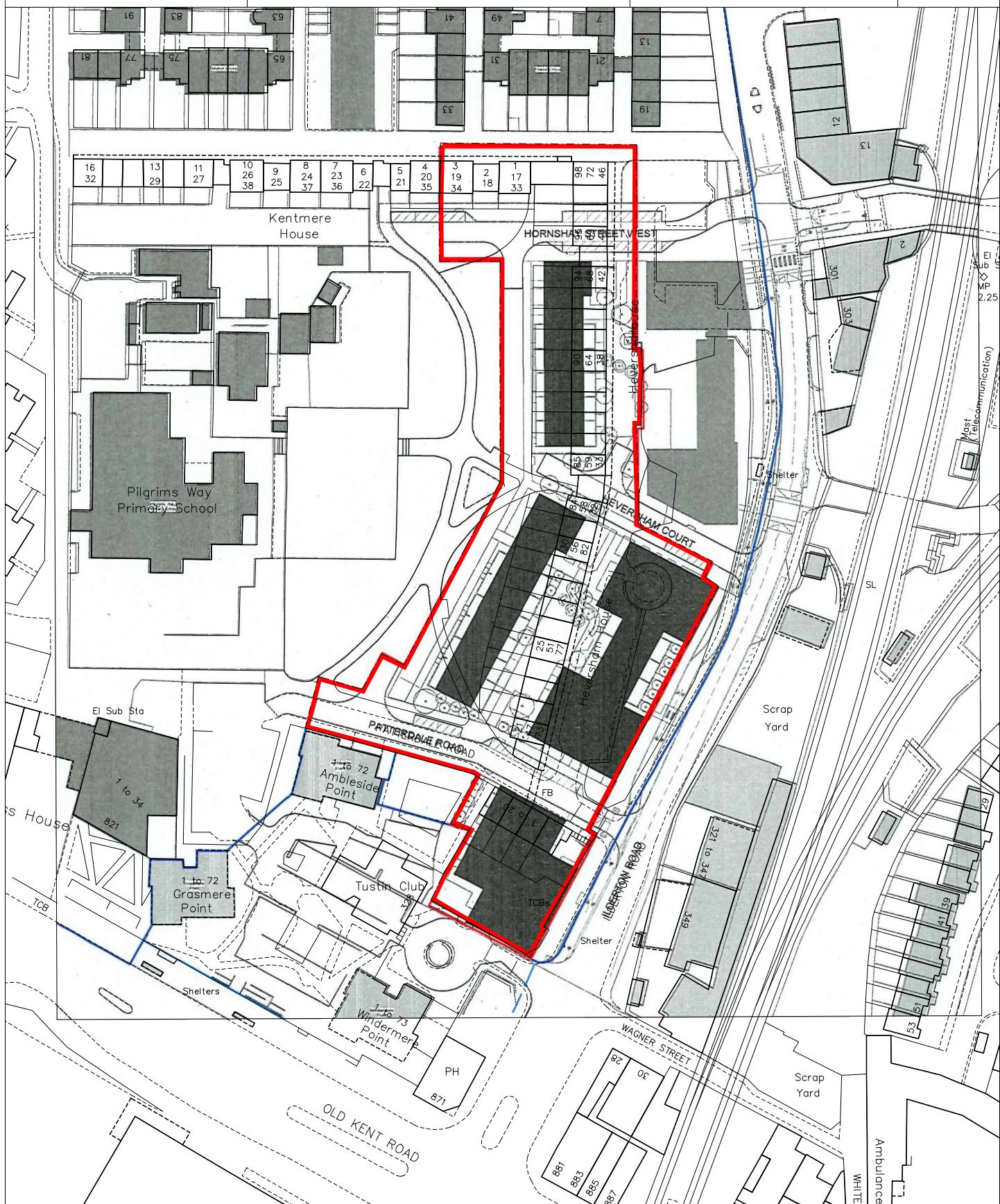
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Property Division

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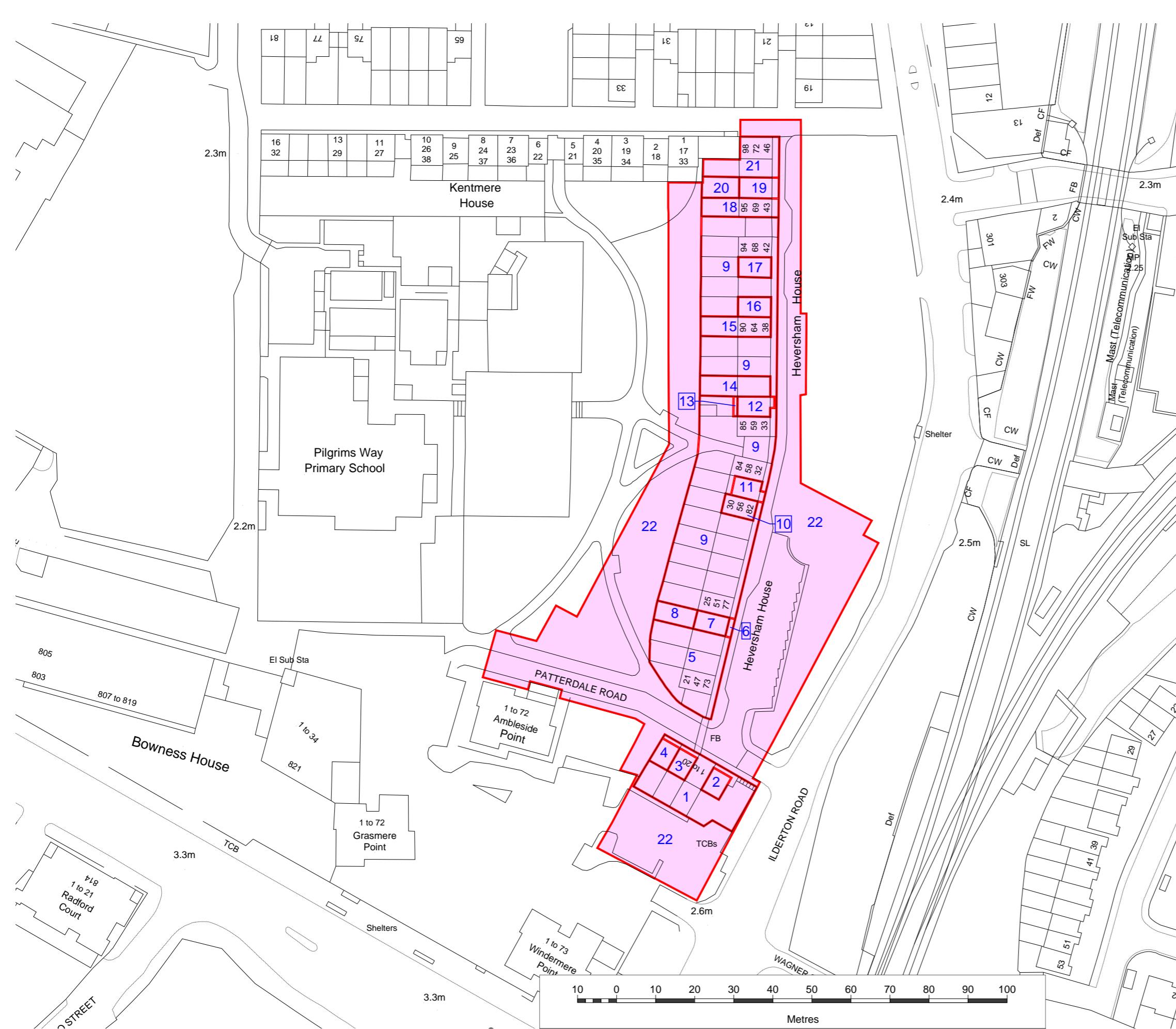
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Key:

- Red box: Area To Be Referenced
- Pink area: Land to be acquired

Business Unit:		Status:	
Land Referencing		Draft	

Approved By	Date Approved	Checked By	Date Checked	Drawn By	Date Drawn
MHE	28/11/2024	RCA	28/11/2024	AMI	27/11/2024

Title:

Heversham House,
Tustin Estate CPO

Date of Issue:	Project Code:	Scale:
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Drawing Reference:	Version:
0115-000290	v3.0

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Tustin Estate Regeneration Programme: Equality and Health Impact Assessment Phase 2

November 2024

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Tustin Estate Regeneration Programme: Equality and Health Impact Assessment Phase 2

November 2024

Issue and Revision Record

Revision	Date	Originator or	Checker	Approver	Description
A	03/08/2024	PD/GH	EW	JB	First Draft for Client Approval
B	20/10/2024	GH	EW	JB	Update to Interim EHIA to Full EHIA

Document reference:

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Executive summary

Overview of the commission

Mott MacDonald have been commissioned by Southwark Council to undertake an Equality and Health Impact Assessment (EHIA) of the Phase 2 redevelopment and use of CPO powers with regards to Tustin Estate (the 'Scheme'), in the London Borough of Southwark.

An Interim EHIA was completed in August 2024.

The Equality and Health Impact Assessment

The EHIA process is focussed on the potential effects, including health effects, likely to be experienced by those living and working in the community in light of their 'protected characteristics' under the Equality Act 2010.

The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation.

The EHIA identifies any disproportionate effects (both positive and negative) on those with protected characteristics that may arise from relocation of the business, and the proposed redevelopment. The EHIA sets out any embedded actions that the Council and its project partners have put in place throughout design and development of the Scheme to mitigate any risk.

This EHIA provides an update to the previously submitted EHAs, specifically assessing the impacts of Phase 2 of the redevelopment and possible use of CPO on local residents, businesses, and the wider community. This Full EHIA submission builds on the work submitted in the Interim EHIA and includes demographic studies of the local population.

Approach to the EHIA

The EHIA considered the impacts of Phase 2 of the Tustin Estate redevelopment programme and the potential use of CPO powers to facilitate this.

Assessment of equality effects has been undertaken in light of the characterisation of potential effects – including sensitivity of the affected parties to the Scheme, the distribution of those groups within the Site, the nature of any potential effects, and any mitigation measures already in place or proposed to address the effect.

The EHIA has identified several potential equality impacts that could arise from the demolition and redevelopment. These have been split into two broad categories:

- Potential impacts on the residents and users of community space during Phase 2 of the redevelopment
- Potential impacts on residents, businesses, and the wider community following Phase 2 of the redevelopment.

Findings of the EHIA

The process of research and analysis for this EHIA has identified several impacts that could arise from Phase 2 of the wider Tustin Estate regeneration programme and use of CPO powers to facilitate this. Some of the people living, working and accessing services in the local area are likely to experience these effects differentially or disproportionately as a result of their protected characteristics.

Phase 2 of the regeneration programme is intended to demolish Heversham and Kentmere House in order to facilitate the construction of 295 new homes. New public and green space will also be provided, as well as better signposting and navigation through the site.

Further opportunities for positive equality effects have been identified which are associated with the following scheme elements:

- The delivery of new spaces for use by community resources.
- The delivery of a new and improved public realm with improved access and mobility

Some adverse impacts may arise for residents who have to leave their homes. However, the Council have embedded mitigation measures to help mitigate these impacts.

In order to further mitigate any remaining equality risk, this EHIA recommends a series of actions which the Council should consider. These include but are not limited to the following:

- Should the CPO be used, residents should be supported through market search assistance to find an alternative property in the local area, if this is desired, which meets their needs.
- Ensure that accessible and inclusive support options are provided for disabled individuals who require support services during relocation.
- Continue to explore options to grow and advocate existing peer support groups such as the Tustin Resident Project Group (RPG). Review accessible provisions within group meetings.
- Liaise with and support the Tustin Residents Association to host free community events to provide a space for original Tustin Estate residents and Phase 2 home residents to meet, mingle, and improve the cohesion of Estate residents

Overall, this assessment has found that Phase 2 of the regeneration has the potential to deliver new and affordable homes, improved living conditions, improved accessibility of homes and the wider estate, and new public realm and green space. This, coupled with the majority vote in the February 2021 ballot for the redevelopment to go ahead means there is a compelling case in the public interest for the redevelopment and use of CPO powers, if necessary, to allow Phase 2 to go ahead. Whilst this must be weighed against the acknowledged potential risks, the Council has sought to mitigate these through a range of reasonable and proportionate measures focused on engagement, rehousing assistance and compensation options in order to improve the outcomes of the redevelopment for the current and future Estate community.

1 Introduction

This EHIA report outlines the findings of the impact assessment for Phase 2 of the Tustin Estate Redevelopment and the potential use of CPO powers. The report provides recommendations for mitigation and further enhancement measures where appropriate.

This chapter sets out the purpose and scope of the EHIA, requirements of the Equality Act 2010 ('the Equality Act'), the approach to EHIA, and tasks undertaken throughout this process.

1.1 The Equality and Health Impact Assessment

1.1.1 Purpose of the Assessment

The purpose of the EHIA is to help Southwark Council ('the Council') understand the potential risks and opportunities of Phase 2 of the Tustin Estate redevelopment programme, and the potential use of CPO powers to facilitate this, with a particular focus on people with characteristics protected under the Equality Act and the health of the local population (including on health inequalities).

Protected characteristics include the following (as defined by the Equality Act):¹ age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation.

This EHIA outlines the findings of the impact assessment for Phase 2 and possible CPO powers and provides recommendations for mitigation and further enhancement where appropriate.

1.1.2 Equality Impact Assessment

1.1.2.1 The Public Sector Equality Duty

This EHIA has been undertaken as part of a process supporting the fulfilment of the Council's obligations under current UK equality legislation, and in particular the Equality Act. The Equality Act sets out a Public Sector Equality Duty (PSED), at section 149 and is set out in Figure 1.1 below.

Figure 1.1: Article 149 of the Equality Act: The Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—
 (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

¹ Government Equalities Office/Home Office (2010): 'Equality Act 2010' Available at: www.legislation.gov.uk

(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.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

(a) remove or minimise 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 protected characteristic that are different from the needs of 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.

The PSED is intended to support good decision-making. It encourages public authorities such as the Council to understand how different people will be affected by their activities. This means services and policies are appropriate and accessible to all and meet different people's needs. The Council must demonstrate that it has shown due regard to the aims of the PSED throughout the decision-making process to deliver the Programme. The process used to do this must take account of the protected characteristics which are identified below in section 1.1.2.2.

1.1.2.2 Protected characteristics

An EqIA provides a systematic assessment of the likely or actual effects of policies or proposals on social groups with the following protected characteristics (as defined by the Equality Act):²

Table 1.1: Protected Characteristics

Protected characteristic	Equality and Human Rights Commission (EHRC) definition
Age	A person belonging to a particular age (for example 32-year olds) or range of ages (for example 18 to 30-year olds).
Disability	A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

² Government Equalities Office/Home Office (2010): 'Equality Act 2010'. Available at: www.legislation.gov.uk

Protected characteristic	Equality and Human Rights Commission (EHRC) definition
Gender reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	<p>Marriage is a union between a man and a woman or between a same-sex couple.</p> <p>Couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).</p>
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism). Generally, a belief should affect someone's life choices or the way they live for it to be included in the definition.
Sex	A man, woman or non-binary person.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

An EqIA does this through the following approaches:

- Assessing whether one or more of these groups could experience disproportionate effects (over and above the effects likely to be experienced by the rest of the population) as a result of the proposed redevelopment option. An EqIA includes examining both potential positive and negative effects.
- Identifying opportunities to promote equality more effectively.
- Developing ways in which any disproportionate negative effects could be removed or mitigated to prevent any unlawful discrimination and minimise inequality of outcomes.

1.1.2.3 Assessing equality impacts

While the PSED does not specify a particular process for considering the likely effects of policies, programmes and projects on different sections of society for public authorities to follow, this process is usually undertaken through some form of equality analysis, which can include EHAs.

Undertaking an EHA helps to demonstrate how a public authority is complying with the PSED by:

- providing a written record of the equality and health considerations which have been taken into account;
- ensuring that decision-making includes a consideration of the actions that would help to avoid or mitigate any negative impacts on particular protected groups; and
- supporting evidence-based and more transparent decision-making.

By understanding the effect of their activities on different people, and how inclusive delivery can support and open opportunities, public bodies can be more efficient and effective. The EHA process therefore helps public bodies to deliver the Government's overall objectives for public services.

1.1.3 Health Impact Assessment

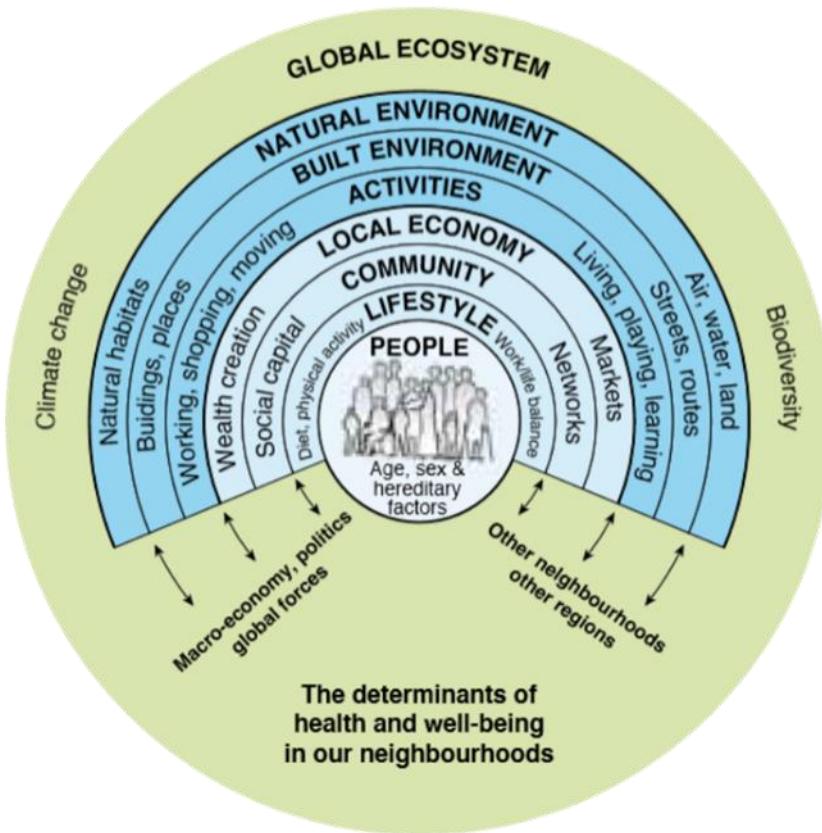
1.1.3.1 Assessing health impacts

Health as a component of the EHA will focus on assessing whether certain sections of the population (based on the protected characteristic groups defined above) will experience health impacts disproportionately or differentially when compared to other sections of the population. The HIA component of this assessment identifies potential health risks and opportunities associated with Phase 2 of the regeneration programme and potential use of CPO powers, focussing on key health aspects of the regeneration process (e.g. relocation, construction effects) and how this intersects with health inequalities. The mitigations Southwark has in place to prevent adverse effects on health for vulnerable sections of society are also outlined.

1.1.3.2 Determinants of health

The approach to the HIA aspect of this report uses the World Health Organization's (WHO) definition of health as a 'state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'. Health inequity (avoidable differences in health) was considered, introducing a notion of fairness. The figure below highlights the determinants of health in a community context.

Figure 1.2: Determinants of Health



Source: Barton and Grant (2006) The health map, based on a public health concept by Whitehead and Dahlgren, The Lancet 1991. Department for Health (2010) Health impact assessment of government policy

1.2 Progress of the EHIA process

This EHIA is the fifth EHIA produced for the Tustin Estate redevelopment programme, aligned with the decision-making process on the Estate. The following EHIA's have been undertaken:

- The Initial EHIA comprised a series of tasks undertaken to understand the equality and health effects of the original five scenarios put forward for the renewal of the estate. Once potential effects were identified, they were assessed against the renewal scenario. The initial EHIA was used to inform the residents ahead of the initial ballot in September 2020.
- The Final Option EHIA was intended to provide further detail and analysis on the Final Option that was selected by residents and being taken forward by Southwark Council.
- The 'Hybrid' Planning Application considered to the updates to provides updated detail and analysis of the final chosen masterplan for the renewal.
- Contractor 'Urban Symbiotics' conducted an EHIA assessing the redevelopment of Phase 2 without the use of CPO powers.
- The Interim Phase 2 EHIA considered the decision-making process on the Estate and the use of CPO powers.

This report has replaced the Interim EHIA by providing a more in-depth submission for Phase 2 and the use of CPO powers which has included updated socio-demographic information, as well as undertaking equality surveys with the leaseholders impacted by the use of CPO powers.

1.3 Tasks Undertaken

1.3.1 Understanding the project

Discussion with Southwark Council: Initial discussions were undertaken with the Council to gain a better understanding of the Estate and the approach to Phase 2 of the Programme.

Site walkover: A visit to the Estate was undertaken in December 2019. The visit included a viewing of the low-rise blocks on the Estate: Ullswater House, Hillbeck Close, Heversham House, Kentmere House, and Manor Grove; Pilgrims Way Primary School; and the Tustin Community Centre

Scheme review: A review of documentation associated with the Scheme, based on information obtained through the above discussions, has been undertaken. This included an overview of consultation summary reports, planning documents including the Statement of Community Involvements, past EHIA's (including that undertaken by Urban Symbiotics), cabinet reports and other pertinent information.

1.3.2 Evidence, distribution, and proportionality

Initial desk-based evidence and literature review: In order to better understand the potential risks and opportunities arising from the redevelopment, and to help to identify possible mitigation measures and opportunities associated with the programme, relevant published literature from governmental, academic, third sector and other sources were reviewed and updated throughout all EqIA stages. This allowed for the characterisation of potential risks and opportunities typically associated with estate regeneration and relocation, to understand whether they applied in this instance.

Demographic analysis of the Estate and surrounding area: This EHIA includes a detailed socio-demographic analysis for both the Scheme area and surrounding community to provide contextual evidence on the local populations. This has created a picture of people living in the local area, through collation of publicly available data on people with protected characteristics, using Scheme area demographic information, compared to borough, London and national statistics.

Stakeholder engagement: This EHIA has utilised a detailed equality and health survey, carried out by trusted sub-contractors to gain an understanding of the characteristics of the residents most likely to be impacted by Phase 2 and possible use of CPO powers. This supports the characterisation of any disproportionate effects on residents.

1.3.3 Impact assessment

Assessment of potential impacts: Potential impacts were identified and assessed using the research undertaken in the stages above. Assessment of impacts was undertaken in light of the sensitivity of the affected parties to regeneration, relocation, and use of CPO powers, as well as the distribution of people with protected characteristics amongst residents of the Estate. Both adverse and beneficial impacts were identified in the context of the mitigation measure implemented by the Council.

Action planning and making recommendations: An action plan has been developed which outlines the responsibilities to involved affected parties following submission of the Full EHIA Phase 2 EHIA. A series of further recommendations have been developed to help manage the renewal process in a way that minimised the potential for adverse effects where appropriate.

1.4 Methodology for identifying and assessing equality and health effects

1.4.1 Identifying equality and health effects

Types of equality effects considered: Potential effects arising from the redevelopment will be assessed as either differential or disproportionate.

- **Differential effects:** Differential effects occur where people with protected characteristics are likely to be affected in a different way to other members of the general population. This may be because groups have specific needs or are more susceptible to the effect due to their protected characteristics. Differential effects are not dependent on the number of people affected.
- **Disproportionate effects:** Disproportionate effects occur where there is likely to be a comparatively greater effect on an equality group than on other sections of the general population. Disproportionate effects may occur if the affected community includes a higher than average proportion of people with a particular protected characteristic, or because people from a particular protected characteristic group are the primary users of an affected resource.

1.4.2 Assessing equality and health effects

The assessment of effects across the EHIA process is predominantly qualitative and outlines the nature of the impact on:

- residents living in the low-rise and tower blocks on Tustin Estate;
- community facilities on Tustin Estate and their service users;
- owners of residential property on Tustin Estate; and
- the local community.

The assessment considers, where possible and applicable:

- whether the scheme will have a positive or negative effect on the lives of those who live or work in the area;
- the relationship of the effect to the scheme (e.g. direct relationship such as loss of property or indirect relationship such as loss of access to services);
- the duration, frequency and permanence of the impacts;
- the severity of the impact and the amount of change relative to the baseline; and
- the capacity of the affected groups to absorb the impacts (their resilience), including their access to alternative facilities, resources or services.

2 Tustin Estate Improvement Programme

This chapter sets out the context of Tustin Estate and the Scheme. It provides background to the Estate including its history and current situation, as well as outlining the previous EHAs which have been undertaken. This chapter will also outline the plans for Phase 2 of the redevelopment as well as use of Compulsory Purchase Order powers.

2.1 Scheme context

Southwark Council is the biggest social landlord in London and has committed to delivering a target of 11,000 new council homes for social rent by 2043. Tustin Estate is also subject to the Southwark Planning policy framework, including the Old Kent Road Area Action Plan which establishes a minimum target of 20,000 new homes and 10,000 new jobs in the area.

It has launched a 'Great Estates' programme, with the aim of guaranteeing that every estate is clean, safe, and cared for, and to give residents the opportunity to improve their estate. Tustin Estate is intended to be a leading example of this programme.

2.1.1 Overview: Tustin Estate

Tustin Estate is a five-hectare brick-built housing estate located in the London Borough of Southwark, on the Southwark and Lewisham border. Constructed in the 1960s and 1970s, the Estate is made up of 526 properties spread over six low-rise blocks and three 20 storey towers; a one form entry Primary School, retail units, Tustin Community Centre, open space and resident parking. Many of the blocks are in need of significant reinvestment; and major renovation works have been completed on the three tower blocks as part of a separate improvement programme.

Over the last eight years plans have been underway to redevelop the low rise blocks on the Estate using a resident first approach. In February 2021 there was an overwhelming positive resident's ballot for these plans which are now going ahead. The new Tustin Estate redevelopment will deliver 690 homes over 10+ years in four phases. Houses will be a mix of council homes, affordable homes, key worker housing and private homes.

As of autumn 2024, Phase 1 is nearing completion. Once complete, these will consist of 167 homes offering rehousing options to the existing residents. These are to be delivered as two blocks of flats ranging from 5 to 13 storeys, and two rows of terraced houses (14 in total).

This EHIA will focus on the blocks which are scheduled for demolition as part of Phase 2: Haversham House and Kentmere House. The use of CPO powers is

only being considered for residents of Heversham House, as it has the largest proportion of leasehold tenancies. As of August 2024, the single resident leaseholder in Kentmere House had verbally agreed to take possession of a property in the Phase 1 homes.

The tenancy breakdown of the Phase 2 blocks as supplied in August 2024 is outlined in the table below:

Table 2.1: Phase 2 Tenancy Breakdown

Estate Block	Count of Tenant/Leaseholder
Heversham House	98
Complex	4
Complex - Non Resi Leaseholder	1
Non-Resi Leaseholder	6
Resident Leaseholder	8
Temporary Accommodation	15
Tenant	57
Void	7
Kentmere House	38
Complex	1
Resident Leaseholder	1
Temporary Accommodation	10
Tenant	22
Void	4

Source: Southwark Council, 2024

2.1.2 Overview of Phase 2

Phase 2 focuses on Heversham House and the adjacent Kentmere House. The Scheme will deliver 295 new homes, consisting of:

- 144 Build to Rent homes
- 151 affordable homes, consisting of 51 keyworker homes, 90 social rent homes and 10 Shared Equity homes

The new homes will be a mixture of maisonettes and one to three bedroom flats across four buildings, flanking the new Tustin Common park area.

During the delivery of Phase 2, there will also be additional outdoor and indoor amenity space for residents including play space and an open space.

The delivery of Phase 2 is anticipated to commence once Phase 1 has been completed and existing residents have moved in, which is currently scheduled for mid-2025.

2.1.2.1 Commitments to residents

The Council has made the following commitments³ in line with the Tustin Manifesto, which has been drawn up by the Tustin Community Association, discussions with the Resident Project Group and resident input:

- **Energy and cost efficient:** New homes will have a meter reading for heating, water and electricity bills with all buildings designed to be as efficient as possible to minimise costs on utility bills.
- **Council rent levels:** All new homes will have council rate levels. The levels of rent are determined by property values, and as the new builds will be of higher value, the rent will be proportionally higher.
- **Adaptable homes:** A commitment that tenants and homeowners will be able to move into a dedicated Over 55s Block. These homes will be wheelchair accessible, adaptable and flexible to meet resident needs, larger balconies and communal facilities such as living rooms.
- **High standards and high quality:** All new homes will be built to the latest standards as set out in current Building Regulations, planning policy and Southwark New Homes Design Guide. For existing residents all new homes will be as big, or bigger, than their current home and it will also have a large outdoor private space.
- **Provision of parking:** Resident car owners who currently have a parking permit will have a parking permit for the redeveloped estate.
- **Community safety:** New buildings and spaces are designed to reduce the opportunities for crime and anti-social behaviour. Homes are designed to give views onto green spaces, with new entry halls to buildings with improved lighting and security.

Preliminary plans of apartment layouts include an oversized space designed for wheelchair users, oversized balconies with views to greenery, large bathroom and an open space kitchen/living room.

2.1.2.2 Commitment to relocated tenants

At the start of the Tustin Estate project, Southwark Council made a number of commitments to council tenants and resident leaseholders on the estate.

The following considerations have been made to accommodate residents during the Phase 2 redevelopment:

- Tenants and leaseholders will be treated equally within allocation priority. The Council allocate priority based on ground floor need and by the date in which the resident originally moved into the Estate.

³ These commitments represent a guarantee from the Council and apply to residents who have been a resident on the Estate 12 months before the Resident Ballot.

- Within Phase 2 all existing residents will be allocated homes before any additional homes are allocated to other people on the housing register. If residents can't afford a property, or don't have enough equity to buy a new home on the Estate, the Council will offer to rehouse residents as a council tenant if they cannot afford to remain a leaseholder. This is determined via a financial assessment.
- Residents are entitled to home loss compensation. This is a statutory payment set in law. Tenants get a payment of £6,500 (this is reviewed annually).
- Residents are entitled to disturbance costs. Residents will be reimbursed for reasonable costs related to removals costs, adjustments to curtains and carpets and disconnection and connection of services such as phones, TV and the redirection of post.
- Residents that live in Bowness House will be able to remain in their current home until the Phase 2 homes are ready. However residents of Heversham or Kentmere House will need to move out of their current home and into a temporary home that the Council will provide in Phase 1 while the Phase 2 homes are built.
- All residents will have access to a dedicated support team. The team will help individuals understand the proposals, and the best options for each individual. This team will support vulnerable residents with all aspects of their move and liaise with family members as necessary.
- Council homes will be allocated according to need. Individual need will be discussed and confirmed with individuals after planning permission has been agreed. If needs change after this time this can be updated with the dedicated support team.
- A dedicated Tustin local lettings system will be used to prioritise moves based on housing need, medical need and existing housing arrangements such as gardens or location within a block.
- All council tenant households in properties to be demolished (will not need to bid for a new home (under Homesearch). These households will be pre-allocated a new home on the Tustin Estate after planning permission has been granted. Residents will choose from a booklet which home they want to move into in line with their need. This means that ahead of time, households will know: the exact home they will be moving to; they will know the timetable for building that home; and will be able to choose finishes for their new home and meet their neighbours.

2.1.3 Compulsory Purchase Order

Section 226 (1) (a) of the Town and Country Planning Act 1990 authorises a local authority to exercise its compulsory purchase powers. This is the case if

acquiring the land in question will facilitate the carrying out of development, redevelopment, or improvement on, or in relation to, the land being acquired, and it is not certain that they will be able to acquire it by agreement.⁴

Additionally, a local authority must not exercise the power under section 226(1)(a) of the 1990 Act unless they think that the development, redevelopment, or improvement is likely to contribute to the achievement of any one or more of the following objectives:

- the promotion or improvement of the **economic** well-being of their area.
- the promotion or improvement of the **social** well-being of their area.
- the promotion or improvement of the **environmental** well-being of their area.⁵

Part of the function of this EHIA report is to provide evidence related to the Council's equality duties in relation to the use of its CPO powers, and to provide a consideration of potential equality impacts, both negative and positive, associated with the scheme.

As a last resort where negotiation is not possible, the Council intends to use its CPO powers to help facilitate the acquisition of land and new rights over land. The purpose of this is to assemble land to facilitate the comprehensive delivery of the scheme. This will require all leases and licences to be transferred to the Council prior to the scheme taking place, and all tenants to be notified of this arrangement.

The Council is currently in the process of undertaking negotiations for acquisitions of interests; however, it may be necessary to pursue the Compulsory Purchase Order to ensure the delivery of the scheme. This process will continue in parallel with acquisition negotiations to ensure that the Council is able to acquire all necessary interests within a reasonable timescale.

2.1.3.1 Commitment to leaseholders

At the start of the Tustin Estate project, Southwark Council made a number of commitments to resident leaseholders on the estate. This included that every resident leaseholder who wants to stay on the rebuilt Tustin Estate will be offered a new leasehold home that can be bought via shared ownership, shared equity or an equity loan with the council. Currently, 8 leaseholders have chosen a new home on the rebuilt Tustin Estate.

The Council has appointed independent surveyors to inspect and value the properties, and leaseholders have appointed their own surveyors to act for

⁴ Ministry of Housing, Communities & Local Government (2019) Guidance on Compulsory purchase process and the Crichel Down Rules

⁵ Legislation UK (1990): 'Town and Country Planning Act 1990'

them. The leaseholders reasonable legal and surveyors' professional fees are borne by the Council.

The following considerations have been made to accommodate residents during the Phase 2 redevelopment:

- Tenants and leaseholders will be treated equally within allocation priority. The Council allocate priority based on ground floor need and by the date in which they originally moved into the Estate.
- Within Phase 2 all existing residents will be allocated homes before any additional homes are allocated to other people on the housing register. If residents can't afford a property, or don't have enough equity to buy a new home on the Estate, the Council will offer to rehouse residents as a council tenant if they cannot afford to remain a leaseholder. This is determined via a financial assessment.

2.1.3.2 Engagement

The Council have maintained strong ties to the leaseholders during the Scheme, in order to improve transparent communication surrounding the redevelopment. The Council has been negotiating with leaseholders in Heversham House since the point the landlord offer was agreed in March 2021 with the intention to acquire all interests by agreement. The Council are committed to consulting residents on proposals for the new development throughout the process, using a range of methods so residents can influence the delivery.

In addition to this, residents have and will continue to remain updated upon Phase 2 redevelopment via the Resident Project Group⁶ and Tustin newsletters. The newsletters have been issued monthly from September 2019-current and provide regular consultation updates about the future of the Estate and details of resident drop-ins or future engagement events. Newsletters additionally signpost a number of useful services, including numbers to contact if residents are struggling with mental health and maintenance problems. The council has commissioned Terraquest to conduct a referencing exercise to identify all legal interests, including lessees, tenants or occupants to inform the compulsory purchase process.

November 2024 Update

A residents homeowner's meeting was held on 20th August 2024 to engage with all resident homeowners who had not yet agreed acquisition with the Council.

⁶ There's a Tustin Resident Project Group (RPG) which is mainly made up of residents in the low-rise blocks and some residents from the towers. The group works with the Council to monitor and consult on the Tustin Estate Low Rise Programme.

After this, letters were sent to all resident and non-resident homeowners to discuss next steps in the acquisition process.

As of mid-November 2024, door knocking was undertaken on all properties who had not yet engaged with the process.

2.1.3.3 Acquired Leaseholds

To enable the delivery of the current programme, the Council are aiming to achieve vacant possession of all homes in both blocks by 31 May 2025. The council agreed, in principle to use its CPO powers to acquire all land and interests within Phase 2 for the purposes of redevelopment, development or improvement of this land on the 16th September 2024. It is intended that the Council will seek a further resolution to use its formal compulsory purchase order powers in January 2025.

As of December 24, the council has acquired 13 leasehold interests in the Heversham block with four moving to either temporarily or permanent in Phase 1 or 2.

2.2 Background to Tustin Estate Redevelopment Programme

The following section provides a summary of the Tustin Estate redevelopment programme prior to this EHIA.

2.2.1 Renewal scenarios

2.2.1.1 Initial options

Options for the Programme were developed by Common Grounds, taking account of feedback from Tustin Estate residents, the Council and other consultants involved in the process to date.

Five scenarios were initially considered for the redevelopment of the Estate:

- Option 1 simply involved the maintenance of the Estate with no new builds
- Option 2 and 3 required part refurbishment/part demolition of the Estate and new builds
- Option 4 required the complete demolition and rebuild of the Estate
- Option 5 required almost complete demolition of the estate, with the exception of Manor Grove, which would be maintained and infilled with new homes.

2.2.1.2 Residents Ballot

In September 2020, residents were asked to rank the options in order of preference in a ballot. Option 4, which would see the full redevelopment of the Estate, including Manor Grove, was the favoured option of all blocks on the

Estate with the exception of Manor Grove residents. Manor Grove is where all freeholders on the Estate live.

The decision on which option to take forward was based on the results of the options survey, its alignment with council policies and aims, and supporting information in the Cost Benefit Analysis and the EHIA. It was determined that the Final Option for the Estate was Option 5 - the complete demolition and re-provision of all blocks with the exception of Manor Grove. The Manor Grove homes would be retained and refurbished, with infill housing established. The decision to proceed with Option 5 was based on taking all of the above information into account, and because it allows for the benefits of both Option 4 and Option 5 to be realised.

The Final Option was taken to a ballot of residents in February 2021, with the option to vote Yes or No on the Final Option. The majority of residents (87% of a 64% turnout) voted Yes to take forward the Final Option and redevelop the Estate.

'Hybrid' Planning Application

After the Residents Ballot voted Yes to take forward the redevelopment of the Estate, Southwark's Cabinet approved the delivery plan including appointing a design team to develop a Masterplan for planning submission. The 'Hybrid' Planning Application for with full submission for Phase 1 was submitted and approved in 2022.

Phase 2 Planning Application

The Planning Application for Phase 2 of the Scheme was submitted in August 2024.

2.3 Policy context

2.3.1 National policy

National Planning Policy Framework: At a national level, the project will support the core principles of the National Planning Policy Framework as outlined below:

- 60. Planning policies and decisions should aim to deliver a sufficient supply of homes where **specific housing requirements** are addressed to meet as much of an areas identified housing need as possible, including an appropriate **mix of housing** types for the local community.
- 61. Planning policies and decisions should reflect the size, type and tenure of **housing needed for different groups** in the community. The groups should include those who require affordable housing, families with children, older people and people with disabilities.

- 66. Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least **10%** of the total number of homes to be available for **affordable home ownership**.
- 96. Planning policies and decisions should aim to achieve healthy, **inclusive and safe places** which:
 - a) **promote social interaction, neighbourhood centres, street layouts** that allow for easy pedestrian and cycle connections within and between neighbourhoods
 - b) **are safe and accessible**, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion
- 97. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
 - a) plan positively for the **provision and use of shared spaces, community facilities** (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments
- 98. Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.
- 102. **Access to a network of high-quality open spaces** and opportunities for sport and physical activity is important for the **health and well-being of communities**, and can deliver wider benefits for nature and support efforts to address climate change.

2.3.2 Regional policy

The London Plan: At a regional level, the London Plan sets out the economic, environmental and social framework for the development of Greater London. It consists of strategic approaches that will be guided by policy. Policies relevant to the project are set out below:

- Policy SD1 Opportunity areas:
 - B2) Support development which creates employment opportunities and **housing choice for Londoners**.
 - B3) Plan for and provide the necessary social and other infrastructure to **sustain growth** and create **mixed and inclusive communities**, working with infrastructure providers where necessary.
 - B9) Ensure planning frameworks are informed by **public and stakeholder engagement and collaboration** at an early stage and throughout their development.
- Policy D5 Inclusive design:

- B) Development proposal should achieve the highest standards **of accessible and inclusive design**. They should:
 - B1) be designed taking into account London's diverse population.
 - B2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion.
 - B3) be convenient and welcoming **with no disabling barriers**, providing independent access without additional undue effort, separation or special treatment.
 - B4) be able to be entered, used and exited safely, easily and with dignity for all.
 - B5) be designed to incorporate **safe and dignified emergency evacuation for all building users**.
- Policy D6 Housing quality and standards:
 - A) Housing development should be of **high-quality design** and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- Policy D7 Accessible housing:
 - A1) At least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'.
- Policy S1 Developing London's social infrastructure:
 - E) **New facilities should be easily accessible by public transport**, cycling and walking and should be encouraged in high streets and town centres.
- Policy G1 Green infrastructure:
 - A) London's network of **green and open spaces**, and green features in the built environment, **should be protected and enhanced**.
 - D) Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- Policy G4 Open space:
 - A2) Include appropriate designations and policies for the **protection of open space** to meet needs and address deficiencies.
 - A4) Ensure that open space, particularly green space, included as part of development remains publicly accessible
- Policy T2 Healthy Streets:

- A) Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.
- B2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.

2.3.3 Local policy

The Southwark Plan: The scheme will directly contribute to several of the Council's local strategic priorities, a summary of which is found below:

- **SP1 Homes for All:** The Council aims to build more homes, increasing the supply of different types of properties (private, housing association and council ownership) to **meet the needs of households of different sizes, on different incomes and with a variety of specific needs.**
 - P1 Social rented and intermediate housing
 - P7 Housing for older people
 - P8 Wheelchair accessible and adaptable housing
- **SP2 Southwark Together:** The Council aims to revitalise places and neighbourhoods to create new opportunities for residents and local businesses, to promote wellbeing and reduce inequalities so that people can have better lives in stronger communities. This includes regeneration in areas where people are vulnerable or face greater disadvantage, by **investing in the prevention and tackling causes of inequality.** Developments being designed for diverse communities will ensure accessibility, inclusivity and interaction in the area. This will create a **place where everyone can benefit from all activities**, including play spaces, leisure activities, and the natural environment, enabling all residents to feel proud of their home and create a sense of belonging in the community.
- **SP5 Thriving neighbourhoods and tackling health inequalities:** The Council aims to maintain and **improve the health and wellbeing of residents**, encouraging healthy lives by tackling the causes of ill health and inequalities. This will be achieved through increasing green spaces, introducing active design and improving access to healthcare, voluntary organisations and community health facilities.
- **SP6 Climate Emergency:** The council aims to provide spaces for people to connect with nature to address the climate emergency. By working with local people to deliver a clean, green and safe borough, the living environment will improve, reducing the poor air quality that can have significant health impacts.

Southwark Housing Strategy: At a local level, the Southwark Housing Strategy sets out the vision and objectives for housing across the borough.

- Southwark's goal for housing is: "To provide a mix of homes to help Southwark's economy grow, while enabling existing communities to have a future in the borough". This will help the borough to respond to fundamental issues in Southwark: **affordability, quality, security and encouraging pride and responsibility.**
- The strategy states the need to build more homes with high standards of design that ensure all residents are kept warm, dry and safe.
- The strategy includes a plan to **work with local residents** to achieve this vision. This includes working in partnership to tackle antisocial behaviour by designing out crime from new developments while protecting access to communal areas and facilities.

3 Review of existing evidence

This chapter presents a summary of the evidence of risks and opportunities. It includes existing evidence of risks and opportunities associated with Phase 2 of the Tustin Estate Regeneration Programme and associated protected characteristic groups who may be disproportionately affected, based on the initial desk-based review.

3.1 Existing published evidence

The below table summarises the existing evidence of risks and opportunities and associated protected characteristic groups, as identified in the 2010 Equality Act, who may be disproportionately affected prior to consideration of any mitigation measures in place. The table does not summarise actual equality effects but rather the potential risks and opportunities that arise from regeneration and housing redevelopment schemes. Risks are defined as potential adverse effects resulting from the scheme, and opportunities are defined as potential benefits. A full assessment of potential equality effects, based on the risks and opportunities identified below, is provided in Chapter 5. Protected characteristic groups include those defined in Chapter 1.

Key potential impacts that have been identified are presented in this chapter, with a detailed literature review provided in Appendix B.

Table 3.1: Evidence Summary

Effects on residents during the renewal process	Affected groups
Relocation and loss of social cohesion: The renewal process can involve temporary or permanent relocation of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and Pregnant people may also experience negative health impacts from this, including increased stress and anxiety.	<ul style="list-style-type: none"> ● Children ● Older people ● Disabled people ● Pregnant people ● People from ethnic minority backgrounds ● People from minority faith groups
Loss of access to community resources:	<ul style="list-style-type: none"> ● Children ● Older people

Effects on residents during the renewal process	Affected groups
<p>Redevelopment can result in the closure and/or relocation of existing community resources that are operating on the site. Any loss in access to these community resources due to closure or relocation away from the area can contribute to feelings of isolation and loneliness amongst local people. This is particularly the case where essential service, such as education and healthcare institutions, are lost. This may have adverse effects for a number of groups. Children can be adversely impacted by a loss of their social networks which may impact their development; whilst older people are at risk of community severance and social isolation. Disabled people are more likely to be lonely than the general population and may be disproportionately impacted by the closure of services.</p>	<ul style="list-style-type: none"> • Disabled people • Minority religious and faith groups
Access to finance as a result of relocation:	<ul style="list-style-type: none"> • Young people not in employment • Older people • Disabled people • Women • People from ethnic minority backgrounds • Lone parents • Low income households
Expenses associated with relocation:	<ul style="list-style-type: none"> • Young people • Older people • Disabled people • People from ethnic minority backgrounds • Women
Access to housing:	<ul style="list-style-type: none"> • Children • Disabled people • People from ethnic minority backgrounds • Women
Appropriate and accessible housing	
Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children , disabled	

Effects on residents during the renewal process	Affected groups
<p>people requiring adaptable and accessible housing, and people seeking affordable housing.</p>	
<p>A lack of suitable housing can lead to families living in overcrowded properties. Overcrowding can lead to negative impacts on children's health, putting them at increased risk of developing respiratory conditions, infections, psychological problems, SIDS, and stress.</p>	
<p>Health effects caused by poor housing, such as respiratory disease, is more likely to impact upon older people.</p>	
<p>Affordable housing</p>	
<p>The need for residents to relocate can cause difficulty in accessing affordable housing. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who have trouble trying to access appropriate and mainstream financial services, such as bank accounts, loans, and mortgages. This is also exacerbated by the increasing unaffordability of homeownership for many people in England and Wales in recent years</p>	
<p>Health effects associated with relocation:</p>	<ul style="list-style-type: none"> ● Children ● Older people ● Ethnic minority ● Pregnancy and maternity
<p>Relocation can have a negative impact on an individual's mental health and well-being. Relocation can create a great deal of stress and anxiety amongst children, young people and older people due to the need to adapt to new routines, facilities and surroundings.</p>	
<p>Health effects may also result from social isolation due to housing relocation, such as poorer mental health, obesity, alcoholism, and a greater risk of hospitalisation.</p>	
<p>Accessibility and mobility in the surrounding area:</p>	<ul style="list-style-type: none"> ● Children ● Disabled people ● Older people
<p>Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.</p>	
<ul style="list-style-type: none"> ● Safety and security: 	<ul style="list-style-type: none"> ● Young people ● Disabled people
<p>In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted</p>	

Effects on residents during the renewal process	Affected groups
activity including anti-social behaviour and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.	<ul style="list-style-type: none"> ● People from ethnic minority backgrounds ● LGBTQ+ people ● Men ● Older people ● Women ● Children
<ul style="list-style-type: none"> ● Information and communication: The process of regeneration often requires two-way communication between residents and the council and or housing authorities in order for residents to understand the options available to them. The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the methods of communication used. 	<ul style="list-style-type: none"> ● Older people ● Disabled people ● People from ethnic minority backgrounds
<ul style="list-style-type: none"> ● Impacts on local people after delivery of Phase 2 	
<p>Improved housing provision: Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption.</p>	<ul style="list-style-type: none"> ● Children ● Older people ● People from ethnic minority backgrounds
<p>Appropriate and accessible housing: Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home. Children living in cold homes are more than twice as likely to suffer from a variety of respiratory problems than children living in warm homes. Cold housing can negatively affect children's educational attainment, emotional wellbeing and resilience. Effects of cold housing are also evident among older people in terms of higher mortality risk, physical health and mental health.</p>	<ul style="list-style-type: none"> ● Disabled people
<p>Affordable housing: Certain groups are more likely to struggle to find affordable housing. Only 1 in 7 disabled people own their own homes;</p>	

Effects on residents during the renewal process	Affected groups
<p>whilst 40% of people from ethnic minority backgrounds live in low income homes. New social housing and affordable housing could impact these groups more, particularly in London.</p>	
<p>Improved access, mobility and navigation:</p>	<ul style="list-style-type: none"> ● Children ● Older people ● Disabled people
<p>Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area.</p>	
<p>Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.</p>	
<p>Improvements in public realm and green space:</p>	<ul style="list-style-type: none"> ● Older people ● Disabled people ● People from ethnic minority backgrounds ● Children
<p>Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is important to ensuring people feel that are a part of their community.</p>	
<p>Regeneration can improve access and mobility for vulnerable groups. In addition, increased green space has been shown to impact positively on both physical and mental health.</p>	
<p>Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development and their mental health.</p>	
<p>Provision of community facilities and improved social cohesion:</p>	<ul style="list-style-type: none"> ● Children ● Older people ● Disabled people ● People from ethnic minority backgrounds ● Pregnant people ● LGBTQ+ people
<p>Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They are safe spaces for communities who often face barriers to participation in society.</p>	
<p>An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social spaces such as sports facilities can also improve the wellbeing of children and reduce crime.</p>	
<ul style="list-style-type: none"> ● New employment and business opportunities: 	<ul style="list-style-type: none"> ● Older people

Effects on residents during the renewal process	Affected groups
<p>Redevelopment and regeneration can support job creation, promoting economic growth. Improved opportunities to access employment and education can address issues of inequality and improve social mobility by removing barriers to employment, faced by marginalised groups such as older people, disabled people, and those from ethnic minority backgrounds.</p>	<ul style="list-style-type: none"> ● Disabled people ● People from ethnic minority backgrounds ● Women ● Young people
<p>Safety and security:</p>	<ul style="list-style-type: none"> ● Young people ● Disabled people ● People from ethnic minority backgrounds ● LGBTQ+ people ● Men ● Older people ● Women ● Children

4 Area profile and proportionality

This chapter is split into three sections: providing an overview of the socio-demographic profile of the Estate, an overview of community resources and businesses on the Estate.

This section presents an updated area profile based on the most up to date national statistics as of autumn 2024, including the most recent Census, and a socio-demographic survey of the residents within the RLB to build up a picture of that specific population.

4.1 Overview of the socio-demographic profile of the area

The area profile summary below provides a demographic characterisation of the area in which Tustin Estate falls, as well as of the Phase 2 homes themselves. It is formed of nationally available official data and the results of a survey undertaken with residents in Autumn 2024.

4.1.1 Socio- demographic baseline

The baseline compares the socio-demographic profile of the Estate with the London Borough of Southwark, the Greater London region (or southeast regional level where London data is unavailable), and England. The summary includes analysis of protected characteristic groups under the Equality Act 2010 and the current socio- economic context of the area.

In comparing these regions, where the Estate deviates by more than 3%, the difference is reported as higher or lower; and where it deviates by 5% or more, the difference is reported as considerable.

The data used in the baseline is the most current publicly available data from the Office of National Statistics. Where there are higher proportions of certain groups on the Estate, this is written in **bold text**.

A more detailed breakdown of the baseline can be found in Appendix A.

4.1.2 Residents survey

The area profile also includes survey responses. Survey questions were designed to highlight the presence of a range of protected characteristic groups on the Site. The questions covered characteristics of existing residents who are likely to experience differential effects related to displacement.

Research was first conducted in Autumn 2024 and consisted of survey interviews with directly affected residents by our survey team. The survey team hand delivered letters explaining the aims of the survey along with a QR code to

complete the survey online; and returned to each home three times on different days at different times to give residents the opportunity to complete it in person. A more detailed breakdown of the survey can be found in Appendix A.

4.2 Socio-demographic profile

Table 4.1: Socio-demographic summary

Protected Characteristic	Estate comparison with Southwark, Greater London and England ⁷	Socio-demographic survey
Age	<ul style="list-style-type: none"> Population of children (18%) is broadly in line with Southwark (17%), Greater London (19%) and England (19%). Population of young people (12%) is broadly in line with Southwark (13%), Greater London (11%) and England (11%). Population of working age people living on the Estate (73%) is broadly in line with Southwark (75%), but slightly higher than Greater London (69%) and considerably higher than England (63%). Population of older people aged 65 and over (9%) is broadly in line with Southwark (8%) but slightly lower than Greater London (12%) and considerably lower than England (18%). 	<ul style="list-style-type: none"> 38% of households surveyed included children (aged 16 and under). 38% of households surveyed have residents aged 16-24. 50% of households surveyed have residents of working age. 50% of households surveyed have residents aged 65 and over.
Disability⁸:	<ul style="list-style-type: none"> 7% of the Estate have a disability that limits their day-to-day activities a lot. This is 	<ul style="list-style-type: none"> 50% of households surveyed have residents with no long-

⁷ To determine the population within the Estate code point data was used. Code point data is a point representing a postcode area (there are multiple within the Estate boundary). Each code point is assigned with Lower Super Output Area (LSOA) data from the LSOA that the point falls in. An LSOA is the smallest geographical area (an average of 1,500 residents and 650 households) for which most population data is published (beyond Census data).

⁸ Defined here as 'People whose day-to-day activities are limited in any way as a result of being disabled or because of a long-term health condition'

	<p>broadly in line with Southwark (6%), Greater London (6%) and England (7%).</p> <ul style="list-style-type: none"> 8% of the Estate have a disability that limits their day-to-day activities a little. This is broadly in line with Southwark (8%), Greater London (7%) and England (10%). 	<p>term health condition or disability (LTHD).</p> <ul style="list-style-type: none"> 25% of households surveyed have residents with a LTHD which limits their day-to-day activities a little. 25% of households surveyed have residents with a LTHD which limits their day-to-day activities a lot. 37.5% of households surveyed have household members with a physical impairment. 25% of households surveyed have household members with a mental health condition.
Gender reassignment	<ul style="list-style-type: none"> 91% of the Estate population have a gender identity the same as sex registered at birth. This is broadly in line with Greater London (91%) but slightly lower than England (94%). 1% of the Estate population have a gender identity different from sex registered at birth. This is broadly in line with Greater London (1%) but higher than England (0.2%). 	<ul style="list-style-type: none"> Each household surveyed has reported that their residents have the same gender identity as their sex registered at birth.
Marriage and civil partnerships	<ul style="list-style-type: none"> 25% of the Estate are married. This is broadly in line with Southwark (26%) but considerably lower than Greater London (40%) and England (45%). 0.4% of the Estate are in a registered civil partnership. 	<ul style="list-style-type: none"> 37.5% of household residents surveyed are single. 12.5% of household residents surveyed are married.

	<p>This is lower than Southwark (1%) but broadly in line with Greater London (0.3%) and England (0.2%).</p> <ul style="list-style-type: none"> 4% of the Estate are separated. This is broadly in line with Southwark (3%), Greater London (2%) and England (2%). 	<ul style="list-style-type: none"> 37.5% of household residents surveyed are divorced. 12.5% of household residents surveyed are widowed.
Pregnancy and maternity	<ul style="list-style-type: none"> The general fertility rate (live births per 1000 women aged 16-44) in the Estate (39.5) is considerably lower than Greater London (50.4) and England (51.9). The total fertility rate (avg. number of children born per woman) in the Estate (1.1) is broadly in line with Greater London (1.4) and England (1.5). 	<ul style="list-style-type: none"> No household residents surveyed are currently pregnant or have been pregnant in the last 12 months.
Race	<ul style="list-style-type: none"> 75% of people who live on the Estate are from an ethnic minority background. This is considerably higher than Southwark (65%), Greater London (63%) and England (27%). The largest ethnic minority group on the Estate are those from a Black African background (23%). This is considerably higher than in Southwark (16%), Greater London (8%), and England (3%). 25% of the Estate are White British. This is considerably lower than Southwark (36%), Greater London (37%) and England (74%). 	<ul style="list-style-type: none"> 75% of households surveyed are from an ethnic minority background. None of the households surveyed are from a Black African background. 25% of households surveyed are White British.

Religion or belief	<ul style="list-style-type: none"> 48% of the Estate are Christian. This is considerably higher than Southwark (43%) and Greater London (41%) but broadly in line with England (46%). 12% of the Estate are Muslim. This is broadly in line with Southwark (10%), slightly lower than Greater London (15%) and considerably higher than England (7%). 15% of the Estate identify with a minority faith group.⁹ This is broadly in line with Southwark (13%), considerably lower than Greater London (25%) and slightly higher than England (11%). 	<ul style="list-style-type: none"> 62.5% of households surveyed are Christian. 12.5% of households surveyed are Muslim. 12.5% of households surveyed identify with a minority faith group.
Sex	<ul style="list-style-type: none"> The population of men on the Estate (48%) is broadly in line with Southwark (48%), Greater London (49%) and England (49%). The population with women on the Estate (52%) is broadly in line with Southwark (52%), Greater London (52%) and England (51%). 	<ul style="list-style-type: none"> 50% of households surveyed have male residents. 87.5% of households surveyed have female residents.
Sexual orientation	<ul style="list-style-type: none"> No information is publicly available for the Estate. 	<ul style="list-style-type: none"> All household residents surveyed are self-identified as heterosexual or straight.
Deprivation	<ul style="list-style-type: none"> 58% of the Estate live in the most deprived quintile. This is considerably higher than Southwark (23%), Greater London (17%) and England (20%). 0% of the Estate live in the least deprived quintile. This is 	<ul style="list-style-type: none"> The survey did not collect data on rates of deprivation. The survey did collect socio-economic data.

⁹ Defined here as a non-Christian religion.

	slightly lower than Southwark (3%) and considerably lower than Greater London (11%) and England (19%).	<ul style="list-style-type: none"> • 50% of households surveyed collect universal credit. • 12.5% of households surveyed claim child tax credit. • 25% of households surveyed claim housing benefits or local housing allowance. • 12.5% of households surveyed claim pension credit.
Employment status	<ul style="list-style-type: none"> • No information is publicly available for the Estate. 	<ul style="list-style-type: none"> • 12.5% of households surveyed have residents who work as full-time carers for the elderly, disabled, children, or are unable to work. • 25% of households have residents in full-time employment. • 25% of households surveyed have residents who are retired. • 12.5% of households have residents who are unemployed but available to work. • 12.5% of households have residents who are unable to work. • 12.5% of households have residents in part-time employment.

Source: Office for National Statistics, Mott MacDonald, 2024

4.3 Further survey responses

The survey carried out in Autumn 2024 with the residents of Heversham and Kentmere House also asked residents about further aspects of their socio-demographic profile than the protected characteristics outlined in the Equality Act.

Table 4.2 outlines this information.

Table 4.2: Summary of survey responses

Theme	Survey response
Education status of under 18s	<ul style="list-style-type: none"> 37% of residents were eligible to provide information on under 18 enrolment Of these, the most common type of enrolment was enrolment in a state nursery or school in Southwark
Time spent caring for household members	<ul style="list-style-type: none"> 38% of households surveyed do not have caring responsibilities for household members. 13% of households surveyed spend 9 or less hours per week caring for household members. 25% of households surveyed spend 50 or more hours per week caring for household members.
Educational attainment	<ul style="list-style-type: none"> 21% of households surveyed have members with no formal qualifications. 50% of households surveyed have members with Level 1 qualifications. 17% of households surveyed have members with Level 4 (degree level) or above qualifications.
Salary	<ul style="list-style-type: none"> 25% of households surveyed have an annual income less than £10,000. 58% of households surveyed preferred not to disclose this information.
Language	<ul style="list-style-type: none"> 92% of households reported that English is the preferred language to use.

Source: Mott MacDonald, 2024

The table below provides information on the makeup of the residential households who responded to the survey. The majority of residents are long term residents, with a household size of two or less. However nearly half of

households who responded said that they experienced overcrowding in their current property.

Table 4.2: Households

Theme	Survey response
Residential makeup	<ul style="list-style-type: none"> • All respondents are residential council tenants. • Most respondents (42%) have lived in their property for over 20 years, with a further 29% resident for 10-20 years. • The most common type of household who responded is lone parents with dependent children (38%) • 33% of households are single people • 51% of households have one or two residents • 25% of households have three residents • 21% of households have four or more residents
Number of bedrooms	<ul style="list-style-type: none"> • 38% of households surveyed have one bedroom. • 17% of households have two bedrooms • 42% of households surveyed have three bedrooms.
Feedback from residents on numbers of bedrooms	<ul style="list-style-type: none"> • 58% of households reported to have the right number of bedrooms. • 42% of households reported that there is overcrowding and not the right number of bedrooms.
Adaptions to household	<ul style="list-style-type: none"> • One household reported having aids or adaptions made to their household- the addition of a handrail.

Source: Mott MacDonald, 2024

The survey also asked respondents for their feedback on the regeneration. Whilst the feedback was generally positive on how they anticipated the regeneration to impact them; many respondents noted that they would like further information on specific impacts.

Table 4.3: Survey feedback

Theme	Survey response
Feedback on the Estate regeneration	<ul style="list-style-type: none"> • The majority of residents anticipate the estate regeneration will have a positive impact on health and wellbeing (67% of households), compared with 13% of households who anticipate a negative impact. • Half of all households anticipate the estate regeneration will have a positive impact on childcare and social provision of young

Theme	Survey response
	<p>people, compared with one (4%) who anticipates a negative impact.</p> <ul style="list-style-type: none">• Half of all households anticipate the estate regeneration will have a positive impact on employment and skills, compared with one (4%) who anticipates a negative impact.• Over half of all households (54%) anticipate the estate regeneration will have a positive impact on care and support in their households, compared with one (4%) who anticipates a negative impact.• However, respondents report requiring needing more information on how the regeneration could impact employment and skills, and childcare and social provision

Source: Mott MacDonald, 2024

5 Impact Assessment

This section identifies the potential impacts that could arise for people with protected characteristics, as a result of Phase 2 of the redevelopment of the Estate and potential use of CPO powers. In line with previous EHAs conducted for this scheme, it includes a coloured rating system to demonstrate the overall impact pre and post mitigation.

The impacts are split into two sections. Table 5.1 assesses the impact on residents and community resources during Phase 2; whilst Table 5.2 assesses the impact on the community after Phase 2 is complete.

5.1 Overview: assessing equality risks and opportunities

The scale below has been used to identify the extent of both risks and opportunities. Where there is more than one impact, the rating summarises the overall impact. Please note that the rating following mitigation captures where there may be possible further mitigation measures that could be put in place by the Council to further reduce the effect, or the impact has been reduced for identified protected characteristic groups to a level that is no worse than that experienced by the rest of the population.

59

Major risk	XXX
Moderate risk	XX
Minor risk	X
Neutral	0
Minor opportunity	✓
Moderate opportunity	✓✓
Major opportunity	✓✓✓

5.2 Impact on residents and community resources during Phase 2

The following table describes the potential impacts during the delivery of Phase 2 and the use of CPO powers on protected characteristic groups, with a focus on impacts for residents and local community resources during the delivery of Phase 2. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Existing measures Southwark Council has in place to mitigate or enhance impacts are set out, and the impacts are rated on their effects before and after mitigation. Finally, recommendations are made as to how Southwark can further mitigate risk or enhance opportunity.

Table 5.1: Impacts on residents and community resources during renewal

Potential equality and health risks	Without mitigation	With mitigation	Existing Southwark Council mitigations or enhancements	Recommendations	Overall equality impact
Relocation and loss of social cohesion: Redevelopment of housing estates can involve the temporary or permanent resettlement of residents as a result of demolition of their existing homes. This could increase the distance of residents from family, friends, or places of social connection, such as community centres or	XXX	0	<ul style="list-style-type: none"> A phasing plan has been developed to limit the number of temporary moves to a maximum of two, with residents only making one move in most circumstances. However, residents of Heversham House and Kentmere House will have to be temporarily 	<ul style="list-style-type: none"> The following recommendations are outlined to enhance equality impacts and mitigate risks further: Work proactively and constructively through a range of channels, including face to 	<p>There is a potential for adverse effects amongst certain equality groups as a result of a loss of social cohesion linked to relocation.</p> <p>As the evidence review highlights, children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds and</p>

<p>schools. Relocation may therefore result in a loss of social cohesion for residents. The evidence review highlights that certain groups can be differentially impacted by this change. The groups include children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds and people from minority faith groups.</p> <p>People from ethnic minority groups are disproportionately represented in the population of the local area (75%) when compared with Southwark. Furthermore, the resident equality survey has identified that people from ethnic minority backgrounds, children, older people, disabled people, and people from minority faith groups reside in Phase 2 buildings.</p>		<p>rehoused in the Phase 1 homes whilst their new permanent home is built. This means residents will remain on the Estate.</p> <ul style="list-style-type: none"> Residents will not have to bid for a home, and will be able to choose one in line with need. Ahead of time, residents will know the exact home they will be moving to; they will know the timetable for building that home; and will be able to meet their neighbours in advance of the move All residents will have access to a dedicated support team. The team will help individuals understand the proposals, and the best options for each 	<p>face engagement where possible with residents, keeping up-to-date records of changing needs and circumstances, particularly if residents who will be most affected by refurbishment and/or relocation in order to remediate feelings of social isolation.</p> <ul style="list-style-type: none"> Temporary housing should adhere to accessibility guidelines and consider the environmental needs of tenants- e.g. elderly residents should 	<p>people from minority faith groups could be differently adversely impacted. As people from an ethnic minority background are disproportionately represented within the population of the LIA they may also experience disproportionate adverse impacts.</p> <p>Furthermore, the resident equality survey has identified that people from ethnic minority backgrounds, children, older people, disabled people, and people from minority faith groups also reside in Phase 2 buildings. As such, these groups may also be disproportionately affected.</p> <p>However, the existing mitigations listed in Column 3, including that</p>
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			<p>individual. This team will support vulnerable residents with all aspects of their move and liaise with family members as necessary.</p>	<p>avoid being allocated in temporary accommodation near busy roads.</p>	<p>residents can be rehoused on the Estate whilst their new home is built, limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
<p>Loss of community resources: Redevelopment of housing estates and local communities can result in the closure or relocation of existing community resources which operate on the Site. Pilgrims Way Primary School will be demolished as part of the Scheme</p>	<p>XXX</p>	<p>0</p>	<ul style="list-style-type: none"> Pilgrim's Way school will remain open during the renewal process, so there will be no requirement for pupils to change schools while the new school is being built. 	<ul style="list-style-type: none"> The following recommendations are outlined to enhance equality impacts and mitigate risks further: Work proactively and constructively 	<p>There is a potential for adverse effects amongst certain equality groups as a result of a loss of community resources. As the evidence review highlights, disabled people, older people, children and those from</p>

<p>Loss in access to community resources due to closure or relocation away from the local area may have adverse effects for a number of groups, including disabled people, older people, children and those from religious and faith groups. The loss of community resources to maintain social links can contribute to feelings of isolation and loneliness in older people and disabled people. Demolition and resource relocation could also adversely affect access to child social networks.</p> <p>The resident equality survey has identified that children, disabled people and older people reside in Phase 2 buildings.</p>		<ul style="list-style-type: none"> Public realm works to be staggered to ensure there is always access to green and recreational space. Temporary amenity space will be provided throughout the redevelopment process. 	<p>through a range of channels, including face to face engagement where possible with residents, keeping up-to-date records of changing needs and circumstances, particularly if residents who will be most affected by refurbishment and/or relocation in order to remediate feelings of social isolation.</p> <ul style="list-style-type: none"> Maintain continuity in access to community resources (e.g. churches and play areas) where 	<p>religious and faith groups could be differently adversely impacted. The resident equality survey identified that children, disabled people and older people reside in Phase 2 buildings. These groups may also be disproportionately affected. However, the existing mitigations listed in Column 3, including that the primary school will remain open in its existing building, limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are</p>
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				possible. If this is not possible, consider pop-up spaces for these uses.	anticipated to be minimal.
<p>Access to finance as a result of relocation:</p> <p>The need to relocate as a result of redevelopment schemes can require residents to access new means of finance to accommodate the relocation.</p> <p>Should access to additional finances (such as loans or mortgages) be necessary as a result of the relocation, those at risk of financial exclusion are more likely to be negatively impacted. Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, young people not in employment, lone parents,</p>	XX	X	<ul style="list-style-type: none"> Resident freeholders, leaseholders, and tenants are entitled to a Disturbance Payment to cover any costs reasonably incurred in moving home or purchasing a property under the CPO compensation guidance. Under the CPO compensation guidance, resident freeholders and leaseholders are entitled to receive home loss compensation at 10% 	<ul style="list-style-type: none"> The following recommendations are outlined to enhance equality impacts and mitigate risks further: Should the CPO be used, residents should be supported through market search assistance to find an alternative property in the local area, if this is desired, which meets their needs. 	<p>There is a potential for adverse effects amongst certain equality groups as a result of issues accessing the finance required to finance relocation.</p> <p>As the evidence review highlights, young people not in employment, lone parents, disabled people, women, ethnic minority groups and older people are more likely to experience barriers in accessing additional finances and may therefore differentially experience adverse impacts.</p>

<p>disabled people, women, ethnic minority groups and older people are more likely to experience barriers in accessing additional finances.</p> <p>People from ethnic minority groups are disproportionately represented in the population of the local area (75%) when compared with Southwark.</p> <p>The resident equality survey has also identified that people from ethnic minority backgrounds, disabled people, older people, and women reside in Phase 2 buildings.</p>		<p>of the market value of the property.</p> <ul style="list-style-type: none"> • A number of options are available to leaseholders on the site, including shared ownership or shared equity loan. For leaseholders who cannot meet the equity requirements for these, council tenancies will be available, subject to financial appraisal. • Southwark Council commitment to work with leaseholders and freeholders to ensure that no household is worse off as a result of renewal. 	<ul style="list-style-type: none"> • Work proactively and constructively through a range of channels, including face to face engagement where possible, keeping up-to-date records of changing needs and circumstances—particularly those who are most affected by financial exclusion. 	<p>As people from an ethnic minority background are disproportionately represented within the population of the LIA, they may also experience disproportionate adverse impacts.</p> <p>Furthermore, the resident equality survey identified that people from ethnic minority backgrounds, disabled people, older people, lone parents, and women reside in Phase 2 buildings. As such, these groups may be also be disproportionately affected.</p> <p>However, the existing mitigations listed in Column 3, limit any adverse impacts. Consideration should also be given to the</p>
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					recommendations in Column 4 to further manage any impacts.
					With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.
Expenses associated with relocation: The need to relocate as a result of redevelopment schemes can require residents to finance costs associated with moving. Relocation can lead to an increase in their financial outgoings due to costs associated with moving and securing new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture.	XX	X	<ul style="list-style-type: none"> Resident freeholders, leaseholders, and tenants are entitled to a Disturbance Payment to cover any costs reasonably incurred in moving home or purchasing a property under the CPO compensation guidance. Should a resident's home require demolition, a Home Loss Payment (sum in recognition of home loss) and a 	<ul style="list-style-type: none"> The following recommendations are outlined to enhance equality impacts and mitigate risks further: Should the CPO be used, residents should be supported through market search assistance to find an alternative property in the local area, if this 	<p>There is a potential for adverse effects amongst certain equality groups as a result of expenses associated with relocation. As highlighted in the evidence review, groups more likely to be low income such as young people, older people, disabled people, ethnic minority groups, and women, may experience adverse differential impacts. As people from an ethnic minority</p>

<p>The costs are more likely to impact those who are low income, such as young people, older people, disabled people, ethnic minority groups, and women.</p> <p>People from ethnic minority groups are disproportionately represented in the population of the local area (75%) when compared with Southwark.</p> <p>The resident equality survey has identified that young people, older people, disabled people, ethnic minority groups and women reside in Phase 2 buildings.</p>		<p>Disturbance Payment would be made to Council tenants and homeowners. The Home Loss Payment would be a one-time payment, whilst the Disturbance Payment may be made more than once where necessary to facilitate multiple moves. This includes reimbursement of funds for removals, disconnection and reconnection of cooker/washing machine, redirection of mail, BT Telephone Installation, cable TV/TV installation and reasonable adjustments to carpets and curtains.</p> <ul style="list-style-type: none"> Additional costs for freeholders resulting 	<p>is desired, which meets their needs.</p> <ul style="list-style-type: none"> Work proactively and constructively through a range of channels, including face to face engagement where possible, keeping up-to-date records of changing needs and circumstances—particularly those who are most affected by financial exclusion. 	<p>background are disproportionately represented within the population of the LIA and the Phase 2 buildings, they may also experience disproportionate adverse impacts.</p> <p>Furthermore, the resident equality survey identified that young people, older people, disabled people, ethnic minority groups and women reside in Phase 2 buildings. These groups may therefore be disproportionately affected.</p> <p>However, the existing mitigations listed in Column 3, limit any adverse impacts. Consideration should also be given to the recommendations in</p>
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			<p>from the works to the wider estate as well as costs related to services and utilities will be set out in detail as the earliest opportunity.</p> <ul style="list-style-type: none"> Council tenants will receive information regarding the indicative rent and council tax of each property size before the selection process. 		<p>Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
<p>Access to housing</p> <p>Appropriate and accessible housing:</p> <p>Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children, people requiring adaptable and accessible housing, people seeking affordable housing and</p>	XXX	X	<ul style="list-style-type: none"> Residents will be supported to access homes that meet their needs and preferences. A mix of housing sizes and typologies will be available in the redevelopment, to provide for different housing needs. 	<ul style="list-style-type: none"> The following recommendations are outlined to enhance equality impacts and mitigate risks further: The Council should continue to communicate proactively with residents through a range of 	<p>Appropriate and accessible housing</p> <p>There is a potential for adverse effects amongst certain equality groups as a result of difficulties accessing appropriate and accessible housing.</p> <p>As listed in the evidence review, families with children, intergenerational families from ethnic minority backgrounds and</p>

<p>large intergenerational ethnic minority households.</p> <p>The residents of Heversham and Kentmere House who will remain on the Estate will be temporarily rehoused within the Phase 1 accommodation whilst Phase 2 is built.</p> <p>All existing residents will be required to relocate once their properties have been acquired by the Council. This relocation will take place either voluntarily or via the Council's CPO.</p> <p>Disabled people are more likely to face barriers to accessing the appropriate mobility aids within properties and are more likely to face resistance from Councils to agree funding for mobility aids that will increase independent living. In addition, ethnic minority groups are more likely to live in intergenerational houses due to cultural norms. Furthermore, individuals from an ethnic minority background</p>		<ul style="list-style-type: none"> These homes will be wheelchair accessible, adaptable and flexible to meet resident needs, larger balconies and communal facilities such as living rooms. Those with special housing needs to be prioritised throughout the rehousing process. All tenanted homes will be adapted for residents needs as required. New homes will have a meter reading for heating, water and electricity bills with all buildings designed to be as efficient as possible to minimise costs on utility bills. Residents will not have to bid for a home, and will be able to choose 	<p>channels, including face-to-face engagement where possible, keeping up-to-date records of changing needs and circumstances, particularly those who are most affected by a change to accessible and appropriate housing such as families with children</p> <p>Early estimates of changes to rent and service charges as a result of the redevelopment should be communicated to</p>	<p>disabled people are likely to differentially impacted.</p> <p>As people from ethnic minority groups are disproportionately represented in the local area (75%) these groups may also experience disproportional adverse impacts. Furthermore, the resident equality survey identified that disabled people reside in Phase 2 buildings, and they may also be disproportionately affected.</p> <p>However, the existing mitigations listed in Column 3 limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p>
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<p>are more likely to face barriers to accessing appropriate housing that meets the needs for the number of individuals living in one property.</p> <p>People from ethnic minority groups are disproportionately represented in the population of the local area (75%) when compared with Southwark.</p> <p>The resident equality survey has identified that disabled people, people on low incomes and ethnic minority groups reside in Phase 2 buildings.</p> <p>Affordable housing: Where renewal schemes require the resettlement of residents, rent charges, council tax charges and service charges have the potential to increase for residents. As the new builds will be of higher value, the rent will be proportionally higher.</p>		<p>one in line with need. Ahead of time, residents will know the exact home they will be moving to; they will know the timetable for building that home; and will be able to meet their neighbours in advance of the move</p> <ul style="list-style-type: none"> • All residents will have access to a dedicated support team. The team will help individuals understand the proposals, and the best options for each individual. This team will support vulnerable residents with all aspects of their move and liaise with family members as necessary. • A dedicated Tustin local lettings system 	<p>residents as soon as possible.</p>	<p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p> <p>Affordable housing</p> <p>There is a potential for adverse effects amongst certain equality groups as a result of issues accessing affordable housing.</p> <p>As highlighted by the evidence review, young people, women, disabled people, older people who are retired, and LGBTQ+ people may differentially experience adverse impacts.</p> <p>The resident equality survey identified that young people, disabled people, ethnic minority</p>
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<p>Young people, women, disabled people, older people who are retired, and LGBTQ+ people are most likely to face financial issues when securing alternative housing.</p> <p>The resident equality survey has identified that young people, older retired people, disabled people and women reside in Phase 2 buildings.</p>			<p>will be used to prioritise moves based on housing need, medical need and existing housing arrangements such as gardens or location within a block.</p>	<p>groups and women reside in Phase 2 buildings. These groups may therefore be disproportionately affected. However, the existing mitigation listed in Column 3 limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
<p>Health effects as a result of relocation</p> <p>The Scheme has the potential to impact upon the health of local people due to the effects of relocation. Home relocation can have a negative impact on</p>	XX	X	<ul style="list-style-type: none"> • A phasing plan has been developed to limit the number of temporary moves to a maximum of two, with residents only making one move in most 	<ul style="list-style-type: none"> • The following recommendations are outlined to enhance equality impacts and mitigate risks further: <p>There is a potential for adverse effects amongst certain equality groups as a result of health effects associated with relocation.</p>

<p>mental health and well-being, particularly for ethnic minority groups, children, young people, older people, disabled people and pregnant people.</p> <p>In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood.</p> <p>Health effects may arise as a result of the stress of relocation, the environmental effects of demolition and construction processes and/or as a result from social isolation due to housing relocation.</p> <p>People from ethnic minority groups are disproportionately represented in the population of the local area (75%) when compared with Southwark.</p> <p>The resident equality survey has also identified that children, young people, disabled people</p>		<p>circumstances. However, residents of Heversham House and Kentmere House will have to be temporarily rehoused in the Phase 1 homes whilst their new permanent home is built. This means residents will remain on the Estate.</p> <ul style="list-style-type: none"> Resident leaseholders are entitled to a Disturbance Payment to cover any costs reasonably incurred in moving home or purchasing a property under the CPO compensation guidance. Resident property owners are entitled to receive home loss compensation at 10% of the market value of the property under the 	<ul style="list-style-type: none"> If possible, permanently rehouse residents within the Phase 1 homes they are being temporarily moved to Ensure that accessible and inclusive support options are provided for disabled individuals who require support services during relocation. Limit the amount of times individuals are moved, where possible, to reduce stress. Continue to explore options to grow and advocate existing 	<p>As highlighted in the evidence review, older people, disabled people, people from ethnic minority backgrounds, children, young people and pregnant people may be differentially adversely impacted by this. This is a particular concern for older people, as there is a serious risk of mortality when relocating older people.</p> <p>As people from ethnic minority groups are disproportionately represented within the population (75%) they may also experience disproportionate adverse health impacts. Furthermore, the resident equality survey identified that ethnic minority groups, children, young people, disabled people</p>
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<p>and older people reside in Phase 2 buildings.</p>		<p>CPO compensation guidance.</p> <ul style="list-style-type: none"> • The Council have begun engagement with leaseholders to reach agreement on the properties • Public realm works to be staggered to ensure there is always access to green and recreational space. • Temporary amenity space will be provided throughout the redevelopment process. • Environmental effects to be mitigated through considerate construction practices and environmental management planning. • Dedicated resident support continues to be available online and 	<p>peer support groups such as the Tustin Resident Project Group (RPG). Review accessible provisions within group meetings.</p> <ul style="list-style-type: none"> • The Council should continue to communicate proactively with residents through a range of channels, including face-to-face engagement where possible, keeping up-to-date records of changing needs and circumstances, particularly those who are most affected by a 	<p>and older people reside in Phase 2 buildings. These groups may also be disproportionately affected.</p> <p>Whilst the mitigations listed in Column 3 do help to mitigate some risk, consideration should also be given to the recommendations in Column 4 to further manage any impacts, particularly allowing residents to permanently remain within their Phase 1 temporary homes.</p> <p>Whilst the Council have taken measures to mitigate this risk, there remains the potential for adverse health impacts on older people in particular.</p>
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			in person where needed.	change to accessible and appropriate housing such as families with children.	
<p>Safety and security:</p> <p>In the lead up to renewal, and during the decanting and demolition of properties in the area, properties will be vacated. This could attract unwanted activity including anti-social behaviour and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.</p> <p>The effects of crime are likely to differentially impact protected characteristic groups who are more likely to be vulnerable to attacks including disabled people, young people, LGBTQ+ people and people from ethnic minority groups. The groups</p>	X	O	<ul style="list-style-type: none"> • New buildings and spaces are designed to reduce the opportunities for crime and anti-social behaviour. Homes are designed to give views onto green spaces, with new entry halls to buildings with improved lighting and security. 	<ul style="list-style-type: none"> • The following recommendations are outlined to enhance equality impacts and mitigate risks further: • Ensure best practices for enhancing safety and preventing crime are considered throughout the planning and construction process. • Ensure a process is in place for reporting and addressing 	<p>There is a potential for adverse effects amongst certain equality groups as a result of changes to feelings of safety and security during the demolition and construction process.</p> <p>As highlighted in the evidence review, groups who are more likely to be vulnerable to harassment such as disabled people, young people, LGBTQ+ people and people from ethnic minority groups, may experience adverse impacts differentially.</p> <p>As people from ethnic minority groups are</p>

<p>may be more likely to experience harassment or antisocial behaviour, and therefore are more likely to experience the effects of unwanted antisocial behaviour within vacant areas and buildings.</p> <p>The population of the LIA is disproportionately represented by ethnic minority groups (75%).</p> <p>The resident equality survey has identified that ethnic minority groups, young people and disabled people reside in Phase 2 buildings.</p>			<p>incidents of Anti-Social Behaviour (ASB) within the Estate.</p> <ul style="list-style-type: none"> Monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of 	<p>disproportionately represented within the population, they may also experience disproportionate adverse impacts related to safety and security.</p> <p>Furthermore, the resident equality survey identified that ethnic minority groups, young people and disabled people reside in Phase 2 buildings. These groups may also be disproportionately affected.</p> <p>However, the existing mitigation listed in Column 3, limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p>
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				community for residents.	With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.
<p>Accessibility and mobility in the surrounding area:</p> <p>Evidence suggests that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic on local roads, reducing parking (as construction vehicles may use existing parking facilities), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.</p> <p>Disabled individuals who utilise mobility aids, or require extra space to navigate, may struggle</p>	XXX	X	<ul style="list-style-type: none"> Resident car owners who currently have a parking permit will be re- provided with a parking permit for the redeveloped estate. Blue badge parking permits will also be re- provided. All residents will have access to a dedicated support team. The team will help individuals understand the proposals, and the best options for each individual. This team will support vulnerable residents with all aspects of 	<ul style="list-style-type: none"> The following recommendations are outlined to enhance equality impacts and mitigate risks further: As with health impacts, good access and mobility would be maintained through the creation of a CEMP, which would set out arrangements for any necessary diversions, which should provide 	<p>There is potential for adverse effects amongst certain equality groups as a result of changes to accessibility and mobility in the surrounding area. Disabled people, older people, and parents with pushchairs are more likely to be impacted by blocked or narrow pathways and may experience differential adverse impacts.</p> <p>The resident equality survey identified that older people and disabled people reside in Phase 2 buildings, as well as</p>

<p>with narrowed paths during the construction process of renewal, limiting their accessibility to facilities in the area. This can create feelings of isolation and poor mental wellbeing. Older people, and parents with pushchairs may also be impacted by blocked pedestrian routes.</p> <p>The resident equality survey has identified that older people and disabled people, as well as parents with young children, reside in Phase 2 buildings.</p>			<p>their move and liaise with family members as necessary.</p>	<p>well-signed routes that limit extra travelling distances. The CEMP should also ensure that access is maintained through measures such as such as limiting pavement obstructions and maintaining disabled parking. The CEMP should specifically consider the needs of protected characteristic groups who may have limited mobility.</p>	<p>parents with young children. These groups may also be disproportionately affected. However, the existing mitigations listed in Column 3, limit any adverse impacts. Consideration should also be given to the recommendations in Column 4 to further manage any impacts.</p> <p>With the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
<p>Information and communication: Complex material and information on the regeneration may present a challenge to</p>	XX	O	<ul style="list-style-type: none"> • All residents will have access to a dedicated support team. The team will help 	<ul style="list-style-type: none"> • The following recommendations are outlined to enhance equality 	<p>There is potential for adverse effects amongst certain equality groups as a result of issues related</p>

<p>those who have different information and communication needs.</p> <p>Individuals who have a disability, and people who do not speak English well may face barriers to engaging with engagement materials regarding Estate regeneration. Furthermore, this could disadvantage and cause distress/confusion amongst individuals.</p> <p>The resident equality survey has identified that disabled people, and people for whom English is not their preferred language reside in Phase 2 buildings.</p> <p>Furthermore, the residential survey identified that some households would like more information on the scheme's wider benefits,</p>		<p>individuals understand the proposals, and the best options for each individual. This team will support vulnerable residents with all aspects of their move and liaise with family members as necessary.</p>	<p>impacts and mitigate risks further:</p> <ul style="list-style-type: none"> ● Accessible format consultation materials, including but not limited to, easy read, different community languages, audio, and braille, should be available if requested. ● Access to information and communication should be available in a number of formats, including online, telephone and one to one meetings, to ensure that all residents have 	<p>to information and communication.</p> <p>Individuals who have a disability or other communication needs may face barriers to engaging with engagement materials. The resident equality survey identified that disabled people and people for whom English is not their preferred language reside in Phase 2 buildings. These groups may be disproportionately affected.</p> <p>However, with the appropriate mitigations and recommendations taken forward, effects are anticipated to be minimal.</p>
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			<p>safe access to information and support services</p> <ul style="list-style-type: none"> Information should be provided in a clear and easy to understand way and communicated in a timely manner. This includes keeping website information up to date. 	
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5.3 Impacts on the community following delivery of Phase 2

The following table describes the potential impacts following delivery of Phase 2 and the use of CPO powers on protected characteristic groups, with a focus on impacts for residents and local community resources during the delivery of Phase 2. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Existing measures Southwark Council has in place to mitigate or enhance impacts are set out, and the impacts are rated on their effects before and after mitigation. Finally, recommendations are made as to how Southwark can further mitigate risk or enhance opportunity.

Table 5.2: Impact on community following delivery of Phase 2

Potential equality and health risks	Without mitigation	With mitigation	Existing Southwark Council mitigations or enhancements	Recommendations	Overall equality impact
<p>Improved housing provision: Appropriate and accessible housing</p> <p>Phase 2 of the scheme provides a key opportunity to improve housing provision for the local population, with a total of 295 homes provided. The housing will meet a range of local needs including flats for families, and flats with flexible accessibility. The evidence review found that improved housing provision will improve both physical and mental health and wellbeing outcomes for those that live in housing that is adequately warm. The provision of an adequate level of accessible housing (accessible homes and a diverse selection of accommodation types) will also benefit the local population. As</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> Large uplift in new homes. 51 homes available for key workers All homes built in Phase 2 available for rent to the wider community, as all existing eligible residents of the Tustin Estate were rehoused on Phase 1. All new homes built to new building, space and accessibility standards. Potential health effects of overcrowding are addressed. Private external space for every home (garden, patio or 	<ul style="list-style-type: none"> The Council should: Ensure rental fees and service charges for proposed properties should be shared with the local community as far in advance of scheme operation as possible to ensure concerns regarding affordability are heard. 	<p>There is potential for major beneficial impacts for certain equality groups as a result of improved housing provision. Improved housing provision is likely to bring affordable, accessible, and appropriate homes for local people. Older people, children, young people, disabled people, women, and LGBTQ+ people are likely to differentially benefit from these new homes. As people from ethnic minority groups are disproportionately represented in the local community, these groups</p>

<p>a result, older people, children and young people, disabled people and those from an ethnic minority background are likely to benefit from improved housing stock in the local area. People from an ethnic minority background make up a disproportionately high section of the population of the local area.</p> <p>The resident equality survey has identified that ethnic minority groups, disabled people, older people, young people and children reside in Phase 2 buildings.</p> <p>Affordable housing</p> <p>The Scheme aims to provide affordable housing. 144 of the Phase 2 homes are expected to be available for private let, with 90 available at social rent.</p> <p>As stated in the literature review, young people, women, disabled people, and LGBTQ+</p>		<p>balcony) to capture health benefits of access to outdoor space.</p> <ul style="list-style-type: none"> • New homes designed to maximise natural daylight and views • Energy efficiency improvements to address potential health effects of cold housing. • Mixture of shared and private external space in blocks . • Housing to suit different needs, including family homes • Large uplift in new homes. • All new homes will meet the Wheelchair User Dwelling Standards, and 10% will meet the 		<p>are also likely to disproportionately benefit. Furthermore, the resident equality survey identified that ethnic minority groups, women, disabled people, older people, young people and children reside in Phase 2 buildings. These groups may also disproportionately benefit. Benefits can be maximised by implementing the recommendations in Column 4.</p> <p>Overall, there is likely to be a major positive impact on equality groups due to improved housing provision after delivery of Phase 2.</p>
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<p>people are most likely to face financial issues when securing alternative housing.</p> <p>The resident equality survey has identified that young people, women and disabled people reside in Phase 2 buildings.</p>		<p>Adaptable Dwellings Standard.</p>		
<p>Improved access, mobility and navigation:</p> <p>Phase 2 of the scheme will open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age or disability, using principles of inclusive design. Phase 2 will include the delivery of better external lighting for safety and visibility, clear and secure routes, the prioritisation of pedestrians on routes through the estate, as well as better signage</p> <p>There are a number of equality groups who can experience</p>	<p>✓✓✓</p>	<p>✓✓✓</p>	<ul style="list-style-type: none"> • Better external lighting for safety and visibility. • Clearer and more secure routes for people passing through the estate. • New estate priorities pedestrians, with clear separate pedestrian routes and new access to existing routes • Improved signage for wayfinding • Secure and controlled parking. • New benches. 	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of improvements to access, mobility and navigation after Phase 2 is delivered.</p> <p>Children, older people, and disabled people are likely to differentially benefit from these improvements as a result of their specific needs (as demonstrated in the literature review).</p> <p>The resident equality survey identified that disabled people, children</p>

<p>difficulties with access, mobility and navigation who could benefit from improvements in this area. These include children, older people, and disabled people.</p> <p>The resident equality survey has identified that children, older people and disabled people reside in Phase 2 buildings.</p>			<p>mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design.¹⁰</p>	<p>and older people reside in Phase 2 buildings. These groups may also be disproportionately affected. Benefits can be maximised by implementing the recommendations in Column 4.</p> <p>Overall, there is likely to be a major positive impact on equality groups due to improved access, mobility, and navigation after delivery of Phase 2.</p>
<p>Improved public realm and green space:</p> <p>Phase 2 of the Scheme will result in the creation of new and</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> • New network of green spaces across the development 	<p>The Council should:</p> <ul style="list-style-type: none"> • Continue to involve the local <p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a</p>

¹⁰ Design Council (2006) 'The Principles of Inclusive Design'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf>

Department for Transport (2005) 'Inclusive mobility' Available at: <https://www.gov.uk/government/publications/inclusive-mobility>

Department for Transport (2007) 'Manual for Streets'. Available at: <https://www.gov.uk/government/publications/manual-for-streets>

<p>improved outdoor and green space for the residents of, and those local to, the Tustin Estate EqIA. Improvements to the space include interim landscaping, as well as a new network of green spaces around the new buildings. Phase 2 will also deliver enhanced bike storage and EV charging points for the residents of the new buildings, and new communal outdoor space will be provided throughout the new development. As highlighted in the literature review, these improvements to the public realm are likely to benefit children, older people, disabled people, those from ethnic minority backgrounds and women.</p> <p>People from an ethnic minority background make up a disproportionately high section of the population of the local area.</p>		<ul style="list-style-type: none"> • Interim landscaping Enhanced bicycle storage provision to facilitate active travel, promoting healthier lifestyles. • Electric charging points for vehicles. • New communal outdoor space in blocks. 	<p>community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people.</p> <ul style="list-style-type: none"> • Ensure access to adequate green and play space is maintained for residents as construction on the Estate continues after Phase 2 	<p>result of improvements to the public realm and green space after Phase 2 is delivered. Children, older people, disabled people, women and people from ethnic minority backgrounds are likely to differentially benefit from these improvements as a result of their specific needs (as demonstrated in the literature review). As people from ethnic minority backgrounds are disproportionately represented within the population of the local area (75%), these groups are also likely to differentially benefit. The resident equality survey identified that ethnic minority groups, children, older people, disabled people and</p>
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<p>The resident equality survey has identified that ethnic minority groups, disabled people, children, older people and women reside in Phase 2 buildings.</p>			<ul style="list-style-type: none"> The Council and its advisors should ensure that improvements to public space (including the pedestrian environment and play spaces on the Site) appropriately consider best practice in accessible and inclusive design. This would also help to address stakeholder concerns around inclusivity in the design of the public realm. It is recommended that the Council works with local 	<p>women reside in Phase 2 buildings. These groups may also therefore disproportionately experience positive benefits.</p> <p>Benefits can be maximised by implementing the recommendations in Column 4.</p> <p>Overall, there is likely to be a major positive impact on equality groups due to improved public realm and green space after delivery of Phase 2.</p>
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				<p>schools and community groups to support an active and healthy lifestyle and improved wellbeing through active play spaces.</p>	
<p>Provision of community resources and improved social cohesion:</p> <p>Phase 2 of the scheme will deliver a series of new community infrastructure, including several key resources. The new homes delivered as part of Phase 2 will include mixed shared communal space, both indoor and outdoor, to improve social cohesion and reduce isolation. Residents will have the opportunity to help manage community spaces.</p> <p>There are a number of equality groups who can experience</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> • A mix of shared communal spaces in new blocks. • Increased access to community resources such as the community garden. • Possibility of tenants managing community spaces. • New outdoor communal space in blocks, and interim landscaping, to improve social cohesion and reduce 	<ul style="list-style-type: none"> • The Council should: • Continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements. 	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of improvements to the provision of community resources and improved social cohesion after Phase 2 is delivered.</p> <p>Children, older people, disabled people, pregnant people, LGBTQ+ people, and people from ethnic minority backgrounds are likely to differentially benefit from these improvements as a result</p>

<p>difficulties with access to community resources. These include children, older people, disabled people, pregnant people, LGBTQ+ people, and people from ethnic minority backgrounds.</p> <p>People from an ethnic minority background make up a disproportionately high section of the population of the local area.</p> <p>The resident equality survey has identified that children, older people, disabled people and ethnic minority groups reside in Phase 2 buildings.</p>		<p>isolation after the COVID- 19 pandemic.</p>	<ul style="list-style-type: none"> ● Ensure analysis is undertaken to understand on any potential pressure on public services that could result from redevelopment (eg. extra pressure on schools and health care services). ● Best efforts should be made to ensure that the pricing of services offered by businesses within the Scheme are affordable for local people. ● Liaise with and support the Tustin Residents Association to 	<p>of their specific needs (as demonstrated in the literature review). As people from ethnic minority backgrounds are disproportionately represented within the population of the local area, these groups are also likely to differentially benefit.</p> <p>As the resident equality survey identified that children, older people, disabled people and ethnic minority groups reside in Phase 2 buildings, these groups may also disproportionately benefit.</p> <p>Some potential for adverse impacts is possible on social cohesion after Phase 2 as a result of the new community moving on to</p>
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				<p>host free community events to provide a space for original Tustin Estate residents and Phase 2 home residents to meet, mingle, and improve the cohesion of Estate residents.</p>	<p>the Estate. The recommendations in Column 4 should be implemented in order to minimise any issues and maximise social cohesion.</p> <p>Overall, there is likely to be a major positive impact on equality groups due to improved provision of community resources and improved social cohesion after delivery of Phase 2.</p>
<p>New employment opportunities: Redevelopment of the Site may act as a catalyst for promoting local economic growth and supporting job creation. The construction phase of the scheme will also provide temporary employment opportunities those in the construction sector.</p> <p>Such job opportunities are likely to positively impact protected</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> Construction employment onsite (varying by the amount of construction required for the job). 	<ul style="list-style-type: none"> The Council should: The Council and its advisors should develop a range of suitable proposals that maximise the employment, apprenticeship and training opportunities created by the 	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of new employment opportunities after Phase 2 is delivered.</p> <p>Older people, young people, disabled people, people from ethnic minority backgrounds, and men are likely to differentially benefit from</p>

<p>characteristic groups more likely to face unemployment including ethnic minority groups, older people, disabled people and young people. Likewise, employment opportunities in the construction industry are likely to benefit men who are more likely to work in construction.</p> <p>As stated above, the population of the LIA is disproportionately represented by ethnic minority groups (75%).</p> <p>The resident equality survey has identified that ethnic minority groups, disabled people, older people, men and young people reside in Phase 2 buildings. It has also identified that there are unemployed people resident within the properties who are looking for work.</p>			<p>Scheme for local residents both at the construction stage and after the Scheme is complete.</p> <ul style="list-style-type: none"> Work with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. ethnic minority groups, disabled people, young people. 	<p>employment opportunities as they are more likely to struggle with unemployment (as demonstrated in the literature review). As people from ethnic minority backgrounds are disproportionately represented within the population of the local area, these groups are also likely to differentially benefit.</p> <p>The resident equality survey identified that ethnic minority groups, young people, older people, men and disabled people reside in Phase 2 buildings. These groups may also disproportionately benefit.</p> <p>Overall, there is likely to be some positive impact on equality groups due to new employment</p>
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					opportunities in the new commercial space after delivery of Phase 2.
<p>Safety and security:</p> <p>Feelings of safety and security amongst the local population are likely to be impacted during both the construction and operation phases of the Scheme.</p> <p>During the redevelopment, the construction process may attract unwanted activity such as anti-social behaviour and crime. This may result in the local population feeling unsafe and fearful of their own security.</p> <p>However, the overall improvements made to the public realm and management of the Site during redevelopment may reduce crime and in turn have a positive effect.</p> <p>The effects of crime are likely to differentially impact protected</p>	✓✓✓	✓✓✓	<ul style="list-style-type: none"> • Better external lighting for safety and visibility. • Clearer and more secure routes for people passing through the estate • Estate to promote safety and security through new design. • Paths and green spaces overlooked by houses to create feeling of safety. • Designed to Secured by Design Standards. 	<ul style="list-style-type: none"> • It is recommended that the council ensure that during the construction and operation phases of the scheme: • Sufficient and adequate lighting and CCTV is provided in and around the regeneration site. • There is an available contact advertised for individuals to contact surrounding any queries of the safety/security of the site. 	<p>There is likely to be a positive impact on equality groups living and using the Phase 2 areas as a result of changes to feelings of safety and security after Phase 2 is delivered.</p> <p>The impacts are likely to be adverse whilst construction continues (during Phase 2 and beyond) and beneficial within the Phase 2 areas once these are open.</p> <p>The effects of crime are likely to differentially impact protected characteristic groups who are more likely to be vulnerable to attacks including disabled people, young people, LGBTQ+ groups.</p>

<p>characteristic groups who are more likely to be vulnerable to attacks including disabled people, young people, LGBTQ+ people and people from ethnic minority groups.</p> <p>The population of the LIA is disproportionately represented by ethnic minority groups (75% of the population), who are more likely to be impacted by safety and security upgrades to the scheme.</p> <p>The resident equality survey has also identified that ethnic minority groups, disabled people and young people reside in Phase 2 buildings.</p>			<ul style="list-style-type: none"> Continue with all measures to improve feelings of safety and security as construction continues, recognising that people will be living on the Estate 	<p>people and people from ethnic minority groups. As people from ethnic minority backgrounds are disproportionately represented within the population of the local area, these groups are a likely to experience differential impacts.</p> <p>The resident equality survey identified that ethnic minority groups, disabled people and young people reside in Phase 2 buildings. These groups may also be disproportionately affected.</p> <p>The recommendations in Column 4 should be implemented in order to minimise any issues during construction and maximise feelings of safety.</p>
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					<p>Overall, there is likely to be some positive impact on equality groups due to changes to feelings of safety and security after delivery of Phase 2.</p>
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6 Conclusion and action plan

6.1 Conclusion

This EHIA has identified a number of risks, opportunities and potential impacts that could arise for those with protected characteristics, as a result of the Compulsory Purchase Order and construction and future delivery of Phase 2 of the Tustin Estate Redevelopment Scheme. The details of these impacts are set out in detail in Chapter 6 Impact Assessment.

Overall, this assessment has found that Phase 2 of the regeneration has the potential to deliver new and affordable homes, improved living conditions, improved accessibility of homes and the wider estate, and new public realm and green space.

The assessment also identifies that the use of a CPO, if required, will allow the delivery of improved housing, an improved public realm and improved community space and facilities for local people. There is therefore a compelling case in the public interest for the use of a CPO to allow for the redevelopment to improve outcomes for the local community.

In this case, the Council has sought to mitigate any potential adverse effects through a series of reasonable and proportionate measures focused on rehousing assistance and compensation plans in order to improve the outcomes of the redevelopment for the current and future Estate community.

6.2 Action plan

The following action plan seeks to establish activities and responsibilities following the planning application to continue to identify and address equality issues where they arise. It is the responsibility of Southwark Council to implement any recommendations and mitigations identified:

Table 6.1: Tustin Estate recommended action plan

Recommendation	Potential impact addressed	Timeframe	Responsibility
Work proactively and constructively through a range of channels, including face to face engagement where possible with residents, keeping up-to-date records of changing	<ul style="list-style-type: none"> ● Loss of social infrastructure and access to community resources ● Difficult accessing 	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams

Recommendation	Potential impact addressed	Timeframe	Responsibility
needs and circumstances, particularly if residents who will be most affected by refurbishment and/or relocation.	finance (e.g. costs associated with moving home) <ul style="list-style-type: none">Appropriate and accessible and housing		
Maintain continuity in access to community resources (e.g. churches and play areas) where possible. If this is not possible, consider pop-up spaces for these uses.	<ul style="list-style-type: none">Loss of social infrastructure and access to community resources	Ongoing during redevelopment period until completion (2030)	Southwark Council
<ul style="list-style-type: none">Temporary housing should adhere to accessibility guidelines and consider the environmental needs of tenants- e.g. elderly residents should avoid being allocated in temporary accommodation near busy roads. If possible, permanently rehouse residents within the Phase 1 homes they are being temporarily moved to.	<ul style="list-style-type: none">Loss of social infrastructure and access to community resources	Early 2025 (period of resident movement)	Southwark Council
Early estimates of changes to rent and service charges as a result of the redevelopment should be communicated to residents as soon as possible.	<ul style="list-style-type: none">Difficult accessing finance (e.g. costs associated with moving home)	Ongoing during redevelopment period until completion (2030)	Southwark Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
	<ul style="list-style-type: none"> ● Appropriate and accessible and housing ● Improved housing provision 		
<p>Ensure that accessible and inclusive support options are provided for disabled individuals who require support services during relocation.</p>	<ul style="list-style-type: none"> ● Health effects 	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council</p>
<p>Continue to explore options to grow and advocate existing peer support groups such as the Tustin Resident Project Group (RPG). Review accessible provisions within group meetings.</p>	<ul style="list-style-type: none"> ● Health effects 	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council, especially engagement teams</p>
<p>Ensure best practices for enhancing safety and preventing crime are considered throughout the planning and construction process.</p>	<ul style="list-style-type: none"> ● Safety and security 	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council</p>
<p>Ensure a process is in place for reporting and addressing incidents of Anti-Social Behaviour (ASB) within the Estate.</p>	<ul style="list-style-type: none"> ● Safety and security 	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council</p>
<p>Monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should</p>	<ul style="list-style-type: none"> ● Safety and security 	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council</p>

Recommendation	Potential impact addressed	Timeframe	Responsibility
<p>only be implemented as a last resort, if deemed necessary, and in conjunction with residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.</p>			
<p>Creation of a CEMP, which would set out arrangements for any necessary diversions, which should provide well-signed routes that limit extra travelling distances.</p>	<ul style="list-style-type: none"> ● Accessibility and mobility in the surrounding area 	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council</p>
<p>Accessible format consultation materials, including but not limited to, easy read, different community languages, audio, and braille, should be available if requested.</p>	<ul style="list-style-type: none"> ● Information and communication 	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council, especially engagement teams</p>
<p>Access to information and communication should be available in a number of formats, including online, telephone and one to one meetings, to ensure that all residents have safe access to information and support services as COVID- 19 restrictions continue.</p>	<ul style="list-style-type: none"> ● Information and communication 	<p>Ongoing during redevelopment period until completion (2028)</p>	<p>Southwark Council, especially engagement teams</p>
<p>Information should be provided in a clear and easy to understand way and communicated in a timely manner. This includes keeping website information up to date.</p>	<ul style="list-style-type: none"> ● Information and communication 	<p>Ongoing during redevelopment period until completion (2030)</p>	<p>Southwark Council, especially engagement teams</p>

Recommendation	Potential impact addressed	Timeframe	Responsibility
Ensure safe, secure, and lit pedestrian routes through the Estate are available to residents as construction continues on the Estate after Phase 2.	<ul style="list-style-type: none"> Improved access, mobility and navigation 	Ongoing during redevelopment period until completion (2030)	Southwark Council and contractors
Ensure the design of movement networks and public spaces specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design.	<ul style="list-style-type: none"> Improved access, mobility and navigation 	Ongoing during redevelopment period until completion (2030)	Southwark Council and contractors
Continue to involve the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people.	<ul style="list-style-type: none"> Improved public realm and green space 	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
Ensure access to adequate green and play space is maintained for residents as construction on the Estate continues after Phase 2.	<ul style="list-style-type: none"> Improved public realm and green space 	Ongoing during redevelopment period until completion (2030)	Southwark Council and contractors
The Council and its advisors should ensure that improvements to public space (including the pedestrian environment and play spaces on the Site) appropriately consider best practice in accessible and	<ul style="list-style-type: none"> Improved public realm and green space 	Ongoing during redevelopment period until completion (2030)	Southwark Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
<p>inclusive design. This would also help to address stakeholder concerns around inclusivity in the design of the public realm.</p>			
<p>It is recommended that the Council works with local schools and community groups to support an active and healthy lifestyle and improved wellbeing through active play spaces.</p>	<ul style="list-style-type: none"> • Improved public realm and green space 	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
<p>Continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements.</p>	<ul style="list-style-type: none"> • Provision of community resources and improved social cohesion 	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams
<p>Ensure analysis is undertaken to understand on any potential pressure on public services that could result from redevelopment (eg. extra pressure on schools and health care services).</p>	<ul style="list-style-type: none"> • Provision of community resources and improved social cohesion 	Ongoing during redevelopment period until completion (2030)	Southwark Council
<p>Best efforts should be made to ensure that the pricing of services offered by businesses within the Scheme are affordable for local people.</p>	<ul style="list-style-type: none"> • Provision of community resources and improved social cohesion 	Ongoing during redevelopment period until completion (2030)	Southwark Council
<p>Liaise with and support the Tustin Residents Council to host free community events to provide a space for original Tustin Estate</p>	<ul style="list-style-type: none"> • Provision of community resources and improved social cohesion 	Ongoing during redevelopment period until completion (2030)	Southwark Council, especially engagement teams

Recommendation	Potential impact addressed	Timeframe	Responsibility
residents and Phase 2 home residents to meet, mingle, and improve the cohesion of Estate residents.	social cohesion	completion (2030)	
The Council and its advisors should develop a range of suitable proposals that maximise the employment, apprenticeship and training opportunities created by the Scheme for local residents both at the construction stage and after the Scheme is complete.	<ul style="list-style-type: none"> • New employment opportunities 	Ongoing during redevelopment period until completion (2030)	Southwark Council
Work with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. ethnic minority groups, disabled people, young people.	<ul style="list-style-type: none"> • New employment opportunities 	Ongoing during redevelopment period until completion (2030)	Southwark Council
Ensure there is sufficient and adequate lighting and CCTV is provided in and around the regeneration site.	<ul style="list-style-type: none"> • Safety and security 	Ongoing during redevelopment period until completion (2030)	Southwark Council and contractors
Ensure there is an available contact advertised for individuals to contact surrounding any queries of the safety/security of the site.	<ul style="list-style-type: none"> • Safety and security 	Ongoing during redevelopment period until completion (2030)	Southwark Council
Continue with all measures to improve feelings of safety and security as construction continues, recognising that people will be living on the Estate.	<ul style="list-style-type: none"> • Safety and security 	Ongoing during redevelopment period until	Southwark Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
completion (2030)			

A. Area profile and proportionality

This appendix is split into five sections. Section A.1 provides an overview of the socio-demographic profile of the Estate (the study area outlined in Chapter 2). An overview of community resources is provided in Section A.2. Section A.3 includes an overview of businesses. Section A.4 provides an overview of the health profile of the Estate. Section A.5 provides the results of socio-demographic survey conducted with residents, businesses and customers on the Estate.

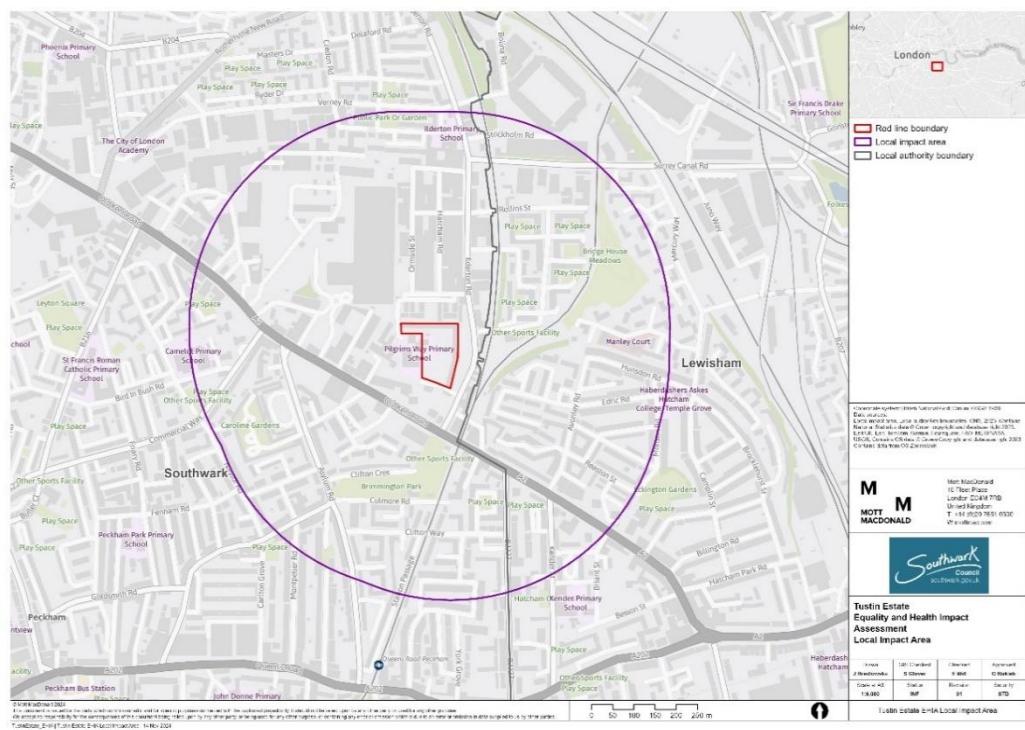
A.1 Socio-demographic profile of the area

The area profile below provides a wider contextual demographic characterisation of the area in which the Estate falls. The data includes the current social and economic context of the area and relevant comparators, namely the London Borough of Southwark, the Greater London region (or southeast regional level where London data is unavailable), and England. In comparing these regions, where the Estate deviates by more than 3%, the difference is reported as higher or lower; and where it deviates by 5% or more, the difference is reported as considerable.

The demographic data¹¹ has been sourced from publicly available data and only applies to the resident population.

Map A.1: Local Impact Area

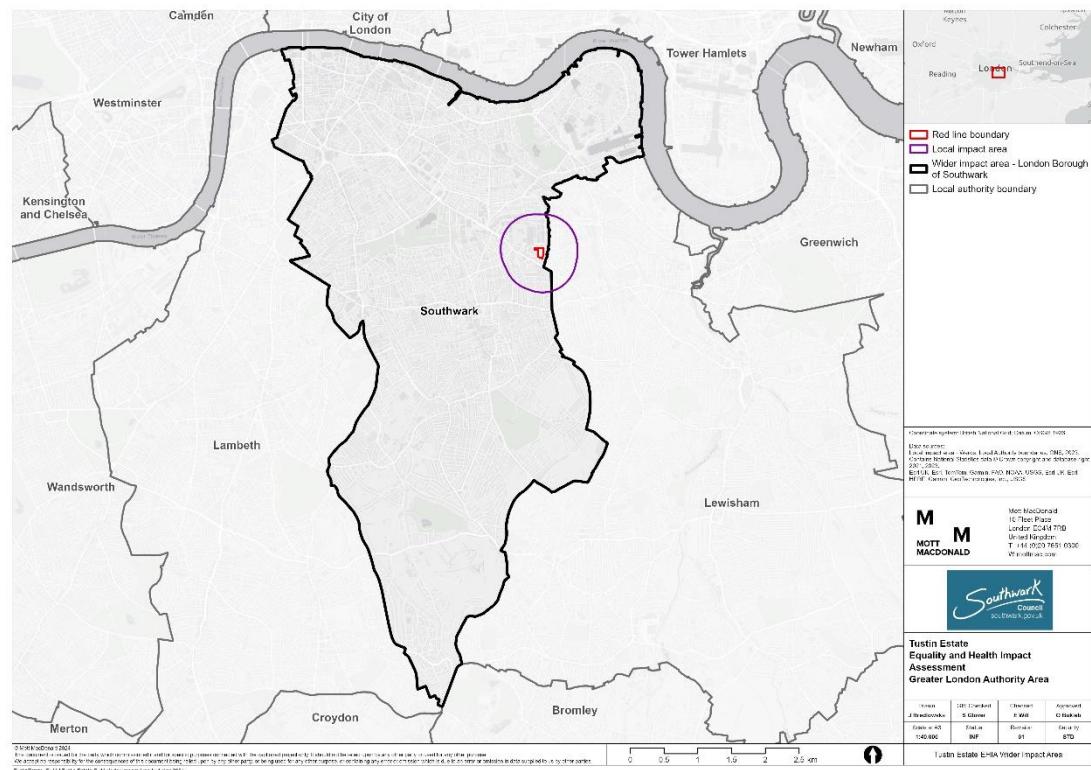
¹¹ In order to calculate statistics for the Estate, codepoint data was used, which includes a point representing each postcode area. Lower Super Output (LSOA) data is shared between the codepoints that fall within each LSOA, and is summed up for where the codepoints fall within the Estate.



Source: AddressBase, 2024

Map A.1 shows the Local Impact Area.

Map A.2: Wider Impact Area



Source: AddressBase, 2024

Map A.2 shows the Wider Impact Area.

A.1.1 Age

The tables and figures below show the population for by age groups within the Estate and the above comparator areas. The figures show the proportion of each age group within the different areas.

A.1.1.1 Children (under 16 years)

The table below indicates that the proportion of people under the age of 16 on the Estate (18%) is broadly in line with Southwark (17%), Greater London (19%), and England (19%).

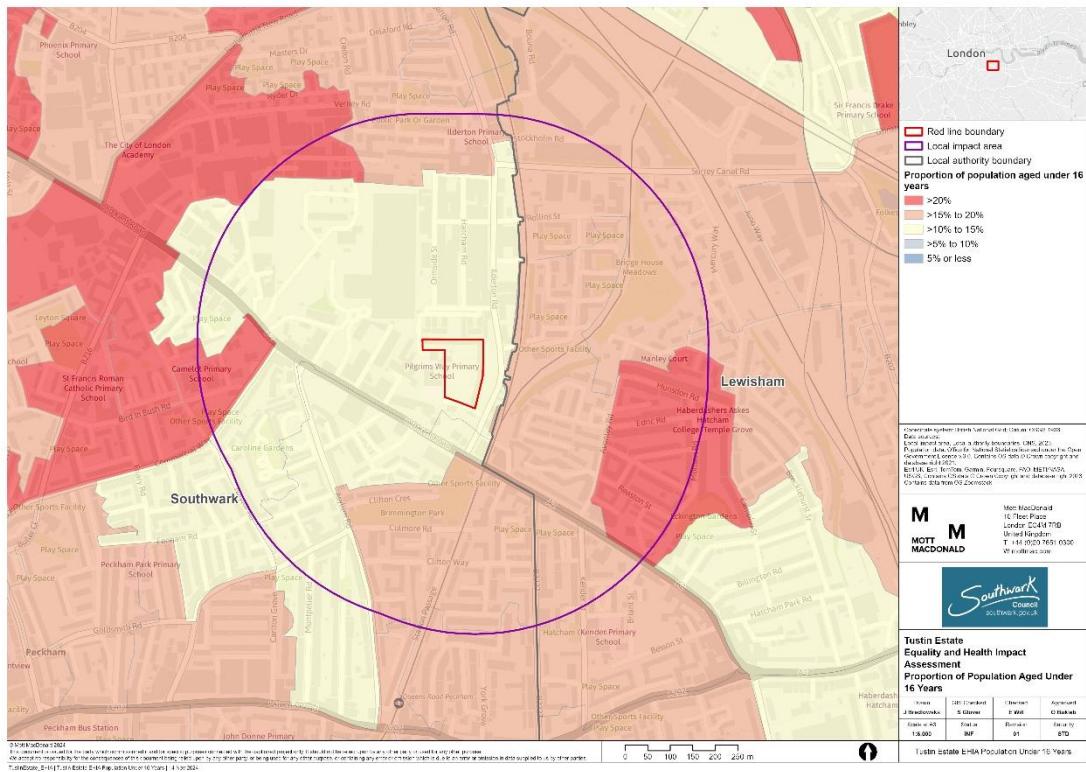
Table A.1: Children (under 16 years)

Location	Total population, 2021	Children (under 16 years)	%
Estate	12,701	2,339	18%
Southwark	307,641	51,500	17%
Greater London	8,799,723	1,695,740	19%
England	56,490,045	10,483,094	19%

Source: ONS 2021

Map A.3 below illustrates that the proportion of children within the red line boundary (RLB) ranges from 10% to 15%. In comparison, the proportion of children in the local impact area (LIA) is higher, ranging from 10% to over 20% of the population.

Map A.3: Proportion of children under 16 within the Estate



Source: ONS Census, 2024

A.1.1.2 Young people (16-24 years)

Table A.2 shows that the proportion of young people aged 16-24 within the Estate (12%) is broadly in line with Southwark (13%), Greater London (11%) and England (11%).

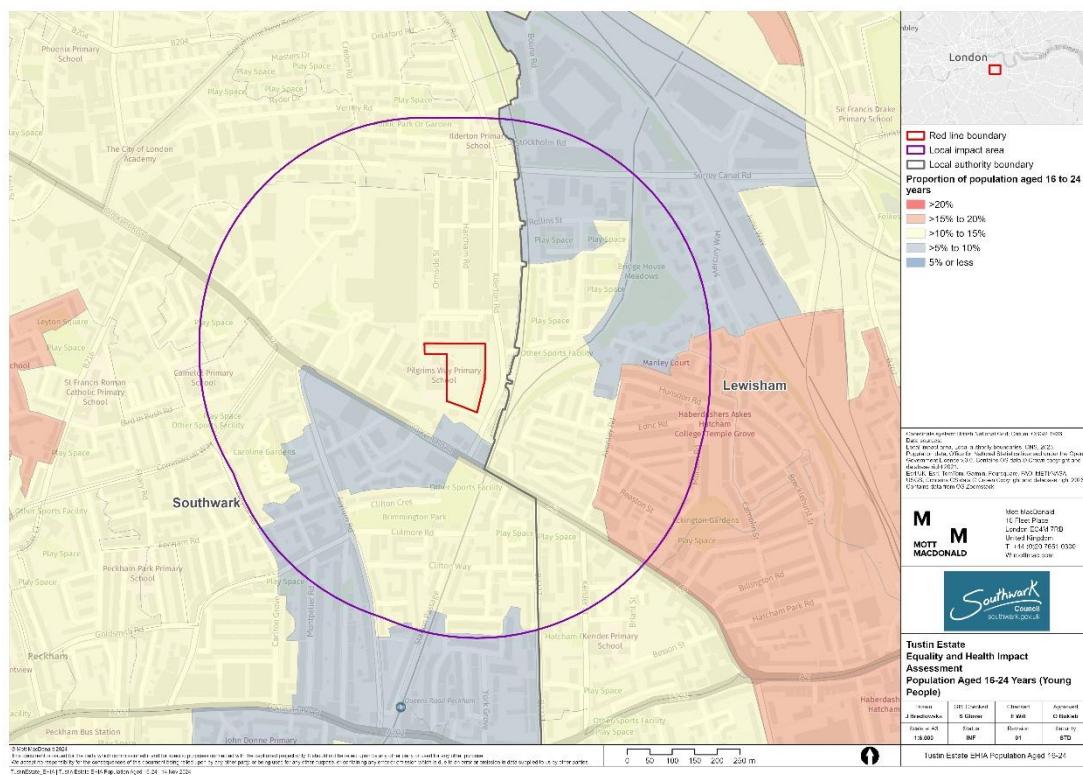
Table A.2: Young people (16-24 years)

Location	Total population, 2021	Young people (16-24 years)	%	%
Estate	12,701	1,568	12%	
Southwark	307,641	38,653	13%	
Greater London	8,799,723	978,722	11%	
England	56,490,045	5,989,231	11%	

Source: ONS 2021

Map A.4 below illustrates the proportion of young people aged 16-24 within the RLB ranges from 10% to 15%. In comparison, the proportion of young people in the LIA ranges from 5% to 20%.

Map A.4: Proportion of young people aged 16-24 within the Estate



Source: ONS Census, 2024

A.1.1.3 Working aged people (16- 64)

The percentage of working age people (aged between 16 and 64) on the Estate (73%) is broadly in line with Southwark (75%) but higher than Greater London (69%) and considerably higher than England (63%).

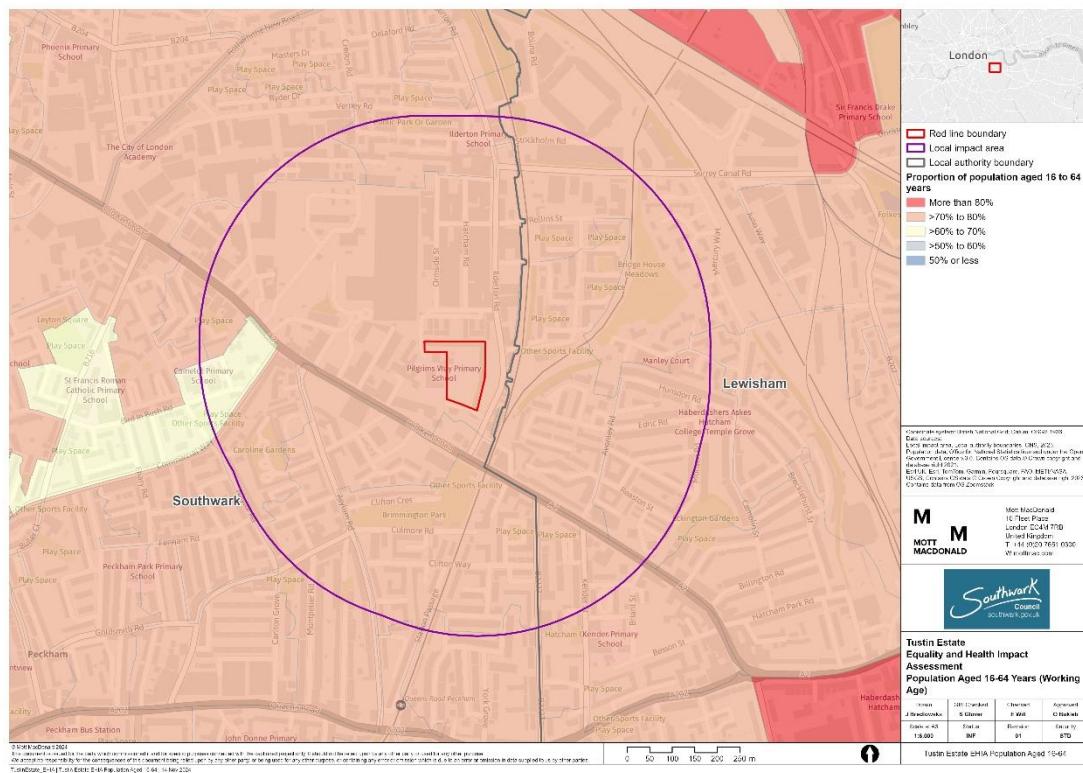
Table A.3: Working age population

Location	Total population, 2021	Working age population	%
Estate	12,701	9,259	73%
Southwark	307,641	230,455	75%
Greater London	8,799,723	6,060,567	69%
England	56,490,045	35,605,651	63%

Source: ONS 2021

Map A.5 below demonstrates that the proportion of working age residents in the RLB is between 70% and 80%. In comparison, the proportion of working age residents in the LIA ranges from 60% to 80%.

Map A.1: Proportion of residents aged between 16 and 64



Source: ONS Census, 2024

A.1.1.4 Older people (65 and over)

The percentage of older people aged 65 and over within the Estate (9%) is broadly in line with Southwark (8%) but slightly lower than Greater London (12%) and considerably lower than England (18%).

Table A.4: Older people (65+ years)

Location	Total population, 2021	Older people (65+ years)	%
Estate	12,701	1,102	9%
Southwark	307,641	25,686	8%
Greater London	8,799,723	1,043,416	12%
England	56,490,045	10,401,300	18%

Source: ONS 2021

Map A.6 below demonstrates that the proportion of older people over 65 years in the RLB ranges from 10% to 15%. In comparison, the LIA ranges from less than 5% to 15%.

Map A.6: Proportion of residents aged 65 and over



Source: ONS Census, 2024

A.1.2 Disabled people

The table below shows the proportion of people living with a long-term health condition or disability (LTHD) in the Estate, Southwark, Greater London, and England. The proportion of people in the Estate with a LTHD which limits day-to-day activities a lot (7%) is broadly in line with Southwark (6%), Greater London (6%) and England (7%). The proportion of those in the Estate with a disability which limits day-to-day activities a little (8%) is broadly in line with Southwark (8%), Greater London (7%) and England (10%). The proportion of the population in the estate with no LTHD limiting day-to-day activities (80%) is broadly in line with Southwark (80%) and Greater London (82%) but slightly higher than England (76%).

Table A.5: Population with a long-term health problem or disability limiting day-to-day activities

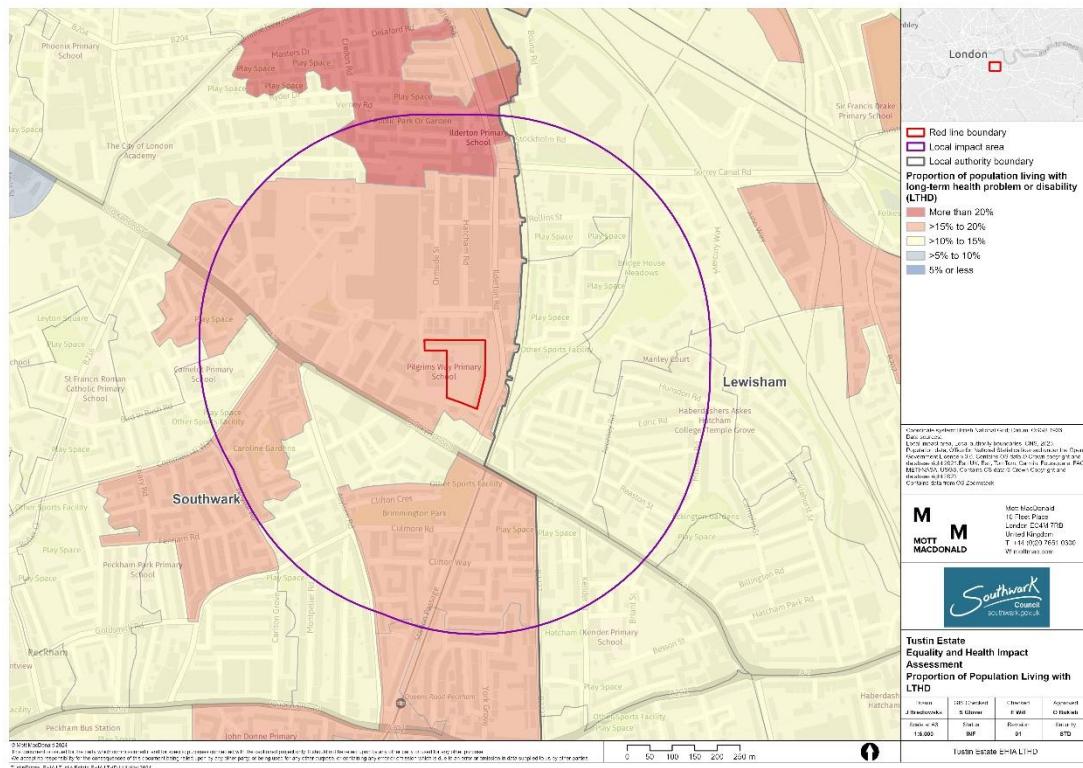
Disability	Estate	Southwark	Greater London	England
Limited a lot	7%	6%	6%	7%

Disability	Estate	Southwark	Greater London	England
Limited a little	8%	8%	7%	10%
Not limited	80%	80%	82%	76%

Source: ONS Census, 2021 – long-term health problem or disability

Map A.7 below shows that the proportion of people in the RLB living with a long-term health condition or disability ranges from 15% to 20%. In comparison, the proportion of people in the LIA ranges from 10% to over 20%.

Map A.7: Proportion of resident with a long-term health condition or disability



Source: ONS Census, 2024

A.1.3 Gender reassignment

The table below provides a breakdown of the population in Southwark, Greater London and England based on gender identity. No data is available for the Estate. The table shows that 91% of the population in Southwark have the same gender identity as sex registered at birth, this is broadly in line with Greater London (91%) but slightly lower than England (94%). 1% of the population in Southwark have a gender identity different from sex registered at birth, this is broadly in line with Greater London (1%) but higher than England (0.2%).

Table A.6: Gender identity

Location	Gender identity the same as sex registered at birth	Gender identity different from sex registered at birth	Trans woman	Trans man	All other gender identities
Southwark	91%	1%	0.2%	0.2%	0.2%
Greater London	91%	1%		0.2%	0.1%
England	94%	0.2%	0.1%	0.1%	0.1%

Source: ONS Census, 2021 – gender identity

A.1.4 Marriage and civil partnership

The table below shows the proportion of the populations on the Estate, Southwark, Greater London and England who are married, in a registered civil partnership or separated. The proportion of the married population on the Estate (25%) is broadly in line with Southwark (26%) but considerably lower than Greater London (40%) and England (45%). The proportion of people in a registered civil partnership in the Estate (0.4%) is lower than Southwark (1%) but broadly in line with Greater London (0.3%) and England (0.2%). The proportion of people on the Estate who are separated, but still legally married (4%) is broadly in line with Southwark (3%), Greater London (2%) and England (2%).

Table A.7: Population married or in a civil partnership

Location	Married	%	In a registered civil partnership	%	Separated (still legally married or in a civil partnership)	%
Estate	2,593	25%	37	0.4%	397	4%
Southwark	67,666	26%	1,323	1%	7,254	3%
Greater London	2,819,968	40%	23,262	0.3%	165,884	2%
England	20,464,074	45%	97,568	0.2%	1,033,518	2%

Source: ONS Census, 2021 – marital and civil partnership status

A.1.5 Pregnancy and maternity

The table below shows that the General Fertility Rate in Southwark (39.5) is considerably lower than Greater London (50.4) and England (51.9). Data for pregnancy and maternity on the Estate is not available. This indicates that

Southwark has a lower fertility rate in comparison to Greater London and England.

Table A.8: Fertility rate of the population

Location	Live births	General fertility rate	Total fertility rate
Southwark	3,393	39.5	1.1
Greater London	106,696	50.4	1.4
England	577,046	51.9	1.5

Source: ONS Census, 2022 Live births in England and Wales: birth rates down to local authority areas

A.1.6 Race and ethnicity

The table below provides a breakdown of the race and ethnicities of residents on the Estate compared with Southwark, Greater London, and England. The proportion of those from a White British background on the Estate (25%) is considerably lower than Southwark (36%), Greater London (37%) and England (74%). The proportion of those from an Ethnic Minority background (75%) is considerably higher than Southwark (65%), Greater London (63%) and England (27%). The largest ethnic minority group on the Estate are those from an African background (23%). This is considerably higher than the proportion in Southwark (16%), Greater London (8%), and England (3%).

Table A.6: Population by race and ethnicity

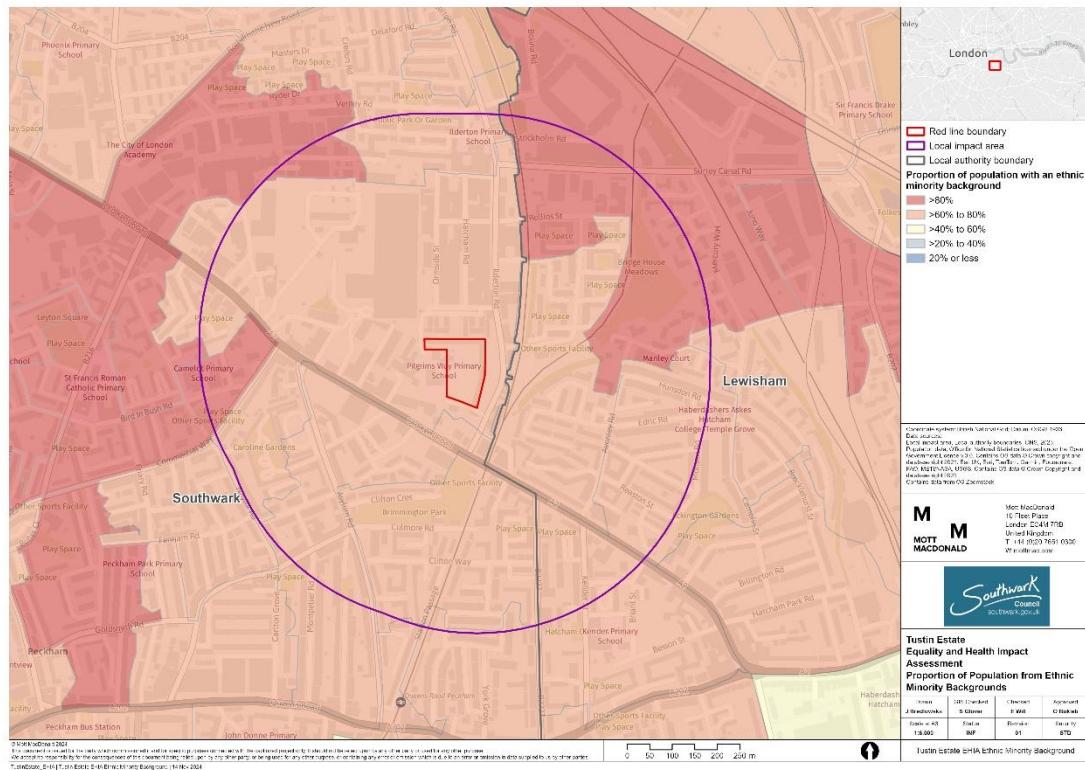
Race and ethnicity	Estate	Southwark	Greater London	England
White	White British	25%	36%	74%
	Irish	1%	2%	1%
	Gypsy or Irish Traveller	0%	0.1%	0.1%
	Roma	0.4%	1%	0.4%
	Other White	11%	13%	6%
Mixed/ multiple ethnic groups	White and Black Caribbean	3%	2%	1%
	White and Black African	1%	1%	0.4%
	White and Asian	2%	2%	1%
	Other Mixed	3%	2%	1%
Asian/ Asian British	Indian	1%	2%	8%
				3%

Race and ethnicity		Estate	Southwark	Greater London	England
Asian	Pakistani	0.4%	1%	3%	3%
	Bangladeshi	1%	2%	4%	1%
	Chinese	2%	3%	2%	1%
	Other Asian	4%	3%	5%	2%
Black/African/Caribbean/Black British	African	23%	16%	8%	3%
	Caribbean	10%	6%	4%	1%
	Other Black	5%	4%	2%	1%
Other ethnic groups	Arab	1%	1%	2%	1%
	Any other ethnic group	6%	5%	5%	2%
Ethnic minorities (including White minorities)		75%	65%	63%	27%

Source: ONS Census, 2021 – ethnic group

Map A.8 below illustrates that the proportion of people in the RLB from an ethnic minority background ranges from 60% to 80%. The proportion of people in the LIA from an ethnic minority background is broadly in line with the RLB, ranging from 60% to over 80%.

Map A.8: Proportion of people from an Ethnic Minority background within the Estate



Source: ONS Census, 2024

A.1.7 Religion and belief

The table below provides a religious profile of the Estate, compared with Southwark, Greater London, and England. The Estate has a considerably higher Christian population (48%) compared to Southwark (43%) and Greater London (41%) but is broadly in line with England (46%). 12% of the Estate population are Muslim, this is broadly in line with Southwark (10%) but slightly lower than Greater London (15%) and considerably higher than England (7%). The proportion of people from minority faith groups on the Estate (15%) is broadly in line with Southwark (13%) but considerably lower than Greater London (25%) and slightly higher than England (11%).

Table A.7: Population by religion or belief

Religion and belief	Estate	Southwark	Greater London	England
Christian	48%	43%	41%	46%
Buddhist	1%	1%	1%	1%
Hindu	1%	1%	5%	2%
Jewish	0.3%	0.4%	2%	1%

Religion and belief	Estate	Southwark	Greater London	England
Muslim	12%	10%	15%	7%
Sikh	0.2%	0.2%	2%	1%
Other religion	1%	1%	1%	1%
No religion	29%	36%	27%	37%
Religion not stated	8%	7%	7%	6%
Minority religion	15%	13%	25%	11%

Source: ONS Census, 2021 - religion

A.1.8 Sex

The following table shows the proportion of the population who are male on the Estate (48%) is broadly in line with Southwark (48%), Greater London (49%) and England (49%). Similarly, the proportion of the population who are female on the Estate (52%) is broadly in line with Southwark (52%), Greater London (52%) and England (51%).

Table A.8: Population by Sex

Sex	Estate	Southwark	Greater London	England
Male	48%	48%	49%	49%
Female	52%	52%	52%	51%

Source: ONS Census, 2021

A.1.9 Sexual orientation

The table below shows the proportion of the population based on sexual orientation for Southwark, Greater London and England. No data is available at Estate level. 83% of the population in Southwark are straight/ heterosexual, this is slightly lower than Greater London (86%) and considerably lower than England (89%). 5% of the population in Southwark are gay or lesbian, this is slightly higher than Greater London (2%) and Southwark (2%)

Table A.12: Population by sexual orientation

Location	Straight/ heterosexual	Gay or lesbian	Bisexual	All other sexual orientations	Not answered
Southwark	83%	5%	3%	1%	9%

Location	Straight/ heterosexu al	Gay or lesbian	Bisexu al	All other sexual orientations	Not answere d
Greater London	86%	2%	2%	1%	10%
England	89%	2%	1%	0.3%	8%

Source: ONS Census, 2021 – sexual orientation

A.1.10 Deprivation

The table below shows the proportion of the population within each Deprivation Quintile, according to the Index of Multiple Deprivation (2019). 58% of the Estate live in the most deprived quintile, this is considerably higher than in Southwark (23%), Greater London (17%) and England (20%). 0% of the Estate live in the least deprived quintile, this is slightly lower than Southwark (3%) and considerably lower than Greater London (11%) and England (19%).

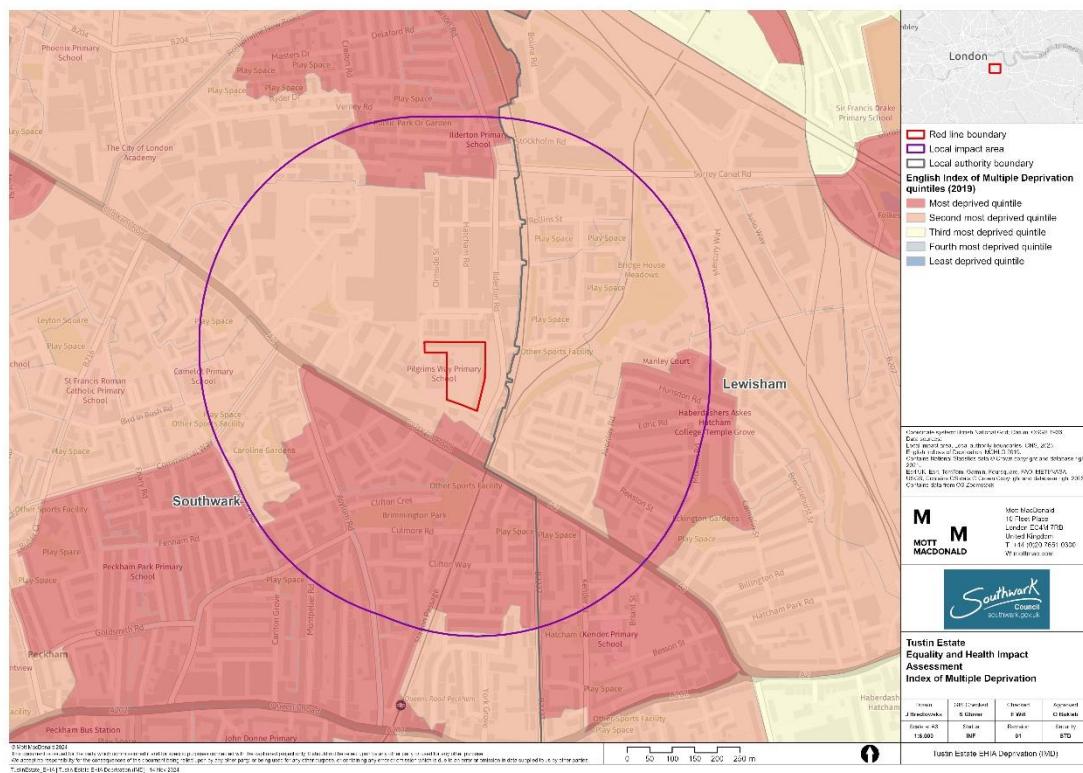
Table A.13: Deprivation quintiles

Levels of deprivation	Estat e	Southwar k	Greater London	Englan d
Most deprived quintile (IMD)	58%	23%	17%	20%
Second deprivation quintile (IMD)	42%	46%	33%	20%
Third deprivation quintile (IMD)	0%	20%	23%	20%
Fourth deprivation quintile (IMD)	0%	8%	16%	20%
Least deprived quintile (IMD)	0%	3%	11%	20%

Source: ONS Census, 2021 and MHCLG 2019 Indices of Multiple Deprivation

Map A.9 below illustrates that the level of deprivation within the RLB is the second most deprived quintile. In comparison, the level of deprivation within the LIA range between the most deprived quintile, and the second most deprived quintile. This is broadly in line with the surrounding area.

Map A.9: Proportion of people from an Ethnic Minority background within the Estate



Source: ONS Census, 2024

A.1.11 Economic activity

The table below shows the economic activity rates of the population for Southwark, Greater London and England. No data is available at Estate level. 78% of 16-64 year olds in Southwark participate in economic activity, this is broadly in line with Southwark (79%) and England (79%). 77% of 16-64 year olds in Southwark are employed, this is broadly in line with Greater London (75%) and England (76%), 3% of the Southwark population are unemployed, this is broadly in line with Greater London (5%) and England (4%). 5% of the working age population claim Job Seekers Allowance (JSA) or Universal Credit, this is broadly in line with Greater London (5%) and England (4%).

Table A.14: Economic activity rates of the working age population

Location	Economic activity rate- 16 to 64 year olds	Employment rate- 16 to 64 year olds	Unemployment rate- 16 to 64 year olds	Monthly average JSA and Universal Credit claimant count
Southwark	78%	77%	3%	5%
Greater London	79%	75%	5%	5%
England	79%	76%	4%	4%

Source: ONS Population Survey Jan 2023-Dec 2023, ONS Claimant Count Jan 2023-Dec 2023 and ONS Census, 2021

A.2 Community resources

There are a number of community facilities and resources located both within, and in close proximity to, Tustin Estate. Within the estate, these include two primary schools, two faith groups, a daycare/learning centre, and a community centre.

Table A.15 lists the community facilities located within the Estate boundary.

Table A.15: List of community facilities within the Estate

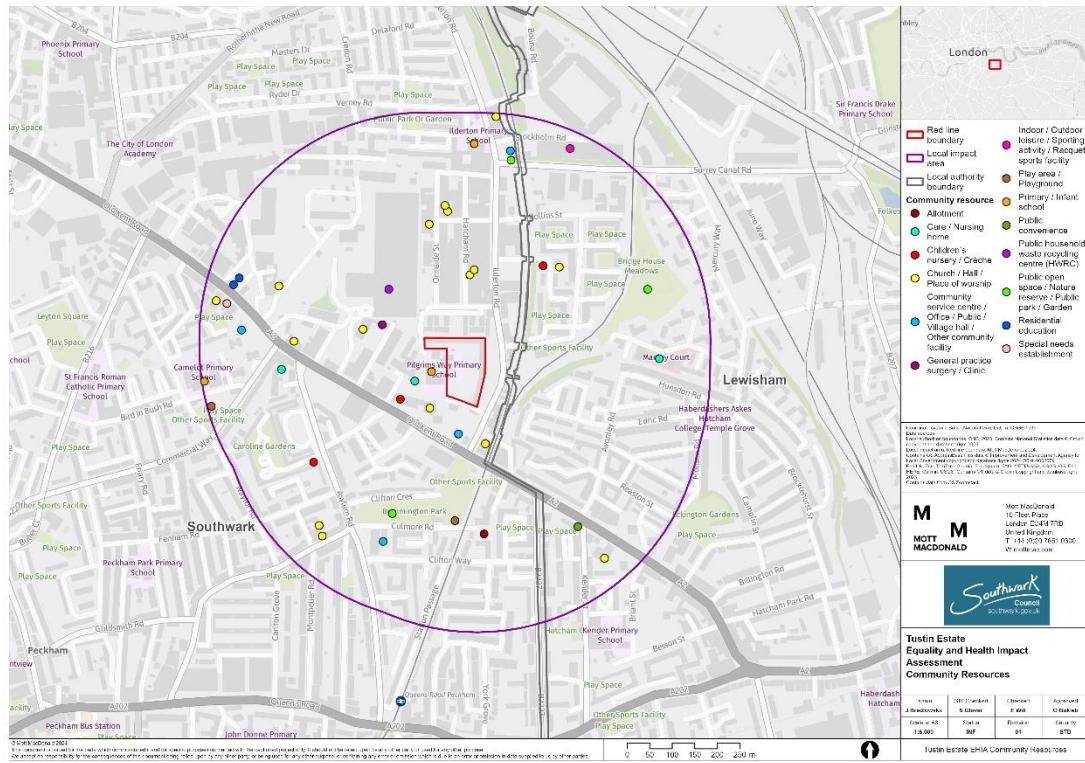
Type of resource	Number
Allotment	1
Care/ Nursing Home	9
Children's Nursery/ Crèche	3
Church	5
Church Hall/ Religious Meeting Place/ Hall	1
Community Service Centre/ Office	1
General Practice Surgery	1
Indoor/ Outdoor Leisure/ Sporting Activity/ Centre	1
Infant School	1
Place Of Worship	10
Play Area	1
Playground	1
Primary School	2
Public/ Village Hall/ Other Community Facility	5
Public Convenience	1

Type of resource	Number
Public Household Wate Recycling Centre (HWRC)	1
Public Open Space/ Nature Reserve	1
Public Park/ Garden	2
Racquet Sports Facility	1
Residential Education	2
Special Needs Establishment	1

Source: OS AddressBase, 2024

Map A.10 below shows the location of community resources and facilities within and surrounding the estate, which are likely to be accessed by protected characteristic groups, or if they were to be lost, would potentially adversely affect protected characteristic groups. Within the LIA, there are sixteen churches, halls, or places of worship which will predominately be used by religious groups. Children are likely to use the three nurseries and primary school and may be impacted if they have to move away from this provision. There are also five community facilities, which are available for use by residents of the current estate.

Map A.10: Community resources within and around the Estate



Source: ONS Census, 2024

Map A.11: Businesses within the Estate

A.3 Health profile

The following presents a human health overview for the Estate. Where Estate level information is not available, data is shown for the wider Borough.

A.3.1 Human health

The table below provides an overview of the health of the population in Southwark, Greater London and England. Data for the Estate is unavailable.

Table A.13: Human health indicators

Category	Indicator	Southwark	London	England
Physical activity	Physically active 19+ year olds	73%	66%	67%
	Physically inactive 19+ year olds	18%	24%	23%
Cardiovascular and respiratory health	Under 75 mortality rates from all circulatory disease	76	75	78
	Under 75 mortality rates from all respiratory disease	37	26	31
	Mortality rate from Chronic Obstructive Pulmonary Disease (COPD)	54	39	43
Obesity	Emergency Hospital Admissions for COPD (aged 35 and over) 2022-2023	435	285	326
	Reception prevalence of obesity (including severe obesity)	11%	10%	10%
Bad health	Reception prevalence of overweight (including obesity)	22%	20%	21%
	Population with bad or very bad health	4%	4%	5%
Life expectancy	Male life expectancy at birth	80	80	79
	Female life expectancy at birth	84	84	83

Source: ONS Life expectancy estimates, all ages, UK, 2018-2020, ONS Census 2021 – general health, Public Health England Mortality Profile 2020-2022, deaths per 100,000, Interactive Health Atlas of Lung Conditions in England 2022, deaths per 100,000, Public Health England Reception prevalence of obesity (including severe obesity) (4-5 years), 2020-2023, Public Health England Emergency Hospital Admissions for COPD (aged 35 and over) 2022-2023

The table above outlines that:

- Southwark has considerably higher rates of physical activity (73%) than London (66%) and England (67%). Additionally, Southwark has a

considerably lower proportion of physically inactive adults (18%) when compared with London (24%) and England (23%).

- Southwark has a considerably higher under 75 mortality rate from all respiratory disease (37) than to London (26) and England (31). Similarly, Southwark has a considerably higher mortality rate from COPD (54) than London (39) and England (43).
- The of childhood obesity in Southwark (22%) is broadly in line with London (20%) and England (21%).
- Male life expectancy in Southwark (80) is broadly in line with regional (84) and national (79) figures.
- Female life expectancy in Southwark (84) is broadly in line with regional (84) and national (83) figures.

A.4 Socio-demographic survey

This section summarises the findings from socio-demographic baseline primary research with residents.

Research was first conducted in Autumn 2024 and consisted of survey interviews with directly affected residents by our survey team. The survey team hand delivered letters explaining the aims of the survey along with a QR code to complete the survey online; and returned to each home three times on different days at different times to give residents the opportunity to complete it in person.

The survey aimed to highlight the presence of a range protected characteristic groups within the RLB who could be impacted by Phase 2.

The demographic data only applies to the resident population.

A.4.1 Residential respondents

- The survey secured twenty-four responses from twenty-four residential properties approached.
- All twenty-four respondents were residential tenants.
- As outlined in table A.1, three respondents have lived in their property for less than one year, four respondents have lived in their property for 6-10 years, seven respondents have lived in their property for 11-20 years, and ten respondents have lived in their property for over 20 years.
- As outlined in table A.2, three households are lone parent with non-dependent, three households are occupied by a couple with dependents, four households are occupied by a single person, two households are lone parent with dependents, and one respondent preferred not to say.
- As outlined in table A.3, eight respondents said there was one person residing in their household, five respondents said there were two people in

their household, six respondents said there are three people in their household, four respondents said there are four people in their household, and one respondent said there are five people in their household.

Table A.1: Years lived in each household

Years lived in property	Count	%
Less than one year	3	13%
6-10 years	4	17%
11-20 years	7	29%
20+ years	10	42%

Source: Mott MacDonald, 2024

Table A.2: Description of household

Description of household	Count	%
Lone parent with non-dependent (i.e. adult) child(ren) at home	3	13%
Couple with dependent child(ren)	3	13%
Single person	8	33%
Lone parent with dependent children	9	38%
Prefer not to say	1	4%

Source: Mott MacDonald, 2024

Table A.3: Number of residents in each household

Number of residents in the household	Count	%
1	8	33%
2	5	21%
3	6	25%
4	4	17%
5	1	4%

Source: Mott MacDonald, 2024

Age

Respondents were asked to identify the age of people in their household. As outlined in Table A.4.:

- 11 respondents reported children in their household
- Two respondents reported young people in their household

- Six respondents reported working age people aged between 25 and 64 in their household
- Four further respondents reported people aged 65 and over in their household

Table A.4: Age of residents in each household

Age of residents in their household	Count	%
Children (Under 16)	11	46%
Young people (16-24)	2	8%
Working age people (16-64)	6	25%
65+	4	17%

Source: Mott MacDonald, 2024

Educational status of children

Respondents were asked to identify the education status of household residents under the age of 18.

As outlined in Table A.5, thirteen respondents reported their answer to be non-applicable,

two respondents reported the education status to be under school age and intend to enrol at a state school in Southwark, one respondent reported the education status to be under school age and intend to enrol at a state school outside of Southwark, four respondents reported the enrollment in a state school in Southwark, one respondent reported the education status to be a enrollment in a state school outside of Southwark, one respondent reported enrollment in a state school outside of Southwark, and two respondents reported the education status as post 16-18 college student.

Table A.5: Education status of under 18s

Education status of under 18s in their household	Count	%
Not applicable	13	54.%
Under school age and intend to enrol at a state school in Southwark	2	8%
Under school age and intend to enrol at a	0	0%

Education status of under 18s in their household	Count	%
private school in Southwark		
Under school age and intend to enrol at a state school outside of Southwark	1	4%
Under school age and intend to enrol at a private school outside of Southwark	0	0%
School or nursery pupil enrolled in a state school in Southwark	4	17%
School or nursery pupil enrolled in a private school in Southwark	0	0%
School or nursery pupil enrolled in a state school outside of Southwark	1	4%
School or nursery pupil enrolled in a private school outside of Southwark	1	4%
Post 16-18 college student	2	8%
University/ college student	0	0%

Source: Mott MacDonald, 2024

Sex

Respondents were asked to identify their sex. As outlined in Table A.6, fifteen households surveyed reported male residents. Twenty households surveyed reported female residents.

Table A.6: Sex

Sex	Count	%
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Male	15	62%
Female	20	83%

Source: Mott MacDonald, 2024

Disability

Respondents were asked to identify whether they have household members who have a long-standing illness, disability, or infirmity which limits their activities in some way.

As outlined in Table A.7, eleven respondents reported that there are no household members who have a long-term health condition or disability (LTHD), six respondents reported that there are household members with a LTHD which limits their day-to-day activities a little, and six further respondents reported that there are household members with a LTHD which limits their day to day activities a lot.

One respondent reported that they preferred not to say.

Table A.7: Residents with a disability in each household

Residents with a long-term health condition or disability (LTHD) in their household	Count	%
No LTHD	11	46%
Day to day activities limited a little	6	25%
Day to day activities limited a lot	6	25%
Prefer not to say	1	4%

Source: Mott MacDonald, 2024

Respondents were asked to specify what long-term health condition or disability household members have.

One respondent reported that there are household members with a sensory impairment, five respondents reported that there are household members with a physical impairment, two respondents reported that there are household members with a learning disability, two respondents reported that there are household members with mental health conditions, two respondents reported that there are household members with a long-standing illness or health condition, four respondents answered that their response was non-applicable, and one respondent reported that they preferred not to say.

Table A.8: Type of disability in each household

Type of disability	Count	%
Sensory impairment	1	4%

Physical impairment	5	21%
Learning disability	2	8%
Mental health condition	2	8%
Long-standing illness or health condition	2	8%
Other	0	0%
Not applicable	4	17%
Prefer not to say	1	4%

Source: Mott MacDonald, 2024

Respondents were asked to report the time spent caring for members with a LTHD in each household. 15 respondents reported that they do not care for household members, one respondent reported that they care for a household member for 9 hours a week or less, one respondent reported they care for a household member for 10 to 19 hours a week, one respondent reported that they care for a household member for 35 to 49 hours a week, three respondents reported that they care for a household member for 50 or more hours a week, and three respondents reported that they preferred not to say.

Table A.9 Time spent caring for household members

Time spent caring for household members with LTHD	Count	%
No	15	38%
Yes, 9 hours a week or less	1	13%
Yes, 10 to 19 hours a week	1	0%
Yes, 20 to 34 hours a week	0	0%
Yes, 35 to 49 hours a week	1	0%
Yes, 50 or more hours a week	3	25%
Prefer not to say	2	13%

Source: Mott MacDonald, 2024

Race

Respondents were asked to identify the race of people in their household. As outlined in Table A.4, in total there are known to be nine households with 'White British' residents and five households with Caribbean residents (21%). Overall, 70% of households have residents from a Black background.

The most common individual ethnicity found across the participating households is White British (38%); whilst 83% of participating households had at least one resident from an ethnic minority group

Table A.4: Race

Race and ethnicity		Count	%
White	White British	9	38%
	Irish	0	0%
	Gypsy or Irish Traveller	0	0%
	Any other White background	0	0%
Mixed/ multiple ethnic groups	White and Black Caribbean	1	4%
	White and Black African	0	0%
	White and Asian	0	0%
	Any other mixed/ multiple ethnic background	0	0%
Asian/ Asian British	Indian	0	0%
	Pakistani	0	0%
	Chinese	0	0%
	Any other Asian background	1	4%
Black/African / Caribbean / Black British	African	4	17%
	Caribbean	5	21%
	Somali	1	4%
	Any other Black / African / Caribbean background	7	29%
Arab			
Kurdish			
Turkish			
Other ethnic groups			

Source: Mott MacDonald, 2024

Religion or belief

Respondents were asked to identify their religious belief. As outlined in Table A.10, residents in two households (25%) responded as having no religion, residents in 17 households (71%) reported as identifying as Christian, and

residents in three households (13%) reported as identifying as Muslim. Christianity was the most common religion found across the participating households, and only three households belonged to minority religions.

Table A.11: Religion

Religion	Count	%
No religion	2	7%
Christian	17	71%
Buddhist	0	0%
Hindu	0	0%
Jewish	0	0%
Muslim	3	13%
Sikh	0	0%
Other	0	0%
Prefer not to say	0	0%

Source: Mott MacDonald, 2024

Gender reassignment

Respondents were asked to report their gender identity. All respondents reported that their gender identity is the same as sex registered at birth.

Sexual orientation

Respondents were asked to report their sexual orientation. All respondents stated that they were heterosexual. No households reported having any residents who identified as LGBTQ+.

Marriage and civil partnerships

Respondents were asked to report their marriage and civil partnership status. As outlined in Table A.11, three respondents (13%) reported that they have never married or registered a civil partnership, nine respondents (38%) reported that they are single, two respondents (8%) reported that they are married, five respondents (21%) reported that they are divorced, and three respondents (13%) reported that they are widowed.

Table A.12: Marriage and civil partnerships

Marriage and civil partnerships	Count	%
Never married and never registered a civil partnership	3	13%
Single	9	38%

Married	2	8%
In a registered civil partnership	0	0%
Separated, but still legally married	0	0%
Separated, but still legally in a civil partnership	1	4%
Divorced	5	21%
Formerly in a civil partnership	0	0%
Co-habiting	1	4%
Registered in a civil partnership	0	0%
Widowed	3	13%
Surviving partner from a registered civil partnership	0	0%
Don't know/ prefer not to say	0	0%

Source: Mott MacDonald, 2024

Pregnancy and maternity

Respondents were asked whether household members have been pregnant or expecting in the last 12 months. Of the 24 households who took part in the survey, 2 households (7%) included a member who had been pregnant in the last 12 months.

Socio economic status

Respondents were asked to report their socio-economic status, through information on which benefits they receive. Overall, 63% of households who responded receive some kind of working- age benefit.

As outlined in Table A.12:

- Ten respondents (42%) reported claiming universal credit,
- Three respondent (13%) reported claiming child tax credit,
- Four respondents (17%) reported claiming housing benefits or local housing allowance,
- One respondent (4%) reported claiming pension credit,
- Four respondents (17%) reported claiming council tax reduction support, and
- Eight respondents (33%) reported claiming none of the benefits below.

Table A.13: Socio-economic status

Socio-economic status	Count	%
Universal credit	10	42%
Child tax credit	3	13%
Housing benefit/ local housing allowance	4	17%
Income support	0	0%
Income-based Jobseekers allowance	0	0%
Income related Employment and Support Allowance (JSA)	1	4%
Working tax credit	0	0%
Pension credit	1	4%
Council tax reduction support	4	17%
None of the above	8	33%

Source: Mott MacDonald, 2024

Educational attainment

Respondents were asked to report the qualifications held in their households.

As outlined in Table A.13:

- Five respondents (21%) reported that members in their household have no formal qualifications.
- 12 respondents (50%) reported that members in their household have Level 1 qualifications.
- Four respondents (17%) reported that members in their household have Level 2 qualifications.
- Three respondents (13%) report members with Level 3 qualifications
- Four respondents (17%) reported that members in their household have Level 4 or above qualifications.

Table A.14: Qualifications

Qualifications in each household	Count	%
No formal qualification	5	21%
Level 1 (e.g. 1-4 GCSEs, Scottish Standard Grade or equivalent qualifications)	12	50%

Level 2 (e.g. 5 or more GCSEs, Scottish Higher, Scottish Advanced Higher or equivalent qualification)	4	17%
Level 3 (e.g. 2 or more A-levels, HNC, HND, SVQ level 4 or equivalent qualifications)	3	13%
Level 4 or above (e.g. first or higher degree, professional qualifications or other equivalent higher education qualifications)	4	17%
Other qualifications (e.g. other vocational/ work related qualifications and non-UK/ foreign qualifications)	1	4%
Prefer not to say	0	0%

Source: Mott MacDonald, 2024

Employment status

Respondents were asked to report the employment status' in their household.

As outlined in Table A.14:

- One respondent (4%) reported being a full-time carer of an elderly or disabled person
- One respondent (4%) reported being a full-time carer of a child
- Five respondents (21%) reported full-time employment,
- Five respondents (21%) reported retirement,
- Two respondents (7%) reported unemployment and availability for work,
- One respondent (4%) reported being unable to work, and
- One respondent (4%) reported part time employment.

Table A.15: Employment status

Employment status in each household	Count	%
A full-time carer of elderly or disabled person	1	4%
A full- time child carer	1	4%
An employee in a full-time job (31 or more hours per week)	5	21%
Wholly retired from work	5	21%

Unemployed and available for work	2	7%
Otherwise unable to work	1	4%
An employee in a part time job (Less than 31 hours per week)	1	4%

Source: Mott MacDonald, 2024

Salary

Respondents were asked to report their household's annual income. As outlined in Table A.15, most respondent declined to answer this question. Of those who did, the most common answer was less than £10,000 (25%) suggesting that there are low income households present in the buildings.

Table A.16: Annual household salary

Annual household salary	Count	%
Less than £10,000	6	25%
£10,000- £15,000	2	7%
£15,000- £20,000	1	4%
£35,000- £40,000	1	4%
Prefer not to say	14	58%

Source: Mott MacDonald, 2024

Language

Respondents were asked to report the preferred language spoken in each household. The most common preferred language spoken in the participating households was English, which was the preferred language of 92% of households.

Table A.17: Preferred language in each household

Preferred language in each household	Count	%
Akan	1	4%
Arabic	1	4%
English	22	92%
Yiddish	1	4%
Other	1	4%

Source: Mott MacDonald, 2024

Household bedrooms

Respondents were asked to report the number of bedrooms in their household. As outlined in Table A.17, nine respondents (38%) reported that their household had one bedroom, four respondents (17%) have two bedrooms; and ten respondents (42%) have three.

Table A.18: Number of bedrooms

Number of bedrooms in each household	Count	%
1	9	38%
2	4	17%
3	10	42%

Source: Mott MacDonald, 2024

Feedback on number of bedrooms

Respondents were asked to consider whether their households have the right number of bedrooms. Whilst the majority of respondents (14 households, or 58%) report that they feel like they have the correct amount of bedrooms; 42% report being overcrowded.

Table A.19: Feedback on number of bedrooms in each household

Feedback on number of bedrooms in each household	Count	%
Yes, household has the right number of bedrooms	14	58%
No, household is overcrowded	10	42%

Source: Mott MacDonald, 2024

Adaptions to household

Respondents were asked to report whether they have had any aids or adaptions made to their household. Only one household had- a hand rail.

A.4.2 Feedback on the estate

Respondents were asked to provide feedback on the estate.

- As outlined in Table A.19, the majority of residents anticipate the estate regeneration will have a positive impact on health and wellbeing (67% of households), compared with 13% of households who anticipate a negative impact.

- As outlined in Table A.20, half of all households anticipate the estate regeneration will have a positive impact on childcare and social provision of young people, compared with one (4%) who anticipates a negative impact.
- As outlined in Table A.21, half of all households anticipate the estate regeneration will have a positive impact on **employment and skills**, compared with one (4%) who anticipates a negative impact.
- As outlined in Table A.22, over half of all households (54%) anticipate the estate regeneration will have a positive impact on **care and support in their households**, compared with one (4%) who anticipates a negative impact.
- However, respondents report requiring needing more information on how the regeneration could impact employment and skills, and childcare and social provision

Table A.19: Impacts of redevelopment on health and wellbeing in each household

How the redevelopment of the site may impact the health and wellbeing of each household	Count	%
Positive impact	16	67%
No impact	3	13%
Negative impact	3	13%
Need more information	2	8%

Source: Mott MacDonald, 2024

Table A.20: Impacts of redevelopment on childcare and social provision of young people in each household

How the redevelopment of the site may impact childcare and school provision	Count	%
Positive impact	12	50%
No impact	3	13%
Negative impact	1	4%
Need more information	8	33%

Source: Mott MacDonald, 2024

Table A.21: Impacts of redevelopment on employment and skills in each household

How the redevelopment of the site may impact employment and skills	Count	%
Positive impact	12	50%
No impact	3	13%
Negative impact	1	4%
Need more information	7	29%

Source: Mott MacDonald, 2024

Table A.22: Impacts of redevelopment on care and support in each household

How the redevelopment of the site may impact care and support	Count	%
Positive impact	13	54%
No impact	2	7%
Negative impact	1	4%
Need more information	3	13%

Source: Mott MacDonald, 2024

B. Literature Review

This chapter sets out the finding of the desk-based review process, providing a literature review of the potential effects of the renewal on people with protected characteristics. All potential risks and opportunities of a typical housing renewal project have been considered. Section B.1 discusses the potential effects on residents and community resources associated with rehousing and section B.2 sets out the wider regeneration impacts on community. All are segmented into key thematic areas and summarised in Chapter 4.

B.1 Impacts on residents and community resources during renewal

B.1.1 Loss of social cohesion associated with relocation

The redevelopment process can involve the temporary or permanent resettlement of residents and the demolition of housing and community resources. As a result, this could potentially lead to the risk of loss of social cohesion and temporary or permanent access to this amenity provision, which can furthermore increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can impact on all parts of the community, but can have a disproportionately negative effect on **children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds and people from minority faith groups.**

The instability caused by involuntary relocation has the potential to be particularly disruptive to **children**. Such disruption can be attributed to stress and anxiety relating to changing schools and the need to adapt to new routines, staff, facilities and peers. It is generally accepted that children develop better in stable environments with a degree of routine; sudden and dramatic disruptions can be both stressful and affect feelings of security, as has been evidenced in the COVID-19 pandemic.¹²

Children with autism spectrum conditions may also find new routines, expectations, and social relationships of a new school environment to be especially challenging, which can have further negative effects on educational attainment and wellbeing.¹³

¹² Lionetti, F., Spinelli, M., Moscardino, U., Ponzetti, S., Garito, M., Dellagiulia, A., . . . Pluess, M. (2022). The interplay between parenting and environmental sensitivity in the prediction of children's externalizing and internalizing behaviors during COVID-19. *Development and Psychopathology*, 1-14. Available at: <https://doi.org/10.1017/S0954579421001309>

Children from low-income families may be particularly impacted by relocation due to loss of local informal childcare support. A study from the Joseph Rowntree Foundation showed that informal childcare support from grandparents was one important factor in enabling parents to work, generating income and preventing families from going without daily necessities.¹⁴

Furthermore, relocation can also have negative mental health effects on children and adolescents for a number of reasons, including: weakened social ties, disturbed social networks, household disruption, social isolation and a reduction in parent-child interactions.¹⁵

The loss of long-standing community links risks creating feelings of isolation, particularly amongst **older people**. Age UK research indicates that physical isolation, a lack of social resources and a removal of familiarity can all contribute to feelings of isolation and loneliness amongst older people.¹⁶ This in turn can lead to negative health outcomes such as poorer mental health, a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism) and a greater risk of hospitalisation.¹⁷ Loneliness increases the likelihood of mortality by 26 per cent among those over the age of 65 and raises the risk of developing conditions, such as high blood pressure, heart disease and stroke.¹⁸ The link between older people and the likelihood of experiencing feelings of isolation and loneliness indicates that this group may be disproportionately negatively impacted by relocation. This can equally be the case for older people remaining in or very close to an area being redeveloped.¹⁹

The impact of the COVID- 19 pandemic has already had an impact on feelings of social isolation amongst **older people**. In the UK, from March 2020, almost nine million people over the age of 70 were advised by the Government to 'strictly adhere' to social distancing rules, only leaving their home for essential purposes. Restrictions have increased social isolation and feelings of loneliness for older people.²⁰

Relocation has the potential to cause stress, anxiety and uncertainty for **disabled people**. Changes, both minor and major, to some disabled people's

¹⁴ Joseph Rowntree Foundation (2016) 'Falling short: the experience of families living below the minimum income standard'. Available at: <https://www.jrf.org.uk/report/falling-short-experiences-families-below-minimum-income-standard>

¹⁵ Morris, T, Manley D, Northstone, K, Sabel, C, (2017): 'How do moving and other major life events impact mental health? A longitudinal analysis of UK children'

¹⁶ Age UK (2015) 'Evidence Review: Loneliness in Later Life'. Available at: "https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health--wellbeing/rb_june15_loneliness_in_later_life_evidence_review.pdf"

¹⁷ IoTUK (2017): 'Social Isolation and Loneliness in the UK' Available at: <https://iotuk.org.uk/social-isolation-and-loneliness-report/>

¹⁸ Age UK (2015): 'Campaign to end loneliness: threat to health'.

¹⁹ Age UK (2015): 'Loneliness and Isolation evidence review'

²⁰ Wu, Bei (2020): 'Social isolation and loneliness among older adults in the context of COVID-19: a global challenge'. Available at: <https://ghrp.biomedcentral.com/articles/10.1186/s41256-020-00154-3>

routines and surroundings may adversely affect feelings of security and comfort. For example, research shows that people on the autism spectrum, tend to prefer set routines (such as traveling via the same routes) and rigid structures (such as preferences to room layouts or objects) as they can help to bring order to their daily life so that they know what is going to happen and when.²¹

Findings from the Jo Cox Commission on loneliness found that over half of **disabled people** say they are lonely, with around one in four feeling lonely every day.²² The report also states that forming and maintaining social connections can be a challenge for disabled people, including those with sensory impairments, learning disabilities, autism, physical and mobility impairments, mental health conditions, dementia, head and brain injury, neurological conditions, cancer and HIV. As disabled people can experience more barriers to forming social connections the loss of existing local social connections through residential displacement or loss of social resources could lead to disabled people experiencing further loneliness and isolation.

Relocation can also create stress, anxiety and uncertainty for **disabled people** regarding the accessibility of their new home. A report published by the EHRC identifies that across all housing tenures, there is a severe shortage of accessible housing. For example, one in three disabled people living in private rented properties live in unsuitable accommodation. This figure is one in five for disabled people living in social housing, and one in seven for disabled people who own their own home. Overall, in England, only 7% of homes offer the basic four accessibility features to make a home fully accessible (level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level).²³ This suggest that disabled people are more likely to be concerned about the accessibility of their new home compared to other residents. Additionally, a report by Leonard Cheshire Disability highlights that only 4% of those with mobility impairments who have looked for accessible homes said they were easy to find. In addition, they also found that some disabled people have also experienced difficulties in terms of local authorities being reluctant to fund adaptations that would allow them to live independently.²⁴

The disruption of social networks caused by relocation may also cause negative health outcomes for people with **mental health conditions and autism**, many

²¹ National Autistic Society (2016) "Obsessions, repetitive behaviour and routines". Factsheet. Available at: <https://www.autism.org.uk/about/behaviour/obsessions-repetitive-routines.aspx>

²² Sense for the Jo Cox Commission on loneliness (2017) 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

²³ DCLG (2015). 'English Housing Survey: Adaptations and Accessibility Report' Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf

²⁴ Leonard Cheshire Disability (2014): 'The hidden housing crisis' Available at: <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

of whom depend on social networks to maintain their standard of living.²⁵ People with mental health problems may be disproportionately impacted by stress and anxiety, especially if relocation is unexpected or accompanied by financial stress.²⁶ Research from Wilding found that increased rates of mental ill health are associated with involuntary residential relocation.²⁷

The impact of the COVID- 19 pandemic and restrictions throughout 2020 have also had a negative impact on feelings of social isolation amongst disabled people. In May 2020 the Office for National Statistics found that nearly two thirds of disabled people said that COVID-19 concerns were affecting their wellbeing, compared with half of non-disabled people. One of the main reasons cited was feelings of loneliness or isolation.²⁸

Ethnic minority and **minority faith** communities are also likely to experience adverse effects as a result of relocation. It has been identified that these groups may be more reliant on social networks, faith and cultural facilities. They are likely to have concerns over loss of social networks and facilities, as well as fears of isolation, harassment or language barriers in new locations.²⁹ Ethnic minority communities also tend to experience greater difficulty in accessing health care when compared to other sections of the population, and rehousing may exacerbate the issue.³⁰

Evidence has suggested that women who move home while **pregnant** tend to experience an increase in stress and depression levels above and beyond that of women who move home when not pregnant.³¹ Evidence also suggests that the stress and physical exercise involved with relocation can slightly increase the risk of miscarriage, preterm delivery, small for gestational age new-borns, low birthweight, preeclampsia / gestational hypertension and can exacerbate deep vein thrombosis which pregnant women are more at risk of.³²

²⁵ National Autism Society. (2017): 'Moving house' URL: <https://www.autism.org.uk/movinghouse> 56

²⁶ Wilding et al., (2018): 'Place and preference effects on the association between mental health and internal migration within Great Britain' Health and Place. 52(1), pp 180-187

²⁷ Wilding et al., (2018): 'Place and preference effects on the association between mental health and internal migration within Great Britain' Health and Place. 52(1), pp 180-187

²⁸ ONS (2020): 'Coronavirus and the social impacts on disabled people in Great Britain: May 2020'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/coronavirusandthesocialimpactsondisabledpeopleingreatbritain/may2020>

²⁹ Della Puppa, Francesco and King. Russell (2019). 'The new 'twice migrants': motivations, experiences and disillusionments of Italian-Bangladeshis relocating to London.' Journal of Ethnic and Migration Studies, 45(11). Available at: <https://doi.org/10.1080/1369183X.2018.1438251>

³⁰ BME Health Forum (2010) 'Good Access in Practice: Promoting community development in the delivery of healthcare'. Available at: http://bmehf.org.uk/files/9013/6536/5135/Good_Access_in_Practice_final.pdf

³¹ Tunstall, H., Pickett, K. and Johnsen, S. (2010): 'Residential mobility in the UK during pregnancy and infancy: Are pregnant women, new mothers and infants 'unhealthy migrants'?'

³² NHS (2016): 'Deep vein thrombosis'; Royal College of Physicians and Faculty of Occupational Medicine (date unknown): 'Advising women with a healthy, uncomplicated, singleton pregnancy on: heavy lifting and the risk of miscarriage, preterm delivery and small for gestational age'

A 2015 survey carried out by the Care Quality Commission assessed the impact that having the same midwife had on pregnant women. The results showed that women who had the same midwife throughout pregnancy had more positive midwifery experiences than those who did not. The most negative experiences occurred with those who wanted to see the same midwife but were unable to.³³ Should relocation result in the need to make changes to preestablished antenatal services and relationships, this could negatively impact pregnant individuals.

B.1.2 Loss of community resources

The loss of facilities where children can socialise, and play could be particularly detrimental to **children** living in the local area. Demolition and resource relocation could adversely affect access to child social networks. Evidence suggests that early years provision plays an important role in a child's development and that free play in early childhood is a vital experience thorough which child learn social, conceptual and creative skills, as well as increasing their knowledge and understanding of the world.³⁴

As demolition proceeds, local amenities and services (such as shops, community centres and health facilities) may decide to close. Some community resources may be included in the demolition process. The loss of these resources can have a disproportionately negative effect on older people remaining in the neighbouring areas, who may find it more challenging to travel to new services outside of their neighbourhood.³⁵ Furthermore, for local businesses, the loss of their traditional customer base following the relocation of residents can force closures, further reducing the choice of services available to people in the community, with older people among the most likely to be affected. Research from Age UK found that reduced access to community facilities can, have serious negative effects on mental health and wellbeing, and increase rates of cardiovascular disease in older people.³⁶

Community severance is defined as and when an individual is cut off from amenities and social facilities within the local community.³⁷ Whilst anyone can suffer from community severance, compared to the general population, **older people** are particularly vulnerable.³⁸ As a result of the development, local residents may find that local amenities such as shops, health and community facilities begin to close. As a result of this, residents will need to find new facilities elsewhere, which may not be as close or convenient as the ones used

³³ Care Quality Commission (2015): '2015 survey of women's experiences of maternity care'. Available at: https://www.cqc.org.uk/sites/default/files/20151215b_mat15_statistical_release.pdf

³⁴ Nation Children's Bureau (2007): 'Free Play in Early Childhood'

³⁵ A. Power (2008) 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability'. Available at: <https://www.sciencedirect.com/science/article/pii/S0301421508004709>

³⁶ Age UK (2015): 'Campaign to end loneliness': 'Threat to health'

³⁷ Age UK. (2015): 'Loneliness and Isolation evidence review'

³⁸ Age UK (2015): 'Campaign to end loneliness: Threat to health'

previously. This may reduce the availability and choice of services for vulnerable older residents that may find it challenging to access services further away. The impacts of reduced access to community facilities may have cause reduced mental health and wellbeing and increase rates of cardiovascular disease in older people³⁹, including social isolation and increased mortality rates.⁴⁰

As a result of the redevelopment, community resources will be relocated or close. The loss of community facilities used by children can lead to; weakened social ties, disturbed social networks, household disruption, social isolation and a reduction in parent-child interactions.⁴¹

The loss of community resources may have a disproportionate impact on **disabled people**. Findings from the Jo Cox Commission on loneliness found that over half of disabled people say they are lonely, with around one in four feeling lonely every day.⁴² The report also found that for those with a range of impairments, including those with sensory impairments, learning disabilities, autism, physical and mobility impairments, mental health conditions, dementia, head and brain injury, neurological conditions, cancer and HIV; forming and maintaining social connections can be a challenge.⁴³ Due to these difficulties, those who are disabled may be disproportionately impacted by a loss of community and social resources that will be relocated or closed as a result of the development. This could lead to an increase in community severance, isolation and loneliness within this demographic.

For **disabled people, particularly those who are autistic**, the relocation and potential closure of community resources from the Site may cause significant negative impacts. This may result in the breakdown of social relationships associated with a community resource, and consequently, a disruption of the social networks which many rely on to maintain their standard of living. Changes, both to their routines and surroundings may adversely affect feelings of security and comfort, highlighting how people with autism may be disproportionately impacted. Similarly, for those with dementia or Alzheimer's, learning about and interpreting new environments can be difficult, and relocation can create feelings of dissonance, confusion and discomfort.⁴⁴

³⁹ Age UK (2015): 'Campaign to end loneliness: 'Threat to health'

⁴⁰ Gough et al (2021) 'Community participation of community dwelling older adults: a cross-sectional study'

⁴¹ Morris, T, Manley D, Northstone, K, Sabel, C, (2017) 'How do moving and other major life events impact mental health? A longitudinal analysis of UK children'

⁴² Sense for the Jo Cox Commission on loneliness (2017) 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

⁴³ Sense for the Jo Cox Commission on loneliness (2017) 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

⁴⁴ Son, G. R., Therrien, B., & Whall, A. (2002). 'Implicit memory and familiarity among elders with dementia'. *Journal of Nursing Scholarship*, 34(3), 263-267. Available at: <https://lemonandcrane.co.uk/resources/Journal%20of%20Nursing%20Scholarship%20-%20Implicit%20Memory%20and%20Familiarity%20Among%20Elders%20with%20Dementia.pdf>

As the construction phase of the redevelopment begins, local amenities including places of worship and community centres may decide to prematurely close or relocate. The Site is currently home to a large number of places of worship. The closure and reprovision of these places of worship as a result of the scheme will disproportionately impact those who are from **religious** communities. Dislocation from cultural and/or religious communities can be concerning for residents belonging to these groups, and relocation can raise fears of isolation, harassment or language barriers in new locations and neighbourhoods, and loss of facilities.⁴⁵

Older people remaining in local areas may be adversely impacted by these changes to local social infrastructure as they find it challenging to access new places of worship relocated to outside their local area.⁴⁶ Religious institutions are also important to upkeep within local communities, as they contribute towards social cohesion and wellbeing. Research outlines that Mosques can help the cognitive wellbeing of **older individuals**, as opportunities such as Arabic learning lessons can help healthy mental functioning. Minority religious communities also contribute towards helping raise awareness and prevention of diseases such as Hepatitis, providing awareness whereby cultural or language barriers exist.⁴⁷ Health inequalities amongst South Asian ethnic groups are higher, therefore religious institutions that disproportionately represent these groups are significant in providing opportunities for equality.

B.1.3 Access to finance as a result of relocation

Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, certain groups are particularly vulnerable to financial exclusion, including **young people** not in employment, **disabled people, lone parents, ethnic minority groups and older people**, as it has been found that social exclusion can lead to financial vulnerability.⁴⁸

Young people, particularly those not in employment, tend to have a lower basic income and fewer savings than the other age groups and are therefore vulnerable to financial exclusion.⁴⁹ The rising cost of housing and deposits is also problematic for many young people due to the gap between income and house prices. Consequently, home ownership amongst 16-24-year-olds

⁴⁵ BME Health Forum (2010) 'Good Access in Practice: Promoting community development in the delivery of healthcare'.

⁴⁶ A. Power (2008) 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability'

⁴⁷ Public Health England (2017) 'Healthy living: mosques' Available at: [Healthy living: mosques - GOV.UK \(www.gov.uk\)](https://www.gov.uk/healthy-living-mosques)

⁴⁸ Fernández-Olit, B., Paredes-Gázquez, J.D. & de la Cuesta-González, M. (2018). 'Are Social and Financial Exclusion Two Sides of the Same Coin? An Analysis of the Financial Integration of Vulnerable People.' Soc Indic Res 135, 245–268. Available at: <https://doi.org/10.1007/s11205-016-1479-y>

⁴⁹ Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'.

represent only 0.7% of homeowners in 2022, with many young people now choosing to rent privately.⁵⁰ This means that as a group, they may be adversely impacted by the financial implications of relocation.

Older people, especially those who have paid off a previous mortgage or have no recent experience of moving home, have less financial flexibility and savings than those in full time employment.⁵¹ Relocation may therefore cause older people to make use of their savings and investments to secure a new home, further impacting their financial independence and stability. Should older people lack savings to assist with relocation, the range of home ownership options is likely to be narrow.

Those from **ethnic minority backgrounds** are more likely to have limited experience of institutional loan finance.⁵² Further, they may have less access to commercial loans due to a poor credit rating or their location in 'high risk' postcodes. In terms of housing affordability, in 2017 it was reported that rents are less affordable for most ethnic minority groups when compared to White British households.⁵³ Two-fifths of people from an ethnic minority background live in low-income households,⁵⁴ further suggesting the cost of relocating has the potential to be problematic.

Women are disproportionately represented among lone parent households. Around 90% of single parents are women and have the highest poverty rate amongst working-age adults, with 43% living in poverty (rising to 51% in London).⁵⁵ This makes the risk of financial exclusion higher as women who are single parents are more likely to spend a higher portion of their income on housing costs. This can increase the risk of homelessness, with single mother families accounting for one quarter of all homeless households in London in 2019.⁵⁶

Disabled people may be impacted by the availability of affordable homes when moving to new areas, as they are more likely to live in poverty.⁵⁷ Indeed, rising

⁵⁰ House of Lords (2016): 'Library Note: Impact of the shortage of housing on young people'. Available at: <https://researchbriefings.files.parliament.uk/documents/LLN-2016-0056/LLN-2016-0056.pdf>; Statista Research Department (2023): 'Age distribution of home owners in England 2022' Available at: <https://www.statista.com/statistics/321065/uk-england-home-owners-age-groups/>

⁵¹ Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'.

⁵² House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'.

⁵³ Shelter (2017) 'BAME homelessness matters and is disproportionately rising – time for the government to act'. Available at: <http://blog.shelter.org.uk/2017/10/bame-homelessness-matters-and-is-disproportionately-rising-time-for-the-government-to-act/>

⁵⁴ The Poverty Site (2017). See: <http://www.poverty.org.uk/06/index.html>

⁵⁵ Department for Work and Pensions (2015) 'Low income'

⁵⁶ Mayor of London (2020): 'Housing in London- 2020'. Available at: <https://data.london.gov.uk/dataset/housing-london>

⁵⁷ Joseph Rowntree Foundation (2019): 'Poverty rates in families with a disabled person'. Available at: <https://www.jrf.org.uk/data/poverty-rates-families-disabled-person>

numbers of disabled people are becoming homeless - up 53% in 2019 alone.⁵⁸ Disabled people are less likely to be able to own their own home and are more likely to rent social housing than those who are not disabled.⁵⁹ Whilst some shared ownership homes are specifically designed to be accessible for disabled people, only 1.1% of households who purchased a shared ownership home in London in 2017/18 included a disabled household member, likely due to the cost.⁶⁰

Disabled people who live in social housing could experience particularly acute effects. The 'removal of the spare room subsidy' or 'bedroom tax' in 2013 has had a disproportionate impact on disabled people in social housing; two thirds of those affected have a disability. Research shows that disabled people have found it difficult to take up proposed mitigation measures, such as taking up work, working longer hours or downsizing, and thus have had their income reduced by £12 to £22 per week, depending on the number of spare bedrooms. These changes have resulted in increased poverty and adverse effects on health, well-being and social relationships of disabled residents in social housing.⁶¹

B.1.4 Expenses associated with relocation

In addition to access to finance, other costs associated with relocation can have major impacts on certain groups. Research by The Health Foundation UK shows that **young people** are more likely to find housing unaffordable.⁶² Additionally, the research found that in 2020, 15% of people aged 16–24 and 13% of people aged 25–34 spent more than a third of their income on housing costs in comparison to 1% of 35–44-year-olds and 8% of 45–54-year-olds. The reason for this is due to older working-age groups generally having higher incomes and therefore a higher likelihood to have lower housing costs due to home ownership status.

Older people are also vulnerable as there may be additional expenses they will have to cover when relocating. In the last 10 years, the affordability of housing has improved across all age groups apart from people over 55 years old.⁶³ More

⁵⁸ The Independent (2019). 'Homelessness amongst ill and disabled people rises 53% in a year, figures show'. Available at: <https://www.independent.co.uk/news/uk/home-news/homeless-disabled-ill-rough-sleeping-housing-crisis-a9251756.html>

⁵⁹ Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019>

⁶⁰ Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: Mayor of London (2020) 'Intermediate housing: Equality Impact Assessment'. Available at: https://www.london.gov.uk/sites/default/files/intermediate_housing_-_equality_impact_assessment_for_part_1_consultation_response_report.pdf

⁶¹ Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. *Journal of Public Health*, 38(2), 197–205.

⁶² The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

⁶³ The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

specifically, the proportion of 55–64-year-olds with unaffordable housing has increased by 25%. Thus, older people can be particularly vulnerable to relocation due to the additional expenses that they would have to cover.

People from **ethnic minority backgrounds** tend to have higher relative housing costs as compared to white British people. Research from 2019/20 has found that the cost for people in all minority ethnic groups are 13 – 19% higher than those of white British people.⁶⁴

For **people with low incomes** (the bottom 20% or quintile of the income distribution), costs associated with housing could adversely affect their standard of living. Research shows that 26% of households on the lowest incomes spent more than a third of their income on housing costs in 2019/20.⁶⁵ In comparison, only 3% of those in the top income quintile spent more than a third of their income on housing costs. This is largely due to housing being less affordable for people on the lowest incomes. Additionally, this inequality is also partly due to there being more people renting either private or social homes in the lower income quintiles, for whom housing tends to be less affordable.

B.1.5 Access to finance and expenses as a result of relocation

Relocation can increase residents' financial outgoings due to the costs of moving and obtaining new housing. These costs may include removal services, the need to adapt to a new home or buy new furniture. Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, certain groups are particularly vulnerable to financial exclusion, including **young people** not in employment, **disabled people, lone parents, ethnic minority groups and older people**, as it has been found that social exclusion can lead to financial vulnerability.⁶⁶

Young people

Young people, especially those not in employment, tend to have a lower basic income and less savings compared to other age groups, making them vulnerable to financial exclusion.⁶⁷ The rising costs of housing and deposits is challenging for many young people due to the gap between income and house prices. Consequently, home ownership amongst 16-24-year-olds represents only 0.7% of homeowners in 2022, with many young people now choosing to

⁶⁴ The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

⁶⁵ The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

⁶⁶ Fernández-Olit, B., Paredes-Gázquez, J.D. & de la Cuesta-González, M. (2018). 'Are Social and Financial Exclusion Two Sides of the Same Coin? An Analysis of the Financial Integration of Vulnerable People.' *Soc Indic Res* 135, 245–268. Available at: <https://doi.org/10.1007/s11205-016-1479-y>

⁶⁷ Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'.

rent privately.⁶⁸ Research by The Health Foundation UK found that in 2020, 15% of people aged 16–24 and 13% of people aged 25–34 spent more than a third of their income on housing costs in comparison to 1% of 35–44-year-olds and 8% of 45–54-year-olds.⁶⁹ A reason for this may be due to older working-age groups often having higher incomes, with a higher likelihood to have home ownership status and lower housing costs. As a result, **young people** may be adversely impacted by the financial implications of relocation.

Older people

Older people, particularly those who have paid off a previous mortgage or have no recent experience of moving home, have less financial flexibility and savings than those in full time employment.⁷⁰ Relocation may cause older people to use their savings to access new housing, threatening their financial independence and stability. This reiterates evidence presented to the House of Commons Communities and Local Government Committee, demonstrating that relocation may also impact people who have savings and investments.⁷¹ Those without savings are also likely to have a negative experience when relocating, due to a narrow range of home ownership options.

Older people are also more vulnerable to additional expenses they will have to cover when relocating. Over the last 10 years, the affordability of housing has improved across all age groups apart from people over 55 years old. In turn, the proportion of 55–64-year-olds with unaffordable housing has increased by 25%.⁷² Therefore, this group faces specific vulnerabilities due to relocation as a result of the expenses this process incurs.

Ethnic minority groups

Individuals from **ethnic minority backgrounds** are more likely to have limited experience of institutional loan finance.⁷³ In terms of housing affordability, in 2017 it was reported that rent is less affordable for most ethnic minority groups when compared to White British households.⁷⁴ Two-fifths of people from an

⁶⁸ House of Lords (2016): 'Library Note: Impact of the shortage of housing on young people'. Available at: <https://researchbriefings.files.parliament.uk/documents/LLN-2016-0056/LLN-2016-0056.pdf> ; Statista Research Department (2023): 'Age distribution of home owners in England 2022' Available at: [Impact of the Shortage of Housing on Young People \(parliament.uk\)](#)

⁶⁹ The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

⁷⁰ Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'.

⁷¹ House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

⁷² The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

⁷³ House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'.

⁷⁴ Shelter (2017) 'BAME homelessness matters and is disproportionately rising – time for the government to act'. Available at: <http://blog.shelter.org.uk/2017/10/bame-homelessness-matters-and-is-disproportionately-rising-time-for-the-government-to-act/>

ethnic minority background live in low-income households, and tend to have higher relative housing costs as compared to white British people.⁷⁵ Research from 2019/20 has found that the cost for people in all minority ethnic groups are 13 – 19% higher than those of white British people.⁷⁶ Altogether, this suggests that costs of relocating can be disproportionately detrimental for this group.

Lone parents

Women are disproportionately represented among lone parent households. Around 90% of single parents are women and this group has the highest poverty rate amongst working-age adults, with 43% living in poverty (rising to 51% in London).⁷⁷ This increases their risk of financial exclusion as **women** who are single parents are more likely to spend a higher portion of their income on housing costs. This can increase the risk of homelessness, with single mother families accounting for one quarter of all homeless households in London in 2019.⁷⁸

Disabled people

Disabled people may be vulnerable to the impacts of relocation due to the availability of affordable homes when moving to new areas, as they are more likely to live in poverty.⁷⁹ In fact, rising numbers of disabled people are becoming homeless – increasing by 53% in 2019.⁸⁰ Disabled people are less likely to be able to own their own home and are more likely to rent social housing than those who are not disabled.⁸¹ Whilst some shared ownership homes are specifically designed to be accessible for disabled people, only 1.1% of households who purchased a shared ownership home in London in 2017/18 included a disabled household member, likely due to the cost.⁸²

Low-income households

⁷⁵ The Poverty Site (2017). See: <http://www.poverty.org.uk/06/index.html>

⁷⁶ The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

⁷⁷ Gingerbread (2019). 'Single parents- facts and figures'. Available at: <https://www.gingerbread.org.uk/what-we-do/media-centre/single-parents-facts-figures/> ; Gingerbread (2020). 'Living standards and poverty. Available at: <https://www.gingerbread.org.uk/policy-campaigns/living-standards-and-poverty/>

⁷⁸ Women's Budget Group (2019) *A home of her own*. Available at: [WBG19-Housing-Report-full-digital.pdf](https://womensbudgetgroup.org.uk/wp-content/uploads/2019/03/WBG19-Housing-Report-full-digital.pdf)

⁷⁹ Joseph Rowntree Foundation (2019): 'Poverty rates in families with a disabled person'. Available at: <https://www.jrf.org.uk/data/poverty-rates-families-disabled-person>

⁸⁰ The Independent (2019). 'Homelessness amongst ill and disabled people rises 53% in a year, figures show'. Available at: <https://www.independent.co.uk/news/uk/home-news/homeless-disabled-ill-rough-sleeping-housing-crisis-a9251756.html>

⁸¹ Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019>

⁸² Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: Mayor of London (2020) 'Intermediate housing: Equality Impact Assessment'. Available at: https://www.london.gov.uk/sites/default/files/intermediate_housing_-equality_impact_assessment_for_part_1_consultation_response_report.pdf

For people with low incomes, costs associated with housing could adversely affect their standard of living. In 2019/2020, 26% of households on the lowest incomes spent more than a third of their income on housing costs.⁸³ In comparison, only 3% of those in the top income quintile spent more than a third of their income on housing costs. This is largely a consequence of housing being less affordable for people on the lowest incomes. Additionally, this inequality is also a result of more people renting either private or social homes in the lower income quintiles, for whom housing tends to be less affordable.

B.1.6 Access to affordable, appropriate and accessible housing

As renewal processes often involve the rehousing of residents, issues may arise regarding sourcing suitable accommodation that meets the needs of a variety of groups:

Women

Around 90% of single parents are women and they have the highest poverty rate amongst working-age adults, with 43% living in poverty (rising to 51% in London).⁸⁴ This increases their risk of financial exclusion as women who are single parents are more likely to spend a higher portion of their income on housing costs. This can increase the risk of homelessness, with single mother families accounting for one quarter of all homeless households in London in 2019.⁸⁵

LGBTQ+ people

Members of the LGBTQ+ community may also be affected by the availability of affordable housing when relocating to a new area. Research conducted within the World Habitat Report⁸⁶ states that personal experiences and wider institutional failings cause LGBTQ+ groups to disproportionately experience housing issues. One in five LGBTQ+ renters have experienced discrimination from a landlord or letting agent due to their gender identity or sexual orientation, which can in turn increase barriers to safe, secure and affordable housing.⁸⁷

Children

⁸³ The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: <https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability>

⁸⁴ Gingerbread (2019). 'Single parents- facts and figures'. Available at: <https://www.gingerbread.org.uk/what-we-do/media-centre/single-parents-facts-figures/>; Gingerbread (2020). 'Living standards and poverty'. Available at: <https://www.gingerbread.org.uk/policy-campaigns/living-standards-and-poverty/>

⁸⁵ Women's Budget Group (2019) *A home of her own*. Available at: [WBG19-Housing-Report-full-digital.pdf](https://womensbudgetgroup.org.uk/wp-content/uploads/2019/06/WBG19-Housing-Report-full-digital.pdf)

⁸⁶ World Habitat Report (no date) 'Left out: Why many LGBTQ+ people aren't accessing their right to housing in the UK' Available at: [Layout 1 \(thinkhouse.org.uk\)](https://www.thinkhouse.org.uk/Layout_1_(thinkhouse.org.uk))

⁸⁷ HQN (2022) 'One in five LGBTQ+ private renters 'experienced discrimination' from a landlord or letting agent' Available at: [One in five LGBTQ+ private renters 'experienced discrimination' from a landlord or letting agent - HQN \(hqnetwork.co.uk\)](https://www.hqn.co.uk/one-in-five-lgbtq-private-renters-experienced-discrimination-from-a-landlord-or-letting-agent/)

There is an established relationship between the availability of housing and poor living conditions for **children**. In England, it is estimated that one in five children live in overcrowded, unaffordable or inadequate houses. Out of this number, 1.3 million children need social housing, with it being the only suitable and affordable form of housing.⁸⁸ Children who live in overcrowded accommodation have an increased risk of developing respiratory conditions, infections and psychological problems.⁸⁹ Overcrowding can also increase children's risk of injury, for example, bed sharing, which is more likely to occur in overcrowded houses, has been identified as a factor contributing to Sudden Infant Death Syndrome (SIDS).⁹⁰ Overall, overcrowded, poor living conditions can negatively impact a child's emotional and physical health.⁹¹

Disabled people

Disabled people, particularly those with a mobility impairment, often experience difficulties when trying to find new housing. Only 4% of those with mobility impairments have easily found accessible homes. Additionally, some disabled people have also experienced difficulties with local authorities being reluctant to fund adaptions that would support their independence.⁹² A published report from the Equality and Human Rights Commission found a severe shortage of accessible housing, with one in three disabled people privately renting living in unsuitable accommodation. This figure is one in five for disabled people living in social housing, and one in seven for **disabled people** who own their own home. Only 7% of UK homes offer the basic four accessibility features to make a home fully liveable; level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level.⁹³

Disabled people may be impacted by the availability of affordable homes when moving to new areas as they are more likely to live in poverty.⁹⁴ **Disabled people** are also less likely to be able to own their own home and are more likely

⁸⁸ National Housing Federation (2021) *1 in 5 children in need of a new home*. Available at: [National Housing Federation - 1 in 5 children in need of a new home](#)

⁸⁹ House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

⁹⁰ The Child Safeguarding Practice Review Panel (2020) 'Out of routine: A review of sudden unexpected death in infancy (SUDI) in families where the children are considered at risk of significant harm'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

⁹¹ National Children's Bureau (2016): 'Housing and the health of young children: Policy and evidence briefing for the VCSE sector'. Available at: <https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf>

⁹² Leonard Cheshire Disability (2014): 'The hidden housing crisis' Available at: <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

⁹³ Department for Communities and Local Government (2015): 'English Housing Survey: Adaptations and Accessibility Report'

⁹⁴ Mayor of London (2020): 'Housing in London- 2020'. Available at: <https://data.london.gov.uk/dataset/housing-london>

to rent social housing than those who are not disabled.⁹⁵ People living with a disability in social housing can experience particularly acute effects. The 'removal of the spare room subsidy' or 'bedroom tax' in 2013 has had a disproportionate impact on disabled people in social housing as two thirds of those affected have a disability. Research shows that disabled people have found it difficult to take up proposed mitigation measures, such as taking up work, working longer hours or downsizing, and thus have had their income reduced by £12 to £22 per week, depending on the number of spare bedrooms. These changes have resulted in increased poverty and adverse effects on health, well-being and social relationships of disabled residents in social housing.⁹⁶

Ethnic minority groups

Research from the English Housing Survey has shown that people belonging to **minority ethnic households** are more likely to live in overcrowded housing compared to the white British population. The highest rates of overcrowding were in Bangladeshi (22.5%), Arab (17.1%), black African (16.3%) and Pakistani (13.5%) households compared to white British households (1.7%).⁹⁷ Ethnic minority groups may also be impacted by the availability of affordable housing when relocating. Rent is less affordable for most ethnic minority groups compared to white British households. For example, after housing costs 53% of Bangladeshi households and 49% of Pakistani households live in low-income households.⁹⁸ Therefore, it is possible that ethnic minority groups could experience difficulties in accessing accommodation that meets their needs.

Older people

When relocating, a lack of affordable or suitable housing is more likely to adversely affect older people (and particularly pensioners) who have lower average incomes than working-age people. Research from Age UK found that 1.9 million (16%) of pensioners in the UK live in relative poverty, with private tenants and social rented sector tenants most at risk.⁹⁹ A lack of financial means can make relocation more challenging, with limited affordable housing options available.

⁹⁵ The Independent (2019). 'Homelessness amongst ill and disabled people rises 53% in a year, figures show'. Available at: <https://www.independent.co.uk/news/uk/home-news/homeless-disabled-ill-rough-sleeping-housing-crisis-a9251756.html>

⁹⁶ Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. *Journal of Public Health*, 38(2), pp. 197-205

⁹⁷ Ministry of Housing, Communities and Local Government (MHCLG) (2023) *English Housing Survey*. Available at: Overcrowded households - GOV.UK Ethnicity facts and figures ([ethnicity-facts-and-figures.service.gov.uk](https://www.gov.uk/government/statistics/english-housing-survey-2023/ethnicity-facts-and-figures))

⁹⁸ Shankley, W. and Finney, N. (2020) *Ethnic minorities and housing in Britain*, Byrne, B., Alexander, C., Khan, O., Nazro, J., Shankley, W. (eds.) *Ethnicity and Race in the UK*. Bristol University Press: Policy Press.

⁹⁹ Age UK (2024) *Poverty and financial disadvantage in later life*. Available at: [poverty-and-financial-disadvantage-in-later-life-briefing-2024.pdf](https://www.ageuk.org.uk/poverty-and-financial-disadvantage-in-later-life-briefing-2024.pdf) (ageuk.org.uk)

Older people are also more likely to need specialist housing which meets their needs. Projections suggest that 38,000 new homes for older people are needed, increasing significantly from the current average of 8,000.¹⁰⁰ As such, older people may find it more challenging to relocate to appropriate housing.

B.1.7 Health effects

B.1.7.1 Health effects associated with relocation

Relocation can have a negative impact on an individual's mental health and well-being, as measured by the SF-12 Mental Health Composite Score¹⁰¹ and Warwick-Edinburgh Mental Wellbeing Scale test.¹⁰² These tests have shown that relocation can create increased levels of depression and anxiety.¹⁰³ The associated impacts have been found to be more severe when there is a lack or perceived lack of control over the decision.

Children

Children and young people are especially vulnerable to the disruption caused by involuntary relocation. This process can cause stress and anxiety among this group when adapting to new routines. Research has found that relocation can increase children's inactivity; as the travel distance to school increases, the transportation mode choice of children can change from active transportation such as cycling or walking, to sedentary transportation, such as vehicular transport.¹⁰⁴

Older people

As noted above, for **older people**, the loss of community connections can result in negative health outcomes. For example, feelings of isolation and loneliness can lead to poor mental health and a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism) and a greater risk of hospitalisation.¹⁰⁵ The charity Mind, has described the negative effects of relocation on sleep and overall mental wellbeing.¹⁰⁶ The term 'relocation stress

¹⁰⁰ National Housing Federation (2024) *Developing specialist housing for older people: opportunities and barriers*. Available at: <https://www.housing.org.uk/globalassets/files/supported-housing/2pp-new-ophg-a4-v1.pdf>

¹⁰¹ The SF-12 is a multipurpose short form survey with 12 questions, all selected from the SF-36 Health Survey (Ware, Kosinski, and Keller, 1996). The questions are combined, scored, and weighted to create two scales that provide glimpses into mental and physical functioning and overall health-related-quality of life.

¹⁰² The Warwick-Edinburgh Mental Well-being scale was developed to enable the monitoring of mental wellbeing in the general population and the evaluation of projects, programmes and policies which aim to improve mental wellbeing. WEMWBS is a 14 item scale with 5 response categories, summed to provide a single score ranging from 14-70. The items are all worded positively and cover both feeling and functioning aspects of mental wellbeing.

¹⁰³ Cleland, C., Kearns, A., Tannahill, C. and Ellaway, A. (2016). The impact of life events on adult physical and mental health and well-being: longitudinal analysis using the GoWell health and well-being survey. Available at: <https://bmcresnotes.biomedcentral.com/articles/10.1186/s13104-016-2278-x>

¹⁰⁴ Department for Transport (2020): 'National Travel Survey 2019?'

¹⁰⁵ IoTUK (2017): 'Social Isolation and Loneliness in the UK'. Available at: [Microsoft Word - Social Isolation and Loneliness Landscape UK v6.docx \(catapult.org.uk\)](https://catapult.org.uk/)

¹⁰⁶ Mind (2021) 'Housing and mental health' Available at: [How can housing affect mental health? - Mind](https://www.mind.org.uk/information-support/types-of-mental-health-problems/housing-and-mental-health/)

'syndrome' highlights the negative effects from the stress of relocating, such as anxiety, depression and loneliness amongst elderly people.¹⁰⁷

Ethnic minority

Individuals belonging to ethnic minority backgrounds often rely on social networks for their wellbeing compared to other groups.¹⁰⁸ Research suggests that community organisations are considered places for promoting health and wellbeing by sharing health messages which can be shared across these communities.¹⁰⁹

Pregnancy and maternity

Relocation can also have adverse health effects on those who are **pregnant**. Evidence suggests that disruption to prenatal care can have detrimental health impacts on a pregnant person.¹¹⁰ Disruptions in prenatal care have resulted in clinically elevated depression, anxiety, and pregnancy-related anxiety symptoms.¹¹¹ If relocation changes preestablished prenatal services and relationships, this could negatively impact pregnant individuals.

B.1.7.2 Health and wellbeing of the population

Children may also be disproportionately affected by changes in noise pollution, due to ongoing cognitive development occurring throughout the demolition and construction stages of a scheme.¹¹² As they are less likely to have the skills to cope with changes in their environment, this can exacerbate any stress they experience. Similarly, **older people** suffering from dementia may feel overwhelmed with sensory stimulation, causing stress and confusion. Additionally, research has linked noise pollution to several adverse outcomes for older people, including cardiovascular diseases, sleep disturbance, tinnitus, and stress.¹¹³

Older people and disabled people are more likely to be impacted by the changes in air quality that are associated with the demolition and construction phase of the redevelopment. Older people are more likely to have respiratory or

¹⁰⁷ Wiyono, H., Sukartini, T. and Mundakir, M. (2019) 'An overview of loneliness, anxiety and depression level of elderly suspected relocation stress syndrome', *The 9th International Nursing Conference*, pp.609-612.

¹⁰⁸ Baskin, C., et al. (2020) 'Community-centred interventions for improving public mental health among adults from ethnic minority populations in the UK: a scoping review', *The British Medical Journal*, 11 (4). Available at: [Community-centred interventions for improving public mental health among adults from ethnic minority populations in the UK: a scoping review | BMJ Open](#)

¹⁰⁹ Baskin, C. (2020) Black and Minority Ethnic adults: a scoping review of UK mental health and wellbeing community interventions. Available at: [PowerPoint Presentation \(nihr.ac.uk\)](#)

¹¹⁰ Frontiers in Global Women's Health (2021): 'Prenatal Care Disruptions and Associations With Maternal Mental Health During the COVID-19 Pandemic'

¹¹¹ Frontiers in Global Women's Health (2021): 'Prenatal Care Disruptions and Associations With Maternal Mental Health During the COVID-19 Pandemic'

¹¹² Gupta, A. et al (2018): 'Noise Pollution and Impact on Children Health'. Available at: <https://link.springer.com/article/10.1007/s12098-017-2579-7>

¹¹³ World Health Organisation (2011): 'Burden of disease from environmental noise Quantification of healthy life years lost in Europe'. Available at: http://www.who.int/quantifying_ehimpacts/publications/e94888.pdf?ua=1

cardiovascular illness when compared to other groups, making them more susceptible to the effects of air pollution. Those with COPD (Chronic Obstructive Pulmonary Disorder) are particularly at risk.¹¹⁴ Disabled people with heart or lung conditions are also at an increased risk of becoming ill and needing treatment as a result of air pollution.¹¹⁵

There are also associated health effects related to demolition and construction on **pregnancy and maternity**. Air pollution exposure during pregnancy can have significant impacts on maternal health, being linked to an increased risk of pre-eclampsia, a serious cardiovascular condition in pregnancy.¹¹⁶ Antenatal exposure to air pollution can affect the lung development of a baby whilst in the womb. This suggests that exposure to significant levels of air pollution can increase the risk of premature birth and low birth weight.

Exposure to air pollution during infancy can result in neurodevelopment and long-term cognitive health problems.⁸² In addition, research from Asthma UK highlights that air pollution is more detrimental to children when compared to other age groups with the condition. This is because children have faster breathing rates and lungs that are still developing.¹¹⁷

B.1.8 Safety and security

In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behaviour and crime such as increased vandalism, arson, break-ins and other damage to neighbouring homes.¹¹⁸ As a result, feelings of safety are important to consider during the regeneration process.

Disabled people

Research has found that in urban areas, active travel routes are associated with an increased perception of risk, often due to poor lighting or a lack of people using the route. This perception of crime can impact disabled people who are at a higher risk of being a victim or witnessing a crime. This reiterates research which has highlighted that **groups who were more likely to have had contact with their local police as a victim or witness include men, disabled people,**

¹¹⁴ Asthma UK (2017). 'Pollution'. Available at <https://www.asthma.org.uk/advice/triggers/pollution/>

¹¹⁵ Department for Environmental Food and Rural Affairs (2013). 'Guide to UK Air Pollution Information Resources'. Available at: [1307241318 Guide to UK Air Pollution Information Resources.pdf \(defra.gov.uk\)](https://www.gov.uk/government/publications/guide-to-uk-air-pollution-information-resources)

¹¹⁶ Pedersen M. et al. (2014) Ambient air pollution and pregnancy-induced hypertensive disorders: a systematic review and meta-analysis, *Hypertension*, 64 (3), pp. 494- 500. Available at: [Ambient air pollution and pregnancy-induced hypertensive disorders: a systematic review and meta-analysis - PubMed \(nih.gov\)](https://pubmed.ncbi.nlm.nih.gov/24733333/)

¹¹⁷ British Lung Foundation (2016): 'How air pollution affects your children's lungs'. Available at: <https://www.blf.org.uk/support-for-you/signs-of-breathing-problems-in-children/air-pollution>

¹¹⁸ Power, A. (2010): 'Housing and sustainability: demolition or refurbishment?' Available at https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1406191156_060618_Guide_to_UK_Air_Pollution_Information_Resources-issue_2-FINAL.pdf <https://www.icevirtuallibrary.com/doi/abs/10.1680/udap.2010.163.4.205>

people from ethnic minority groups and younger people aged 16-34.¹¹⁹

Therefore, it should be considered that changes to public spaces can have a disproportionate effect on feelings of safety for this group.

LGBTQ+

Research has found that three in ten LGBTQ+ people might choose to adapt behaviour when deciding whether to walk down a certain street.¹²⁰ This relates to an increase in hate crimes related to sexual orientation rising by 25%.¹²¹ Therefore, it should be noted that people's sexual orientation may impact their feelings of safety in public urban areas.

Women

Demolition during regeneration can affect perceptions of safety. Changes to safety procedures, such as lighting and clear signage influence women's decision-making when in public.¹²² When walking in a badly lit neighbourhood, women were considerably more likely to report feeling 'very unsafe' when compared to men; 48% compared to 19%.¹²³ With almost two-thirds of women in the UK feeling unsafe when walking alone,¹²⁴ the environment of public areas can play a large role in the perceived accessibility of places for this group. Therefore, it is important to maintain safety features in areas undergoing regeneration, especially when communities remain in the area.

B.1.9 Accessibility and mobility in the area

Evidence suggests that during renewal, construction can affect the accessibility and mobility of the local area.¹²⁵ Increased traffic from construction vehicles can reduce parking availability, block access to homes, shops, bus stops, pavements and safe routes, as well as negatively affecting wayfinding.

Children

Increased road traffic levels and roadworks may reduce **children's** access to community and recreational facilities. This can have negative impacts on

¹¹⁹ Future Thinking, (2018), 'Attitudes to safety and security: annual report 2017-2018', TfL Compliance, Policing and on-street services.

¹²⁰ Bachmann, C and Gooch, B. (2017): 'LGBT in Britain: Hate Crime and Discrimination'

¹²¹ Home Office (2019): 'Hate crime, England and Wales, 2018/2019'

¹²² Department for Transport (2020) ' TAG Unit A4.1: Social Impact Appraisal'

¹²³ Neighbourhood Watch (2013): 'Street lighting and perceptions of safety survey, November 2013'

¹²⁴ Plan International (2016): 'Almost two thirds of women feel unsafe walking alone after dark'

¹²⁵ Anciaes, P. R., Jones, P. and Mindell, J. S. (2015) Community Severance: Where Is It Found and at What Cost? *Transport Reviews*, 36 (3), pp. 293- 317. Available at: [Full article: Community Severance: Where Is It Found and at What Cost? \(tandfonline.com\)](http://Full%20article%3A%20Community%20Severance%3A%20Where%20Is%20It%20Found%20and%20at%20What%20Cost%3F%20(tandfonline.com))

children's wellbeing as open spaces away from home and school can encourage psychical activity, reducing obesity and improving physical health.¹²⁶

Disabled people

National Travel Survey data shows disabled people are generally more likely to experience travel difficulties in the daily trips that they make.¹²⁷ Wheelchair users may struggle with narrowed paths during the construction process of renewal, limiting their accessibility to facilities in the area. This can create feelings of isolation and poor mental wellbeing. The presence of vehicular traffic during construction can also act as a barrier for disabled people. Disabled people who travel by car are more likely to report difficulties due to congestion and roadworks, especially where the severity of the disability increases.¹²⁸

Older people

During renewal and construction, community facilities in a housing estate can be relocated and public transport services can be changed. Older people may find it difficult to travel to new locations, which may be further away from their home, or navigate new routes. Altogether, this can heighten feelings of loneliness and isolation.¹²⁹

B.1.10 Information and communication

Regeneration often involves complex material and information which may present a challenge to those who have different information and communication needs. This includes but is not limited to people with learning disabilities, people with low literacy levels, older people, people with visual or hearing impairments and people who use English as a second language. Evidence suggests that the following processes can ensure that information documents are fully accessible to everyone and reduce concerns regarding access to information:¹³⁰

- information should avoid jargon;
- pictures should be included to support the text information;
- the format, layout and length of document should be carefully considered;
- easy read, braille, audio and large print should be provided upon request;
- information should be translated into people's first language upon request.

¹²⁶ Hiscock, R. and Mitchell, R. (2011) What is needed to deliver places that provide good health to children? Available at: [The lack of play and green space for children in disadvantaged areas is very significant \(edphis.org.uk\)](https://edphis.org.uk)

¹²⁷ Department for Transport (2020): 'National Travel Survey 2019'

¹²⁸ Department for Transport (2017) 'Disabled people's travel behaviour and attitudes to travel' Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647703/disabled-peoples-travel-behaviour-and-attitudes-to-travel.pdf

¹²⁹ NatCen (2019): 'Transport, health and wellbeing: an evidence review for the Department for Transport'

¹³⁰ Change (2015) How To Make Information Accessible: A guide to producing easy read documents'. Available at: [How-to-make-info-accessible-guide-2016-Final \(changepeople.org\)](https://changepeople.org)

B.2 Impact on community following regeneration

B.2.1 Improved housing provision

The relocation of residents during renewal can have positive outcomes. Residents can be relocated to areas with more green space and better air quality. The regeneration of the site will improve housing provision, increasing capacity and quality.

Children

Relocation can improve standards of living for **children** as they move to better quality homes that are more energy efficient. **Children** are disproportionately vulnerable to the effects of fuel poverty, with those living in cold homes twice as likely to suffer from a variety of respiratory illnesses compared to children living in warm homes.¹³¹ Cold housing can negatively impact children's educational attainment and emotional wellbeing.¹³² In such instances, relocation can improve outcomes for children.

Older people

Effects of cold housing are also evident among **older people**. On average, this group spend 80% of their time at home, making them more susceptible to cold or damp related health problems. Cold living conditions can exacerbate existing conditions such as arthritis and rheumatism, increase levels of minor illnesses such as colds and flu, harm mental health and ultimately increase mortality rates.¹³³ Relocation can improve housing standards, improving the physical and mental wellbeing of this group.

Ethnic minority groups

In England, **ethnic minority households** are more likely to live in fuel poverty, at 19.1% in 2021 compared to 12.6% of White households (including White ethnic households).¹³⁴ Therefore, relocation to housing with improved energy efficiency may benefit this group.

Disabled people

According to Scope, a disability charity, long-term impairments or conditions can increase energy costs. In particular, those with limited mobility often consume more energy and have reported needing more heating to stay

¹³¹ Marmot Review Team. (2011). 'The Health Impacts of Cold Homes and Fuel Poverty'

¹³² Liddell, Save The Children (2008) *The impact of Fuel Poverty on Children*. Available at: [Fuel Poverty FINAL \(savethechildren.org.uk\)](http://fuelpoverty.org.uk)

¹³³ The Housing and Ageing Alliance (2013) 'Policy Paper: Health, Housing and Ageing', Available at www.housingling.org/HAA/

¹³⁴ Department for Business, Energy and Industrial Strategy (2022): 'Fuel Poverty'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/fuel-poverty/latest>

warm.¹³⁵ 38% of households considered 'fuel poor' have a disabled resident.¹³⁶ Research from the Office for National Statistics have found that more than half (55%) of **disabled people** struggle to afford their energy bills, compared to 40% of non-disabled adults.¹³⁷ This suggests that relocation may offer benefits to disabled people with their quality of housing.

B.2.2 Safety and security

During the demolition in the renewal process, sites may be vacated and fall into disrepair. This leaves the area and vulnerable groups remaining in the community at risk of anti-social behaviour and crime such as vandalism, arson and trespassing.¹³⁸ Existing research has identified a number of groups included in the 2010 Equality Act who are more likely to be victims or witnesses of crime:¹³⁹

- **Men** are more likely to be victims of violent crime than women.¹⁴⁰
- **Younger people** aged 16 to 24 are more likely to be victims of crime than those in older age groups.¹⁴¹
- **People with disabilities** are more likely to be victims of violent crime than those without disabilities.¹⁴²
- **Mixed and Asian ethnic groups** are more likely to have said they were victim of crime compared to white people.¹⁴³

In addition, the fear of crime is also more prevalent amongst protected characteristic groups, affecting mental health and wellbeing.¹⁴⁴ It has been

¹³⁵ Scope (2018) 'Out in the Cold', Available at <https://www.scope.org.uk/Scope/media/Images/Out-in-the-cold.pdf>

¹³⁶ Scope (2018): 'Out in the cold'. Available at: <https://www.barrowcadbury.org.uk/wp-content/uploads/2018/03/Out-in-the-cold-Scope-report.pdf>

¹³⁷ Office for National Statistics (2021) Disability, England and Wales: Census 2021. Available at: [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

¹³⁸ Smirniotis, C., Henderson, M., Bailey, B.A. and Kagawa, R.M.C. (2022) 'Crime and Building Rehabilitation or Demolition: A Dose-Response Analysis, *International Journal of Environmental Research and Public Health*', 19 (20). Available at: [IJERPH | Free Full-Text | Crime and Building Rehabilitation or Demolition: A Dose-Response Analysis \(mdpi.com\)](https://www.mdpi.com/1660430/19/20/7300)

¹³⁹ Ipsos MORI (2016):'Public views of policing in England and Wales'. Available at: <https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Publications/sri-public-views-of-policing-in-england-and-wales.pdf>

¹⁴⁰ ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

¹⁴¹ ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

¹⁴² ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

¹⁴³ Gov.uk (2019) 'Victims of crime'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest>

¹⁴⁴ Lorenc, T., Petticrew, M., Whitehead, M., Neary, D., Clayton, S., Wright, K., Thomson, H., Cummins, S., Sowden, A. and Renton, A. (2013) 'Fear of crime and the environment: systematic review of UK qualitative

suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as **children, older people, ethnic minority groups and women**.¹⁴⁵

B.2.3 New employment and business opportunities

Redevelopment and regeneration can support job creation, promoting economic growth.¹⁴⁶ Improved opportunities to access employment and education can address issues of inequality and improve social mobility by removing barriers to employment, faced by marginalised groups such as **older people, disabled people, and those from ethnic minority backgrounds**.

Women

These opportunities also have the potential to positively affect **young people and women**. There are notable barriers women face in employment, such as, the gender pay gap, underrepresentation in leadership roles and gender norms which all enforce discrimination.¹⁴⁷ Job creation offers women new opportunities to find a range of work which reflects their skills and expertise, allowing them more options in accessing suitable employment.

Young people

Recent statistics show that in 2023 11.9% of **young people** were not in education, employment or training (NEET).¹⁴⁸ Furthermore, it has been found that young people are four times more likely to be unemployed than their adult counterparts aged 25-64.¹⁴⁹ This highlights that young people can be disproportionately benefitted by employment opportunities from redevelopment. Additionally, analysis of national unemployment trends highlights that the rate of national unemployment is disproportionately high for **ethnic minority** groups in comparison to white British people¹⁵⁰, furthering the opportunities renewal can have on groups with protected characteristics.

evidence', *BMC Public Health*, 13 (496). Available at: [Fear of crime and the environment: systematic review of UK qualitative evidence \(nih.gov\)](#)

¹⁴⁵ Lorenc, T et al (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3666893/>

¹⁴⁶ Communities and Local Government (2012) 'Regeneration to enable growth: A toolkit supporting community-led regeneration'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/5983/2064899.pdf

¹⁴⁷ Hanek, K.J. and Garcia, S.M. (2022) 'Barriers for women in the workplace: A social psychological perspective', *Social and Personality Psychology Compass*. Available at: [Barriers for women in the workplace: A social psychological perspective - Hanek - 2022 - Social and Personality Psychology Compass - Wiley Online Library](#)

¹⁴⁸ GOV.UK (2024) NEET age 16 to 24. Available at: [NEET age 16 to 24, Calendar year 2023 - Explore education statistics - GOV.UK \(explore-education-statistics.service.gov.uk\)](#)

¹⁴⁹ UK Government (2018) 'Unemployment'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

¹⁵⁰ Runnymede Trust. (2016): 'Ethnic Inequalities in London: Capital for All'.

B.2.4 Improved access, mobility and navigation

Aging and being disabled can lead to a decline in physical or cognitive functions, resulting in decreased social activity and narrowing of social networks.¹⁵¹ Leisure activities are considered to be effective mediators between social relationships and wellbeing of **older people** and **disabled people**. This is because leisure is scientifically proven to help people overcome their stress resulting from a chronic condition or negative life event. Leisure activities provide disabled and old people with social support, and further mediate their stress-health relationship. Availability of leisure services and facilities could therefore benefit older and disabled people, who are in a greater need for social interaction than the general population.¹⁵²

B.2.5 Improvements in public realm and urban green space

The ability to access public spaces and green environments is important for all members of society, to improve their sense of belonging¹⁵³ and physical wellbeing.¹⁵⁴ Specifically, green spaces have been shown to improve attention, lower muscle tension and improve emotional state.¹⁵⁵ However, it has been found that participation in public spaces, including green spaces, is variable, with some disabled people, older people, children and those belonging to ethnic minority communities having particular difficulties in assessing these arenas.¹⁵⁶ Regeneration can be used as an opportunity to improve accessibility and social mobility.

Older people

A report from TfL has found that unmaintained public areas, such as poor upkeep of streets and lack of rest areas, increase the difficulty **older people** experience when navigating public spaces and may increase levels of anxiety around travel.¹⁵⁷ Environmental barriers, such as poor signage, lots of noise and uneven pavements can be a concern for older people and prevent their

¹⁵¹ Wray et al. (2014): 'Social relationships, leisure activity and health in older adults' Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4467537/>

¹⁵² Liu et al. (2018): 'Social interaction patterns of the disabled people in asymmetric social dilemmas' Available at: <https://www.frontiersin.org/articles/10.3389/fpsyg.2018.01683/full>

¹⁵³ White, M.P., Alcock, I., Wheeler, B.W. and Depledge, M.H. (2013) 'Would You Be Happier Living in a Greener Urban Area? A Fixed-Effects Analysis of Panel Data', *Psychological Science*, 24 (6). Available at: [Would You Be Happier Living in a Greener Urban Area? A Fixed-Effects Analysis of Panel Data - Mathew P. White, Ian Alcock, Benedict W. Wheeler, Michael H. Depledge, 2013 \(sagepub.com\)](https://doi.org/10.1177/0956797612460212)

¹⁵⁴ World Health Organisation (2016) *Urban green spaces and health*. Available at: [Urban green spaces and health \(who.int\)](http://www.who.int)

¹⁵⁵ Brown, K. (2012): Integrating green and blue spaces into our cities: Making it happen'. https://www.researchgate.net/publication/334391615_Integrating_green_and_blue_spaces_into_our_cities_Making_it_happen/link/5d2721c692851cf44079a21e/download?tp=eyJjb250ZXh0Ijp7InBhZ2UiOiJwdWJsaWNhdGlvbilsInByZXZpb3VzUGFnZSI6bnVsbH19

¹⁵⁷ TfL (2016): 'Older Londoners' perceptions of London streets and the public realm: Final report'

access to outside spaces.¹⁵⁸ Social contact can be encouraged through urban green space, promoting cohesion and a sense of community. This is particularly important for the health and wellbeing of **older people**, having been shown to increase mortality rates.¹⁵⁹ Opportunities to improve this can be achieved through regeneration, highlighting the beneficial impacts this process can have on older people.

Disabled people

Similarly, **disabled people** can find public spaces difficult to access. Vehicular traffic and inaccessible design can create a barrier for disabled people when interacting within their communities.¹⁶⁰ This may increase their rates of social isolation, harming their mental wellbeing. Renewal provides opportunities to use inclusive design, ensuring that all individuals are able to feel that they are active members of their community. This includes basic tasks such as using local shops or meeting up with people in a shared space outside close to home.

Ethnic minority communities

Evidence suggests that **ethnic minority groups** visit greenspace 60% less than the rest of the adult English population.¹⁶¹ This puts them at greater physical and mental health risks, and results in social exclusion. Furthermore, this group tend to have less access to green space

than areas which are predominately white. For example, wards with an ethnic minority population of less than 2% have six times as much green space as wards where the ethnic minority population is over 40%.¹⁶² Increasing the provision of green space will provide opportunities for this group to access spaces that encourage socialisation and improvements to overall well-being. Research has also shown that individuals belonging to ethnic minority communities in urban environments perceive themselves as vulnerable due to previous victimisation or harassment. As a result, maintaining the public realm through regeneration efforts can help to ensure all residents feel safe.

Children

¹⁵⁸ Phillips, J., Walford, N., Hockey, A., Foreman, N. and Lewis, M. (2013) 'Older people and outdoor environments: Pedestrian anxieties and barriers in the use of familiar and unfamiliar spaces', *Geoforum*, 47. Available at: [Older people and outdoor environments: Pedestrian anxieties and barriers in the use of familiar and unfamiliar spaces - ScienceDirect](https://www.sciencedirect.com/science/article/pii/S0016718512001004)

¹⁵⁹ World Health Organisation (2016): 'Urban green spaces and health, a review of evidence'. Available at: http://www.euro.who.int/_data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1

¹⁶⁰ House of Commons Women and Equalities Committee (2017): 'Building for Equality: Disability and the Built Environment'.

¹⁶¹ Haqqani, N. (2022) *Ethnic Minority Inclusion and Participation in Urban Greenspace: Good practices of UK Friends Groups*. Available at: [NFPF-Ethnic-Diversity-and-Friends-Groups-Research-Report-9.2022.pdf \(nfpf.org.uk\)](https://nfpf.org.uk/nfpf/2022/09/05/nfpf-ethnic-diversity-and-friends-groups-research-report-9-2022.pdf)

¹⁶² Commission for Architecture and the Built Environment (2010): 'Community green: Using local spaces to tackle inequality and improve health'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/community-green-full-report.pdf>

Children are also likely to benefit from increased green space in urban environments. During early childhood, children gain vital social, conceptual and creative skills through outdoor free play.¹⁶³ A study by University College London found that access to green space has a positive impact on cognitive functioning for **children**.¹⁶⁴ Further research suggests that in early childhood, children gain vital social, conceptual and creative skills through outdoor free play.¹⁶⁵ According to Public Health England, there is a positive association between green living environments and mental health outcomes in **children**, such as improved emotional wellbeing, reduced stress, improved resilience, and higher health-related quality of life.¹⁶⁶ **Children** in London can experience difficulties accessing green space compared to the general population as there are significant deficiencies in green space in the city. The positive impact the creation green space can have on **children** in this location is disproportionate.

B.2.6 Provision of community facilities and changes to social cohesion

Community facilities provide necessary opportunities for social connection and wellbeing across a range of vulnerable groups such as, **children, older people, disabled people, people from an ethnic minority background, Pregnant people and members of the LGBTQ+ community**¹⁶⁷. For example, socialisation has been found to have a positive effect on the loneliness of older people, in turn providing health benefits for this demographic.¹⁶⁸ Regeneration can improve the provision of community spaces, positively impacting these groups who often face barriers to participation.

Improved provision of affordable sports facilities has been linked to reduced crime rates and anti-social behaviour amongst young people.¹⁶⁹ Therefore, facilities improved by regeneration can support personal development, self-regulation and problem-solving skills. This shows that development can have significant positive impacts on this group.

¹⁶³ Charan, G.S., Kalia, R., Khurana, M.S. and Narang G.S. (2024) 'From Screens to Sunshine: Rescuing Children's Outdoor Playtime in the Digital Era', *Journal of Indian Association for Child and Adolescent Mental Health*, pp. 11- 17. Available at: [From Screens to Sunshine: Rescuing Children's Outdoor Playtime in the Digital Era - Gopal Singh Charan, Raman Kalia, Mandeep Singh Khurana, Gursharan Singh Narang, 2024 \(sagepub.com\)](https://doi.org/10.1177/2238220023950010)

¹⁶⁴ UCL (2018): 'Greener neighbourhoods may be good for children's brains'.

¹⁶⁵ Nation Children's Bureau (2007): 'Free Play in Early Childhood'

¹⁶⁶ Public Health England (2020): 'Improving access to greenspace: A new review for 2020'.

¹⁶⁷ Assembly, N. I. (2010). 'Barriers to Sports and Physical Activity Participation'.

¹⁶⁸ National Institute on Aging (2024) Loneliness and Social Isolation – Tips for Staying Connected. Available at: [Loneliness and Social Isolation — Tips for Staying Connected | National Institute on Aging \(nih.gov\)](https://www.nia.nih.gov/health/loneliness-and-social-isolation-tips-staying-connected)

¹⁶⁹ Youth Endowment Fund (2021) Sports Programmes- Toolkit technical report. Available at: [Sports-Programmes-Technical-Report.pdf \(youthendowmentfund.org.uk\)](https://www.youthendowmentfund.org.uk)

B.2.7 New employment and business opportunities

Redevelopment and regeneration can support job creation, promoting economic growth.¹⁷⁰ Improved opportunities to access employment and education can address issues of inequality and improve social mobility by removing barriers to employment, faced by marginalised groups such as **older people, disabled people, and those from ethnic minority backgrounds.**

These opportunities also have the potential to positively affect **young people and women.** There are notable barriers women face in employment, such as, the gender pay gap, underrepresentation in leadership roles and gender norms which all enforce discrimination.¹⁷¹ Job creation offers women new opportunities to find a range of work which reflects their skills and expertise, allowing them more options in accessing suitable employment.

Recent statistics show that in 2023 11.9% of **young people** were not in education, employment or training (NEET).¹⁷² Furthermore, it has been found that young people are four times more likely to be unemployed than their adult counterparts aged 25-64.¹⁷³ This highlights that young people can be disproportionately benefitted by employment opportunities from redevelopment. Additionally, analysis of national unemployment trends highlights that the rate of national unemployment is disproportionately high for **ethnic minority** groups in comparison to white British people¹⁷⁴, furthering the opportunities renewal can have on groups with protected characteristics.

B.2.8 Safety and security

During the demolition in the renewal process, sites may be vacated and fall into disrepair. This leaves the area and vulnerable groups remaining in the community at risk of anti-social behaviour and crime such as vandalism, arson and trespassing.¹⁷⁵ Existing research has identified a number of groups

¹⁷⁰ Communities and Local Government (2012) 'Regeneration to enable growth: A toolkit supporting community-led regeneration'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/5983/2064899.pdf

¹⁷¹ Hanek, K.J. and Garcia, S.M. (2022) 'Barriers for women in the workplace: A social psychological perspective', *Social and Personality Psychology Compass*. Available at: [Barriers for women in the workplace: A social psychological perspective - Hanek - 2022 - Social and Personality Psychology Compass - Wiley Online Library](https://doi.org/10.1111/spc.12500)

¹⁷² GOV.UK (2024) NEET age 16 to 24. Available at: [NEET age 16 to 24, Calendar year 2023 - Explore education statistics - GOV.UK \(explore-education-statistics.service.gov.uk\)](https://www.gov.uk/government/statistics/young-people-in-uk-education-and-training#neet)

¹⁷³ UK Government (2018) 'Unemployment'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

¹⁷⁴ Runnymede Trust. (2016): 'Ethnic Inequalities in London: Capital for All'.

¹⁷⁵ Smirniotis, C., Henderson, M., Bailey, B.A. and Kagawa, R.M.C. (2022) 'Crime and Building Rehabilitation or Demolition: A Dose-Response Analysis, *International Journal of Environmental Research and Public Health*', 19 (20). Available at: [IJERPH | Free Full-Text | Crime and Building Rehabilitation or Demolition: A Dose-Response Analysis \(mdpi.com\)](https://www.mdpi.com/1660-4601/19/20/12333)

included in the 2010 Equality Act who are more likely to be victims or witnesses of crime:¹⁷⁶

- **Men** are more likely to be victims of violent crime than women.¹⁷⁷
- **Younger people** aged 16 to 24 are more likely to be victims of crime than those in older age groups.¹⁷⁸
- **People with disabilities** are more likely to be victims of violent crime than those without disabilities.¹⁷⁹
- **Mixed and Asian ethnic groups** are more likely to have said they were victim of crime compared to white people.¹⁸⁰

In addition, the fear of crime is also more prevalent amongst protected characteristic groups, affecting mental health and wellbeing.¹⁸¹ It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as **children, older people, ethnic minority groups and women.**¹⁸²

¹⁷⁶ Ipsos MORI (2016): 'Public views of policing in England and Wales'. Available at: <https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Publications/sri-public-views-of-policing-in-england-and-wales.pdf>

¹⁷⁷ ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/violentcrimeandabuse/natureofviolentcrimeinenglandandwales)

¹⁷⁸ ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/violentcrimeandabuse/natureofviolentcrimeinenglandandwales)

¹⁷⁹ ONS (2021) *The nature of violent crime in England and Wales: Year ending March 2020*. Available at: [The nature of violent crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/violentcrimeandabuse/natureofviolentcrimeinenglandandwales)

¹⁸⁰ Gov.uk (2019) 'Victims of crime'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest>

¹⁸¹ Lorenc, T., Petticrew, M., Whitehead, M., Neary, D., Clayton, S., Wright, K., Thomson, H., Cummins, S., Sowden, A. and Renton, A. (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence', *BMC Public Health*, 13 (496). Available at: [Fear of crime and the environment: systematic review of UK qualitative evidence \(nih.gov\)](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3666893/)

¹⁸² Lorenc, T et al (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3666893/>



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Acquisition of Leasehold Interests

1. The Council holds the freehold interest of all the land within the area shown edged black and bold on the Plan at Appendix Two. The site contains a block of flats (Heversham House) and surrounding amenity land.
2. The Housing Act 1985 gives qualifying Council tenants the right to buy their homes. Twenty-eight tenants at these properties purchased their homes under these provisions.
3. The Council can only repurchase these leases in the following circumstances:
 - where there is agreement with the leaseholder; or
 - following a confirmed compulsory purchase order.
4. The statutory compensation code provides that a leaseholder is entitled to the following compensation following a compulsory acquisition:
 - the market value of the interest acquired;
 - a home loss payment; this is 10% of the market value where the leaseholder lives at the property or 7½% of the market value where the leaseholder lives elsewhere; and
 - a disturbance payment to cover the leaseholder's reasonable costs arising as a direct and natural result of the compulsory acquisition, this might include removal costs, legal fees, surveyors' fees and adaptation expenses.
5. Where an acquisition takes place by agreement ahead of the exercise of compulsory purchase powers the leaseholder is treated in the same way and with the same entitlement as would be the case if there was a compulsory purchase order.

Third party and statutory utility rights

6. Utility Companies may have rights across the sites that enable them to provide their infrastructure to the Estate. To enable redevelopment to proceed these rights will have to be acquired or extinguished. It is also possible that persons may have unregistered rights over the site such as a right of access and these rights, if any, will need to be dealt with in the same way as those of the utility companies.

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7. Other leaseholders on the Estate may benefit from rights over the subject areas; the Council's standard form lease provides for them having rights over the whole Estate including roads, paths and gardens. These rights will have to be included within the Order for extinguishment.

Outline of Compulsory Purchase Procedure

Resolution

8. The Cabinet passes a resolution to make an Order. This is the purpose of this report.

Referencing

9. The Council assembles information that provides details of all owners, mortgagees, tenants and occupiers. This is to both identify what interests need to be acquired and who is entitled to receive a notification of the publication of the Order. This stage will enable the precise details of the Order areas to be determined. The boundaries shown edged black and bold on the plan at Appendix Two may need subtle amendment in the light of this and it is recommended that the Director of Planning and Growth be given delegated authority to set the order extents.

Resolving planning and finance

10. In considering an Order the confirming authority needs to be confident that the proposals behind it are likely to come to fruition. In this connection s/he will need to be satisfied that there are no significant planning or financial obstacles that will frustrate it.

Making the Order

11. The Council makes the Order, to a prescribed format. A schedule accompanies the Order identifying ownership details of all land within it. A Statement of Reasons must also be prepared to accompany the Order. This is a critical document that may be challenged by objectors and therefore needs careful drafting.

Publication of the Order

12. The Council serves notice of making of the Order on all owners, mortgagees, tenants and occupiers affected by it. A notice of the making of the Order has to be published for two successive weeks in a local newspaper and put up online on a website (Council's website).

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13. The notices will advise objections to it can be made to the relevant authority and specify an address for this purpose. The Order is then passed to the relevant department for confirmation.

Confirmation of the Order

14. The Order does not become effective unless confirmed by the confirming authority. Where there are objections to the Order they must be considered before confirmation. This is usually done by way of a public inquiry (which can take days or weeks) but can sometimes be dealt with by written representations.
15. After considering the objections by written representations or in a public inquiry chaired by a planning inspector the relevant authority may confirm all or part, modify or reject the Order. If it is rejected that is the end of the process and the Council will need to revisit its plans.
16. Following confirmation of the Order or if applicable, modification, a notice advising of this must be published in the local newspaper, put up online on a website (Council's website) and all leaseholders, tenants and occupiers should also have a notice served on them. A confirmed Order should be implemented within three years to retain its validity.

Taking Possession

17. This can be achieved by either Notice to Treat/Notice of Entry or by using General Vesting Declaration procedure. The latter is usually considered the most appropriate as it transfers both the right to possession and title of the land to the Council.

Power to make a Compulsory Purchase Order

18. Section 226 of the Town and Country Planning Act 1990 is the recommended enabling provision in this instance for the purpose of compulsorily acquiring the interests required to progress the implementation of the redevelopment of the site. The detailed application and use of this power is set out in paragraphs 19-29 below.

Legal Implications

19. Section 226(1)(a) of the Town and Country Planning Act 1990 (the Act) (as amended by section 99 of the Planning and Compulsory Purchase Act 2004) is the appropriate power in this instance to secure the compulsory acquisition of properties within Phase 2 of the Tustin Estate redevelopment. Section 226(1)(a) enables authorities to exercise their compulsory purchase powers if they think that the land in question will:

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"Facilitate the carrying out of development, redevelopment, or improvement on, or in relation to, the land being acquired and it is not certain that they will be able to acquire it by agreement."

20. The Council, in exercising its power under this Section must have regard to section 226(1A) which states:

"(1A) But a local authority must not exercise the power under paragraph (a) of subsection (1) unless they think that the development, re-development or improvement is likely to contribute to the achievement of any one or more of the following objects-

 - (a) The promotion or improvement of the economic well-being of their area;*
 - (b) The promotion or improvement of the social well-being of their area;*
 - (c) The promotion or improvement of the environmental well-being of their area."*
21. It is considered that the use of this section is therefore most appropriate having regard to the Council's aspirations for the estate as a whole. The interests to be acquired by the Order are required in order to permit the redevelopment of the area to take place. The proposal also satisfies the "well being" element of the Act in that the rebuilding of Phase 2 is clearly required in order to provide a better standard of accommodation for residents compared to its current state and to create a sustainable and diverse community, and the provision of new facilities which are able to meet the needs of the area. Thus the proposals will inevitably assist in promoting the social economic and environmental well being of the area.
22. Government Guidance on the use of CPO powers - Guidance on the Compulsory Purchase Process – October 2024 (“the Guidance”) sets out the circumstances in which this power may be relied on by a local authority for the purposes of compulsorily acquiring land. It recognises that compulsory purchase powers under the Act provide an "important tool" to local authorities in assisting them to acquire and assemble land where it is necessary to help deliver social, environmental and economic change.
23. The Guidance is clear that the confirming authority will expect the acquiring authority to demonstrate that they have taken reasonable steps to :

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- Understand the impact of the exercise of compulsory purchase powers on those with an interest in land, through direct engagement with those parties;
- Attempt the acquisition of all the land and rights included in the compulsory purchase order by agreement.

The Guidance acknowledges that what counts as “reasonable steps” will depend on the circumstances of each case. It makes clear that a single attempt to engage an affected party without eliciting a response is unlikely to be sufficient. It also makes clear that an acquiring authority would be expected to engage with affected parties on the impact of the CPO despite a party’s unwillingness to discuss the acquisition of their land by agreement.

24. The confirming authority will also expect the acquiring authority to have considered what mitigation measures will be in place against any identified impacts of the exercise of CPO powers.
25. The Guidance acknowledges that CPO powers are intended as a last resort to secure land assembly for the implementation of projects but that time may be lost if an authority waits for negotiations to break down before starting the process. Authorities may therefore plan a compulsory purchase timetable as a contingency measure and initiate formal procedures. This will also help to make the seriousness of the authority’s intentions clear from the outset which might encourage more meaningful engagement.
26. For the purposes of confirming a compulsory purchase order, the Guidance identifies considerations which will be taken into account by the confirming authority in making such a decision. Perhaps the most fundamental of these is that there should be a compelling case in the public interest, and that reasonable efforts have been made to negotiate the purchase of land by agreement.
27. The acquiring authority should have a clear idea of how it intends to use the land which it is proposing to acquire and show that all the necessary resources are likely to be available to achieve that end within a reasonable time-scale. If it is unable to do so then it may be difficult to show conclusively that the compulsory acquisition of the land included in the order is justified in the public interest.
28. The Guidance also acknowledges that it may not always be possible for acquiring authorities to have specific detailed proposals for the land included in a CPO beyond the general planning framework for the area.
29. However, the Guidance recognises that it may not always be possible to wait until planning permission has been obtained, if the authority can show that the proposed use of the land fits within the planning framework and there are no obvious reasons why planning permission might be withheld.

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30. The acquiring authority will need to address its sources and timing of funding both for acquiring the land and implementing the scheme for which the land is required.
31. As is already set out in this report, officers will continue to take reasonable steps to seek to negotiate the acquisition of interests by agreement rather than relying solely on the compulsory acquisition powers available. Section 120 of the Local Government Act 1972 contains wide powers for local authorities to acquire land by agreement for any of their statutory functions or for '*the benefit, improvement or development of their area*'. Section 227 of the Town and Country Planning Act 1990 also enables a council to acquire land by agreement for facilitating the carrying out of development, redevelopment of improvement and for the social economic and environmental well-being of the area. It is considered therefore that there are adequate powers available to the Council to secure outstanding interests in the land by agreement.
32. The initial stage of the compulsory purchase process will be to ensure that the Council correctly identifies all necessary interests in the Order land that need to be incorporated within the schedule of the Order. As the Council is the freeholder much of this information should be readily available. Nonetheless it is advised that formal requisitions for information should be served on all known owners, mortgagees and occupiers of each property to be subject to the Order pursuant to Section 5A of the Acquisition of Land Act 1980 and or Section 16 of the Local Government (Miscellaneous Provisions) Act 1976. It is important that the Council takes all reasonable steps to ensure that all interests are properly captured in the Order and are properly notified, the requisition for information is a means of ensuring the Council fulfils this.
33. In the event that the Order is confirmed, the next stage will be to vest all necessary title in the Council. In these circumstances, as has already been mentioned, the best means of doing so will be by way of the General Vesting Declaration procedure. This is something that can be carried out by the Council's legal advisors as and when this stage is achieved.

Human Rights Considerations

34. 31. The Human Rights Act 1998 incorporated into domestic law the European Convention on Human Rights ("the Convention").
35. 32. In proposing the Order the Council has duly considered the rights of property owners under the Convention, notably under the following Articles: *Article 1 of the First Protocol*. This protects the right of everyone to the peaceful enjoyment of possessions. No one can be

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deprived of possessions except in the public interest and subject to the relevant national and international law.

36. The Council has also considered the rights contained within Article 8 of the convention, which protects private and family life, home and correspondence. No public authority can interfere with these interests except if it is in accordance with the law and is necessary in the interest of national security, public safety or the economic well being of the country.
37. In relation to these Convention rights, the Council has been conscious of the need to strike a balance between the rights of the individual and the interest of the public. In light of the significant public benefit that would arise from the redevelopment of the Tustin Estate, it will be appropriate to make the Order, if the relevant leaseholder interests cannot be acquired by agreement. Objections can be made against the Order that will then have to be considered by the appropriate authority before deciding whether or not to confirm the Order.

Community Impact Statement

38. The effect of the negotiated acquisition or compulsory purchase order will be to dispossess persons of their rights in land. This is a necessary process to ensure the redevelopment of the Tustin Estate can proceed. This is considered acceptable where the proposals are in the public interest and where, as in this case, the advantages of redevelopment substantially outweigh the disadvantages to those dispossessed.
39. The redevelopment of the Tustin Estate is considered to have benefits to the immediate community but also the Borough as a whole in that it will act as a catalyst to further investment. It is therefore necessary to balance the benefits that could be provided by the proposed scheme against the possible impact to those with an interest in the affected land. In carrying out this exercise a degree of proportionality should therefore be adopted. The Human Rights of these individuals have accordingly been considered and commented upon in this report.
40. The furtherance of the redevelopment will not negate the Council's Diversity and Equal Opportunities policies. Indeed, in the long term, it is anticipated the diversity of the area will be widened.
41. Section 149 of the Equality Act 2010 requires the Council to have due regard to the need to:
 - a. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

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- c. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 42. The Council must, in order to comply with this Public Sector Equality Duty (PSED), take steps to ensure that it considers equalities issues throughout the compulsory purchase process and has due regard to its duties under the Equality Act.
- 43. The Guidance is clear about the need for acquiring authorities to comply with their obligations as set out in the PSED throughout the compulsory purchase process.

Consultation

- 44. There has been extensive consultation with Tustin Estate residents [including tenants and leaseholders] at all stages of the development. Consultation will continue as the development proceeds. As set out above the Guidance indicates that this is a crucial factor that will be taken into consideration when a decision is being made as to whether or not to confirm a CPO.

APPENDIX 5

THE LONDON BOROUGH OF SOUTHWARK

SECTION 226 (1)(a) OF THE TOWN AND COUNTRY PLANNING ACT 1990

AND

SECTION 13 OF THE LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS)

ACT 1976

AND

THE ACQUISITION OF LAND ACT 1981

**LONDON BOROUGH OF SOUTHWARK (TUSTIN ESTATE – HEVERSHAM
HOUSE COMPULSORY PURCHASE ORDER 2025”**

STATEMENT OF REASONS

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1. INTRODUCTION

- 1.1. On [] 2025 the London Borough of Southwark ("the Council") made the London Borough of Southwark (Tustin Estate – Heversham House) Compulsory Purchase Order 2025 ("the Order").
- 1.2. The Order dated [] 2025 is made pursuant to section 226(1)(a) of the Town and Country Planning Act 1990 ("the 1990 Act") and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 and the Acquisition of Land Act 1981 for the acquisition of all interests (except those of the Council) in the land and the acquisition of new rights within the areas as shown edged red and shaded pink and blue on the plan[s] attached to the Order ("the Order Land"), and as described in the Schedule to the Order. The Order has been made to facilitate the carrying out of the necessary development, re-development and improvements on the Order Land to deliver the continued redevelopment of the Tustin Estate and will be submitted to the Secretary of State for Housing, Communities and Local Government ("the Secretary of State") for confirmation pursuant to the above Acts.
- 1.3. The Order Land comprises [INSERT DESCRIPTION – [] leasehold flats, [etc.]. The new rights sought to be acquired are [INSERT DETAILS OF NEW RIGHTS – e.g. rights of access to carry out works and to swing the jib of a crane, loaded or unloaded, through airspace above parts of the Order Land]. The land and interests proposed to be acquired compulsorily pursuant to the Order are described in greater detail in section [3] below. The Order has been made to secure the outstanding interests and associated rights and so as to facilitate the carrying out of the redevelopment of the site, including of the demolition of Heversham House [and Kentmere House] and the construction of four buildings between 5 and 20 storeys in height, containing 295 homes as well as amenity space, parking, landscaping and ancillary infrastructure ("the Scheme"). The Scheme, is described in greater detail in paragraph [4.12] below.
- 1.4. The Scheme is intended to be undertaken by BY Development Ltd the Council's selected development partner who will be responsible for delivering

the comprehensive phased redevelopment of the Tustin Estate, which for the avoidance of doubt, includes the Scheme.

- 1.5. On 8 November 2022 the Council and the Developer entered into a contract for the carrying out of the comprehensive phased regeneration of the Tustin Estate, Pilgrims Way, Manor Grove, London (the “**Regeneration Project**”) which includes, *inter alia*, the carrying out of the Scheme (“the **DA**”). The Regeneration Project is intended to provide over 690 new homes across the Tustin Estate. Development of the first phase of the Regeneration Project is underway. The Scheme represents phase two of the Regeneration Project. Further details are set out in paragraphs [4.24- 4.285] below.
- 1.6. This Statement of Reasons introduces the Order and explains the justification for its confirmation, heeding the advice provided in the Guidance on Compulsory Purchase Process (October 2024) (“**the Guidance**”) issued by the Ministry of Housing, Communities and Local Government).
- 1.7. The overarching consideration of the Secretary of State in deciding when a compulsory purchase order should be confirmed, and which is of equal relevance to the Council in reaching its decision, is set out in paragraphs 13, 15 and 109 of the Guidance which identify the following issues to be considered:
 - a. whether the purpose for which the land is being acquired fits with the development plan for the area;
 - b. the extent to which the Scheme would contribute to the achievement of the economic and/or social, and/or improvement of the environmental well-being of the Council’s area;
 - c. whether the purposes for which the proposed Order Land is to be acquired could reasonably be achieved by any other means; and
 - d. the potential financial viability of the Scheme, general funding intentions and the timing of the funding and that there is a reasonable prospect of the Scheme going ahead.
- 1.8. Each of these considerations will be addressed within this Statement of Reasons using the following structure:

- i. Power
- ii. Description of the Order Land & interests to be acquired
- iii. Justification for the use of compulsory purchase powers
 - a. The need for regeneration
 - b. The Scheme
 - c. Consistency of the Scheme with the planning framework for the area
 - d. Well-being benefits
 - e. Consultation
 - f. The development Partner
 - g. Financial viability/funding
 - h. Alternatives
 - i. No impediments to delivery
 - j. Reasonable steps to acquire land by agreement
 - k. Compelling case in the public interest
- iv. Legal regards
 - a. Public sector equality duty
 - b. Human rights considerations
 - c. Conservation, listed buildings and special category land
 - d. Compensation in a no Scheme world
- v. Conclusion

1.9. The Council recognises that a compulsory purchase order can only be made if there is a compelling case in the public interest which justifies the overriding of private rights in the land sought to be acquired. It is considered that a compelling case exists here.

1.10. Although significant parts of the site of the Scheme (**“the Scheme Site”**) are already in the freehold ownership of the Council, single ownership and control of the Order Land is required to enable the Scheme to proceed. The Council

is satisfied that it has made reasonable attempts to acquire outstanding interests by private agreement. The Council and those persons duly authorised by them have and will continue to make reasonable attempts to purchase outstanding interests by private agreement. However, given the number of third party interests identified in the Schedule to the Order, the Council considers it unlikely that it will be able to acquire all of these interests by agreement within a reasonable time period. The exercise of compulsory purchase powers will enable redevelopment to take place by providing certainty in respect of site assembly.

- 1.11. Following confirmation of the Order, the Council will, in line with Guidance, continue to take reasonable steps to seek to acquire land and interests in the Order Land by private agreement, but in the event that agreement and acquisitions cannot be completed within a reasonable time period the Council intends either to serve a Notice (or Notices) to Treat or execute one [or more] General Vesting Declaration[s] [at appropriate stages as the Scheme progresses] in order to assemble title to the Order Land to facilitate delivery of the Scheme.

2. POWER

- 2.1. The Order has been made under Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended) (“**the 1990 Act**”) and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 and the Acquisition of Land Act 1981. Section 226(1)(a) of the 1990 Act permits a local planning authority to exercise compulsory acquisition powers if it thinks that the land will facilitate the carrying out of development, redevelopment or improvement on, or in relation to the land being acquired and it is not certain that it can be acquired by agreement.
- 2.2. Section 226(1)(a) is now subject to Section 226(1A) which sets out the “wellbeing” power. This requires that the acquiring authority (the Council) must not exercise the power unless it thinks that the Scheme, redevelopment or improvement is likely to achieve the promotion or improvement of the economic and or social and or environmental well-being of its area.

- 2.3. The Council believes that the Scheme meets all of these objectives. The Council has taken into account the guidance provided in the Guidance on the use of its compulsory purchase powers in making the Order. The Council is using its powers under section 226(1)(a) because achieving voluntary transfer of the ownership of the Order Land is uncertain and the Council needs to ensure that ownership of the Order Land is vested in it so that it can provide vacant possession and title to the Order Land so that the Scheme can go ahead within a reasonable time period.
- 2.4. Although the primary objective of the Scheme is to deliver housing provision and, as such, the Council has powers of compulsory acquisition under section 17 of the Housing Act 1985 to achieve such aims, the Council has considered that the use of general planning powers is appropriate as the Scheme includes amenity spaces, parking, landscaping and ancillary infrastructure. The Scheme also forms part of the wider estate regeneration proposals for the Tustin Estate which includes the provision of new housing as well as new commercial space, a new park and a new school. The proposed Scheme will give rise to the well-being benefits in the Council's area and accordingly the Council has concluded that section 226(1)(a) is the appropriate power.
- 2.5. The Council has had regard to paragraph 166.1 of Section 7 of the Guidance which confirms that the Council's use of its planning powers is appropriate even where the primary objective is the delivery of housing. The Guidance states "*Where an authority has a choice between the use of housing or planning compulsory purchase powers the confirming authority will not refuse to confirm a compulsory purchase order solely on the grounds that it could have been made under another power.*"
- 2.6. Where, as in this case, the Order Land is being assembled under planning powers for housing development, the Secretary of State will have regard to the policies which would have been relevant if the Order was made under housing powers and evidence that the Scheme will achieve a quantitative and qualitative housing gain are as set out in paragraphs [] below together with information regarding the needs for the provision of further housing accommodation in the Borough as part of the development plan and as referred to in paragraphs [] below.

3. DESCRIPTION OF ORDER LAND

- 3.1. The Scheme Site which makes up the Order Land extends to approximately 0.845ha hectares (ha). It is irregular in shape and is located to the north of Old Kent Road and west of Ilderton Road. The main body of the Scheme Site, Heversham House, is a low rise residential block constructed in the 1960s. That building is at the end of its lifespan and requires modernising to meet the needs of existing and new communities.
- 3.2. In total there are 98 residential units in the Scheme Site. Of these 28 have been sold under right to buy and are subject to long leaseholds.
- 3.3. All of the roads bordering the Order Land are publicly adopted highway.
- 3.4. The Order Map[s] show the [freehold and] leasehold interests to be acquired compulsorily. The Order Map[s] have been carefully delineated to ensure the land and rights to be acquired are only what is required to facilitate the delivery of the Scheme.
- 3.5. The properties included within this Order include all [freehold and] leasehold interests that are outside of the Council's ownership within the following:
 - i. [];
 - ii. [];
 - iii. [];
 - iv. []; and
 - v. [].
- 3.6. The Order Land comprises approximately 0.845ha hectares. The Order Land includes [[] freehold interests and] [] leasehold interests in [residential] property within the Scheme Site that fall outside of the Council's ownership.
- 3.7. There are also a number of utilities running through the site, including water, telecommunications, gas and electricity. Other commercial interests within the Order Land include [].

- 3.8. Full details of the Order Land appear in the Schedule to the Order. The Order Map[s] identifies [the freehold and] leasehold interests to be acquired (coloured pink) and the new rights sought (coloured blue).
- 3.9. As well as securing the land necessary to deliver the Scheme, new rights are also necessary to allow the Scheme to be constructed. These new rights are being acquired under Section 13 of the Local Government (Miscellaneous Provisions) Act 1976 and the affected parts of the Order Land are shown coloured blue on the Order Map[s].
- 3.10. The new rights are described in greater detail in the Schedule to the Order, but can be summarised as follows:
 - a. [to enable access to land (with or without vehicles) for the purposes of demolition, construction and future activities such as maintenance and renewal for the purposes of constructing the Scheme and its on-going management, maintenance and repair in perpetuity;
 - b. to oversail land with loaded or unloaded cranes;
 - c. to erect and use scaffolding and hoardings;
 - d. to carry out works to and modify service media;]
- 3.11. The new rights are described in greater detail in the Schedule of Rights accompanying the Order.

Land Referencing

- 3.12. The Council instructed independent agents, TerraQuest to carry out the land referencing exercise. The actions taken by the agents to investigate title and occupier details for inclusion in the Order include:
 - a. Land Registry searches;
 - b. Service of Section 16 Requisitions for Information on behalf of the Council (issued on 15th August 2024 and 2nd September 2024) and review of information returned in response;
 - c. Contact Site Visit alongside council personnel including a door knocking exercise on 26th September.

4. JUSTIFICATION FOR THE USE OF COMPULSORY PURCHASE POWERS

a) THE NEED FOR REGENERATION

- 4.1. The Scheme represents the second phase of the Regeneration Project, which involves the comprehensive redevelopment and refurbishment of the low rise buildings on the Tustin Estate.
- 4.2. The Tustin Estate itself is located at the junction of Old Kent Road (to the south) and Ilderton Road (to the east), both roads are well trafficked, with Old Kent Road being a route into central London and Ilderton Road leading north to Bermondsey serving the local area to the north and east. The Tustin Estate was constructed in the 1960s following the clearance of bomb damaged terraced houses and small industrial premises post the second world war. There is no vehicular route through the estate and the area has limited dedicated cycle paths.
- 4.3. The Tustin Estate is located within the Old Kent Road Opportunity Area (“OKROA”). It is important to note that despite the Tustin Estate not forming part of any specific allocation, the draft Area Action Plan (“AAP”) always anticipated the possibility of estate regeneration here, subject to the support of residents which has been obtained through the Resident Ballot held in March 2021.
- 4.4. The Tustin Estate falls within an area of higher deprivation and the housing is generally considered poor quality due to its poor energy efficiency.
- 4.5. The area surrounding the Tustin Estate is undergoing rapid transformation and change and numerous regeneration schemes have been granted planning permission in the immediate vicinity. Sites to the immediate north, south and east and further to the west fall within the Old Kent Road Area Action Plan and as such are changing and emerging. Plans for the Bakerloo Line extension to the London Underground network feature two new stations, one of which proposed to be located to the south-east of the Tustin Estate.

- 4.6. Planning permission was originally granted on 27 October 2022 (under reference 22/AP/1221) for the redevelopment of the low rise buildings on the Tustin Estate, comprising full planning permission for Phase 1 (167 homes) and outline planning permission for Phases 2 to 4 (523 homes, 3,452sqm sqm of flexible commercial space and 2,214 sqm of educational space), alongside new open spaces and landscaping (the “**Original Hybrid Permission**”).
- 4.7. Following changes to the building fire safety requirements, particularly on taller buildings, a minor material amendment was proposed to the Original Hybrid Permission to address those fire safety requirements as well as resolve minor issues with phasing and land uses. That minor material amendment was approved on 11 August 2024 (under planning reference 23/AP/3474) pursuant to an application made under section 73 of the Town and Country Planning Act 1990 (the “**S73 Permission**”).
- 4.8. The construction of Phase 1 is ongoing, with the first homes scheduled to handover in Spring 2025.
- 4.9. An application for reserved matters approval for the Scheme was submitted to the local planning authority and validated on 27 August 2024 (allocated reference 24/AP/2446) which is [currently pending determination]. (the “**Phase 2 RMA**”)
- 4.10. The Scheme will significantly contribute to the delivery of new, good quality housing and the Council’s housing targets to create 11,000 new council homes by 2043. Southwark have a council housing waiting list of over 17,000 households and approximately 1,500 households living in temporary accommodation.
- 4.11. A resident ballot was held in March 2021 and GLA funding has been secured for the regeneration of Tustin Estate with over 87% of residents voting in favour of the proposals to regenerate the area.

b) THE PROPOSED REDEVELOPMENT (“THE SCHEME”)

- 4.12. The Scheme (which represents the second phase of the Tustin Estate regeneration project) comprises the eastern part of the Tustin Estate and

includes the demolition of Heversham House to facilitate the construction of four buildings (Blocks F1, F2, G2 and H) ranging between 5 and 20 storeys, containing 295 homes as well as amenity space, parking, landscaping and ancillary infrastructure:

4.13. Although the Scheme forms part of the wider Tustin Estate Regeneration Project, it should be noted that the Scheme is not dependent upon the delivery of the later phases of that Project.

Residential

4.13.1. The 295 homes (867 habitable rooms) are proposed for Blocks F1, F2, G2 and H and are split as follows:

- i. Block F1 – 19 homes (72 habitable rooms)
- ii. Block F2 – 22 homes (96 habitable rooms)
- iii. Block G2 – 110 homes (339 habitable rooms)
- iv. Block H – 144 homes (360 habitable rooms).

4.13.2. The 295 homes will be a mixture of 1, 2, 3, and 5 bedroom units being; 120 one-bedroom homes (40.7%), 126 two-bedroom homes (42.7%), 47 three-bedroom homes (15.9%) and 2 five-bedroom homes (0.7%).

4.13.3. Out of 295 homes, it is proposed that 146 of those units will be affordable homes (comprising 88 social rent homes and 58 keyworker units) and 149 market homes comprising 5 shared equity units and 144 private homes (to be provided as build to rent accommodation).

4.13.4. 30 M4(3) accessible homes (10.2% by habitable room), which are spread throughout the blocks and across a range of tenures and sizes. Over 10% of the accessible homes within the social rent tenure are designed to M4(3)(2)(b) standards.

Open Space and Landscaping

4.13.5. 3,204 sqm of private amenity consisting of a mix of balconies and gardens.

- 4.13.6. 745 sqm of communal amenity space (proposed to be located in Block H and in between Blocks F2 and G2)
- 4.13.7. 642 sqm of children's play space located in the courtyard areas between Blocks F1 and G1, and Blocks F2 and G2.
- 4.13.8. The loss of 23 trees (plus 5 more within the temporary landscape are on Tustin Common). The trees to be removed include 14 category B and 14 category C trees. No category A trees are to be removed. 46 trees will be planted as part of the Scheme contributing significantly towards a greater canopy cover across the Tustin Estate, urban greening and biodiversity net gain.

Access and Circulation

- 4.14. The wider Tustin Estate regeneration proposals propose a network of streets and Quietways to improve access and circulation around the Tustin Estate. Relevant to the Scheme Site are the following:
 - 4.14.1. Patterdale Road – This is to be located between Blocks G2 and H to initially function as a cul-de-sac for servicing and deliveries with some limited parking for Blocks F2, G2 and H and a temporary turning head. It is anticipated that the Quietway will be completed in Phase 4 of the wider Tustin Estate regeneration project allowing cyclists and pedestrians to travel safely through the site. It is anticipated that the temporary turning head will be converted to open space at that time.
 - 4.14.2. Hornshay Street West – This is to be located between Blocks G1 and F1 to the south and Block E (anticipated to be constructed in Phase 3 of the wider Tustin Estate regeneration project) to the north. It is an extension of the access from Ilderton Road being completed as part of Phase 1. It will also function as a cul-de-sac for servicing and deliveries with some limited parking for Blocks F1 and G1 and a temporary turning head. The longer-term ambition is for Hornshay Street west to extend to the new Pilgrim's Way Primary School that is proposed to be constructed as part of Phase 3 of the wider Tustin Estate regeneration project. Once Phase 3 is completed, it is

intended that Hornshay Street West will predominantly function as a pedestrian only route.

- 4.14.3. Heversham Court – To be located between Blocks G1 and G2 is a permanent cul-de-sac that will primarily allow for servicing and deliveries. No amendments are to be made to this cul-de-sac in future phases, and it will continue to be used by smaller delivery vans.
- 4.14.4. Green Link – a green link to be provided between Blocks F1 and G1, and F2 and G2, linking Hornshay Street West in the north to Patterdale Road in the south. This link will offer communal amenity and play space alongside extensive landscaping.

Cycle Parking

- 4.14.5. A total of 538 cycle parking spaces are proposed amounting to 530 long stay spaces and 8 short stay spaces, with 276 spaces servicing the affordable homes and 254 spaces for the market homes.
- 4.14.6. Cycle stores are proposed to be located at the ground floor of each respective block with the cycle storage area consisting of perforated folded metal panels to provide passive surveillance over the storage areas. Additionally, qualitative improvements will be added to the storage areas in the form of workshop repair benches which will benefit users.

Car Parking

- 4.14.7. Nine blue badge car parking spaces are proposed within Phase 2 along Hornshay Street West, Heversham Court and Patterdale Road, with at least 20% of the spaces being equipped with electric vehicle charging points. As the car parking spaces are suitable for blue badge holders, the spaces will be slightly larger than a standard parking space

c) CONSISTENCY OF THE SCHEME WITH THE PLANNING FRAMEWORK OF THE AREA

4.15. As referred to above the Original Hybrid Permission was granted for the redevelopment of the Tustin Estate on 27 October 2022 and a further S73 Permission was granted on 11 August 2024. The time period for submitting a claim in judicial review against the grant of those planning permissions has now expired and there is no claim.

4.16. Due to the nature of the hybrid permissions (i.e. being part full (in respect of Phase 1) and part outline in respect of the later phases (phases 2-4) of the Tustin Estate redevelopment) the Phase 2 RMA was submitted to the local planning authority and validated on 27 August 2024. The Phase 2 RMA seeks approval of all of the reserved matters for the Scheme. The Phase 2 RMA [is pending approval / has been approved] [and there is therefore no planning impediment to the delivery of the Scheme]

4.17. The Scheme remains consistent with the planning framework for the area and is strongly supported by planning policy at all levels. In the paragraphs which follow, the Scheme is considered against the key policies of the statutory Development Plan, national policy and other material considerations.

4.17.1. For the purposes of section 38(6) of the Planning and Compulsory Purchase Act 2014, the statutory Development Plan covering the Order Land comprises:

- i. The London Plan (2021)
- ii. Southwark Plan (2022)]

4.17.2. The following are material planning considerations:

- i. National Planning Policy Framework (“NPPF”),
- ii. National Planning Practice Guidance
- iii. Draft Old Kent Road Area Action Plan (December 2020)
- iv. Better homes for local people: The Mayor’s Good Practice Guide to Estate Regeneration (February 2018)
- v. National Model Design Code (2021)
- vi. The Mayors Housing SPG (March 2016)

- vii. Southwark's 2015 Technical update to the Residential Design Standards (2011)
- viii. Tustin Estate Design Code (March 2022) and Addendum (2024)

Housing Provision

Unit Mix

4.17.3. 175 of the proposed units (60%) consist of two- or more-bedroom homes which is compliant with Policy P2 of the Southwark Plan.

Accessibility

4.17.4. 30 of the proposed homes (10.2%) are wheelchair accessible (M4(3)) with the remaining 265 homes being wheelchair adaptable (M4(2)), which is compliant with Policy P8 of the Southwark Plan and Policy D7 of the London Plan. 13 of the 18 wheelchair homes provided within the affordable tenure are built to standard M4(3)(2)(b) wheelchair accessible dwellings. This amounts to 100% of the social rent provision, significantly above the recommended 10% as per Policy P8.

Affordable Housing

4.17.5. The quantum of affordable housing to be provided across the Tustin Estate is set by the extant consent. There are no specific requirements for Phase 2. However, the section 106 obligation pertaining to the extent consent define the overall affordable housing mix required across the masterplan:

Unit Type	Social Rented Units	Intermediates Housing Units
1 bed	143	37
2 beds	82	38
3 beds	87	23
4 beds	30	0
5 beds	3	0
Total	345	98

4.17.6. The following table shows what has been provided in Phase 1, what is proposed as part of the Scheme (i.e. Phase 2) and what is therefore left to be provided in Phases 3 and 4

Unit Type	Phase 1		Phase 2		Phases 3 & 4	
	Social Rented Units	Intermediates Housing Units	Social Rented Units	Intermediates Housing Units	Social Rented Units	Intermediates Housing Units
1 bed	67	0	28	20	48	17
2 beds	22	0	27	25	33	13
3 beds	61	0	31	13	-5	10
4 beds	10	0	0	0	20	0
5 beds	1	0	2	0	0	0
Total	161	0	88	58	96	40

4.17.7. The Scheme provides five extra 3-bedroom affordable family homes, which is a benefit of the Scheme. The Scheme insulation includes 146 affordable homes (53.8% by habitable room) in accordance with Policy H5 of the London Plan which sets a target of 50% on publicly owned land.

Quality of Accommodation

Internal Space Standards

4.17.8. All residential homes in Phase 2 meet the minimum floorspace standards as defined in Table 6 of Policy P15 of the Southwark Plan. Additionally, all homes have adequately sized bedrooms, bathrooms and storage space provision.

4.17.9. Regarding wheelchair user housing, 18 of the 30 WCU homes fall short of the minimum floorspace standards contained within Table 4 of the Southwark Plan. The remaining 12 WCU homes are in the 2B4P bed type and are 85.4sqm, which exceeds the minimum standards for this bed type.

4.17.10. All WCU homes that fall short are homes that benefit from dual aspect views. Furthermore, the Wheelchair Unit Review demonstrates that the 18 WCU homes are not impeded by the shortfall with each WCU home still benefitting from adequate

circulation, movement and storage space within their respective homes.

Internal Living Conditions

4.17.11. 88% (259) of the units benefit from a dual aspect outlook that enables natural daylight and sunlight to penetrate deep into unit layouts in accordance with the requirements of Southwark Plan Policy P15, and London Plan Policy D6 which advocate for the maximisation of dual aspect units, sufficient daylight for new homes, and comfortable and functional layouts.

Amenity Space

Private Amenity Space

4.17.12. A total of 3,204 sqm of private residential amenity space is proposed across the Scheme, consisting of 2,790 sqm of balcony space and 414 sqm of garden space. Regarding the balconies, all three-bedroom flats have 10sqm of balcony space with one- and two-bedroom flats having at least 5sqm and 7sqm respectively.

Communal Amenity Space

4.17.13. A total of 745 sqm of communal amenity space is proposed, designed to provide multiple benefits such as recreation, habitat creation and SUDS, which exceeds the requirement for 50 sqm per block (a total of 200 sqm for the Scheme) in Southwark Plan Policy P15.

Play Space

4.17.14. A total of 642 sqm of play space is proposed between the blocks as part of the Scheme. The play equipment selected is inclusive and utilises robust materials that reflect the character of the site. Natural materials have been used to soften the appearance of the play elements.

Public Open Space

4.17.15. AAP 11 of the OKR AAP acknowledges that there is currently an area of open space deficiency within the OKROA. The policy calculates that 5sqm of public open space per dwelling is required. As an interim measure to accommodate public open space within the Scheme, temporary landscape works to Tustin Common were approved under the S73 Permission.

Shortfall

4.17.16. Overall, there is a residual shortfall of 1,844sqm of amenity space within the Scheme. However, and given the constrained nature of the Scheme, this is not unexpected and adequate open spaces are to be provided within the later Phases 3 and 4 to compensate for this shortfall as demonstrated at the masterplan stage.

4.17.17. As per the Public Open Spaces parameter plan approved as part of the hybrid permission, the new Tustin Common and the Old Kent Road Plaza, that are to be provided in Phases 3 and 4 respectively will deliver 5,690sqm sqm of high-quality open space for residents to enjoy. Alongside the incorporation of children's play space in the forthcoming phases, the overall redevelopment of the Tustin Estate will overcome the shortfall issues identified within the Scheme.

Amenity for Existing and Future Residents

Privacy and Separation

4.17.18. Local Plan Policy D3 requires development proposals to be designed to allow for adequate privacy and outlook for adjoining and potential occupiers and users. The Southwark Residential Design Guidance SPD provides recommends a minimum of 12m separation distances between habitable windows to allow for an acceptable degree of privacy for occupiers. London Plan Policy D1 further explains that development proposals should deliver appropriate outlook, privacy and amenity.

4.17.19. As per the Design Code, all street widths are at least a minimum of 12m in width. Heversham Court is a link route in the Design Code and complies with the 12m width between G1 and G2. Hornshay

Street West and Patterdale Road, identified as main routes, are at a width of 14m. These route widths enable the minimum separation distances to be adhered to in line with the guidance contained within the Southwark Residential Design SPD.

4.17.20. The SPD recommends a minimum distance of 21m between the rear of buildings. These distances are largely adhered to, particularly at ground floor where the maisonettes in Blocks G1 and G2 are setback sufficiently from the rear building line of the buildings opposite.

Daylight, Sunlight and Overshadowing

4.17.21. Overall, the Scheme achieves good levels of internal daylight and sunlight compliance to all units within the scheme in accordance with Southwark Plan Policy P15 and London Plan Policy D6. The results demonstrate a higher level of compliance than the recently approved scheme at Ilderton Wharf (21/AP/4757) which achieved an overall compliance rate of 56%. The NPPF is also clear that “authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.”

Wind Microclimate

4.17.22. A Wind Microclimate Assessment has been undertaken to ascertain the prevailing wind conditions in the surrounding area alongside appropriate mitigation measures. The assessment has been submitted as part of the Phase 2 RMA and is compliant with policies P14 and P56 of the Southwark Plan where mitigation measures have been secured to restrict impacts on neighbouring amenity and the design quality of the buildings.

Noise

4.17.23. A Noise and Vibration Assessment (“NVA”) has been submitted with the Phase 2 RMA to demonstrate compliance with Conditions 41 (internal noise levels) and 49 (vibration).

4.17.24. Overall, the NVA demonstrates that the Scheme would be compliant with Southwark Plan Policies P15 and P56 and London Plan Policy D14.

Urban Greening Factor

4.17.25. The Scheme proposals will meet the recommended target of 0.4 Urban Greening Factor (UGF) in accordance with Policy G5 of the London Plan, and Southwark Plan Policies P59 and P65. The UGF will be achieved through the incorporation of green roofs, flower-rich perennial planting, permeable paving, green walls, semi-natural vegetation, rain gardens, and the planting of trees in natural soils and individual pits.

Biodiversity

4.17.26. The Scheme will attain a 6.12% BNG uplift. This will be achieved by increasing the floristic diversity within the Scheme through green infrastructure provisions such as shrubs, rain gardens, new tree planting, and biodiverse green roofs to all Blocks within the phase. These initiatives are also considered to increase connectivity on site for bats, birds and invertebrates in accordance with Policies P59 and P60 of the Southwark Plan, and Policies GG2, D8, G1, G5, and G6 of the London Plan.

Transport, Highways and Parking

4.17.27. A Transport Assessment Addendum has been submitted with the Phase 2 RMA providing further details of access arrangements for the Scheme pursuant to the extant permission alongside other matters as discussed below.

Trip Generation and Impact

4.17.28. The Transport Assessment approved as part of the Original Hybrid Permission detailed the transport effects of multi-modal trips from the additional 440 homes proposed for the Estate. The Transport Assessment Addendum submitted for this RMA demonstrates that although an additional 49 homes are proposed for Phase 2, the total

number new homes proposed across the Estate remains at 440. Therefore, whilst there is a short-term uplift in the number of homes, the net increase in movement by transport modes is negligible to other highway users and transport passengers.

Pedestrian Access

- 4.17.29. The masterplan provides a clear emphasis on the prioritisation of pedestrians around and through the Estate. Three pedestrian access routes are provided from Ilderton Road, these being Hornshay Street West, Heversham Court, and Patterdale Road. Whilst Patterdale Road and Hornshay Street West are constructed as cul-de-sacs in this Phase, the intention of these routes is for both to span from east to west through the site with the alignments being pedestrian only beyond the cul-de-sacs to promote the prioritisation of pedestrian movement through the Estate. Secondary routes are proposed off these cul-de-sacs that will provide access to the communal courtyards located between Blocks F1 and G1, and F2 and G2.
- 4.17.30. In accordance with the Design Code, these pedestrian routes allow for a minimum of 2m width in public spaces for pedestrian comfort. The secondary footpaths that provide access for private and communal areas are at a minimum of 1.2m width to comply with the ambitions of the Design Code.
- 4.17.31. Entrances to Blocks F1 and F2 will be from footpaths adjacent to the Common which allows for passive surveillance to the Common once it is brought forward in Phase 3. The entrance to Block G2 is predominantly via the Heversham Court with the access to the ground floor maisonettes is through individual entrances from Ilderton Road.
- 4.17.32. For Block H, the entrance is via Ilderton Road, adjacent to Patterdale Road which is enhanced by an open soft landscape square. A Bus Stop is to be constructed outside of Block G2 as part of the CFR12 works being done by TfL and Southwark Highways along Ilderton Road which provides ease of access for residents within this Phase.

Car Parking

4.17.33. A total of nine car parking spaces, suitable for blue badge drivers, are proposed with Phase 2 split across Hornshay Street West, Heversham Court and Patterdale Road. The spaces are parallel to the layouts of the cul-de-sac roads as per the ambitions of the hybrid permission. Additionally, the blue badge spaces are built with an extra 1.2m on both sides and to the rear than a standard parking space of 2.5m x 5m. In line with the policy requirements of P54 of the Southwark Plan, 20% of the proposed car parking spaces will be equipped with Electric Vehicle Charging Points.

Cycle Parking

4.17.34. Cycle storage is provided at the ground floor area of each respective Block with an external storage area located between Blocks F2 and G2. For the ground floor homes within Blocks F1 and F2, cycle storage is located within the rear garden amenity area.

4.17.35. The proposed cycle storage broadly adheres to the guidance contained within the London Cycling Design Standards. In some storage areas, bike repair stations are proposed to enhance the quality of the overall provision. Whilst it is noted that there is a minor shortfall (4%) in the private cycle storage provision, this provision has been agreed with officers. The 250 cycle spaces allocated to the affordable units within the development provides 100% of the requirement.

Deliveries, Servicing, and Emergency Access

4.17.36. Delivery, servicing and maintenance access is provided at the northern and southern ends of Phase 2 on Hornshay Street West and Patterdale Road respectively. Delivery bays are located off each route to ease pressure on Ilderton Road whilst also providing surveillance over the two routes within the site.

4.17.37. For access to maintenance of plant spaces located on the roof level of each Block, this is provided via the staircases in each core with an

access hatch to get on to the roof. Post boxes are contained within the lobbies at the ground floor of each respective Block.

4.17.38. The Transport Assessment Addendum is compliant with Southwark Plan policies P50, P51, P53, and P54 of the Southwark Plan, and policies T1, T3, T4, T5, T6, and T6.1 of the London Plan 2021.

Waste and Recycling

4.17.39. The development provides 29x 240L bins for food waste, 31x 1100L eurobins for residual waste, and 21x1100L eurobins for recycling. The bin stores are located at the ground floor of each respective Block close to the delivery bays.

4.17.40. During collection refuse vehicles will park within the delivery bays with dropped kerb with the delivery bays being located within 10m to minimise drag distances. It is noted in some instances, such as a few deck access units in Blocks F1 and F2, the distance to travel to the bin stores is over 30m to their respective refuse store doors. Despite the distance and given that the route is largely a straight route due to layout constraints, it is considered that this would not be detrimental to the affected residents.

4.17.41. The proposed waste and recycling storage is compliant with the 'Waste management guidance notes for residential developments' document produced by LBS.

Energy and Sustainability

4.17.42. Condition 53 of the hybrid permission requires the submission of an Energy Statement for each respective phase. The Energy Assessment Report submitted with this RMA addressed the requirements of Southwark Plan Policy P70 as follows:

- *Be Lean* - The design of the units has targeted highly efficient U-values for windows and air tightness with the units being provided heating, cooling and ventilation from the District Heat Network ("DHN"). Additionally, domestic hot water pipework will be

insulated with all units receiving instantaneous hot water via a twin late heat interface unit.

- *Be Clean* - The DHN is now operational with the operator Veolia confirming that heat will be available for the Phase 2 RMA. The DHN will provide heat, ventilation and cooling will be electrical.
- *Be Green* - Photovoltaic Panels ("PV") are to be installed at roof level on all Blocks within Phase 2 alongside biodiverse roofs.
- *Be Seen* - The energy usage within each Block will be monitored by meter readings in accordance with the GLA's Energy Monitoring Guidance (2021). This approach will be undertaken during the first five years from occupation with the metering plans developed further allow for energy performance reporting to occur. Residents will be able to monitor their respective energy usage through smart meters.

4.17.43. Overall, the Phase 2 proposals will reduce carbon emissions by 85% beyond Part L 2021 Building Regulations, resulting in a CO2 offset payment of £118,976. Full details of the Energy Strategy can be found in the Energy Assessment Report. A Deed of Variation to the Section 106 Agreement is being considered to allow the carbon offset payment to be made.

Utilities

4.17.44. The South East London Combined Heat and Power ("SELCHP") District Heat Network ("DHN") is now operational within the OKROA, and within the vicinity of the Estate. The Phase 2 proposal is designed in accordance with CIBSE CP1 Heat Networks Version 2, and suitably sized heat substations and plant rooms are proposed. Veolia is the provider of the DHN and coordination is required to agree utilities routes and delivery dates for the Estate to connect to the DHN.

Fire

- 4.17.45. Condition 52 of the hybrid permission requires the submission of a Fire Strategy for each respective phase. For this Phase 2 RMA, a Fire Strategy has been prepared and shall be carried out in accordance with any approval by LBS.
- 4.17.46. All Blocks are provided with automatic fire detection and alarm systems to support the evacuation strategy for the different sections of each building with involve a stay put strategy for residential areas, and simultaneous for ancillary areas. Additionally, a fire suppression system is to be installed throughout all parts of the four Blocks in accordance with BS 9251:2021, with ancillary accommodation and residential homes being separated from each other to assist in creating separated fire compartments.
- 4.17.47. Regarding means of escape and firefighting, the upper floors of the two tallest buildings, Block G2, and Block H, will be served by two protected stairs which are to be constructed as firefighting stairs, Blocks F1 and F2 will be served by a single protected staircore. As Block H is taller than 50m, one of the firefighting stairs is to be equipped with the appropriate wet riser and associated pumps in accordance with BS9990. Blocks F1, F2, and G2, being under 50m in height will be equipped with dry risers to comply with BS 9990.
- 4.17.48. All firefighting cores in Block H and G2, and evacuation cores in Blocks F1 and F2 will have provisions to assist with disabled evacuation. Firefighting lifts will serve all floors above ground level, and all lifts assisting evacuation of disabled residents will be fitted with disabled refuge space and emergency voice communication systems in the event of evacuation procedures within protected lobbies.
- 4.17.49. The Gateway One Fire Statement and associated Fire Strategies for each respective Block in this RMA are compliant with the requirements of Policies D5 and D12 of the London Plan.

d) WELL-BEING BENEFITS

4.18. The Council is satisfied that Scheme represents a significant investment in the area, the benefits of which will be considerable to the economic, social and environmental wellbeing of the Borough, in terms of:-

Economic

- i. Brining additional housing to the Borough which will enhance spending in the local economy and promoting and strengthening the borough
- ii. Employment and training – the proposed social value targets for the Scheme include 53 new jobs; 53 training courses and 13 apprenticeships or NVQs all for local residents. In addition all jobs created by the construction will be advertised locally, and BY Development Ltd will provide work experience and graduate opportunities as well as run job fairs and provide educational workshops in local schools.
- iii. The Scheme will attract significant CIL and s106 payments to support local infrastructure

Social

- i. The right for all existing secure tenants and resident leaseholders to stay living on the redeveloped estate
- ii. The right for all existing secure tenants and resident leaseholders to stay living on the redeveloped estate
- iii. Maximising and improving existing housing to create a mixed and balanced community and improved public realm;
- iv. The delivery of a range of housing typologies and accommodation sizes to meet the needs of single people, couples, families and older people;
- v. The delivery of high quality homes built to high standards of design and energy efficiency;
- vi. Provision of 745 sqm of communal amenity space,
- vii. Provision of 642 sqm of children's play space

- viii. BY Development Ltd will continue running the programme of resident drop-ins, RPGs, and estate events contributing to strengthening the local community
- ix. Affordable housing – delivery of 146 affordable homes including 88 social rent
- x. Delivery of significant public realm and landscaping including upgrades to the existing Tustin Common

Environmental

- i. Provision of 3,204 sqm private amenity space consisting of balconies and gardens
- ii. Planting of 46 trees, contributing significantly towards a greater canopy cover across the Estate, urban greening and biodiversity net gain.
- iii. The site wide proposals approved by the Outline Hybrid Permission and the S73 Permission will deliver more efficient pedestrian and cycle routes through the Tustin state that will improve accessibility for existing and new residents and connect into a growing network of active travel measures in the local area. The Scheme will help to deliver those routes.
- iv. The Scheme is proposed to be connected to the SELCHP district heating network.
- v. Green roofs on all buildings
- vi. Drainage strategy minimising rainwater run-off to the sewers
- vii. Highly energy-efficient and water-efficient new homes
- viii. The Scheme encourages active modes of transport with reduced car parking, high levels of cycle parking and close proximity to public transport

4.19. The regeneration well-being benefits reflect the objectives set out in the planning policy framework for the area and will be delivered by and are satisfied by the Scheme.

e) CONSULTATION

4.20. Significant levels of consultation have been undertaken with existing residents of the Tustin Estate, the local planning authority, TfL and Southwark's Design Review Panel. There has been a structured approach to community engagement throughout various events such as place-making sessions, resident tours, and festive gatherings, which were pivotal in shaping the final design and the Scheme is a reflection of the feedback received from all stakeholders.

4.21. Residents of the Tustin Estate developed a Manifesto in 2019 setting out what they would like to see from the Council in respect of the regeneration of the Tustin Estate.

4.22. The Council worked with residents in 2019 and 2020 to consider options for the future of the Tustin Estate. In October 2020 an options survey was undertaken where residents were asked to rank various regeneration, redevelopment and refurbishment options for the Tustin Estate. Following that options survey, residents were informed about the final proposed option for the Tustin Estate and a Resident Ballot was held (in March 2021). As part of that Resident Ballot process the Council produced a Landlord Offer setting out details of the Council's commitments to residents should the final proposed option for Tustin Estate proceed. Residents were asked as part of the ballot process whether they were in favour of the proposal for the re-development of the low rise homes on the Tustin Estate. The voter turnout was 307 out of 480 (64% voter turnout) with 87% of voters voting 'yes'.

4.23. There is a programme of monthly coffee mornings, community drop-ins, newsletters, Resident Project Group meetings and other community events.

f) THE DEVELOPMENT PARTNER

4.24. The Council appointed BY Development Limited (the “Developer”) to deliver the comprehensive development of the Tustin Estate and entered into a formal development agreement with the Developer on 8 November 2022. The appointment was made under the Pagabo developer framework in line with a formal procurement process and approved by the Council’s Cabinet on 18 October 2022.

4.25. BY Development Limited is the development arm of construction firm Bouygues UK who will deliver the works at the Tustin Estate pursuant to the DA in conjunction with their specialist contractors. BY Development Ltd have experience of delivering other high-quality large scale housing development for local authorities – their previous regeneration experience includes:

- Hallsville Quarter, Canning Town, Newham: BYD / BYUK; masterplan for 1,1100 homes and a retail town centre, ph1-3 complete (delivering all the homes), ph4 under construction as student accommodation
- Gascoigne Estate, Barking: BYUK, delivered award-winning phase 1 including 190 homes
- Wornington Green Estate, Kensington: BYUK, delivered phase 2b including 230 homes
- Church Street Regeneration, Westminster: BYD/BYUK, developed and delivered ph1 including 170 homes

4.26. The Council and the Developer wish to implement the Scheme as soon as possible. They have entered into the DA to undertake the Scheme and have committed to developing the Order Land by applying for the Phase 2 RMA and obtaining the Original Hybrid Permission and the S73 Permission.

4.27. BY Development Ltd have attended monthly resident project group meetings and the monthly Tustin Community Association meeting as well as taking part in estate ‘walkarounds’ to better understand the residents needs and concerns about the construction.

4.28. The Council is responsible for securing vacant possession of the Scheme Site under the terms of the DA. .

g) THE POTENTIAL FINANCIAL VIABILITY OF THE SCHEME, GENERAL FUNDING INTENTIONS AND THE TIMING OF AVAILABLE FUNDING AND THAT THERE IS A REASONABLE PROSPECT OF THE SCHEME GOING AHEAD

4.29. The regeneration of the Tustin Estate (which comprises the Scheme) has received £43,360,000 grant funding from the Greater London Authority following a positive result in 2021 to a resident ballot. The required budgets to fully implement the Scheme including the cost of acquiring the land and building out the scheme were agreed by cabinet in October 2022. These costs will be funded from resources supporting the Housing Investment Programme, including borrowing and GLA grant.

h) ALTERNATIVES.

4.30. The planning policy documents are clear that the preferred approach is for the Scheme Site to be redeveloped.

4.31. A number of options were considered by the Council as part of the regeneration of the wider Tustin Estate (which includes the Scheme Site). These options were consulted on with residents and residents views were sought. The options considered were:

4.31.1. Option 1: Do Nothing but maintain the Tustin Estate

i. This option involved the council maintaining properties for the next 30 years to Decent Homes + Southwark Standard (new kitchens and bathrooms) + estate repairs.

4.31.2. Option 2: Refurbish Tustin with new infill homes

i. This option involved the building of new homes on existing empty space in the estate.

4.31.3. Option 3: Partial refurbishment and partial redevelopment

i. This option included the retention of some homes (i.e. maisonettes at 21-98 Heversham House, Bowness House and

houses at Manor Grove and carrying out works to maintain such) and the demolition of Kentmere House, Hillbeck Close, Ullswater House and bed-sit flats at the end of Heversham House in order to build between 320- 370 additional new homes as well as a new school and dedicated housing for the over 55s.

4.31.4. Option 4: Redevelop Tustin – demolition and rebuild of low rise homes

i. This option included the demolition and rebuilding of the low rise blocks on the Tustin Estate but not the tower blocks, as well as a new school, dedicated houses for the over 55s and a new park at the centre of the estate.

4.31.5. Option 5 Redevelop Tustin - demolition and rebuild of low rise homes except Manor Grove

i. This option included the demolition and rebuilding of the low rise blocks on the Tustin Estate but not homes in Manor Grove or the tower blocks, as well as a construction of a new school, dedicated houses for the over 55s and a new park at the centre of the estate. The Scheme forms part of this option and this option was considered by residents as part of the Resident Ballot held in March 2021 – where 87% of residents voted in favour of this option.

4.32. Whilst the Council could have elected to do nothing that approach nor the options considered at options 2, 3 and 4 would not have comprehensively addressed the existing issues nor delivered the range of well-being benefits that the Scheme delivers. Option 5 was the Council's preferred option because the majority of Manor Grove residents did not support plans to demolish their homes.

4.33. In light of the multiple ownerships on the Scheme Site, it is considered that the only sure way of securing development to deliver the Scheme in its entirety and within a reasonable time and in accordance with the relevant policies, is for a Compulsory Purchase Order to be made covering the whole of the Scheme Site. This approach is supported by the planning policy framework of

the area, the potential to deliver the regeneration well-being benefits, and the fact that alternatives that are not comprehensive would not deliver the range of regeneration benefits that are required.

- 4.34. Although significant parts of the Scheme Site are already in the ownership or control of the Council, the implementation of the Scheme requires the acquisition of a number of further land interests including land currently owned by third parties [unregistered land] [and the acquisition of new rights over land owned by third parties].
- 4.35. The Council has been negotiating with the holders of the private sector interests for their acquisition by agreement, but a significant number of interests still need to be acquired. Details of the negotiations to date are set out in paragraph [4.41] below.
- 4.36. Single ownership and control of the Order Land is necessary to enable the Scheme to proceed. Given the number of third party interests identified in the Schedule to the Order it is unlikely that the Council will be able to acquire all of the necessary interests by agreement within a reasonable timescale.
- 4.37. The Council has therefore made the Order to ensure that the significant benefits of the Scheme can be brought forward in a reasonable timescale. Whilst the Council's approach is to negotiate all interests wherever possible, given the fragmented nature of the Order Land, confirmation of the Order is required in order to use compulsory purchase powers where necessary.
- 4.38. For the reasons explained above, the Council therefore considers there to be a compelling case in the public interest to proceed with Order.

i) IMPEDIMENTS TO DELIVERY OF THE SCHEME

- 4.39. For the reasons set out in paragraphs [] above [*planning and financial*] the Council considers that there are no planning, financial, legal or other impediments to the delivery of the Scheme.]

j) STEPS TO ACQUIRE ORDER LAND BY AGREEMENT

4.40. There are [] interests in the Order Land [PROVIDE DETAILS OF THE NUMBER OF INTERESTS IN THE ORDER LAND AND THE STEPS TAKEN TO ACQUIRE THOSE INTERESTS BY AGREEMENT]

4.41. The Council recognises the Guidance advice, that acquiring authorities should seek to acquire land by negotiation wherever possible. Given the timescales involved in obtaining a CPO, the Guidance recommends that acquiring authorities seek to run a CPO in parallel with negotiations. Outlined below are the steps taken to secure vacant possession of individual property types.

- i. The Council has been negotiating with leaseholders in Heversham House since the point the Landlord Offer was agreed in March 2021 with the intention to acquire all interests by agreement. The Council has appointed independent surveyors to inspect and value the properties, and leaseholders have appointed their own surveyors to act for them. The leaseholders reasonable legal and surveyors' professional fees are borne by the Council. In addition, all resident leaseholders have been offered a range of rehousing options to acquire a new leasehold home that can be bought via shared ownership, or shared equity loan with the Council.
- ii. Negotiations are ongoing with statutory undertakers regarding diversion of their networks running through the Scheme Site with the principle of development agreed with certain undertakers.

Summary

4.42. Prior to the availability of compulsory purchase powers, discussions will continue with the owners of the relevant interests who are willing to sell their interest by agreement. This approach of making the Order and, in parallel, conducting negotiations to acquire land by agreement is in accordance with the Guidance

4.43. The Council remains committed to acquiring outstanding interests, wherever practicable, by way of agreement. The Council has agreed to continue their attempts to negotiate purchases of the outstanding land interests by private

treaty agreement, but there is no guarantee that these attempts will be successful and accordingly, without the Order, there is no certain prospect of the Scheme proceeding.

- 4.44. The Council considers that the use of its CPO powers to acquire all outstanding interests in the Order Land [and the new rights] is required as it has not been possible to achieve this by agreement and it is highly unlikely that it would be able to do so within an acceptable timescale without the Order. The Scheme cannot proceed unless these interests are acquired.
- 4.45. [The Order Land includes a total of [INSERT DETAILS OF ANY UTILITIES – EG ELECTRICITY SUBSTATIONS ETC], and other utilities run through the Scheme Site. All utility operators with known equipment in the Order Land will be given notice of the making of the Order. The Scheme takes account of the apparatus of Statutory Undertakers and where affected, discussions will be held with the relevant Statutory Undertakers and alternative arrangements agreed to relocate or replace as required by the Scheme.]

k) COMPELLING CASE IN THE PUBLIC INTEREST

- 4.46. [The Council has been conscious of the need to strike a balance between the rights of the individual within the Order Land and the interests of the public. In light of the significant benefits both to residents and the public that would arise from the regeneration of the Order Land, the Council has concluded that it would be appropriate to make the Order, and that the Order will not result in any unlawful interference with Human Rights. At all times, the Council has been aware that the Order Land includes homes, balancing this with the need to secure the regeneration of the area for the provision of high quality new homes, and the wider well-being, social and economic benefits.
- 4.47. The Council and the Developer have undertaken wide and meaningful engagement and consultation with residents and owners who have had the opportunity to make representations in respect of the proposals. In addition, objections can also be made to the Order, which will then have to be considered by the Secretary of State before a decision is made whether or not to confirm the Order. It is therefore considered that the statutory procedures

which give the right to object and provide for judicial review are sufficient to satisfy. Furthermore, those directly affected by the Order may be entitled to compensation in line with legislation and statutory guidance together with support from the Council as necessary.

- 4.48. The purpose of the Order is therefore to secure the acquisition of all the relevant interests in the Order Land to facilitate the Scheme.
- 4.49. The Council considers that there is a compelling case in the public interest for the making of the Order. The principle of the Scheme is supported by planning policy at both a national and local level. [It is not considered that there are any planning or viability impediments to the implementation of the Scheme: the Original Hybrid Permission was granted on 27 October 2022 with the S73 Permission being granted on 11 August 2024. The Phase 2 RMA has been submitted to the local planning authority and it is considered that there is no planning basis for refusal of that application] . The Developer is committed to the delivery of the Scheme. The Council considers that the Scheme will make a positive contribution to the promotion of the achievement of the economic, social and environmental well-being of the area.
- 4.50. Vacant possession of the outstanding interests within the Order Land is required to enable the Scheme to proceed. The Council is satisfied that it has made reasonable attempts to acquire outstanding interests by agreement. The Council have attempted, and will continue to attempt, to take reasonable steps to purchase the outstanding interests by agreement. However, the Council considers it unlikely that it will be able to acquire all of these interests by agreement within a reasonable time period. The exercise of compulsory purchase powers will enable redevelopment to take place at an earlier date by providing certainty in respect of site assembly.
- 4.51. The Council has carefully considered the need to include each parcel of land in the Order Land and is satisfied that these interests are required for the delivery of the Scheme.
- 4.52. For the reasons explained above, the Council therefore considers there to be a compelling case in the public interest to proceed with the Order.

5. **LEGAL REGARDS**

PUBLIC SECTOR EQUALITY DUTY

- 5.1. In formulating and promoting the Order, the Council has had regard to its statutory duties and obligations under the Equality Act 2010 and in particular its obligations under Sections 149 and 150 of the said Act in taking into account the differential impact the Order will have on various groups of persons with different characteristics.
- 5.2. A full equality analysis was undertaken in November 2024. This analysis identified effects on residents during the renewal process including Relocation and loss of social cohesion, Loss of access to community resources, Access to finance as a result of relocation, Expenses associated with relocation, Access to housing, Health effects associated with relocation, Safety and security, Accessibility and mobility in the surrounding area and Information and communication
- 5.3. No other negative impacts were identified and the assessment will be regularly reviewed and updated to ensure that any impacts are identified and mitigated.

HUMAN RIGHTS CONSIDERATIONS

- 5.4. The Human Rights Act 1998 ("the **HRA**") incorporated into domestic law the Convention.
- 5.5. Section 6 of the HRA prohibits public authorities from acting in a way which is incompatible with the Convention. Articles 6 and 8 and Article 1 of the First Protocol of the Convention are considered to be relevant by the Council.
- 5.6. The Council has duly considered the rights of property owners under Article 1 of the First Protocol of the Convention, which provides for the peaceful enjoyment of possessions. Article 1 further provides that no one shall be deprived of possessions except as provided for by law or where it is in the public interest. It is considered that the Order will strike a fair balance between the private loss of property and the public interest in securing the implementation of the Scheme.

- 5.7. Article 6 of the Convention provides that everyone is entitled to a fair and public hearing in the determination of their civil rights and obligations. It is considered that the statutory procedures, which give the right to object and provide for judicial review, are sufficient to satisfy the requirements of this Article.
- 5.8. The Council has also considered the rights contained in Article 8 of the Convention. This provides that everyone has the right to respect for their private and family life and that there shall be no interference by a public authority with the exercise of this right except in accordance with the law, where there is a legitimate aim and where it is fair and proportionate in the public interest. It is considered that any interference caused by the Order will fall within these exceptions having regard to the public benefit which will accrue from the Scheme.
- 5.9. The Council have been conscious of the need to strike a balance between the rights of the individual and the interest of the public. It has considered the effect of the Articles and decided that on balance, and in light of the significant public benefit that would arise from the Scheme and the nature of the Order Land, it is in the interest of the wider community to make the Order over and above the interests of any individuals affected. Any interference with the Convention rights is considered to be justified in order to secure the economic, social, physical and environmental regeneration that the Scheme will bring. Appropriate compensation will be available to those entitled to claim it under the relevant statutory provisions.

Landlord Offer – Resident Ballot

- 5.10. [As part of the Resident Ballot process a series of commitments have been made by the Council to all residents on the Tustin Estate who were resident on the estate at least 12 months prior to the ballot in March 2021. These commitments included but were not limited to the following:
 - 5.10.1. if a resident wishes to remain on the estate a new home would be offered in the development that meets the residents housing needs;

5.10.2. a commitment to ensuring that no homeowners are worse off financially, and an option for homeowners to buy a property on the estate (if they so wished).

As a result, residents will not be unintentionally displaced from the Tustin Estate as a result of the regeneration proposals]

CONSERVATION AREA, LISTED BUILDINGS AND SPECIAL CATEGORY LAND

5.11. The Scheme Site is not located in a conservation area, and does not comprise any special category land nor does the Scheme Site contain any listed or designated assets.

NO SCHEME WORLD

5.12. For the purposes of assessing compensation to be awarded under the CPO Compensation Code, the effects of the Scheme should be disregarded and compensation should be assessed in the no scheme world.

6. CONCLUSION

6.1. [The Order Land forms a critical part of the Scheme Site and the Tustin Estate regeneration proposals. The Scheme itself will deliver much needed high quality new homes (295 residential units), including over 50% affordable housing, spread across a range of dwelling types and sizes to help meet local needs. The majority of homes are dual aspect, and each has good access to green open spaces, public transport and active travel. A high standard of design is proposed, with robust brick and metal being the primary materials to ensure longevity and good weathering for years to come. The proposal is also highly sustainable with on-site carbon emissions reductions of 85% beyond Building Regulations due in part to the site's connectivity to the District Heating Network. This will ensure that residents' bills are kept to a minimum moving forward.

6.2. Furthermore the Scheme is supported in policy terms at national, regional and local level. In order to achieve the redevelopment of the Order Land, action is required to facilitate the acquisition of the interests necessary for the provision of the high quality residential accommodation as envisaged by the Scheme. The redevelopment of the Scheme Site can only sensibly be achieved within a reasonable timescale through the use of the Council's powers of compulsory acquisition.

6.3. Having considered the relevant policy and guidance the Council is satisfied that there is a compelling need in the public interest for compulsory powers to be sought in order to secure the redevelopment and improvement of the Order Land as part of the Scheme Site to deliver economic, social and environmental improvements to the Order Land and the surrounding area. The Council has therefore made the Order and would ask the Secretary of State to confirm the Order.]

7. ADDITIONAL INFORMATION

Council Contacts

7.1. Anyone who considers that they are affected by the Order can contact [INSERT CONTACT DETAILS] : telephone [INSERT] during normal office hours or make an appointment to visit him/her at [INSERT ADDRESS].

The Order, Order Map[s] and Statement of Reasons

7.2. A copy of the Order, Order Map[s] and this Statement of Reasons can be inspected at [INSERT ADDRESS] between [INSERT TIME] a.m. and [INSERT TIME] p.m. on Mondays to Fridays (excepting bank holidays).

7.3. This Statement of Reasons for making the Order is not intended to discharge the Council's statutory obligations under the Compulsory Purchase (Inquiries Procedure) Rules 2007 in the event of a public local inquiry being held.

7.4. In the event of a Public Inquiry, further supporting material, plans and documents will be put in evidence. A list of these, together with the addresses

at which they can be inspected, will be notified to the public in accordance with the relevant Rules.

DRAFT

RELEVANT DOCUMENTS FOR THE INQUIRY**Number of document**

1. Ministry for Housing, Communities and Local Government - Guidance on Compulsory Purchase Process (October 2024)

2. Cabinet Report and Decisions

Date of Report/Decision	Title of Report/Decision	Issued by
13 July 2021	Tustin Estate Low Rise Delivery Programme	Cabinet
16 September 2024	Tustin Estate Phase 2 Compulsory Purchase Order	Cabinet
[7 January 2025]	Tustin Estate Phase 2 Compulsory Purchase Order	Cabinet

3. Town and Country Planning Act 1990, Section 226

4. *[Others – to be completed by SP]*

5.

CABINET AGENDA DISTRIBUTION LIST (OPEN)**MUNICIPAL YEAR 2024-25**

NOTE: Original held by Constitutional Team; all amendments/queries to
Paula.thornton@southwark.gov.uk

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