

Cabinet

Tuesday 11 March 2025

11.00 am

Kingswood House, Seeley Drive, Dulwich, SE21 8QN

Appendices

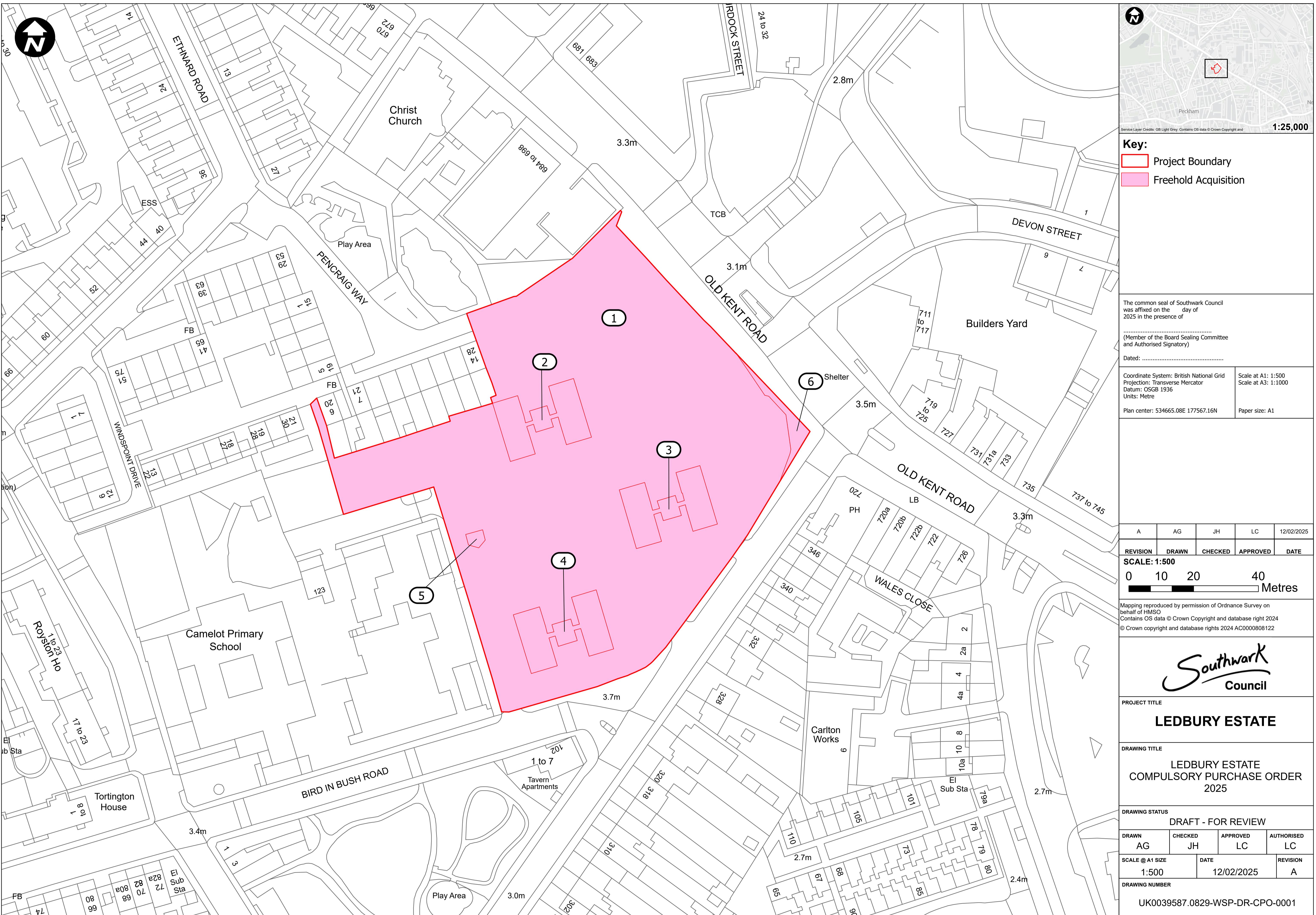
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Contact

Email: paula.thornton@southwark.gov.uk; constitutional.team@southwark.gov.uk
Webpage: www.southwark.gov.uk

Date: 3 March 2025



**Ledbury Estate Phase 2 Compulsory Purchase Order
Procedural and Legal matters**

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 One, save for a small section of unregistered land at the intersection of Commercial Way and Old Kent Road.
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. If compulsory purchase takes place, a leaseholder is entitled to be compensated on the basis of the 'compensation code', which is a mixture of statute and case law based rules and principles for compensation. A leaseholder will be entitled to:
 - the market value of the interest acquired;
 - a statutory loss payment; this is 10% of the market value where the leaseholder lives at the property or 7.5% 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 rights and statutory utility rights and apparatus

6. Utility Companies may have rights across land that enable them to provide infrastructure to the Estate. To enable redevelopment to proceed these rights will have to be acquired or extinguished.
7. The report explains that UKPN will be affected by this CPO and that negotiations with them are ongoing. UKPN have a single above ground substation within the Order Land. The Council has also had contact (following request for information letters being sent out by the Council) from Southern Gas Networks who may have underground pipework across the site. The Council will open discussions with them to ascertain the location and effect of construction on their equipment.

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8. 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 both to 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 One 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. This process has already commenced following the decision of Cabinet in December 2024.

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. A draft Statement of Reasons accompanies this report as appendix four.

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 notices are displayed around the site. Those parties directly affected by the Order will have been contacted in advance of the formal notices being served.
13. The notices will advise that 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,

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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 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.

Implementation of the CPO and Taking Possession

17. Implementation of the CPO 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 19-27 below.

Legal Implications

19. Section 226(1)(a) of the Town and Country Planning Act 1990 (the Act) (as amended by the Planning and Compulsory Purchase Act 2004) is considered by the Council to be the appropriate power in this instance to secure the compulsory acquisition of properties within Phase 2 of the Ledbury Estate redevelopment. Section 226(1)(a) enables authorities to exercise their compulsory purchase powers if they think that the acquisition of the land in question will facilitate the carrying out of development, redevelopment, or improvement on, or in relation to, the land.
20. The Council, in exercising its power under this Section must have regard to and apply 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, redevelopment 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 most appropriate having regard to the Council's aspirations for the estate as a whole. The interests to be

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acquired by the Order are required in order to permit the redevelopment of the land 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 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 – January 2025 –“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 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 :
 - 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.
23. 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. However authorities should make clear that they are willing to continue to engage with affected parties to purchase land by agreement, even after the CPO process has started.
24. 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. 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.
25. 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

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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.

26. The Guidance 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.
27. 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.
28. 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.
28. As is already set out in this report, officers will continue 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.
29. 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 formal requisitions for information have been 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. 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.
30. 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 is considered to be by means 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

31. The Human Rights Act 1998 incorporated into domestic law the European Convention on Human Rights ("the Convention").
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

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of possessions. No one can be deprived of possessions except in the public interest and subject to the relevant national and international law. In respect of rights under Article 1 of the First Protocol, a fair balance must be struck between the public interest and private rights.

33. 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, the economic well being of the country, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others. Any interference with this right must be proportionate.

Article 6 Convention rights are also relevant: in the determination of civil rights and obligations, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.

34. 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 Ledbury Estate, it is considered 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

35. The effect of the negotiated acquisition or compulsory purchase order will be to dispossess persons of their rights in land. The Council has made significant efforts to acquire the outstanding interests in the land by agreement but making a compulsory purchase order is considered to be a necessary process to ensure the redevelopment of the Ledbury Estate can proceed. This is an appropriate course of action where there is a compelling case in the public interest and where, as in this case, the advantages of redevelopment substantially outweigh the disadvantages to those dispossessed.

36. The redevelopment of the Ledbury 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 impact to those with an interest in the affected land. In carrying out this exercise a degree of proportionality should be adopted. The Human Rights of these individuals have accordingly been considered and commented upon in this report.

37. Pursuing the compulsory purchase order and redeveloping the Order land is consistent with the Council's Diversity and Equal Opportunities policies. Indeed, in the long term, it is anticipated the diversity of the area will be widened.

38. Section 149 of the Equality Act 2010 requires the Council to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

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- 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.

39. 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.

40. 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

40. There has been extensive consultation with Ledbury Estate residents (including tenants and leaseholders) at all stages of the development. Consultation will continue as the development proceeds.

Equality Impact and Needs Analysis Guidance and Template

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the protected characteristics and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme. All Cabinet reports will also publish related

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering implications arising from socio-economic disadvantage, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Ledbury Estate Compulsory Purchase Order Approval
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Equality analysis author	Beth Arbuckle		
Strategic Director:	Hakeem Osinaike		
Department	Housing	Division	Southwark Construction
Period analysis undertaken	03/10/2024 – 10/02/2025		
Date of review (if applicable)			
Sign-off		Position	

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

This report presents an Equality Impact and Needs Analysis (EINA) on the impact of using a Compulsory Purchase Order (CPO) to acquire outstanding land and interests, in the absence of a negotiated settlement to acquire such interests, across the Ledbury Estate Redevelopment.

A construction contract with Higgins Partnerships Ltd to deliver both Phase 1 and Phase 2 of the Ledbury Estate Redevelopment, along with the required budgets to deliver the Ledbury Estate Renewal Scheme was agreed by Cabinet in December 2021 and March 2023 respectively.

A planning application (22/AP/0554) for the redevelopment of both phases of the site, providing 80 homes on the first phase and 260 homes on the second phase was approved in December 2022.

The council has already acquired 20 leasehold interests across the four Ledbury towers. Six of these were in Bromyard House which facilitated successful vacant possession for Phase 1.

On Phase 1, vacant possession was achieved on 25 July 2022 with a formal start on site date of 4 December 2023.

On Phase 2, there are currently 14 leasehold interests across the three remaining towers of Peterchurch House, Skenfrith House and Sarnesfield House (hereafter “the three towers”).

The council is pursuing a negotiated settlement with all leaseholders situated within the three remaining towers, with the intention to acquire these remaining interests by agreement without the need for the council to apply to use its compulsory purchase powers.

The council may need to use its compulsory purchase powers to acquire outstanding land and interests in the absence of a negotiated settlement to acquire such interests.

There are various third-party interests in the land at Phase 2 of Ledbury Estate. The council will need to acquire those interests in order to secure vacant possession of the three towers (which it is contractually obliged to do) so as to enable the Scheme, including the demolition works scheduled to commence in summer 2026, to proceed.

The preparation of a CPO is crucial to the scheme’s success. A paper is being prepared for Cabinet seeking approval to confirm its willingness to investigate the use of compulsory purchase powers.

This EINA is being undertaken to ensure the impacts of the re-development of the estate have been independently assessed. It will identify differential or disproportionate effects, both positive and negative, on those with protected characteristics from the proposal to undertake a CPO and sets out mitigation or enhancement measures that the council can put in place. Relevant mitigation measures will be identified and become embedded into the approach of the CPO and associated redevelopment.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	<p>The key users that will be impacted by this action are as follows:</p> <ol style="list-style-type: none"> 1. Resident leaseholders 2. Non-resident leaseholders 3. Private tenants renting from owners of the property <p>Secondary users impacted by this action are:</p> <ol style="list-style-type: none"> 1. Secure council tenants 2. Temporary accommodation tenants <p>While secure council tenants and temporary accommodation tenants will still be affected by this action, the impact on this group is secondary as they can be legally moved out of the towers and into alternative accommodation, without the need for a CPO.</p>
Key stakeholders who were/are involved in this policy/decision/business plan	<p>The key community stakeholders who have been consulted about this proposal are as follows:</p> <ol style="list-style-type: none"> 1. Ledbury TRA 2. Residents of Ledbury Estate <p>Internal stakeholder divisions that have been involved in the proposal are as follows:</p> <ol style="list-style-type: none"> 1. New Homes Delivery Team 2. Property Team 3. Property Legal Team 4. Letting and Allocations Team 5. Resident Services Team

Section 4: Data Collection

Methodology and Distribution

Phase 1:

Equality monitoring data for leaseholders was collected through a survey that was open from 5 November 2024 to 29 November 2024. A copy of this survey can be found in Appendix A.

The survey was available on the Council consultation website, Engage, and paper copies were also available in the Ledbury TRA Office.

On 5 November 2024, Council Officers emailed a link with the online survey to the current leaseholders, secure tenants and temporary accommodation tenants in Peterchurch House, Skenfrith House and Sarnesfield House.

Council Officers sent a chaser email on 21 November 2024.

The survey was also publicised through posters in the TRA Office, and flyers that were distributed through resident's doors. The flyer contained a QR code that residents could scan to access the survey via Engage.

Phase 2:

Due to a low response rate from leaseholders, the equality monitoring survey was re-opened between 9 January 2025 and 26 January 2025.

Council Officers emailed a link with the online survey to leaseholders in Peterchurch House, Skenfrith House and Sarnesfield House. A paper copy of the survey was also attached, which leaseholders could return via email.

Council Officers sent a chaser email on 22 January 2025.

Equalities data for secure tenants and temporary accommodation tenants was obtained via the council's iWorld housing database on 15 January 2025 and a desktop data analysis has been carried out. This data is gathered by the Resident Services Team.

Equalities data for leaseholders is not recorded on the council's iWorld housing database. Therefore, the equality monitoring survey was conducted to gather this information.

Sample Size

Phase 1:

On 5 November 2024 there were 53 households residing within the three towers.

These households can be broken down as follows:

- 28 Temporary Accommodation households
- 10 Secure Tenant households
- 15 Leaseholders:
 - 9 resident leaseholders
 - 6 non-resident leaseholders

Phase 2:

On 9 January 2025 there were 33 households residing within the three towers.

These households can be broken down as follows:

- 9 Temporary Accommodation households
- 10 Secure Tenant households
- 14 Leaseholders:
 - 8 resident leaseholders
 - 6 non-resident leaseholders

Data Collected
Phase 1:

- Six households completed the equality monitoring survey via the council consultation website, Engage, meaning the survey response rate was 11.5%.
- Compulsory questions included consent, support and accessibility requirements and household and residency information.
- Each respondent answered a series of optional equality monitoring questions which covered all the protected characteristics found within the Equality Act 2010.

Phase 2:
Equality monitoring survey:

- An additional four households completed the equality monitoring survey via the council consultation website, Engage, meaning the survey response rate overall was 19.2% (based on the original sample size).
- Compulsory questions included consent, support and accessibility requirements and household and residency information.
- Each respondent answered a series of optional equality monitoring questions which covered all the protected characteristics found within the Equality Act 2010.

iWorld housing data:

- The data was downloaded from the council's iWorld housing database on the 15 January 2025.
- For the Secure Tenants, we have equalities data for 18 residents, across 10 households.
- For the Temporary Accommodation Tenants, we have equalities data for 39 residents, across 9 households.

Key Insights

Phase 1:

- **Response Distribution**
 - Responses include individuals aged 25 to 74, with a mix of working-age and senior respondents.
 - None of the respondents stated that their household includes children under 18 years old.
 - Respondents identify as diverse, including White Irish, White British, White Other European, Nigerian, and Sierra Leonean backgrounds.
 - Two out of six respondents reported having a disability.
 - All respondents described themselves as heterosexual/ straight.
- **Housing Relationship**
 - Three respondents were leaseholders (two resident, one non-resident).
 - Two respondents were temporary accommodation tenants.
 - One respondent was a secure tenant.
 - The number of people each respondent answered on behalf of was between 1 and 3, reflecting differing household structures.
- **Consent and Support Needs**
 - All respondents provided consent to use their data.
 - No respondents indicated a need for additional support or assistance with the survey.

Phase 2:

Equality monitoring survey:

- **Response Distribution**
 - Responses include individuals aged 25 to 74, with the majority in their 40s and 50s.
 - None of the respondents stated that their household includes children under 18 years old.
 - Respondents identify as White Other European and White Irish.
 - No respondents stated that they have a disability.
 - Two respondents described themselves as a gay man, and the rest identified themselves as heterosexual/ straight.
- **Housing Relationship**

- All four respondents were leaseholders (two resident, two non-resident).
- The number of people each respondent answered on behalf of was between 1 and 3, reflecting differing household structures.
- **Consent and Support Needs**
 - All respondents provided consent to use their data.
 - No respondents indicated a need for additional support or assistance with the survey.

iWorld housing data:

- **Secure Tenants:**
 - Ages range from 18 to 64 years, with the majority in their 50s and 60s.
 - None of the households contain children under 18 years old, however there are three residents between 18 and 25.
 - There are a range of ethnicities, however over half of respondents identify as Black.
 - One respondent stated that they have a disability.
- **Temporary Accommodation Tenants:**
 - Ages range from 0 to 50 years, with the majority under 18 and in their early 40s.
 - All nine households contain children under 18.
 - In total there are 18 children under 18.
 - There are a range of ethnicities, however over half of respondents identify as Black.
 - No respondents stated that they have a disability.

Strengths and Challenges

Strengths from Phase 1:

- **Representation of Key Groups:** the equality monitoring survey successfully gathered data from a mix of leaseholders, tenants, and temporary accommodation residents, ensuring a variety of perspectives.
- **Consent Confirmation:** All participants agreed to data use, enabling the analysis to proceed within ethical guidelines.

Challenges from Phase 1:

- **Low Response Rate:** with only 6 responses out of 52 households, the response rate is approximately 11.5%. This limits the statistical representativeness of the findings.
- **Incomplete Data:** some fields were left blank (e.g., gender identity, disability, sexual orientation), which restricts a full equality impact analysis.
- **Optional Questions:** the optional nature of equality questions may have contributed to gaps in critical data for assessing impacts on protected characteristics.

Strengths from Phase 2:

Equality monitoring survey:

- **Representation of Key Groups:** by re-opening the equality monitoring survey on Engage, we successfully gathered data from an additional four leaseholders, meaning we have obtained responses from 7 out of 14 leaseholders.
- **Consent Confirmation:** All participants agreed to data use, enabling the analysis to proceed within ethical guidelines.

iWorld housing data:

- **Representation of Key Groups:** the Council's iWorld database contains equalities data on all of the secure tenants and temporary accommodation tenants that currently reside within the three towers.
- **Improved Data Set:** including data from the iWorld database improves the statistical representativeness of the equality impact analysis.

Challenges from Phase 2:

Equality monitoring survey:

- **Low Response Rate:** although we received an additional four responses in phase 2, we still only have responses from 7 out of 14 leaseholders, which limits the statistical representativeness of the findings.
- **Incomplete Data:** some fields were left blank (e.g., gender identity, disability, sexual orientation), which restricts a full equality impact analysis.
- **Optional Questions:** the optional nature of equality questions may have contributed to gaps in critical data for assessing impacts on protected characteristics.

iWorld housing data:

- **Missing Protected Characteristics:** the council's iWorld housing database does not collect data on gender reassignment or pregnancy/ maternity status.
- **Incomplete Data:** some fields were left blank (e.g., marital status, sexual orientation), which restricts a full equality impact analysis.

Section 5: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of underrepresented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.

Potential Socio-Economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)

<p>Positive impact on children and young people:</p> <ul style="list-style-type: none"> Children and young people will benefit from upgraded, modern housing with better facilities and amenities. This is likely to improve quality of life and long-term health outcomes. The quality of the public realm vis-à-vis the current situation will be significantly improved with a wide array of improved public amenities. One of the most notable features will be the significantly increased and improved greening on both phases of the estate. Increased parks and play areas will provide spaces for physical activity, relaxation and socialising. This can reduce stress, encourage exercise and provide a safe environment for children to play. The new site will also include a brand-new community centre at the base of one of the blocks in Phase 2. The facility will be markedly improved compared to the existing community centre and will offer child-friendly activities that support early development. <p>Negative impacts on children and young people:</p> <ul style="list-style-type: none"> Redevelopment will result in the temporary closure and/ or relocation of existing community resources that are operating on site. The loss of facilities where children can socialise could adversely affect access to child social networks. Evidence suggests that free play in early childhood is a vital experience thorough which children learn social, conceptual and creative skills.¹ 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. <p>Positive impact on older people:</p> <ul style="list-style-type: none"> Redevelopment will improve housing standards, which is likely to improve the psychical and mental wellbeing of older people. 	<p>Positive impact on children and young people:</p> <ul style="list-style-type: none"> Redevelopment of the site may act as a catalyst for promoting local economic growth and supporting job creation.³ Such job opportunities are likely to positively impact protected characteristic groups more likely to face unemployment including young people. Inner-city green space can promote social cohesion and instil a sense of community. Green space can also have a positive role in a child's cognitive development and their mental health. <p>Negative impacts on children and young people:</p> <ul style="list-style-type: none"> Children from low-income families may be particularly impacted by relocation due to loss of local informal childcare support.⁴ 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 interactions⁵. <p>Positive impact on older people:</p> <ul style="list-style-type: none"> 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. Regeneration will improve access and mobility for vulnerable groups. 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. <p>Negative impact on older people:</p> <ul style="list-style-type: none"> 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
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¹ Nation Children's Bureau (2007): 'Free Play in Early Childhood'

³ 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/5983/2064_899.pdf

⁴ 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>

⁵ 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'

<ul style="list-style-type: none"> On average, older people 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. <p>Negative impact on older people:</p> <ul style="list-style-type: none"> Redevelopment will result in the temporary closure and/or relocation of existing community resources that are operating on the site. Any temporary 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 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.² 	<ul style="list-style-type: none"> those at risk of financial exclusion, such as older people, who may have trouble trying to access appropriate and mainstream financial services, such as bank accounts, loans, and mortgages. 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.⁶ 																								
Equality information on which above analysis is based	Socio-Economic data on which above analysis is based																								
<p>Equality Monitoring Survey Data:</p> <table border="1" data-bbox="214 1163 489 1439"> <thead> <tr> <th>Age</th><th>Count</th></tr> </thead> <tbody> <tr> <td>25 – 34</td><td>2</td></tr> <tr> <td>35 – 44</td><td>3</td></tr> <tr> <td>45 – 54</td><td>3</td></tr> <tr> <td>55 – 64</td><td>2</td></tr> <tr> <td>65 – 74</td><td>3</td></tr> <tr> <td>Total</td><td>13</td></tr> </tbody> </table> <p>iWorld data:</p> <p>Secure Tenants</p> <table border="1" data-bbox="214 1619 489 1834"> <thead> <tr> <th>Age</th><th>Count</th></tr> </thead> <tbody> <tr> <td>70+</td><td>0</td></tr> <tr> <td>30-70</td><td>13</td></tr> <tr> <td>18-29</td><td>5</td></tr> <tr> <td>Under 18</td><td>0</td></tr> </tbody> </table>	Age	Count	25 – 34	2	35 – 44	3	45 – 54	3	55 – 64	2	65 – 74	3	Total	13	Age	Count	70+	0	30-70	13	18-29	5	Under 18	0	<p>In 2021/22 approximately 23,000 children aged 0-15 in Southwark were living in poverty, after housing costs were factored in, equating to 36% of children in the borough. This is higher than the London average of 33%.¹⁰</p> <p>The Old Kent Road Council Ward has one of the highest proportions of child poverty (22-28%).¹¹</p> <p>GOV.UK Accredited Official Statistics – English Housing Survey 2021 to 2022: Social Rented Sector.</p> <p>GOV.UK Accredited Official Statistics – English Housing Survey 2022 to 2032: Rented Sectors.</p>
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² 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_lonelines_in_later_life_evidence_review.pdf"

⁶ IoTUK (2017). 'Social Isolation and Loneliness in the UK' Available at: <https://iotuk.org.uk/social-isolation-and-loneliness-report/>

¹⁰ Source: JSNA Annual Report - Southwark Council

¹¹ JSNA Annual Report 2023; JSNA Multiward Profiles 2023: West Central Southwark

<table border="1"> <tr> <td>Blank</td><td>0</td></tr> <tr> <td>Total</td><td>18</td></tr> </table>	Blank	0	Total	18	<p>Temporary Accommodation Tenants</p> <table border="1"> <thead> <tr> <th>Age</th><th>Count</th></tr> </thead> <tbody> <tr> <td>70+</td><td>0</td></tr> <tr> <td>30-70</td><td>10</td></tr> <tr> <td>18-29</td><td>2</td></tr> <tr> <td>Under 18</td><td>27</td></tr> <tr> <td>Blank</td><td>0</td></tr> <tr> <td>Total</td><td>39</td></tr> </tbody> </table> <p>General data:</p> <p>The median age in Southwark is 33, which is below that of London as a whole (35).⁷</p> <p>Southwark has an ageing population. Between 2011 and 2021, the proportion of Southwark residents aged 0-9 fell from 12.6% to 10.5%, while the proportion aged 50 and over rose from 20.4% to 24.7%.⁸</p> <p>Age Trends in UK Social Housing:</p> <p>Social housing tends to have a larger proportion of older residents, including retirees and people with long-term health conditions, compared to private rental housing.</p> <p>According to recent data from the English Housing Survey, about 27% of social housing tenants are aged 65 or older, compared to 17% of private renters.⁹</p>	Age	Count	70+	0	30-70	10	18-29	2	Under 18	27	Blank	0	Total	39
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<p>Mitigating Actions Already Taken:</p> <p>All residents have access to a dedicated support team. The team are working with residents to help them understand the proposals, and the best options for each individual. This team are supporting vulnerable residents with all aspects of their move and will liaise with family members as necessary.</p> <p>Access to information and communication is available in a number of formats, including online,</p>	<p>Mitigating Actions to be Taken in the Future:</p> <p>Early estimates of changes to rent and service charges as a result of the redevelopment should be communicated to residents as soon as possible.</p> <p>While the redevelopment will result in the temporary closure of the local T&RA hall, in its place will be a brand-new building developed at the base of one of the blocks in Phase 2. Not</p>																		

⁷ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

⁸ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

⁹ GOV.UK Accredited Official Statistics – English Housing Survey 2021 to 2022: Social Rented Sector and GOV.UK Accredited Official Statistics – English Housing Survey 2022 to 2032: Rented Sectors.

<p>telephone and one to one meetings, to ensure that all residents have safe access to information and support services.</p> <p>Residents do 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.</p> <p>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.</p> <p>Housing Allocations are focusing on offering temporary moves that are close to the vicinity of Ledbury Estate in order to minimise effects on all age groups of disruption (schools, health care facilities, community groups).</p> <p>Temporary housing adheres to accessibility guidelines and considers the environmental needs of tenants e.g. elderly residents should avoid being allocated in temporary accommodation near busy roads.</p> <p>All offers for leasehold properties, whether purchased voluntarily or via CPO will be made on the basis of independent valuation and in line with the financial offer outlined Ledbury Estate Renewal Offer Document. No consideration of the households age composition will have any impact on this final offer.</p> <p>Residents who don't want to take up an offer of new build house on the estate (as is their right) will have the option to either locate as a tenant or take up a number of initiatives aimed at leaseholders that will allow them to reside in another Southwark Council owned home. This will allow residents, should they be concerned about increased rent/service charges to avoid this and move to a home with either equal or lower levels of rent/service charges.</p>	<p>only will the facility be markedly improved compared to existing asset, residents are also feeding in to the designs proactively.</p> <p>The amount of time the building will be closed without the delivery of the new building is expected to be between 3 and 4 years. The council is already working proactively with the T&RA to identify alternative options for this time.</p> <p>There are other local community buildings that could be used, a local on site office, used by the contractor, that can serve as a hub for meetings. In addition the Council is looking at options to give a small financial settlement to the T&RA to compensate them for this period, as they are losing the opportunity to rent out the asset.</p> <p>The Council is initiating 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.</p>
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Disability - A person has a disability if s/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.

Please note that under the PSED due regard includes:

Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>Positive impacts on disabled people:</p> <ul style="list-style-type: none"> The renewal process will 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. New homes will meet all current standards for disabled access with all homes meeting adaptable standards, and specific homes, delivered in Phase 2, meeting accessible standards. None of the current Ledbury Estate Tower Block Homes are specifically designed for disabled persons with accessibility needs. The new scheme will also regularise the estates public realm to help support a disabled friendly environment that can't currently be said of all the estates public realm. <p>Negative impacts on disabled people:</p> <ul style="list-style-type: none"> Relocation has the potential to cause stress, anxiety and uncertainty for disabled people. Changes, both minor and major, to some disabled people's routines and surroundings may adversely affect feelings of security and comfort.¹² Relocation can also create uncertainty for disabled people regarding the accessibility of their new home.¹³ The disruption of social networks caused by relocation may also cause negative health outcomes for people with mental health conditions and autism, many of whom depend on social networks to maintain their standard of living.¹⁴ 	<p>Positive impacts on disabled people:</p> <ul style="list-style-type: none"> Redevelopment of the site may act as a catalyst for promoting local economic growth and supporting job creation.¹⁵ Such job opportunities are likely to positively impact protected characteristic groups more likely to face unemployment including disabled people. 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.¹⁶ Fuel costs are often significantly lower in new builds, therefore relocation to housing with improved energy efficiency may benefit this group. <p>Negative impacts on disabled people:</p> <ul style="list-style-type: none"> 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.¹⁷ The new homes will also attract higher rents/service charges, which may make them unaffordable for this group. 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.¹⁸ 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.¹⁹

¹² National Autistic Society (2016) 'Obsessions, repetitive behaviour and routines'. Factsheet. Available at: <https://www.autism.org.uk/about/behaviour/obsessions-repetitive-routines.aspx>

¹³ 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

¹⁴ National Autism Society. (2017): 'Moving house' URL: <https://www.autism.org.uk/movinghouse> 56

¹⁵ 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/5983/2064_899.pdf

¹⁶ Office for National Statistics (2021) Disability, England and Wales: Census 2021. Available at: Disability, England and Wales - Office for National Statistics (ons.gov.uk)

¹⁷ 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>

¹⁸ Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousing/uk/2019>

¹⁹ 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

Equality information on which above analysis is based	Socio-economic data on which above analysis is based																
Equality Monitoring Survey Data:																	
<table border="1"> <thead> <tr> <th data-bbox="227 384 473 417">Are you disabled?</th> <th data-bbox="473 384 616 417">Count</th> </tr> </thead> <tbody> <tr> <td data-bbox="227 417 473 451">Blank</td> <td data-bbox="473 417 616 451">5</td> </tr> <tr> <td data-bbox="227 451 473 485">No</td> <td data-bbox="473 451 616 485">6</td> </tr> <tr> <td data-bbox="227 485 473 518">Yes</td> <td data-bbox="473 485 616 518">2</td> </tr> <tr> <td data-bbox="227 518 473 552">Total</td> <td data-bbox="473 518 616 552">13</td> </tr> </tbody> </table>	Are you disabled?	Count	Blank	5	No	6	Yes	2	Total	13	See references.						
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<table border="1"> <thead> <tr> <th data-bbox="227 631 695 720">Please tick the box or boxes below that best describe your disability:</th> <th data-bbox="695 631 814 720">Count</th> </tr> </thead> <tbody> <tr> <td data-bbox="227 720 695 754">Blank</td> <td data-bbox="695 720 814 754">11</td> </tr> <tr> <td data-bbox="227 754 695 855">Hearing / Vision (e.g. deaf, partially deaf or hard of hearing; blind or partial sight)</td> <td data-bbox="695 754 814 855">1</td> </tr> <tr> <td data-bbox="227 855 695 911">Physical / Mobility (e.g. wheelchair user, arthritis, multiple sclerosis etc.)</td> <td data-bbox="695 855 814 911">1</td> </tr> <tr> <td data-bbox="227 911 695 945">Total</td> <td data-bbox="695 911 814 945">13</td> </tr> </tbody> </table>	Please tick the box or boxes below that best describe your disability:	Count	Blank	11	Hearing / Vision (e.g. deaf, partially deaf or hard of hearing; blind or partial sight)	1	Physical / Mobility (e.g. wheelchair user, arthritis, multiple sclerosis etc.)	1	Total	13							
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²⁰ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

<p>In the Old Kent Road Ward, 2,740 residents were recorded as Disabled under the Equality Act (of which 1,237 had activities 'limited a lot', and 1,503 had activities "limited a little"). This means 17-23% of residents had a disability.²¹</p> <p>As such, 6.5% of Southwark's disabled residents reside in the Old Kent Road ward.</p> <p>Disability Trends in UK Social Housing:</p> <p>Social housing tends to have a larger proportion of disabled residents compared to private rental housing.</p> <p>According to recent data from the English Housing Survey, approximately 30% of social housing tenants report having a long-term illness or disability, compared to 15% of private renters in the UK.²²</p>	
<p>Mitigating Actions Already Taken:</p>	<p>Mitigating Actions to be Taken in the Future:</p>
<p>All residents have access to a dedicated support team. The team are working with residents to help them understand the proposals, and the best options for each individual. This team are supporting vulnerable residents with all aspects of their move and will liaise with family members as necessary.</p> <p>The council is providing accessible and inclusive support options for disabled individuals who require additional support during relocation.</p> <p>Access to information and communication is 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.</p> <p>Accessible format consultation materials are also being made available if requested, including but not limited to, easy read versions, large print, audio, and braille.</p> <p>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.</p> <p>While it is likely that rent and month-to-month servicing costs will be higher in the new homes, residents have a choice not to exercise their right to return if they want to avoid what they may determine to be prohibitive costs of doing so.</p>	<p>Early estimates of changes to rent and service charges as a result of the redevelopment should be communicated to residents as soon as possible.</p> <p>Work with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. disabled people.</p> <p>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 change to accessible and appropriate housing such as residents with a disability.</p> <p>Ensure the design of movement networks and public spaces within the redevelopment specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design.</p> <p>While the redevelopment will result in the temporary closure of the local T&RA hall, in its place will be a brand-new building developed at the base of one of the blocks in Phase 2. Not only will the facility be markedly improved compared to existing asset, residents are also feeding in to the designs proactively.</p>

²¹ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

²² GOV.UK Accredited Official Statistics – English Housing Survey 2019-2020: Headline Report

<p>Disabled households are aware that they have the option to move to new homes or they can be allocated a home in another Southwark Council managed property, that may not have higher rent and/or service charges.</p> <p>All offers for leasehold properties, whether purchased voluntarily or via CPO will be made on the basis of independent valuation and in line with the financial offer outlined Ledbury Estate Renewal Offer Document. No consideration of households with a disabled member will have any impact on this final offer.</p>	<p>The amount of time the building will be closed without the delivery of the new building is expected to be between 3 and 4 years. The council is already working proactively with the T&RA to identify alternative options for this time.</p> <p>There are other local community buildings that could be used, a local on site office, used by the contractor, that can serve as a hub for meetings. In addition the Council is looking at options to give a small financial settlement to the T&RA to compensate them for this period, as they are losing the opportunity to rent out the asset.</p>
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<p>Gender reassignment: - The process of transitioning from one gender to another.</p> <p>Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>											
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p>										
<p>The council has not identified any positive or negative impacts to this group of residents as a result of the Ledbury Estate CPO Approval.</p>	<p>No positive or negative socio-economic impact applicable.</p>										
<p>Equality information on which above analysis is based.</p>	<p>Socio-economic data on which above analysis is based</p>										
<p>Equality Monitoring Survey Data:</p> <table border="1" data-bbox="235 1484 811 1738"> <thead> <tr> <th data-bbox="235 1484 695 1574">Is the Gender you identify with the same as the sex you were recorded at birth?</th><th data-bbox="695 1484 811 1574">Count</th></tr> </thead> <tbody> <tr> <td data-bbox="235 1574 695 1612">Blank</td><td data-bbox="695 1574 811 1612">4</td></tr> <tr> <td data-bbox="235 1612 695 1650">Yes</td><td data-bbox="695 1612 811 1650">9</td></tr> <tr> <td data-bbox="235 1650 695 1688">No</td><td data-bbox="695 1650 811 1688">0</td></tr> <tr> <td data-bbox="235 1688 695 1738">Total</td><td data-bbox="695 1688 811 1738">13</td></tr> </tbody> </table>	Is the Gender you identify with the same as the sex you were recorded at birth?	Count	Blank	4	Yes	9	No	0	Total	13	<p>N/A</p>
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<p>iWorld Data:</p> <p>The council's iWorld housing database does not collect data on gender reassignment.</p> <p>General Data:</p>											

1.23% of people aged 16 years and over in Southwark have a gender identity different from their sex registered at birth. ²³	
Mitigating and/or improvement actions to be taken	
As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.	As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)																	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)																
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²³ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

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<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.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p> <p>Positive impacts on those who are pregnant or on maternity leave:</p> <ul style="list-style-type: none"> The quality of the public realm vis-à-vis the current situation will be significantly improved with a wide array of improved public and semi-public amenities. One of the most notable features will be the significantly increased and improved greening on both phases of the estate. 	<p>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p> <p>Positive impacts on those who are pregnant or on maternity leave:</p> <ul style="list-style-type: none"> A brand-new community centre will be built at the base of one of the blocks in Phase 2. Not only will the facility be markedly improved compared to the existing asset, residents are also feeding in to the designs proactively.

²⁴ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

<ul style="list-style-type: none"> Increased parks and play areas will provide spaces for physical activity, relaxation and socialising. This can reduce stress, encourage exercise and provide a safe environment for parents and their young children to play. Redevelopment will also address issues of overcrowded living conditions, which can be detrimental to both maternal and child health. More space can provide a safer, more comfortable environment for families. <p>Negative impacts on those who are pregnant or on maternity leave:</p> <ul style="list-style-type: none"> 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.²⁵ 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 newborns, low birthweight, preeclampsia / gestational hypertension and can exacerbate deep vein thrombosis which pregnant women are more at risk of.²⁶ 	<ul style="list-style-type: none"> A new community centre will create communal spaces that encourage social interaction which can reduce isolation. This is an important factor for new mothers who might otherwise feel disconnected during pregnancy or maternity leave. <p>Negative impacts on those who are pregnant or on maternity leave:</p> <ul style="list-style-type: none"> Relocation could mean moving away from established support networks, such as close family, friends, or healthcare providers. This is especially important for pregnant women or new mothers who rely heavily on nearby support for childcare, emotional well-being and medical care.²⁷ 										
Equality information on which above analysis is based	Socio-economic data on which above analysis is based										
<p>Equality Monitoring Survey Data:</p> <table border="1" data-bbox="228 1221 759 1477"> <thead> <tr> <th>Are you currently pregnant or have you been pregnant in the last year?</th><th>Count</th></tr> </thead> <tbody> <tr> <td>Blank</td><td>4</td></tr> <tr> <td>No</td><td>9</td></tr> <tr> <td>Yes</td><td>0</td></tr> <tr> <td>Total</td><td>13</td></tr> </tbody> </table> <p>iWorld Data:</p> <p>The council's iWorld housing database does not collect data on pregnancy/ maternity status.</p> <p>General Data:</p> <p>The total number of babies born in Southwark has been decreasing year on year over the past 10 years. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women.</p>	Are you currently pregnant or have you been pregnant in the last year?	Count	Blank	4	No	9	Yes	0	Total	13	<p>See references below.</p>
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²⁵ 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'?'

²⁶ NHS (2016): 'Deep vein thrombosis'; Royal College of Physicians and Faculty of Occupational Medicine: 'Advising women with a healthy, uncomplicated, singleton pregnancy on: heavy lifting and the risk of miscarriage, preterm delivery and small for gestational age'

²⁷ Care Quality Commission (2015): '2015 survey of women's experiences of maternity care'.

The average age of mothers giving birth in Southwark in 2022 was around 33 years. ²⁸	
Mitigating Actions Already Taken:	Mitigating Actions to be Taken in the Future:
<p>Ensure that residents, particularly vulnerable groups like pregnant women or new mothers, are notified well in advance about the CPO process. Early communication allows families to prepare and makes them aware of available support services.</p> <p>Offer support with the relocation process and ensure that affected families are offered properties that meet their needs and are within a reasonable proximity to schools, healthcare facilities and support networks. Family and other kinship networks will be actively considered for any temporary allocations.</p> <p>Southwark is working closely with any temporarily moved households to try to minimise the distances involved. Given Southwark's high quality public transport network this should help to minimise instances of social isolation from support networks.</p> <p>Households with a pregnant woman, be they leaseholders or tenants have options to not take up new build home and instead take up the offer of another Southwark Council managed house which may be closer to family or friends.</p> <p>All offers for leasehold properties, whether purchased voluntarily or via CPO will be made on the basis of independent valuation and in line with the financial offer outlined Ledbury Estate Renewal Offer Document. No consideration of households with a pregnant member will have any impact on this final offer.</p>	<p>Early estimates of changes to rent and service charges as a result of the redevelopment should be communicated to residents as soon as possible.</p> <p>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 change to accessible and appropriate housing such as households with children.</p> <p>While the redevelopment will result in the temporary closure of the local T&RA hall, in its place will be a brand-new building developed at the base of one of the blocks in Phase 2. Not only will the facility be markedly improved compared to existing asset, residents are also feeding in to the designs proactively.</p> <p>The amount of time the building will be closed without the delivery of the new building is expected to be between 3 and 4 years. The council is already working proactively with the T&RA to identify alternative options for this time. There are other local community buildings that can be used by residents in the meantime.</p>

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. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>Positive impacts on ethnic minority communities:</p> <ul style="list-style-type: none"> • Better housing standards (such as improved ventilation, insulation, and reduced overcrowding) will address specific health inequalities experienced by ethnic minorities, 	<p>Positive impacts on ethnic minority communities:</p> <ul style="list-style-type: none"> • Regeneration projects create local employment and business opportunities, and targeted

²⁸ Source: JSNA Annual Report - Southwark Council.

<p>particularly respiratory and cardiovascular issues.²⁹</p> <ul style="list-style-type: none"> The redevelopment will also provide homes designed to better meet the cultural needs of diverse ethnic communities, such as larger family homes for multi-generational households. Upgraded housing and public spaces can reduce crime and anti-social behaviour, creating safer environments, which particularly benefits ethnic minority communities who may have experienced disproportionate exposure to unsafe conditions.³⁰ Mixed and Asian ethnic groups are more likely to have said they were victim of crime compared to white people.³¹ <p>Negative impacts on ethnic minority communities:</p> <ul style="list-style-type: none"> Ethnic minority communities are 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.³² 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. 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.³³ 	<p>initiatives can ensure ethnic minority residents have access to these opportunities, reducing unemployment and promoting economic inclusion.</p> <ul style="list-style-type: none"> A brand-new community centre will be built at the base of one of the blocks in Phase 2. Not only will the facility be markedly improved compared to the existing asset, residents are also feeding in to the designs proactively. The new community centre will incorporate spaces designed to foster social interaction and support cultural events, helping to strengthen community ties among ethnically diverse groups. <p>Negative impacts on ethnic minority communities:</p> <ul style="list-style-type: none"> Ethnic minorities are often overrepresented in precarious and low-paid work, so relocating could result in higher travel costs, longer commuting times, and the loss of proximity to employment opportunities.³⁴ Ethnic minority groups are more likely to experience barriers in accessing additional finances and may therefore differentially experience adverse impacts.³⁵ 						
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>						
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What is your ethnic background?	Count						
Blank	2						
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²⁹ Race Equality Foundation (2014) 'The Housing Conditions of Minority Ethnic Households in England' Available at: https://raceequalityfoundation.org.uk/wp-content/uploads/2022/09/housing_briefing_24-final.pdf

³⁰ 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)

³¹ 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>

³² 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).

³³ 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

³⁴ Joseph Rowntree Foundation (2015) 'Ethnic minority disadvantage in the labour market' Available at: <https://www.jrf.org.uk/race-and-ethnicity/ethnic-minority-disadvantage-in-the-labour-market>

³⁵ The Runnymede Trust (2008) 'Financial Inclusion and Ethnic Minorities' Available at: <https://www.runnymedetrust.org/publications/financial-inclusion-and-ethnicity>

³⁹ JSNA Annual Report - Southwark Council.

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<p>Southwark is a very ethnically diverse borough. In 2021, 51.4% of residents identified as white. 25.1% identified as 'Black, Black British, Black Welsh Caribbean or African'. 9.9% identified as 'Asian, Asian British or Asian Welsh'. 6.3% identified as 'Arab of any other ethnic group'.³⁶</p> <p>Ledbury Estate is located in the Old Kent Road Ward, which has a significant Black African and Black Caribbean population, comprising 26% of its residents.³⁷ This is notably higher than the London</p>																				

³⁶ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

³⁷ <https://crystalroof.co.uk/report/ward/old-kent-road-southwark/demographics>

<p>average of 13.5%³⁸ however it is consistent with Southwark's overall demographic, where around 25% of residents are from Black ethnic groups.</p> <p>Given this data, Ledbury Estate can be seen as both a hub for the Black African and Black Caribbean community and representative of Southwark's overall diversity.</p>	
<p>Mitigating Actions Already Taken:</p>	<p>Mitigating Actions to be Taken in the Future:</p>
<p>A dedicated local lettings system is being used to prioritise moves based on housing need and existing housing arrangements. This system is blind to race or ethnicity of any applicant and will be based entirely on the parameters outlined in Ledbury Estate Renewal Offer Document.</p> <p>Residents have been offered a range of rehousing options, including options to remain on the estate or within the local area, to mitigate any potential disruption to those reliant on faith and cultural facilities.</p> <p>Leaseholders have the right to a pre-allocation within new homes being built on Phase 1 of the estate. They can either buy this outright or purchase a share of the property under a shared equity scheme. The scheme allows a resident to purchase a share of the property with the other share being retained by the council: leaseholders would not then pay rent on the share they don't own.</p> <p>In order to take up the shared equity, leaseholders need to be able to afford at least a 25% share. Leaseholders who can't do this have the right to become a social tenant again and can take an allocation on a secure tenancy in either a pre-allocated home in Phase 1, or in another eligible property that is owned and managed by the council.</p> <p>Leaseholders have been offered a council tenancy on a council-owned property or the purchase of a council property on a shared equity basis in Bromyard House, once phase 1 is complete.</p> <p>Secure tenants have been given priority status in bidding for alternative accommodation either within the new homes on Phase 1, or within existing council stock elsewhere. Secure tenants who have moved away temporarily whilst the scheme is being built to another secure tenancy, can exercise their right of return to either Phase 1 new homes or Phase 2 new homes.</p>	<p>Continue to ensure that ethnic minority communities are fully consulted and involved in the decision-making process.</p> <p>Carry out effective consultation with the affected community, recognising diversity and different interest groups, to contribute towards sharing of benefits of regeneration.</p> <p>Use diverse communication methods to reach all groups, including translating consultation materials and offering culturally relevant outreach to ensure accessibility.</p> <p>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. This includes through social value provision allowed for in the main works contract.</p>

³⁸ "Ethnic group – Office for National Statistics" Available here: <https://www.ons.gov.uk/datasets/TS021/editions/2021/versions/1/filter-outputs/d2f0a39a-75b6-4995-b4bd-a5b68ff79027#get-data>

<p>This will follow an official local lettings policy, which is soon to be ratified by the council and is based on the allocations process as outlined in the Ledbury Estate offer document which form the basis of the successful estate regeneration ballot.</p> <p>All offers for properties, whether purchased voluntarily or via CPO will be made on the basis of independent valuation and in line with the financial offer outlined Ledbury Estate Renewal Offer Document. No consideration of households racial or ethnic make-up will have any impact on this final offer.</p>	
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<p>Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p>													
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<p>Southwark being a multicultural borough has many places of worship across the borough. This will enable residents to practice their faith. There is no information to suggest the Ledbury Estate CPO Approval will impact the ability for residents to access services to practice faith.</p>	<p>No positive or negative socio-economic impact applicable.</p>												
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Sex - A man or a woman.											
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⁴⁰ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

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<p>Mitigating and/or improvement actions to be taken</p>																	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>																

<p>Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>The council has not identified any positive or negative impacts to this group of residents as a result of the Ledbury Estate CPO Approval. However, it is understood that individuals from the LGBTQ+ community can experience discrimination and homophobia when accessing housing services generally.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>

⁴¹ Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

Equality Monitoring Survey Data:	N/A										
<table border="1"> <thead> <tr> <th data-bbox="235 276 727 343">Which of the following best describes your sexual orientation?</th><th data-bbox="727 276 830 343">Count</th></tr> </thead> <tbody> <tr> <td data-bbox="235 343 727 384">Blank</td><td data-bbox="727 343 830 384">4</td></tr> <tr> <td data-bbox="235 384 727 424">Gay man</td><td data-bbox="727 384 830 424">2</td></tr> <tr> <td data-bbox="235 424 727 464">Heterosexual/straight</td><td data-bbox="727 424 830 464">7</td></tr> <tr> <td data-bbox="235 464 727 505">Total</td><td data-bbox="727 464 830 505">13</td></tr> </tbody> </table>	Which of the following best describes your sexual orientation?	Count	Blank	4	Gay man	2	Heterosexual/straight	7	Total	13	
Which of the following best describes your sexual orientation?	Count										
Blank	4										
Gay man	2										
Heterosexual/straight	7										
Total	13										
iWorld data:											
Secure Tenants											
<table border="1"> <thead> <tr> <th data-bbox="235 597 568 664">Sexual Orientation</th><th data-bbox="568 597 671 664">Count</th></tr> </thead> <tbody> <tr> <td data-bbox="235 664 727 705">Blank</td><td data-bbox="727 664 830 705">6</td></tr> <tr> <td data-bbox="235 705 727 745">Prefer not to say</td><td data-bbox="727 705 830 745">4</td></tr> <tr> <td data-bbox="235 745 727 786">Straight (heterosexual)</td><td data-bbox="727 745 830 786">8</td></tr> <tr> <td data-bbox="235 786 727 826">Total</td><td data-bbox="727 786 830 826">18</td></tr> </tbody> </table>	Sexual Orientation	Count	Blank	6	Prefer not to say	4	Straight (heterosexual)	8	Total	18	
Sexual Orientation	Count										
Blank	6										
Prefer not to say	4										
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Temporary Accommodation Tenants											
<table border="1"> <thead> <tr> <th data-bbox="235 918 568 985">Sexual Orientation</th><th data-bbox="568 918 671 985">Count</th></tr> </thead> <tbody> <tr> <td data-bbox="235 985 727 1026">Blank</td><td data-bbox="727 985 830 1026">35</td></tr> <tr> <td data-bbox="235 1026 727 1066">Straight (heterosexual)</td><td data-bbox="727 1026 830 1066">4</td></tr> <tr> <td data-bbox="235 1066 727 1107">Total</td><td data-bbox="727 1066 830 1107">39</td></tr> </tbody> </table>	Sexual Orientation	Count	Blank	35	Straight (heterosexual)	4	Total	39			
Sexual Orientation	Count										
Blank	35										
Straight (heterosexual)	4										
Total	39										
General data:											
<p>In the 2021 Census, 8.08% of Southwark's residents identified as LGBT+. This is the fourth highest figure of any local authority district in England and Wales.⁴²</p>											
<p>In 2017, estimates from the Annual Population Survey (APS) showed that 93% of the UK population identified as heterosexual or straight and 2% of the population identified themselves as lesbian, gay or bisexual (LGB).⁴³ This comprised of:</p>											
<ul style="list-style-type: none"> • 1.3% identifying as gay or lesbian • 0.7% identifying as bisexual • A further 0.6% of the population identified themselves as "other", which means that they did not consider themselves to fit into the heterosexual or straight, bisexual, gay or lesbian categories. A further 4.1% refused or did not know how to identify themselves. 											
Mitigating and/or improvement actions to be taken											

⁴²Source: How life has changed in Southwark: Census 2021 (ons.gov.uk).

⁴³<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2017>

As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

Potential impacts (positive and negative) of proposed policy/decision/business plan

1. Right to Property (Article 1, Protocol 1 of the ECHR)

- **Potential Infringement:** The right to peaceful enjoyment of property will be affected by a CPO since it compels property owners to sell their property, often against their will.
- **Justification:** This right is not absolute. Governments can interfere with property rights if it is in the public interest, provided the interference is proportionate, lawful, and includes fair compensation.
- **Mitigation:** The council has sought to mitigate potential negative impacts through a range of reasonable and proportionate measures focused on rehousing assistance and compensation options.

2. Right to a Fair Trial (Article 6 of the ECHR)

- **Potential Infringement:** A CPO could potentially infringe on an individual's right to a fair trial if affected parties are not given an adequate opportunity to challenge the order or present their case in an impartial setting.
- **Justification:** 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.
- **Mitigation:** The council has sought to mitigate potential negative impacts by ensuring timely and clear communication with all affected parties regarding their rights and the CPO process.

3. Right to Respect for Private and Family Life (Article 8 of the ECHR)

- **Potential Infringement:** A CPO could disrupt a person's private and family life by displacing them from their home and community. This is particularly significant for vulnerable groups, such as ethnic minorities or those with strong social and cultural ties to the area.
- **Justification:** Authorities must balance the public interest against the individual's right to remain in their home. Displacement without adequate consideration of the impact on private and family life could constitute an infringement.
- **Mitigation:** The council has sought to mitigate potential negative impacts by offering residents a range of rehousing options, including options to remain on the estate or within the local area.

- Leaseholders, both resident and non-resident, have been offered a range of options which are tailored based on the outcome of a financial assessment.
- Leaseholders have the right to a pre-allocation within new homes being built on Phase 1 of the estate, they can either buy this outright or purchase a share of the property under a shared equity scheme. The scheme allows a resident to purchase a share of the property with the other share being retained by the council: leaseholders would not then pay rent on the share they don't own.
- In order to take up the shared equity, leaseholders need to be able to afford at least a 25% share. Leaseholders who can't do this have the right to become a social tenant again and can take an allocation on a secure tenancy in either a pre-allocated home in Phase 1, or in another eligible property that is owned and managed by the council.
- Leaseholders have been offered a council tenancy on a council-owned property or the purchase of a council property on a shared equity basis in Bromyard House, once phase 1 is complete.
- Secure tenants have been given priority status in bidding for alternative accommodation either within the new homes on Phase 1, or within existing council stock elsewhere. Secure tenants who have moved away temporarily whilst the scheme is being built to another secure tenancy, can exercise their right of return to either Phase 1 new homes or Phase 2 new homes.
- This will follow an official local lettings policy, which is soon to be ratified by the council and is based on the allocations process as outlined in the Ledbury Estate offer document which form the basis of the successful estate regeneration ballot.
- These processes ensure that all those potentially affected by the CPO will not have their Right to Respect for Private and Family Life materially impacted by the execution of a compulsory acquisition.

4. Right to Freedom of Religion and Belief (Article 9 of the ECHR)

- **Potential Infringement:** If a CPO leads to the loss of access to places of worship or cultural facilities important to certain communities, it could interfere with religious practices and beliefs.
- **Justification:** Any interference must be lawful, necessary, and proportionate. A failure to provide alternative arrangements for affected communities could infringe on this right.
- **Mitigation:** Southwark being a multicultural borough has many places of worship across the borough. This will enable residents to practice their faith. There is no information to suggest the Ledbury Estate CPO Approval will impact the ability for residents to access services to practice faith.

5. Right to Non-Discrimination (Article 14 of the ECHR)

- **Potential Infringement:** If a CPO disproportionately affects specific groups, such as ethnic minorities, without measures to mitigate or address their specific needs, it could be seen as discriminatory.
- **Justification:** Public authorities must ensure that the implementation of a CPO does not disproportionately harm any group. Failure to account for the specific vulnerabilities of affected communities could breach this right.
- **Mitigation:** The council has sought to mitigate potential negative impacts by implementing measures to address the specific needs of vulnerable or marginalised groups, such as ethnic minorities or those with disabilities.

Information on which above analysis is based

- European Convention on Human Rights (ECHR): The rights mentioned in the analysis are derived from the ECHR, which is legally binding in the UK through the Human Rights Act 1998.

<ul style="list-style-type: none">• Legal Frameworks Governing CPOs in the UK: Compulsory Purchase Act 1965 and the Planning and Compulsory Purchase Act 2004.
Mitigating and/or improvement actions to be taken
Specific mitigating actions have been listed above. To summarise, the council will: <ul style="list-style-type: none">• Engage affected communities to ensure their concerns are heard and addressed.• Ensure timely and clear communication with all affected parties regarding their rights and the CPO process.• Implement measures to address the specific needs of vulnerable or marginalised groups, such as ethnic minorities or those with disabilities.• Provide adequate compensation and support to those affected, including relocation assistance.• Offer residents a range of rehousing options, including options to remain on the estate or within the local area.• Ensure the decision-making process is transparent and fair.

Mitigating and/or improvement actions to be taken

Specific mitigating actions have been listed above. To summarise, the council will:

- Engage affected communities to ensure their concerns are heard and addressed.
- Ensure timely and clear communication with all affected parties regarding their rights and the CPO process.
- Implement measures to address the specific needs of vulnerable or marginalised groups, such as ethnic minorities or those with disabilities.
- Provide adequate compensation and support to those affected, including relocation assistance.
- Offer residents a range of rehousing options, including options to remain on the estate or within the local area.
- Ensure the decision-making process is transparent and fair.

Conclusions

The process of research and analysis for this EINA has identified several impacts that could arise from Phase 2 of the Ledbury 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 impacts differentially or disproportionately as a result of their protected characteristics.

The details of these impacts are set out in Section 5 of this report, however the most significant impacts, and their mitigation measures, are listed below:

1. Loss of social infrastructure and access to community resources

Equality impact:

- There is a potential for adverse effects amongst certain equality groups as a result of a loss of social cohesion linked to relocation.
- Children, older people, disabled people, people who are pregnant and people from ethnic minority backgrounds could be differently adversely impacted.

Mitigation measures:

- 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.
- The council will 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 needs and circumstances, particularly if residents who will be most affected by refurbishment and/or relocation in order to remediate feelings of social isolation.
- Temporary amenity space will be provided throughout the redevelopment process.

2. Affordable housing

Equality impact:

- 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.
- Young people, disabled people, older people who are retired, and individuals from an ethnic minority background may differentially experience these effects.

Mitigation measures:

- Should the CPO be used, residents will be supported through market search assistance to find an alternative property in the local area, if this is desired, which meets their needs.
- Leaseholders receive market value for the purchase of their property, plus a home loss payment of 10% for resident leaseholders, or 7.5% for non-resident leaseholders, as well as disturbance payment to cover the reasonable costs of moving, such as removals costs and fees.
- Secure tenants have priority rehousing status, and housing officers are working with them to assist them with the rehousing process.

- Secure tenants are also aware that they have the option to be allocated a home in another Southwark Council managed property, that may not have higher rent and/or service charges.
- Early estimates of changes to rent and service charges as a result of the redevelopment should be communicated to secure tenants as soon as possible.

3. Access to appropriate and accessible housing

Equality impact:

- There is a potential for adverse effects amongst certain equality groups as a result of difficulties accessing appropriate and accessible housing.
- Families with children, intergenerational families from ethnic minority backgrounds and disabled people are likely to differentially impacted.

Mitigation measures:

- 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.
- New homes will meet all current standards for disabled access with all homes meeting adaptable standards, and specific homes, delivered in Phase 2, meeting accessible standards. None of the current Ledbury Estate Tower Block Homes are specifically designed for disabled persons with accessibility needs.
- The new scheme will also regularise the estates public realm to help support a disabled friendly environment that can't currently be said of all the estates public realm.

4. Health effects as a result of relocation

Equality impact:

- There is a potential for adverse effects amongst certain equality groups as a result of health effects associated with relocation.
- Older people, disabled people, people from ethnic minority backgrounds, children and pregnant people may be differentially adversely impacted by this.

Mitigation measures:

- 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.
- Dedicated resident support continues to be available online and in person where needed.
- Ensure that accessible and inclusive support options are provided for disabled individuals who require support services during relocation.
- Temporary amenity space will be provided throughout the redevelopment process.
- Environmental effects to be mitigated through considerate construction practices and environmental management planning.

5. Complex information and communication

Equality impact:

- Older residents, individuals who have a disability, or residents who do not speak English may face barriers engaging with consultation materials.

Mitigation measures:

- 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.
- 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 safe access to information and support services.
- 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.

As evidenced by the above, the council has given consideration to the potential disproportionate impacts that could potentially arise and has identified and implemented measures to mitigate such impacts as far as possible.

The proposed redevelopment promises to bring about extensive 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 as a whole.

Phase 2 of the regeneration will allow the delivery of new, high-quality housing, whilst also improving living conditions and the accessibility of homes. The redevelopment will also vastly enhance the public realm and green space on the estate and provide an improved community space and facilities for local people.

This, coupled with the majority vote in the July 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.

It is therefore considered that there remains a compelling case in the public interest for the scheme to proceed and for the council to promote a CPO for the site.

Section 5: Further equality actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Ensure that the effects of the CPO are monitored following approval for potential and actual effects on different groups.	<ul style="list-style-type: none"> Regular diversity monitoring regarding the impact of the development on affected third parties; Reporting on the engagement process and how representations from third party stakeholders have been taken into account; and Any further identified mitigation measures (including a programme for implementation) that are identified as a result of ongoing monitoring and that are both necessary and directly related to the development. 	No later than 3 months after the Council resolves to make a CPO.
2	Ensure equal access to housing and relocation options.	<ul style="list-style-type: none"> Prioritising housing that meets the specific needs of individuals, such as disabled residents, or older people. Consider the cultural and social needs of ethnic minorities, ensuring that relocated individuals have access to familiar services, community centres and places of worship. 	Ongoing.
3	Ensure that there is no language barrier preventing residents from accessing documents relating to the CPO.	<ul style="list-style-type: none"> Upon request the Council can translate the documents into other languages. To date this has not been requested for any communications linked to the estate renewal. 	Upon request.

5. Equality and socio-economic objectives (for business plans)

Based on the initial analysis above, please detail any of the equality objectives outlined above that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2

6. Review of implementation of the equality objectives and actions

Action	Target Date	Review Mechanism
CPO in principle Approval	DEC-24	Review outcomes according to EINA & adjust practice as needed
CPO Final Cabinet Approval	MAR-25	Review outcomes according to EINA & adjust practice as needed
CPO Implication	JUN-25 (Subject to Enquiry)	Review outcomes according to EINA & adjust practice as needed

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