

Equality and Health Impact Assessment

Consultation on redevelopment
of the Ledbury Estate Towers

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 effect 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.

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 health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health & wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Consultation on redevelopment of the Ledbury Estate Towers			
Equality analysis author		Helen Laker (Independent review undertaken by Open Communities)			
Strategic Director:		Michael Scorer			
Department		Housing and Modernisation	Division	Asset Management	
Period analysis undertaken		September - October 2021			
Date of review (if applicable)		n/a			
Sign-off	Patricia Lewin	Position	New Homes Project Manager	Date	10 November 2021

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

1.1 Brief description of policy/decision/business plan
<p>The Council is committed to building 11,000 new council homes. To achieve this, the Council identifies potential development sites and works with the local community to explore the feasibility of each site. The Council seeks to engage with all local residents and community groups to ensure they are able to influence and shape the proposals throughout the design development process, as it recognises the impact that new homes will have on improving the lives of those in housing need.</p> <p>Public meetings with Ledbury estate residents began in July 2017 following concerns raised about fire safety. The decision to develop the Towers as a phased development was taken in consultation with residents following several meetings held in 2019.</p> <p>The proposals for redevelopment of the four tower blocks on the estate entails demolition of the towers comprising 224 homes to re-provide them as new homes in line with current design standards and terms of the Landlord Offer. Proposals also include the provision on 116 additional new homes for council rent and sale on the open market along with a re-provided T&RA hall and MUGA (multi-use games area).</p>

The four tower blocks located on two separate sites as shown in the image below are; Sarnsfield House, Skenfrith House, Peterchurch House and Bromyard House located on the south site.



As detailed in the Cabinet report of February 2021 (Ledbury Estate Towers – Ledbury Towers Residents’ Ballot) there will be improved open space and play areas, larger, safer and more energy efficient homes with private outdoor space, and a guaranteed right of return for all existing residents and non-resident leaseholders.

There has already been extensive engagement with residents over 4 years about the proposed major works phases, this statement is about consultation for new homes on the sites of the tower blocks, including the ballot on new homes to replace the tower blocks on the estate. Options considered included refurbishment, refurbishment with infill, and demolition and new build homes.

The ballot was sent out to:

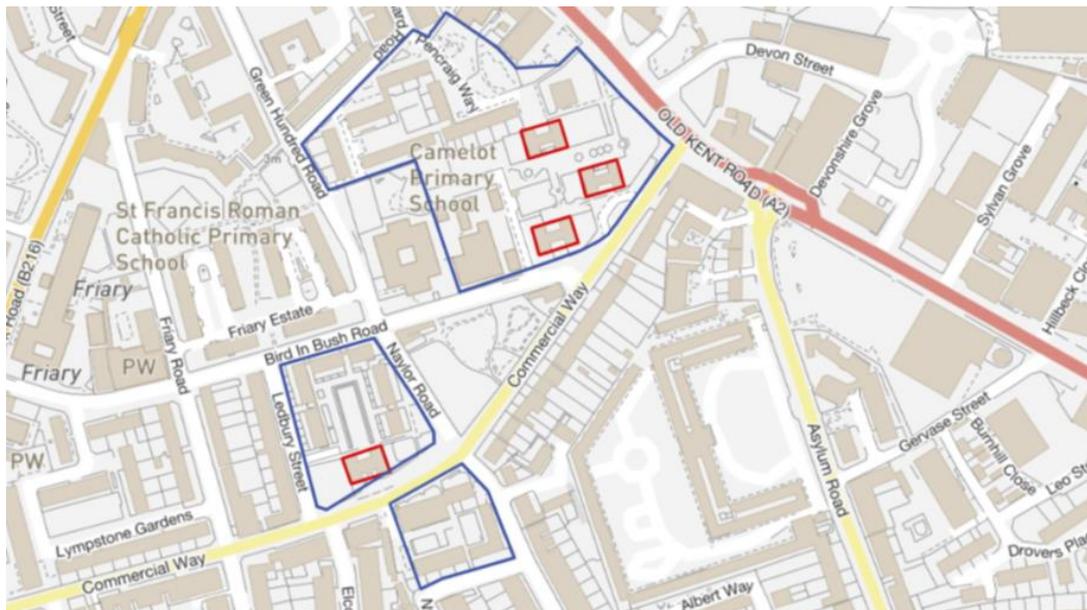
- Remaining tenanted residents in the Towers
- Tenanted households who moved from the Towers with the Right to Return
- Remaining resident leaseholder households in the Towers
- Non-resident leaseholders in the Towers

Residents of the low rise homes on Ledbury Estate were given information about their proposals and asked for their comments.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	Members of the public; resident groups, community organisations, developers; consultants, Housing and Modernisation Department; Councillors; Finance and Governance Department; Greater London Authority; Transport for London; Chief Executive's Department.
Key stakeholders were/are involved in this policy/decision/business plan	Residents and former residents of the Ledbury Towers, non-resident leaseholders with flats in Ledbury Towers; neighbours on Ledbury Estate, Members of the public; Housing and Modernisation Department; Councillors; Finance and Governance Department; Livesey Exchange and Camelot Primary School.

Consultation area - Boundary of Ledbury Estate



Section 4: Pre-implementation equality 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.

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), including health impacts of proposed policy/decision/business plan			
Two relevant principles are:			
<ul style="list-style-type: none"> • Simplicity & Accessibility: We recognise that everyone's needs are not the same. We will provide engagement and consultation in plain English and provide materials in a variety of formats to support older residents to get involved. • Inclusion: We will make a particular effort to connect with those likely to be most affected by any potential change. 			
Equality information on which above analysis is based			
1. iWorld housing database information for Ledbury Estate, updated with details of the household trackers supplied by the Ledbury team.			
For the areas outlined in blue on the map of the Ledbury Estate above, information compiled from the iWorld housing database on 20 August 2021 is set out below.			
This is based on Sarnsfield House, Skenfrith House and Peterchurch House blocks as Bromyard House is unoccupied. Also note that the data includes members from the same households, for example five leaseholders from one property.			
Three tower blocks and surrounding area:			
Under 18	0	Over 18 (up to 30)	4
Over 30 (up to 70)	63	Over 70	13
Data missing – leaseholders	64		
Under 18	0	Over 18 (up to 30)	0
Over 30 (up to 70)	32	Over 70	8
Data missing – leaseholders	49		
Hoyland Close:			
Under 18	0	Over 18 (up to 30)	0
Over 30 (up to 70)	28	Over 70	9
Data missing – leaseholders	21		

2. Information from TRA members
3. Consultation hubs
4. Information from resident feedback about communication in the Southwark Conversation, and local population data
5. Feedback from other consultation workshops
6. Ledbury team housing needs survey

Over 40% of the Southwark population consists of those aged 20 to 39, compared to 34% in the rest of London and only 8% of the population of Southwark is aged over 65.

Both the Southwark Conversation and the Kaizen report identified digital engagement as a means to improve participation. In the Planning department the move to digital engagement has increased the pool of participants from 2000 to 7000 in a relatively short period of time.

Mitigating actions to be taken

We need to make sure all age groups are included within the consultation process.

Digital methods are attractive to younger people, but many older age groups still prefer hard copies and face to face contact. The 24 hour presence of resident services officers based in the estate TRA hall helps to address this. The project team will also be more accessible as they will be based on the estate at least twice a month, in addition to attending the standing meeting with residents.

Project updates about the estate and the project proposals are uploaded to the Commonplace platform.

All correspondence relating to the Towers is posted to each home and uploaded to the Ledbury Estate website. This includes consultation information on proposals for development.

Weekly newsletters are provided to residents and those with the Right to Return to the estate, in accessible formats. Newsletters are provided monthly for residents in the low rise blocks next to Ledbury Towers.

The project team has held several events on the estate to engage with residents and stakeholders to listen to views and feedback to help inform the proposals, where possible. These have included in person consultation events on:

- Including the TRA Hall in the redevelopment
- Play Space
- Making Space for Girls
- Community Space

There are further consultation events planned before the planning application is submitted.

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.

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

Two relevant principles are:

- **Simplicity & Accessibility:** We recognise that everyone's needs are not the same. We will provide engagement and consultation in plain English and provide materials in a variety of formats to support our varied communities to get involved.
- **Inclusion:** We will make a particular effort to connect with those likely to be most affected by any potential change.

Equality information on which above analysis is based

iWorld housing database information for Ledbury Estate updated with details of the household trackers supplied by the Ledbury team.

iWorld housing database information for the areas outlined in blue on the map at 20 August 2021 is set out below.

The data includes members from the same households, for example records include disabilities of five leaseholders from one property.

Ledbury outlined area – 34 residents recorded a disability

Arthritis	8	Anxiety	2
Back	3	Blood pressure	3
Breathing	1	Cancer	1
Cerebral palsy	1	Diabetes	1
Depression	1	Hearing	2
Heart	1	Kidneys	1
Muscle pain	1	Other illness	3
Other mental	1	Other mobility	2
Psychosis	1	Sight	1

Hoyland Close – 10 residents recorded a disability

Arthritis	1	Cancer	2
Diabetes	1	Heart	1
Other mobility	2	Depression	2
Psychosis	1		

Mitigating actions to be taken

At least one resident uses a wheelchair, and so any consultation event should be held in a step free building or one that has a lift and accessible toilets. The Ledbury TRA Hall where events have been held has step free access and accessible toilets. Some tenants are vulnerable due to their age and so we will arrange house visits where requested, we have given our telephone contact. The Ledbury contact team and Open Communities are assisting the design team with including the vulnerable and the elderly in the consultation process.

Everyone's needs are not the same. We will provide engagement and consultation in plain English and provide materials in a variety of formats to support residents.

Hard copies of reports have been emailed or posted out to interested residents and further support can be designed around the tenant. Technical reports are available on the Ledbury Estate website. Resident services officers are also based in the TRA hall at the estate and provide individual support and advice to residents and those with the Right to Return. Resident Service Officers have identified the communication needs of every resident and ensure they receive information in the form that is accessible, for example reading newsletters to residents who are unable to read, and explaining proposals one to one with residents who have dementia.

Gender reassignment - The process of transitioning from one gender to another.

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

It is unclear what impacts this will have on this group of people

Equality information on which above analysis is based.

Not applicable based on the above statement.

Mitigating actions to be taken

The Council has a commitment to use inclusive imagery, and to recognise the needs of all residents with protected characteristics in the way that services are delivered.

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 couple. 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), including health impacts, of proposed policy/decision/business plan

It is unclear what impacts this will have on this group of people

Equality information on which above analysis is based

Not applicable based on the above statement.

Mitigating actions to be taken

The Council has a commitment to use inclusive imagery, and to recognise the needs of all residents with protected characteristics in the way that services are delivered.

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.

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

The timing and durations of meeting may affect this group. Meetings are usually held in the evening and can run for up to two hours. Regular resident design group meetings are currently held online due to Covid-19 pandemic but this could change to in person meetings held at a nearby public meeting space.

Equality information on which above analysis is based

None

Mitigating actions to be taken

Any consultation event should be held in a step free building or one that has a lift and accessible toilets.

Particularly relevant to this protected characteristic, the principle of being inclusive will mean that the council will seek to engage with those likely to be most affected by any potential change.

Resident Service Officers based at the T&RA hall on a 24 basis, and accessible to residents, have identified the communication needs of every resident and ensure they get information in the form that is accessible.

Project updates about the estate and the project proposals are uploaded to the Commonplace platform.

All correspondence relating to the Towers is posted to each home and uploaded to the Ledbury Estate website. This includes consultation information on proposals for development.

Weekly newsletters are provided to residents and those with the Right to Return to the estate, in accessible formats. Newsletters are provided monthly for residents in the low rise blocks next to Ledbury Towers.

The project team has held several events across the estate, including the hall, to engage with residents and stakeholders to listen to views and feedback to help inform the proposals, where possible. These have included in person consultation events on:

- Including the TRA Hall in the redevelopment
- Play Space
- Making Space for Girls
- Community Space

There are further consultation events planned before the planning application is submitted.

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), including health impacts, of proposed policy/decision/business plan

Lack of understanding of the language and illiteracy.

We can review the available data about Black and Ethnic Minority communities within the estate and any information received. Working closely with organisations locally to encourage levels of engagement.

We need to make sure that we provide engagement and consultation in plain English and provide materials in a variety of formats to support our varied communities to get involved. Resident services officers are also based in the TRA hall at the estate.

Equality information on which above analysis is based

iWorld housing database information for Ledbury estate updated with details of the household trackers supplied by the Ledbury team.

Responses to the Equalities Monitoring form issued with residents' questionnaires.

iWorld housing database information for the areas outlined in blue on the Ledbury Estate Map at 20 August 2021 is set out below.

The data includes members from the same households, for example records include disabilities of five leaseholders from one property.

Ledbury:

Asian British	1	Asian Vietnamese	1
Black British	1	Black Caribbean	9
Black Ghanaian	5	Black Ivorian	1
Black Nigerian	13	Black Other	4
Black Other African	2	Black Sierra Leonean	2
Black Somali	2	Colombian	1
Mixed White and Caribbean	1	Prefer not to say	2
White British - Eng, Scot, Welsh, NI	26	White Other European	1
White Other Non-European	2	No data	69

Hoyland Close

Asian Bangladeshi	1	Asian Indian	1
Asian Other	2	Asian Vietnamese	1
Black British	4	Black Caribbean	6
Black Ethiopian	2	Black Ghanaian	2
Black Nigerian	2	Black Other	1
Black Other African	1	Black Ugandan	1
White British - Eng, Scot, Welsh, NI	8	White Irish	1
White Portuguese	1	No data	23
Prefer not to say	1		

Mitigating actions to be taken

Working closely with organisations such as Ledbury Resident Project Group and Ledbury Estate TRA Group locally to encourage take up of feedback.

Working with tenants' named interpreters on the iWorld database.

Newsletters and notes of all meetings held on Ledbury are uploaded to the Ledbury Towers website. And project updates about the estate and the project proposals are uploaded to the Commonplace platform.

All correspondence relating to the Towers is posted to each home and uploaded to the Ledbury Estate website. This includes consultation information on proposals for development.

Weekly newsletters are provided to residents and those with the Right to Return to the estate, in accessible formats. Newsletters are provided monthly for residents in the low rise blocks next to Ledbury Towers.

Resident Service Officers have identified the communication needs of every resident and ensure they get information in the form that is accessible, for example reading newsletters to residents who are unable to read, and briefing family members where residents have asked for this.

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.

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

Southwark is home to over 400 faith organisations and many of these groups play an active role in their communities. Faith groups have a key role to play in reaching some of our harder to reach communities.

Equality information on which above analysis is based

Census data 2011

This identified the following belief make-up of the borough:
52.54% Christian; 1.35% Buddhist; 1.27% Hindu; 0.35% Jewish; 8.52% Muslim; 0.23% Sikh; 0.47% other religion; 26.74% no religion; 8.54% did not say.

Mitigating actions to be taken

Be mindful of venue locations. Some residents may not be happy to enter/use a venue of another faith.

Ledbury TRA Hall used for consultation events is a non-faith venue.

Sex - Gender.

Potential impacts (positive and negative), including health impacts of proposed policy/decision/business plan
It is unclear what impacts there will be on this group of people
Equality information on which above analysis is based
iWorld data Equalities Monitoring questionnaires
Mitigating actions to be taken
We will endeavour to ensure that any venues used will have accessible toilets. Ledbury TRA Hall has accessible toilets for women and men and for those with mobility issues. The Council has a commitment to use inclusive imagery, and to recognise the needs of all residents with protected characteristics in the way that services are delivered.

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes
Potential impacts (positive and negative), including health impact of proposed policy/decision/business plan
It is unclear what impacts this will have on this group of people
Equality information on which above analysis is based
Not applicable based on the statement above.
Mitigating actions to be taken
The Council has a commitment to use inclusive imagery, and to recognise the needs of all residents with protected characteristics in the way that services are delivered.

Socio-economic disadvantage – although the Equality Act 2010 does not include socio-economic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, individual's or family's economic and social position in relation to others, based on income, education, health, living conditions and occupation.

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

For leaseholders the impact of the consultation will be considerably different due to financial implications.

For householders without internet access, information may not be as accessible, and they may find it harder to respond and participate in the consultation.

Equality information on which above analysis is based

Current household occupation data below based on information supplied by the Ledbury team, 7 November 2021, includes temporary accommodation residents.

Tower block	Secure tenants	Leasehold interests	Temporary accommodation
Bromyard House	4	3	0
Peterchurch House	3	3	29
Skenfrith House	6	6	40
Sarnsfield House	8	6	34

The Ledbury team remain in contact with, and available to, all tenants and leaseholders who have already been rehoused due to the impending demolition of the tower blocks.

Mitigating actions to be taken

We are committed to informing all residents on an estate where they are being affected by redevelopment. All residents will have an opportunity to share their thoughts and views regardless of their socio-economic status.

For leaseholders there is additional information supplied about financial and rehousing options available. The Landlord Offer document included a specific section on options for both resident and non-resident leaseholders, setting out details of the specific commitments. This includes leasehold buyout, shared ownership and equity options in addition to temporary rehousing until the new homes are completed amongst other things for both resident and non-resident leaseholders.

For residents with who have moved with the Right to Return there is a dedicated Resident Services Officer. Other Resident services officers are also based in the TRA hall at the estate. In addition, there is an independent tenant and leaseholder advisor, Open Communities, contactable by phone and email along with in person visits.

All residents are treated equally and additional support will be given where identified and/or requested.

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

- Positive impacts of better access to information about improvements to housing and open space;
- Resident empowerment from involvement in the detailed consultation process.
- Improved community strength from collective response to the stress and threats of safety issues in the Ledbury Towers;
- Positive impact of outcomes to quality of life resulting from the regeneration of the estate.

Information on which above analysis is based

Mitigating actions to be taken

Section 5: Further actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Analysis of needs of those who want to exercise their Right to Return	Identify which tenants want to return, where to, and what their needs are.	April 2023
2	Address, as much as possible, any concerns raised by residents and stakeholders about the proposals.	Analyse written and feedback received from those who are engaged during the consultation events and ongoing meetings.	In line with the project programme.
3			
4			
5			

5. Equality objectives (for business plans)				
Based on the initial analysis above, please detail any equality objectives 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

5. Health objectives (for business plans)				
Based on the initial analysis above, please detail any health objectives 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