

Appendix E - Due Regard (Equality Analysis)

Due Regard (Equality Analysis) is an on-going proactive process which requires us to consider the effect our decisions are likely to have on local communities, service users and employees, particularly those most vulnerable and at risk of disadvantage.

This template has been designed to assist in the collation of information and evidence required to support the 'Due Regard' process when introducing new policies/procedures/functions and services or reviewing existing ones.

Name of procedure being analysed: Development at Naseby Square, Market Harborough

Name of lead officer: Judith Wise (Platform HA)

Other people involved (assisting or reviewing – including any service users or stakeholder groups etc.): Tom Day (HDC)

Date assessment completed: 20 December 2019

Step 1: Defining the policy/procedure/function/service

Is this a new, amended or reviewed policy? What are the aims, objectives and purpose and how will they be achieved? What are the main activities and which communities are likely to be affected by these activities? What are the expected outcomes?

Naseby Square is currently an overall development consisting of 61 bungalows a community room, Lounge and office owned by Platform Housing Association (formerly Waterloo Housing). The development was built in approx. late 1950s early 1960s and as such the bungalows are designed to old specifications. Due to the age of the design and internal accessibility limitations of the properties Platform Housing have found it difficult to find tenants for vacant bungalows and as of December 2018 there were four bungalows empty out of a total of 61 bungalows on the whole site.

There is an area of wasteland at the rear of the development which has been identified as being a possible location for additional newbuild housing. This would require demolition of 21 of the existing bungalows at Naseby Square to enable the site to be developed. Of the 21 maisonettes and bungalows, 3 were used for non-residential purposes, 5 were vacant and despite viewings no potential tenants who wanted to live in these empty properties could be found. We do not have exact numbers but it would be fair to say that there have been approximately 5 viewings. A total of 13 single person households are to be re-located.

As a partner of Harborough District Council, Platform Housing have regular meetings to discuss the potential provision of affordable housing and housing need identified throughout the district. Through discussions, following the identification of wasteland which could potentially be used for housing, and the difficulties in filling the vacant affordable accommodation at Naseby Square, a proposal was formulated to consider the development of the area to provide more up to date, modern housing. This could be used to relieve some of the pressure on the housing register by ensuring that people are accommodated rather than affordable housing being left vacant. The

current situation, with properties which are deemed to be adequate but are small and do not meet current building regulation requirements, would be improved for residents with the standard of housing that can be expected with new builds being built today. Consideration was given with regard to the ability to rehouse existing tenants into more comfortable and modern accommodation which would be suitable for their needs. It was identified that it would be important that the tenants who will have to be relocated due to this proposal are consulted and given the opportunity to contribute to the proposition presented to them, and also that they are involved in selecting where they will be housed in appropriate alternative accommodation. It was also deemed important to ensure that those who will remain on the unaffected section of the current Naseby Square site are considered as equally to those who would be leaving and are treated fairly and with consideration throughout the building of the new development.

Step 2: Data collection & evidence

What relevant evidence, research, data and other information do you have and is there any further research, data or evidence you need to fill any gaps in your understanding of the potential or known effects of the policy on different communities? Include quantitative data as well as qualitative intelligence such as community input and advice.

Residents

Of the 13 properties which are occupied, and would be demolished as part of the proposal, they are all single person households with the residents having the following characteristics:

Age: all tenants directly affected are aged 55 or over

Gender: 8 tenants are female and 5 are male

Disability: 11 residents have mobility issues and/or disabilities. All 13 of the existing homes have had to have the bathroom turned into a wet room, 4 homes have had grab rails fitted and 1 property has had level access provided. When originally built in the 1950/60s the properties were not built to current accessibility standards or to accommodate mobility aids, hence adaptations have had to be made over the years to make them more accessible for residents with additional requirements.

Whilst the proposal will principally affect those who would need to be relocated it needs to be acknowledged that there will also be an impact on those residents who live in the remaining properties, particularly with regard to their sense of community. There are 40 residents on the rest of the overall development, they are all single person households, the characteristics of these residents are:

Age: 55 to 97 years

Disability: mobility issues due to old age

Remaining households have identified the loss of the community room as being an important issue for them and their sense of community. Whilst past usage data does not support the argument that the community space was well utilised (two regular bookings which were an after school club and movie makers club using the room once a week each) it is recognised that having a social space which is available for residents to use and come together as a community was important for the residents and with the reduction in the wider community numbers due to the proposal this space may become a more important feature for remaining residents in the future, particularly in relation to their sense of community and wellbeing. Recognition of the impact of the environment with regard to feeling safe is also an important consideration with regard to the characteristics of those residents who are remaining.

Housing Data

Housing and Economic Development Needs Assessment (HEDNA) 2016

District level data from the 2016 HEDNA report suggests that the benchmark housing mix profile for the area is as follows: 1 bed housing 35-40%, 2 bed housing 25-30%, 3 bed housing 25-30%, 4+ bed housing 5-10%

This is an indicative mix for planning purposes. Individual site issues will influence housing mix on each development. This benchmark is intended to provide a basis for the kind of house types/sizes sought as a starting point in future development.

Policy H2 (Affordable Housing) requires housing developments (of more than 10 dwellings or with a combined gross floorspace of more than 1,000 square metres) to provide a minimum of 40% of the dwellings as affordable housing. If bungalows form part of a development, they equate to the equivalent of 1 bungalow for 2 houses.

Harborough District Council Housing Register Data

The figures contained in the tables below are broken down into the wards households have selected as their 'area of preference', by bedroom need and, for 1 and 2 bedroom homes, whether the household is over 55 years old. Some over 55's who have a need for a 1 bedroom may like to have a 2 bedroom property, but technically they do not have an assessed need for 2 bedrooms. There are 13 households where there are 2 household members who are both over 55 years old (who have put Market Harborough as their area of preference).

The Spare Room Subsidy (bedroom tax) is applicable to households in social housing who are under state pension age. This means that a couple who are 55 years old are entitled to a 2 bedroom bungalow through the housing register allocations criteria, but they may be subject to the spare room subsidy (bedroom tax) until they are pension age, unless they can prove that they have a medical or other need for that second room. This will reduce their housing benefit (or housing element of Universal Credit) by 14% for the first bedroom they have spare and 25% for 2 or more spare bedrooms.

Area of preference – number of households:

Ward	Total Households	1 bed under 55	1 bed over 55	2 bed	2 bed over 55	3 bed	4 bed	5 bed	6 bed
Market Harborough-Great Bowden and Arden	220	71	47	65	0	25	8	3	1
Market Harborough-Little Bowden	220	70	47	65	0	25	9	3	1
Market Harborough-Logan	218	72	48	61	0	24	9	3	1
Market Harborough-Welland	220	72	49	62	0	24	9	3	1

Age of applicant (who chose Market Harborough wards as their area of preference) – number of households:

under 55	175
over 55	54
Total:	229

Site Development

The development at Naseby Square, which is in Market Harborough Welland Ward, is proposing the build of 38 units. As 17 affordable bungalows would be replaced, in addition to 1 other residential unit, the 40% consideration would be based on 21 units being built. 40% of 21 units equates to 8.4 units which would be rounded down to a need for 8 affordable units within the development.

However, with the proposal resulting in the loss of 17 affordable bungalows, a request for more affordable units above the minimum requirement was sought by planners. At pre-application an agreement was made for 14 affordable units on site (a net loss of 3 affordable

units). In order to provide bungalows on the development, which are accepted on a 1 for 2 basis, this meant that the request for affordable housing is for 10 units, 8 units to be provided as rented units and 2 units as intermediate tenure on the following mix:

Agreed affordable rent/shared ownership units for the development:

2 x 3 bed 5 person houses

4 x 2 bed 4 person bungalows (1 for 2 basis)

2 x 2 bed 3 person bungalows (1 for 2 basis)

2 x 2 bed 4 person houses

Bungalows would not only be beneficial for elderly residents requiring them but also for people with disabilities who need accessible properties.

Step 3: Consultation and involvement

Have you consulted and if so outline what you did and who you consulted with and why.

As soon as the proposal was presented and further investigation supported in principal by both Platform Housing and by Harborough District Council a newsletter was sent to residents during October 2018 followed by a consultation meeting in the community room on 4th December 2018. This was to discuss the proposals and potential effects and to be able to get the tenants opinions on the proposals. 7 residents attended the drop in session (which were a mixture of those leaving and staying) which was staffed by two representatives from the Platform Housing lettings team. Concerns were raised regarding security, parking, community facilities and traffic.

A further drop-in session was carried out on 18th December 2018 and 18 residents attended being those that are staying and those that were leaving plus additional relatives of those who needed to leave, along with a member of the Labour Party, a local councillor, a representative of the contractor and the architect. The same issues were raised along with a new comment that more social housing is required for older people as maisonettes were being demolished.

In January 2019 Platform development and lettings teams had a design meeting with Harborough District Council and the architects to discuss the outcome of the December consultation and review the drawings to see what alterations could be made to the proposal to meet concerns.

Within Platform an internal forum on Microsoft teams to coordinate the flow of information and ensure tenants were responded to on any concerns raised.

Proposals were altered to include additional parking, as it was felt by residents. that parking was being lost, and to provide a better landscaped area for those not moving and in response to residents' concerns ensure it was fenced for privacy.

Platform letting officers arranged and carried out meetings at all of the tenant's homes, to discuss their individual concerns and needs. This gave all residents a direct opportunity to discuss, on a personal basis, the process for moving, what financial compensation was available and the timescales of the proposal. It was stressed at each meeting that there was no time pressure for them to move and offers of alternative properties would be presented until they found one that they liked. It was also stressed that any modifications and adaptations that may be required in an alternative property would be made prior to them moving in.

A further drop-in session with tenants at Naseby Square took place in February 2019. This was to show residents revised drawings with the additional parking and better design of landscaped space that took into consideration the comments of the previous meeting. It was also an opportunity to hear about how the consultation on moving was going and to raise any concerns still present.

Following this, another design team meeting took place address the comments received. This meeting between the architect, Harborough DC and Waterloo HG housing and development teams was to discuss what we could implement of the requests receive. A request was made by residents to convert one of the remaining maisonettes into a replacement community room to replace the one that will be demolished as part of the development. This was considered by the team and, to ensure opportunities for community activities are still available for residents, one of the remaining vacant properties has been identified and will be renovated for this purpose. The new community room will be smaller than the current building, however, usage of the building has been limited and the number of residents of the site will reduce so the space has been deemed as still being adequate for the needs of the remaining community.

In July 2019 a letter was sent to inform tenants of the submission of the planning application and that a letting officer would visit the community room to help anyone who would like help in submitting any comments to the planning officer regarding the application.

A further newsletter was sent in November 2019 to give an update of where things stood regarding the planning proposal. Objections where received that no bungalows were included in the original design. This has subsequently been addressed and six bungalows put into the mix of affordable homes to be built.

Step 4: Potential impact

Considering the evidence from the data collection and feedback from consultation, which communities will be affected and what barriers may these individuals or groups face in relation to Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation, Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities and also the potential impact on Community Cohesion. Remember people have multiple characteristics so the impact of a policy on a particular community may impact people within the community differently. Where possible include numbers likely to be affected.

There are distinct impacts on both groups of residents currently residing with Naseby Square.

The first is for those whose homes are in the section which would be demolished as part of the proposal. Those who would need to move will not necessarily be able to go to the same area together. Whilst some have chosen to move into empty properties on the other side of the development, not all could do this. There was a fear from tenants who would need to be relocated as to whether they would be able to secure the type of accommodation they needed in an environment that they wished to live in. There was also concern as to whether the property would fit their needs and could be adapted and if they could have a garden if they wanted one. Also, that there will be amenities close by, such as shops, doctors, dentist, places of worship etc, as they are not as able bodied as they used to be and do not all have access to cars, so they would need to be housed near a bus route. All those residents who were identified as needing to move are aged over 55 and the majority have mobility difficulties or disabilities. They all expressed similar concerns.

There are also impacts for those residents who are not affected directly by relocation, but who will be impacted by the change in environment. They were concerned for their safety and how secure they will be due to the new housing for couples and family housing which will mean a higher level of children in the area. They do not want to live in an area known for its young occupancy and would prefer and area of their own age group. They are also concerned about the potential loss of the feeling of community as the result will be to split in half the existing community. All of these residents are aged over 55 and the majority have mobility difficulties or disabilities.

For both groups of residents, due to their ages, it must be acknowledged that their expectations may have been that when they moved into their current homes this would become their home for life. The impacts on their mental and physical health as a consequence of the potential upheaval of either moving home or remaining but within a changed environment needed to be considered carefully and monitored appropriately.

Step 5: Mitigating and assessing the impact

If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons. If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately. If you have identified adverse impact or discrimination that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people. Consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs have identified can be addressed.

Of the 13 tenants required to move 2 relocated to vacant properties on the unaffected section of Naseby Square, 5 relocated to Brookland Gardens, 3 relocated to Huntingdon Gardens, 1 relocated to Birchtree Gardens, 1 relocated to Clover Court and 1 to Heath Street. Wherever possible people were kept together, if requested, to ensure that they had familiar faces close by. Regular meetings with individuals were carried out to ensure that the properties they moved into were fitted out and modified to meet their needs before they moved in. All financial compensation was paid in advance of moving and removal costs paid so that there would be no financial hardship

to those involved. The housing team were in constant communication to react to any queries or requests for help during the entire processes and will remain in contact with tenants after they relocate.

For the residents who are remaining at the site, ongoing communication and consultation is planned to help inform the residents and address any concerns that they may have. The renovation of one of the properties to be used for relocating the community room/space will hopefully also help residents to ensure that they are able to maintain their community events and enjoy a shared space to assist with good health and wellbeing.

Step 6: Making a decision

Summarise your findings and give an overview of whether the policy will meet responsibilities in relation to equality, diversity and human rights.

To Summarise;

- The impact is the disruption and disturbance of relocating 13 tenants from their homes and the change in environment, disturbance, potential mess and noise for the remaining residents from the new building site
- The Tenants affected are all aged over 55, with varying physical conditions to be considered
- The strong community feeling between the tenants that has built up over time they have all lived there
- There is an opportunity for those whose homes are part of the proposal to relocate to more modern homes which have been built to current building regulations and are therefore more accessible
- Constant internal communication between housing, lettings, development and maintenance teams concerning the effect of the proposal and wellbeing of the tenants involved is an important part of the project
- External meetings/contact with Harborough District Council, Councillors, the design team and the tenants themselves to provide updates and receive comments for action to provide a better process
- Consultations carried out with the tenants along with individual visits to determine what their individual concerns are that need to be addressed and action taken
- Housing officers keeping in regular contact with tenants to offer help and advice whenever required daily not just at arranged meetings. This assists residents to provide feedback privately as well as publicly at meetings
- The development will provide availability for alternative affordable housing which will benefit residents with various characteristics within the District
- The development will provide a better mix of accommodation which is intended to bring a more diverse community and greater wellbeing for people who are waiting on the housing register
- Remaining residents to be empowered and consulted with regard to landscaping etc to ensure they feel safe and secure in their homes and surroundings

Step 7: Monitoring, evaluation & review of your policy/procedure/service change

What monitoring systems will you put in place to promote equality of opportunity, monitor impact and effectiveness and make positive improvements? How frequently will monitoring take place and who will be responsible?

Throughout the whole development of this proposal consideration has been given with regard to how residents would be impacted. Through consultation and communication, it has been important for residents to be able to express their concerns. This will continue during each stage to ensure that the impact on the health and wellbeing of the residents involved is as low as possible.

Equality Improvement Plan**Equality Objective :**

Action: Consultation timetable developed and results monitored to assess equality impacts

Officer Responsible: Judith Wise (Platform HG)

By when: March 2020

Equality Objective :

Action: Status of equality impact mitigation discussed at each Platform/Harborough District Council meeting

Officer Responsible: Mark Beddow

By when: March 2020

Signed off by: Judith Wise

Date: 20 December 2019