



Equality and Human Rights Impact Assessment

STEP A) Description of what is to be assessed and its relevance to equality

What is being assessed?

The impact of proposed redevelopment on the Hayes Town Centre and Avondale Drive Estates.

Who is accountable?

Perry Scott Corporate Director of Infrastructure, Transport & Building Services

Date assessment completed and approved by accountable person

18th May 2021

Names and job titles of people carrying out the assessment

Vicky Trott, Equality Manager

A.1) What are the main aims and intended benefits of what you are assessing?

In response to concerns raised by residents about building condition and anti-social behaviour on the Hayes Town Centre and Avondale Drive Estates, the council has been exploring ways to improve the standard of residential provision for current residents.

It has also taken into account the opportunity to deliver additional housing supply and a high-quality public realm, which is in line with its planning policies for Hayes town centre, the Hayes Housing Zone and the borough generally.

The redevelopment of the estates will provide positive opportunities for existing residents and the wider community including those with protected characteristics, as defined in the Equality Act 2010.

This is because it provides more affordable homes of a higher quality that are safer, more accessible and more fuel efficient and sustainable and therefore have the potential to help reduce fuel poverty and improve the quality of life for people of all ages and backgrounds.

The new homes will be an opportunity to ‘design out crime’, therefore improving community safety in Hayes.

They will also be an opportunity to build new homes to modern accessibility standards such that those with disabilities will be able to benefit from more appropriate and adaptable homes in terms of level access, wheelchair accessibility etc.

New safer play areas will benefit young people.

Finally, this redevelopment also allows the council to build larger homes that will positively impact large families with children, who are currently overcrowded.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

The residents being affected are those who live on the Hayes Town Centre and Avondale Drive Estates in the Townfield Ward.

Townfield lies in the South East of Hillingdon and is bordered by Charville, Barnhill, Yeading, Botwell and Pinkwell as well as the London Borough of Ealing.

The current population of the borough as a whole and Townfield as a ward by sex and age is: (source: ONS Small Area Population Estimates (SAPE), 2019-based)

		Male		Female				
Borough	306,870	50.3%		49.7%				
Townfield	16,575	51.2%		48.8%				
Age Groups %	<16	16-24	25-34	35-44	45-54	55-64	65-74	75+
Borough	21.9%	10.9%	15.2%	15.2%	12.8%	10.4%	7.1%	6.4%
Townfield	24.7%	10.3%	15.3%	16.4%	12.7%	10.1%	5.6%	4.9%

Broadly, Townfield has more under 16s than borough total and less 65+ than borough total.

In terms of ethnicity, based on the GLA Ethnic Group Population Projections 2016, the total borough population is 50.6% from BAME backgrounds and 49.4% non-BAME.

At ward level, the most up to date information is from the Census 2011 which

shows that 62.9% of the population are from BAME backgrounds and 37.1% non-BAME.

Looking at the change at borough level, it's most likely that Townfield ward will now be over 70%.

This ward has the highest number of people who live in deprived households in Hillingdon at 22%, compared to the borough average of 14% (source PHE Local Health 2015)

Equality data, where known, for the estates is presented below. It has been gathered as part of a tenancy management survey.

It is important to note that data for ethnicity was withheld or unavailable for 46% of residents and leaseholders.

Private renters are not included in the statistics unless they are on the housing register.

Data is therefore only available for 70% of the properties on the Hayes Town Centre Estate and 81% on the Avondale Drive Estate.

Hayes Town Centre Estate

Of the 260 total homes there are 182 council owned homes with an estimated population of 452 people.

In terms of sex, there are more female tenants than male tenants (57% compared to 43% respectively) which is greater than the ward population of 48.8% female.

In terms of age, there are 102 tenants under 16 (27%) which is slightly above the ward population of 24.7%.

In terms of age, the number of tenants aged 65-74 is 5% and those aged over 75 is estimated to be 5% (10% total). This is in line with the ward profile of 5.6% and 4.9% respectively and slightly lower when compared to the total borough population of over 65's at 13.5%.

The largest ethnic group is Black African at 24% which is significantly higher than the total borough population of 7.3%¹ Black British, African Caribbean and African. Of those identifying as Black African, the majority are Somali.

The second largest ethnic group at 11% is White British which is significantly lower than the total borough population of 60.6%² White.

The third largest is Asian (Other) at 7% which is significantly lower than the total borough population of 25.3%³ Asian or Asian British.

There are 12 households where someone has disclosed that they have a disability.

Avondale Drive Estate

Of the 144 total homes there are 117 council owned homes with an estimated population of 318 people.

In terms of sex, there are more female tenants than male tenants (54% compared to 46% respectively) which is greater than the ward population of 48.8% female.

In terms of age, there are 70 tenants under 16 (22%) which is slightly below the ward population of 24.7%.

In terms of age, the number of tenants aged 65-74 is 9% and those aged over 75 is estimated to be 5% (14% total). This is slightly higher when compared to the total borough population of over 65's at 13.5%.

The largest ethnic group is Black African at 21% which is significantly higher than the total borough population of 7.3%⁴ Black British, African Caribbean and African. Of those identifying as Black African, the majority are Somali.

The second largest ethnic group at 11% is White (Other) which is significantly lower than the total borough population of 60.6%⁵ White.

The third largest is White British at 7% which is significantly lower than the total borough population of 60.6%⁶ White.

There are 15 households where someone has disclosed that they have a disability.

1,2,3,4,5,6 Ethnicity of all usual residents Census 2011

A.3) Who are the stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Residents of Hayes Town Centre and Avondale Drive Estates	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p>

<p>Director of Infrastructure, Building Services and Transport</p>	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p> <p>That by providing additional and affordable homes, this will help to reduce waiting times on the housing register and alleviate pressure.</p>
<p>Director of Planning, Environment, Education and Community Services</p>	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p> <p>That by providing additional and affordable homes, this will help to reduce waiting times on the housing register and alleviate pressure.</p>
<p>Chief Executive</p>	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p>

	That by providing additional and affordable homes, this will help to reduce waiting times on the housing register and alleviate pressure.
Leader of the Council and Council Cabinet	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p> <p>That by providing additional and affordable homes, this will help to reduce waiting times on the housing register and alleviate pressure.</p>

A.4) Which protected characteristics or community issues are relevant to the assessment?

Age	✓	Sex	✓
Disability	✓	Sexual Orientation	
Gender reassignment			
Marriage or civil partnership		Carers	
Pregnancy or maternity		Community Cohesion	✓
Race/Ethnicity	✓	Community Safety	✓
Religion or belief		Human Rights	

STEP B) Consideration of information; data, research, consultation, engagement

B.1) Consideration of information and data - what have you got and what is it telling you?

It is important to note that data for ethnicity was withheld or unavailable for 46% of residents and leaseholders.

Private renters are not included in the statistics unless they are on the housing register.

Data is therefore only available for 70% of the properties in Hayes Town Centre and 81% of Avondale Drive.

There is a higher number of women and Black African people living on the estates when compared to the total borough population.

Consultation

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick NO YES

The proposal to go ahead with redevelopment has been the subject of extensive consultation with residents since August 2020 and has culminated in a GLA compliant resident ballot.

Pre-Ballot engagement

In drawing up the design and rehousing proposals the council has undertaken a significant amount of consultation with residents. The council commissioned specialist external consultants, Icen Projects, to deliver the consultation plan and has been careful to consider potential barriers to engagement for the protected groups.

In November 2020 all residents received an invitation to join a resident steering group. This had a regular attendance of around 20 residents representing all of the tenures and a wide variety in terms of gender, ethnicity and age.

One of the first tasks of the resident steering group was to interview and commission an Independent Tenant and Leaseholder Advisor (ITLA). The companies chosen are also tasked with identifying those on the estate with language or other barriers to engagement and can provide translation/interpreter services when required.

Due to Covid restrictions meetings had to take place virtually and strenuous efforts were made to ensure that those unfamiliar with the technology were able to participate. However, the fact that attendance was high compared to other estate regeneration projects led the team to believe that this mode of communication in fact suited some groups better than traditional meetings.

A WhatsApp broadcast group was also established to keep residents updated with events and information.

Due to the fact that physical drop in events could not take place, the council complemented the virtual meetings with paper packs covering design and newsletters that were distributed to all residents, followed by tenure specific 'Guides' to explain how rehousing would work.

All paper communication extended an offer to help with further explanation and translation if necessary and a freephone number.

Conscious that some residents in the protected groups, such as older residents, much prefer face to face engagement the council resumed one-to-one appointments on site in gazebos as soon as restrictions allowed.

Events have been timed so that parents with young children can attend before school pick up or in the evening and on Saturdays.

Several languages are spoken on the estates, but the majority of households contain at least one family member who speaks very good English and there have been limited occasions where interpreters have been required.

However, in the light of the fact that such high percentages of Hayes Town Centre and Avondale Estate residents are Somali speakers the council has made sure that there is a member of staff that is a Somali speaker at all drop in events who can explain the offer and this has proved very popular with residents.

The Landlord Offer and ballot arrangements

There are 236 residents that are eligible to vote at Hayes Town Centre and 139 at Avondale Drive. There is no discretion for the council in terms of eligibility as it is obliged to follow the GLA rules for resident ballots.

If you are 16 or over, you can vote if you are:

- A council secure tenant or a housing association assured tenant, inc introductory and fixed term, named on the tenancy agreement
- A resident leaseholder who has been living in the property as your principal residence for a year
- A resident on the estate who has been on the housing register for a year or more

The council has been guided in the arrangements for the ballot by its “Independent Body” Civica, commissioned to carry out the ballot completely independently of the council in accordance with GLA requirements. They sent out letters to all residents in advance to check that they have the correct details etc before ballot papers were sent out on 28th April 2021.

Residents were sent unique voting codes and could vote using a prepaid envelope, on-line or over the phone. Assistance was available to anyone who is finding the process hard to understand.

Residents had three weeks in which to cast their vote from the day the ballot paper is issued which is a GLA requirement.

The Landlord Offer was delivered to all eligible households two weeks before the ballot opened. It was produced in an eye-catching way to convey the main features of the new development and attempts to balance providing the detail that some residents want with the communication of the key facts for those who prefer the information summarised – for instance in the form of the ‘commitments’ page at the front of the document that contains the key facts.

It was produced in 12 pt font to make it easy to read and although it has not been provided fully in translation this can be provided on request. In acknowledgement of the large group of Somali speakers on the estate a letter containing the key information was sent out in Somali to all council tenants, where the council had a record of their first language. The council has also put posters up on the estates in Somali emphasising the key commitments so that there is no misunderstanding and the offer to provide translation services has been repeated on regular newsletters.

Finally, staff continue to be available for one-to-one conversations on the phone or on site, with interpreters available.

B.3) Provide any other information to consider as part of the assessment

Often the process of regeneration is a catalyst for action in the community that builds on existing strengths and encourages inclusion, community cohesion and fosters good relations between those with protected characteristics and those without.

It also allows existing residents to benefit from additional social value aspects such as training and employment opportunities.

The Council is also aware that as the redevelopment proceeds it may have some short-term adverse impacts on certain groups for instance older or more vulnerable groups. The disruption of moving home can cause anxiety for vulnerable groups, particularly if they have lived in their home for many years.

To mitigate this, in addition to providing financial compensation and arranging removals the council will provide an additional comprehensive package of support to assist vulnerable tenants such as packing and unpacking services, help with moving utilities and physical adaptations to the new homes where needed.

The Council will also try to arrange moves with neighbours where they provide informal support where requested. The aim is to make moving as stress free as possible.

Impact of Rehousing proposals

- The Landlord Offer allows for tenants to access housing that fits their housing needs – in particular this will benefit families with young children and those whose current homes are unsuitable due to health/mobility issues.
- Council tenants have the right to return (or remain) to the new estate – this aids community cohesion.
- The phased scheme means that most residents will only have to move once, minimising disruption – this is particularly important for vulnerable and older residents
- To minimise the worry around moving there will be a dedicated decant officer and a comprehensive package of support with the arrangements for moving and all the costs are covered - there is extra help for older and vulnerable residents such as a packing service to mitigate any adverse impacts to these groups.
- The council will take into consideration requests to move with neighbours where there is a support network – this is particularly important for older residents and will aid community cohesion.
- If a resident has to move temporarily while a new home is built for them the council will find accommodation as close as possible to their current address and will take into consideration need for proximity to schools, GPs etc – this will mitigate any adverse impact in terms of community cohesion.
- If tenants are currently under-occupying, they can retain one extra bedroom- this will aid those that might need a carer to stay over.
- If residents don't want to stay on the estate they can move to other social housing in the borough, including specific over 60s flats and bungalows if they are eligible – this benefits older residents who will be helped with this move if it is their preference.

- Leaseholders will have options such as the shared equity product that will allow them to remain on the estate – this will mitigate any adverse impact in terms of community cohesion.
- There are opportunities for eligible residents currently in TA or private rented to move into one of the new council homes – this will aid community cohesion and allow families to access suitably sized accommodation.

C) Assessment

C.1) Describe any **NEGATIVE** impacts (actual or potential):

The impact of the disruption of rehousing may have a short term disproportionately negative impact on older people, vulnerable people or those with a disability.

Procedures will be put in place to mitigate against any negative impact including a dedicated decant officer, a comprehensive package of support for moving arrangements including all the costs being covered, and a packing service.

C.2) Describe any **POSITIVE** impacts

There are many positive impacts of the proposed redevelopment which would benefit people with protected characteristics. These are outlined below.

- The new design allows for step free access to all areas – this will be particularly beneficial for those with mobility issues and parents with young children.
- The new homes will incorporate occupational therapist recommended adaptations and 10 of all homes are being designed to wheelchair accessible standards – this will be particularly beneficial to those with mobility issues, their carers and some older residents.
- The new estate will include a mixture of flat types, some with open plan kitchen dining living rooms and some with separate kitchens to cater for different preferences.
- There will be a greater range of homes available, from one bed to four bed homes – this will benefit families with children and those in extended family groups. This is particularly true at Avondale Estate where currently all homes are two bed flats.
- There will be discrete residential blocks around resident only courtyard communal gardens and fewer homes per communal entrance – this will aid community cohesion and safety.
- The existing community room at Hayes Town Centre will be provided in a new facility with frontage to a new public square – aiding community cohesion.

- The new homes will be designed with more front doors onto the street and greater natural surveillance – increasing community safety.
- There will be new safer play areas – benefitting younger residents.

D) Conclusions

The council believes that the redevelopment will provide positive opportunities for existing residents and the wider community, including those with protected characteristics.

This is because it provides more affordable homes of a higher quality that are safer, more fuel efficient and accessible, therefore improving the quality of life for people of all ages and backgrounds.

The council has taken into account the views of residents in drawing up its final rehousing proposals and these are reflected in a specific Local Lettings Policy. In particular it has made provision for eligible residents in private rented and TA to stay on the estate in order to further community cohesion.

The council is aware that if the redevelopment proceeds it may have some short-term adverse impacts on certain groups, for instance older or more vulnerable residents. The disruption of moving can cause anxiety for residents and the council will have procedures in place to mitigate this as part of its rehousing proposals.

Signed and dated: *Perry Scott* *18 May 2021*

Name and position: Perry Scott, Corporate Director of Infrastructure, Transport & Building Services