

## Initial Screening Equality Impact Analysis Tool

<b>Section 01</b>	<b>Details of Initial Equality Impact Screening Analysis</b>
<b>Financial Year and Quarter</b>	2011/12 / Q3
<b>Name of policy, strategy, function, project, activity, or programme</b>	<p><b>Borough Investment Plan (New Document)</b></p> <p>The purpose of this new document is to set out to the Homes and Communities Agency (HCA) and the Greater London Authority (GLA) the Council's strategic housing and regeneration investment priorities. This document will need to be approved by both the Council's Cabinet and the Mayor of London's Housing Board. It is not a mandatory document, but will enhance the Council's ability to attract housing and regeneration future funding to the borough.</p>
<b>Q1 What are you looking to achieve?</b>	<p>The primary task is to give clarity to interested parties where the Council's strategic housing and regeneration priorities are, providing the rationale for public funding support if needed, to support the delivery of those priorities. Without a borough investment plan in place, it would be very difficult to secure the funding necessary to expedite projects.</p> <p>The Council's Core Strategy (underpinned by its Strategic Housing Land Availability Assessment) has identified housing capacity for an additional 14,400 homes, 13,200 in five regeneration opportunity areas with a further 1,200 on other 'rest of borough' sites. In addition three of the five regeneration opportunity areas are the subject of Opportunity Area Planning Frameworks (OAPFs) supported by the London Mayor. The purpose of the Borough Investment Plan is to set out in broad terms where the public investment is required; what it will be used for; over what timeframe; what outputs and outcomes will be yielded.</p> <p><b>It should be noted that there will be no direct impacts arising from the approval by Cabinet of the Borough Investment Plan, but does give a greater likelihood of attracting affordable housing and wider regeneration funding in the future which will have the potential to deliver direct positive impacts for Hammersmith &amp; Fulham's residents.</b></p>
<b>Q2 Who in the main will benefit?</b>	<p>The delivery of the 14,400 homes over a twenty year period will have a range of benefits. The Council is aiming to deliver 60% market housing (8,640 homes) which may include some student accommodation with the remaining 40% of that total (5,760 homes) provided as affordable housing. The market housing will be either for market ownership or rent. The large majority of the new housing (13,200 homes) will be delivered in the five regeneration opportunity areas identified in the Council's Core Strategy. These areas are White City; Hammersmith Town Centre and Riverside; Fulham Regeneration Area; South Fulham Riverside; and Park Royal Opportunity Area. The affordable housing will comprise intermediate housing (for working households on</p>

low to medium incomes); affordable rent housing (a new type of affordable housing) with rents which will be charged up to 80% of market rents); and social housing where re-provision of existing social housing is required. The remaining 1,200 homes will be delivered on small to medium sites in the rest of the borough provided on the same basis described above.

The wider impact of delivering these regeneration projects will be significant. Three of the five areas – White City; Fulham; and Park Royal – host some of the most disadvantaged communities in the borough and a key objective is to ensure that wider regeneration benefits – improved transport infrastructure; over 25,000 new jobs; improved physical environments; new retail and office space; replaced and/or improved affordable housing - improve the life chances of disadvantaged people.

The Council will be seeking all new all new build dwellings should be built to “Lifetime Homes” standards with 10% to be wheelchair accessible, or easily adaptable for residents that are wheelchair users. The Council also supports the standards set out in the Mayor of London’s housing design guide which will help improve the sustainability of new housing; reduce fuel poverty; have more family accommodation that meets modern day living and space standards; and help ensure that new housing developed delivers mixed tenure, mixed use living environments. One of the Council’s over-arching regeneration objectives is to reduce the incidence of mono-tenure social housing environments which are considered to be a factor in perpetuating social and economic exclusion. Initiating these five regeneration projects will help address that issue by regenerating existing environments, creating employment opportunities for local people which can ideally arrest and reverse exclusion as described above, providing effective mechanisms are in place.

Social affordable housing has been allocated on the basis of necessitous need in the last 30 or so years, inevitably disadvantaged groups have been disproportionately over-represented in this sector. Groups such as the elderly; Black, Asian and minority ethnic (BAME) groups; single parent households; people with dependency issues (e.g., drugs, alcohol). Therefore, where new affordable social housing is developed, being able to allocate new homes to disadvantaged groups will have a positive equalities impact. Included under the social housing heading is supported housing (where there are services provided to ‘support’ vulnerable households live in the community) and also older people’s sheltered housing (which may or may not include onsite warden support). The Council expects that such housing will be provided in the new regeneration opportunity areas and also gives the Council an opportunity to review the provision of its current sheltered housing portfolio. It should be noted that the Government’s Affordable Rent housing model will involve charging rents at closer to market rent levels, There is a risk that if the maximum rent increase permissible under the new proposals is applied, some larger family sized accommodation would be unaffordable to both non working and working households. The Council has sought to mitigate the impact s of such rises by adopting an interim rents policy that is within the housing benefit caps that are to be implemented from January 2012. Additional

consideration in due course will need to be given when to this issue when the Government's Universal Credit proposals are implemented in 2013. Intermediate affordable housing is that which is allocated to households on low to medium incomes. It can take the form of shared ownership; shared equity; discounted market sale; sub market rent housing. This is an effective housing product which enables people working in public sector and for other essential service providers to gain stable and long term housing accommodation. This will have positive equality impacts on the basis that minority groups are actively sought to take advantage of new intermediate housing products and the impacts monitored and mitigating action undertaken. Given households from disadvantaged groups are generally on lower than average incomes (and often benefit dependent), such households are less likely to take advantage of such products.

Age	The development of new housing – market and affordable – that meets modern day standards will improve the choice of housing that households will be able to access. Where large family affordable accommodation is provided, this is considered to improve the educational attainment for children 4-18 years olds wishing to study. Where better quality older people's affordable housing is provided this will create improved opportunities and lifestyle for 65+ year old households. Where improved choices can be made for older people, this can have the effect of freeing up larger, under-occupied housing where older people's children have left home, meaning that younger families can benefit from leaving over-crowded accommodation. Older people would not be required to leave their current accommodation. under current secure and assured tenancies. Future Affordable Rent tenancies are likely to be granted on a fixed term basis and therefore there will be greater flexibility to assess people's needs on a periodic basis.	H	+
Disability	The development of new housing – market and affordable – which delivers 10% wheelchair accessible housing and delivers the "Lifetime Homes Standards" will have direct and positive impacts on disabled people's quality of life, regardless of age. Implementing these design standards will also have the impact of 'future proofing' homes, allowing people as they get older and/or become disabled to able to stay in their own homes with relatively minor adjustments being required.	H	+

	Gender reassignment	No impacts, negative or positive, are expected to be experienced by individuals who are in the process of transitioning from one gender to another.	L	Neutral
	Marriage and Civil Partnership	No impacts, negative or positive, are expected to be experienced by people who are married or in a civil partnership.	L	Neutral
	Pregnancy and maternity	Where pregnant women are living in good quality, secure, warm and weathertight accommodation, it can be expected that this will have a positive impact on their social and health well-being.	M	+
	Race	The provision of new affordable rent housing is expected to have a positive impact on the quality of life for groups from Black, Asian and minority ethnic backgrounds. Historically, such housing has been allocated on the basis of need and therefore the positive impacts associated with high quality, well designed, spacious housing which reduces fuel poverty will have a beneficial impact on this group. It should be noted that under the Localism Bill proposals, greater flexibility is to be granted to local authorities to allocate new affordable rent housing (and the re-letting of existing housing). In the event that affordable rent housing is allocated to (say) economically active households as opposed to benefit-dependent housing, then the positive impacts described above will be diluted.	H	+
	Religion/belief (including non-belief)	No impacts on the basis of gender, negative or positive, are expected to be experienced by these groups.	L	Neutral
	Sex	Where overcrowding is reduced, positive equality impacts can be expected to be experienced by adult household members	M	+
	Sexual Orientation	No impacts on the basis of sexual orientation, negative or positive, are expected to be experienced by these groups.	L	Neutral

	<p><b>Human Rights and Children's Rights</b></p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>
<p><b>Q3</b> Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</p>	<p>Yes</p> <p>The adoption of this Borough Investment Plan provides a basis for making a positive contribution to equalities. The development of new affordable housing over the twenty year timeframe of the Investment Plan (and the Core Strategy) will help meet affordable housing need, providing a platform for new individuals and community well-being. Its adoption by the Council and agreement by the Homes and Communities Agency and the Mayor of London will not on its own lead to additional housing and regeneration funding to be invested in the borough. Therefore there will be no direct impacts arising from its adoption. However, it should be seen as a pre-requisite for future discussions and bids for funding to be undertaken on a meaningful basis helping to deliver the Council's Core Strategy and Community Plan vision.</p>
<p><b>Q4</b> Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity, and/or adversely impact human rights?</p>	<p>No</p> <p>If the answer here is 'yes', then it is necessary to go ahead with a Full Equality Impact Analysis. You should also consider a Full Equality Impact Analysis if your decision is likely to be of high relevance to equality, and/or be of high public interest.</p>