

Addendum to Revised Sustainability Appraisal
Appendices

Replacement Appendix A9 Equalities Impact
Assessment

A9 Equalities Impact Assessment

The Equality Act 2010 replaces previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection; and sets out the different ways in which it's unlawful to treat someone. Before, the Act came into force there were several pieces of legislation to cover discrimination, including:

- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995

At the decision making stage local authorities are required to assess how changes to policies and service delivery will affect different people. In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics'- which includes the following:

- Age
- Disability
- Sex/Gender
- Race or belief
- Religion
- Sexual Orientation
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity

The 2011 Act also introduced a Public Sector Equality Duty to ensure that in exercising the Council's functions and delivering services and partnership work, the Council will:

- Eliminate discrimination, harassment, victimisation
- Advance quality of opportunity between persons who share a protected characteristic and persons who do not share a protected characteristic
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The ongoing discharge of the Duty will require further consideration at the points where planning applications are received, the adoption of the Estates Local Plan and other decisions the Council may need to consider under its various powers. The Duty does not require the need to avoid all harmful effects but to recognise them, eliminate them wherever possible (and always with regard to unlawful discrimination or harassment) and mitigate any remaining consequences.

London Borough of Merton Equality Strategy 2013-17

Merton's Equality Strategy sets out the Council's equality objectives and outlines how the Council will embed equalities considerations into day-to-day business.

The Equality Objectives are grouped into the following five themes:

- Tackling inequality
- Service access
- Improving engagement
- Promoting community cohesion
- Workforce development

The Strategy sets out how the Council is committed to carrying its legal responsibilities including:

- Promoting equal opportunities, social inclusion and human rights
- Eliminating unlawful discrimination and disadvantage
- Eliminating harassment and victimisation
- Promoting a positive attitude towards people of different backgrounds, disabled people and others
- Encouraging participation by people of all backgrounds in all public life
- Valuing diversity and promoting good relations between individuals, communities and employees of all backgrounds
- Taking the necessary steps towards meeting the needs of disabled people and others.

Estates Local Plan

The purpose of the EqIA is to assess the impact of a policy, strategy or service in the Borough in terms of the nine protected characteristics.

CHMP prepared an Equality Analysis as part of the regeneration proposals in August 2015, which has been used to inform this assessment. The Equality Analysis has identified that the 'protected characteristics' of: Age, Disability and Race are particularly relevant to the regeneration proposals and there is the potential for these groups to be negatively affected. The assessment has therefore focussed on these issues.

A summary of relevant data is provided below.

Demographic Profile of the Estates

Ethnicity

There are a number of households on each estate where English is not the first language of the householder or tenant. There are also a number of households on each of the estates from black and minority ethnic (BAME) communities. All three wards have shown an increase in the number of BAME households since the last census. There is evidence that BAME households are more likely to be overcrowded than other comparable households, which will need to be taken into consideration when consulting with households on their future housing needs. The ethnicity breakdown for each of the Estates is as follows:

Ethnicity	Eastfields	High Path	Ravensbury
White British	113	174	79
Black/Black British African	51	43	16
Black/Black British Caribbean	34	29	12
Prefer Not to Say	15	29	23
Asian/Asian British Other	15	28	5
Mixed White & Black Caribbean	9	7	1
White Other	8	27	2
Black/Black British Other	7	4	3
Asian/Asian British Pakistani	5	8	4
Mixed White & Asian	4	4	-
Asian/Asian British Indian	4	10	-
Mixed Other	3	4	1
White Irish	3	13	5
Asian/Asian British Bangladeshi	2	11	2
Chinese/Other Ethnic Group	2	14	6
Mixed White & Black African	-	2	-
Unknown	4	2	8

Age and Disability

The information has been taken from the Local Authority Ward profile data – Low Super Output Areas (LSOA), which relate to the following wards:

- Eastfields Estate – Figge’s Marsh (LSOA E0103391)
- High Path Estate – Abbey Ward (LSOA E0103357)
- Ravensbury Estate – Ravensbury (LSOA E01003440)

The information demonstrates that the residents of the estates are comparatively deprived when compared with ward, borough and national deprivation. There are also proportionately larger numbers of older households, when compared to the Borough average) on both the Ravensbury and High Path estates.

Eastfields	
Deprivation	Quintile 1 – Most deprived (Merton and nationally)
Age and Family Structure	<ul style="list-style-type: none"> • Higher proportion of very young children 0-4 12.8% (Figge’s Marsh 9.3%) • Lower proportion of adults aged 35-54 25.6% (Figge’s Marsh 28.8%) • Slightly higher proportion 55-79 age group 16.5% (Figge’s Marsh 15.6%) • Higher proportion of people under 65 living alone 27.8% (Figge’s Marsh 19.8%) • Higher proportion of lone parent families with dependent children 16.7% (Figge’s Marsh 12.5%)
Housing Overcrowding	<ul style="list-style-type: none"> • Higher overcrowding than the rest of the ward and Merton; in particular households which include dependent children • Of households with dependent children 51.8% are overcrowded (Figge’s Marsh 40.2%)
Health	<ul style="list-style-type: none"> • Higher proportion of long term sick or disabled 5.7% (Figge’s Marsh 3.8%)
Unemployed	<ul style="list-style-type: none"> • One third of households 33.3% where no adults work (Figge’s Marsh 28.4%, Merton 23.9%)

High Path	
Deprivation	Quintile 1 – Most deprived in Merton, National Quintile 2 - Second most deprived
Age and Family Structure	<ul style="list-style-type: none"> • Higher proportion of 0-19 age group 22.5% (Abbey 19.1%) and older adults aged 45-64 20.3% (Abbey 17.1%) • Lower proportion of adults aged 30-39 17.6% (Abbey 25.8%) • Significantly higher proportions of lone parent families 16.2% (Abbey 6.8%) both with dependent and non-dependent children
Housing Overcrowding	<ul style="list-style-type: none"> • Higher overcrowding than the rest of the ward and Merton; in particular households which include dependent children • Of households with dependent children 43.6% are overcrowded (Abbey 22.4%)
Health	<ul style="list-style-type: none"> • Higher proportion of long term sick or disabled 6.3% (Abbey 2.4%)
Unemployed	<ul style="list-style-type: none"> • One third of households 30.2% where no adults work (Abbey 20.5%, Merton 23.9%)

Ravensbury	
Deprivation	Quintile 1 – Most deprived in Merton, National Quintile 2 - Second most deprived
Age and Family Structure	<ul style="list-style-type: none"> • Higher proportion of 25-39 26.9% (Ravensbury 23.9%) • Slightly higher proportion of 0-4 age group 8.2% (Ravensbury 7.6%) • Higher proportion of people under 65 living alone 20.1% (Ravensbury 16.2%) • Similar proportion of lone parent families with dependent children compared to the ward 9.1%
Housing Overcrowding	<ul style="list-style-type: none"> • Overcrowding similar to the rest of the ward; in particular households which include dependent children • Of households with dependent children 36.4% are overcrowded (Ravensbury 35.0%)
Health	<ul style="list-style-type: none"> • Higher proportion of long term sick or disabled 8.9% (Ravensbury 4.1%)
Unemployed	<ul style="list-style-type: none"> • Over a quarter of households 28.7% where no adults work (Ravensbury 29.9%, Merton 23.9%)

Equality Impact Assessment & Sustainability Appraisal

As with the SA, the EqIA has informed and influenced the development of the Plan and will continue to be reviewed towards adoption. A specific indicator on [Diversity and Equality](#) has been added to the SA Framework to ensure that equalities issues have been identified, although there will be an impact within many of the Sustainability Objectives, specifically the following:

SO16 Housing - Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home

SO17 Access to Activities - Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities

SO18 Social Deprivation - To contribute to reducing poverty and encouraging social inclusion

SO19 Health and Wellbeing - To improve the health and wellbeing of residents and reduce health inequalities

SO20 Diversity and Equality - To support diversity and equality in order to promote community cohesion

SO21 Services and Facilities - To ensure accessibility to essential services and facilities

SO23 Education and Skills - To improve the education and skills of the population.

CHMP has advised that residents of Eastfields, High Path and Ravensbury have provided information about the problems with their homes and outside spaces, which include:

- homes that are expensive to heat
- leaking roofs
- poor noise insulation
- condensation and damp
- issues with refuse collection
- unsafe pathways.

Some of these issues were also raised in both Council consultations in 2014 and 2016, particularly concerns around unsafe pathways, damp and poor internal conditions.

As set out in the policies in the Council's Estates Local Plan, regeneration will be expected to provide a range of choices and benefits including:

- high quality well designed neighbourhoods
- wider housing mix
- more private space for residents
- better quality green spaces and community facilities
- job creation opportunities.

It will also be an opportunity to provide much needed new homes by making more efficient use of brownfield land, improving the quantity, quality and mix of new homes on each of the three estates.

A key expectation of any regeneration proposals that come forward will be a commitment to keeping the existing community together in each neighbourhood, and for existing residents to have a guaranteed right to return to a new home in their regenerated neighbourhood.

Assessment of Policies

The Estates Local Plan contains a total of 24 policies (8 per estate) regarding the regeneration of the estates. The policies have been assessed as part of the SA, however, in order to ensure that 'protected characteristics' have been considered appropriately in the ELP a further assessment is set out below against the specific equality categories.

It is considered that the impacts from the policies upon the following 'protected characteristics' are likely to be of low/no impact as it is difficult to determine how the policies could affect the following groups in a significant way:

- Sex/Gender
- Religion
- Sexual Orientation
- Gender Reassignment Marriage and Civil Partnership
- Pregnancy and Maternity

The assessment therefore focuses on the following categories where the policies could potentially have an impact:

- Age
- Disability
- Race or belief

The impacts against the equalities groups are assessed as follows:

	Negative
	Minor negative
	Neutral
	Minor positive
	Positive

ELP Policies Equalities Assessment

Eastfields Policies	Equalities Categories	Impact	Assessment
EP E1: Townscape	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy concerns the urban design, layout and massing of the proposals and is considered neutral in terms of equalities considerations.
EP E2: Street Network	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy concerns the design of the street network and is considered neutral in terms of equalities considerations.
EP E3: Movement and Access	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy proposes the improvement of movement and access for vehicles, pedestrians and cyclists, which is likely to have a positive impact for all residents, including the elderly and disabled.
EP E4: Land Use	<ul style="list-style-type: none"> Age Disability Race or belief 		The land use will remain as predominantly residential use with open space and re-provision of non-residential uses. Increased densities may be considered appropriate. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet residents' individual needs. The policy will have a positive impact for all equality groups.
EP E5: Open Space	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy provides for the re-provision of the equivalent or better open space which is likely to have a positive impact for all residents, including the elderly and disabled.
EP E6: Environmental Protection	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy sets out a range of measures to ensure improvements in environmental performance including flood risk, energy efficiency and pollution during construction and operation. Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes, which will have a positive impact for all equality groups.
EP E7: Landscape	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy concerns the design of the landscape proposals and is considered neutral in terms of equalities considerations.
EP E8: Building Heights	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy concerns the building heights of the proposals and is considered neutral in terms of equalities considerations.

High Path Policies	Equalities Categories	Impact	Assessment
EP H1: Townscape	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the urban design, layout and massing of the proposals and is considered neutral in terms of equalities considerations.
EP H2: Street Network	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the design of the street network. Increased accessibility for pedestrians and cyclists must be designed into the street network. which is likely to have a positive impact for all residents, including the elderly and disabled.
EP H3: Movement and Access	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy proposes the improvement of movement and access for vehicles, pedestrians and cyclists, which is likely to have a positive impact for all residents, including the elderly and disabled.
EP H4: Land Use	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The land use will remain as predominantly residential use with open space and re-provision of non-residential uses. Increased densities may be considered appropriate. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet residents' individual needs. The policy will have a positive impact for all equality groups.
EP H5: Open Space	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces, which is likely to have a positive impact for all residents, including the elderly and disabled.
EP H6: Environmental Protection	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy sets out a range of measures to ensure improvements in environmental performance including flood risk, energy efficiency and pollution during construction and operation. Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes, which will have a positive impact for all equality groups.
EP H7: Landscape	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the design of the landscape proposals and is considered neutral in terms of equalities considerations.
EP H8: Building Heights	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the building heights of the proposals and is considered neutral in terms of equalities considerations.

Ravensbury Policies	Equalities Categories	Impact	Assessment
EP R1: Townscape	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the urban design, layout and massing of the proposals and is considered neutral in terms of equalities considerations.
EP R2: Street Network	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the design of the street network and is considered neutral in terms of equalities considerations.
EP R3: Movement and Access	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy proposes the improvement of movement and access for vehicles, pedestrians and cyclists, which is likely to have a positive impact for all residents, including the elderly and disabled.
EP R4: Land Use	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The land use will remain as predominantly residential use with open space and re-provision of non-residential uses. Increased densities may be considered appropriate. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet residents' individual needs. The policy will have a positive impact for all equality groups.
EP R5: Open Space	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy provides for the re-provision of the equivalent or better open space which is likely to have a positive impact for all residents, including the elderly and disabled.
EP R6: Environmental Protection	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy sets out a range of measures to ensure improvements in environmental performance including flood risk, energy efficiency and pollution during construction and operation. Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes, which will have a positive impact for all equality groups.
EP R7: Landscape	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the design of the landscape proposals and is considered neutral in terms of equalities considerations
EP R8: Building Heights	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the building heights of the proposals and is considered neutral in terms of equalities considerations

Sustainability Appraisal Findings

The assessment has shown that the regeneration will result in major positive impacts for the issues of housing, access to activities and social deprivation. Minor positive impacts are achieved for diversity and equality and education and skills.

The regeneration will enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need.

The redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups.

The provision of new community space and improved accessibility within the estates and to the wider area will help to promote community cohesion.

Regeneration is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development.

The level of impact is uncertain at this stage with regards to health and wellbeing and services and facilities. The new accommodation is likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. However, there will be significant disruption to residents as a result of the redevelopment. The phasing and decanting will need to be carefully considered to minimise adverse impacts upon residents.

An asbestos survey will also be required before any work is carried out as it is considered likely that there may be asbestos in several of the current structures.

The opportunity for new layouts within the estates that the regeneration will provide, should ensure that accessibility to and within the site is improved for all.

The sites are relatively well served by social infrastructure including schools, health, leisure and community facilities. An assessment of the impact of the increase in population upon the existing facilities will be required as part of the design process.

Impacts of The Regeneration Proposals

The regeneration of the Estates provides an opportunity for CHMP to provide high quality homes of the right size for their tenants and resident homeowners taking in to account the specific needs of the individual and so catering for needs arising due to an individual having a protected characteristic and seeking to eradicate inequalities.

New affordable homes which replace the existing, will be covered by the current Nomination Agreement that ensures 100% of True Voids are made available as nominations to the Council. When the planning consents confirm that new affordable homes for rent will be provided (which are not replacements of existing affordable homes), the Council will need to negotiate and enter into a new supplementary agreement for nominations.

Negotiations have begun with CHMP on the use of void properties on the estate, especially those bought back from owners, with the intention of using them to help the Council with the discharge of its obligations to people that are homeless or in housing need.

Regeneration also provides an opportunity for CHMP to reduce overcrowding amongst its tenanted households. Overcrowding is proportionately more likely to affect households from the BAME community and so the regeneration provides an opportunity to address inequality in this area. Significant amenity and size improvements will be provided for residents, with all new homes built to current space standards with private outdoor space.

Some of the properties are in need of major structural works or can be expected to fail in the next few years. This is particularly important in respect of the Orilt houses in Ravensbury. Replacing or very major repairs to these properties will be required, probably during the anticipated life of the regeneration programme

The regeneration is an opportunity to provide new lifetime homes for all tenants, this will enable older tenants (and homeowners) to remain independent in their own homes for longer. New homes can be adapted to meet the specific needs of disabled residents, 10% of all new homes will be fully accessible and adaptable for wheelchair users.

However, it is acknowledged that the process of redeveloping the estates itself is likely to have a negative impact on older, disabled and vulnerable residents, due to the requirements to move house, potentially more than once, if temporary accommodation is necessary during the construction period.

CHMP has committed to designing the construction phases to minimise the need to “double decant” and where at all possible older, vulnerable or disabled tenants will only be asked to move once, straight in to a new home. Help will be provided to assist with such moves

Self-Build and Custom Housebuilding Act 2015

The Council has a number of duties under the Self Build and Custom Housebuilding Act 2015. One of these is to have regard to the entries on Merton's Self-Build register when carrying out functions relating to planning, housing, the disposal of land owned by the authority and regeneration.

It is not recommended to allocate sites for self-build and custom housebuilding as part of this Estates Local Plan. As an estates regeneration programme, the priority is rehousing residents who are already living on the three estates in new homes, built to modern standards, and providing new homes viably to meet housing need. This does not preclude self-build and custom housebuilding within any or all of the three estates as part of the delivery of the plan, should this be a viable option supported by the landowner.

Land Assembly

The estates each sit in different ways in relation to their surroundings, offering slightly different challenges in respect of retaining residents close to home during any temporary decant period. CHMP may need to assemble land to realise these opportunities.

If the current owners of sites that would prevent comprehensive and effective regeneration are resistant to sale, the Council will be asked to consider exercising its Compulsory Purchase powers. Property acquired in this way would then be sold to CHMP as part of the programme.

If a situation should arise where regeneration can only be delivered through use of those powers, then a separate and further decision will be required about whether to proceed. It is very important that such a decision should be subject to an equalities impact assessment in its own right at the time of the consideration. A decision to exercise such powers has not been made at this stage in the process.

CHMP's Proposals on the Delivery of the Estates Local Plan

The greatest impact on equalities will be the mechanics of the delivery of the Estates Local Plan including: the residents' offer; moving existing residents into new homes; addressing overcrowding; and minimising disruption during this extensive process. CHMP has undertaken an Equalities Analysis of their proposals and it is recommended that this is reassessed regularly during the regeneration delivery process.

Merton Council and CHMP Commitments

In order to address potential concerns for residents in relation to the regeneration of the Estates, the Council and CHMP signed up to the following commitments in September 2014.

1. Circle Housing Merton Priory will consult with residents, consider their interests at all times, and address concerns fairly.

CHMP's Response: In summer 2013 CHMP began consulting with residents of the estates about the possible regeneration of the three neighbourhoods. Consultation activities, including one-to-one meetings with individual residents, have taken place at each project milestone. The master planning process and development of the Residents' Offer have been supported by on-going exhibitions, workshops and drop-in events for all residents. Feedback is collated and used to inform further iterations of the master plan and design of the new homes. Every effort is made to show the correlation between residents' comments and the development of the designs with feedback presented at events, in newsletters and online.

In June 2015 an independent survey of all households was launched and the results were published on the website. All individual enquiries receive a personalised response from one of CHMP's regeneration managers. Other communication channels used to keep residents informed include:

- Letters and newsletters with dates of the new master planning events delivered to all households at the same time. These are available in large print or translation
- Posters and flyers to advertise events
- Ongoing dialogue with the Wimbledon Guardian
- A dedicated project website
- Briefings with ward councillors and local MPs

2. Current homeowners will be entitled to at least the market value of their home should they wish to take the option to sell their home to Circle Housing Merton Priory.

This is a particularly important consideration as it reflects the strong concerns of residents that they are not financially disadvantaged by the regeneration in assessing the financial structure of the proposals for CHMP.

CHMP's Response: The Residents' Offer is explicit on this matter and includes sections for resident homeowners and landlords. The former will receive market value plus 10% and the latter will receive market value plus 7.5%. Valuation, legal and relocation costs are also included.

Resident homeowners who wish to stay living in their neighbourhood after regeneration will be offered a replacement home with the same number of bedrooms as their existing home at no cost. They will own their home outright from when they move in and may only have to repay some or all of the difference between the replacement home and existing one, if they move within 11 years.

CHMP's 'early buy back' scheme gives homeowners the option to sell their home to CHMP on the same terms as above (not including the replacement home option) if they wish to move before the regeneration starts.

3. Current tenants will be entitled to be rehoused in a new home of appropriate size considering the number of people in the household.

CHMP's Response: The Residents' Offer published in May 2015 by CHMP, guarantees that current tenants will be rehoused in a new home of the appropriate size considering the number of people in the household. This will result in an increase in the number of habitable rooms being provided overall as none of the currently overcrowded households will be overcrowded in their new homes.

4. Existing Circle Housing Merton Priory tenants will keep all their rights and have the same tenancy agreement, including rent levels, in the new neighbourhood as they do now.

CHMP's Response: The Residents' Offer published in May 2015 by CHMP, guarantees that current tenants will keep all their rights, including tenancy conditions and the associated rent level, in the new neighbourhood as they do now.

5. All new properties will be more energy efficient and easier to heat than existing properties, helping to keep down residents' fuel bills.

CHMP's Response: All new properties will be built to current energy standards and will be better insulated and easier to heat than those that they replace. CHMP's masterplan proposals and planning applications for early phases outside the masterplans will include details on the type of construction and energy strategies that will be in place to demonstrate this.

6. Circle Housing Merton Priory will keep disruption to a minimum, and will do all it can to ensure residents only move once if it is necessary to house them temporarily while their new home is being built.

CHMP's Response: CHMP will keep disruption to a minimum by having workable decant and construction strategies in place. Housing needs of existing households will change over the course of the project and we will keep this under constant review. Wherever possible, existing residents will move directly into their new homes. If temporary housing is unavoidable CHMP will assist residents with their moves.

7. Circle Housing Merton Priory will offer extra help and support for older people and/or disabled residents throughout the regeneration works.

CHMP's Response: CHMP has committed to helping older and disabled residents throughout the regeneration works. This will include helping tenants and resident homeowners arrange and prepare for their move, arrange service and utilities connections, etc. If tenants or resident homeowners have any extra needs CHMP can offer

support or refer them to specialist services. Each neighbourhood will have dedicated staff appointed to help residents every step of the way to help make the move go as smoothly as possible.

The Residents' Offer promises to help residents / tenants 'arrange and prepare' for their move. CHMP will pay for removals including packing materials and a packing service. For older and vulnerable residents, CHMP will offer help with things such as re-hanging curtains and fitting lightbulbs, provided through a free handyperson service. If residents have any extra needs connected with their move, CHMP can offer support or refer residents to specialist services.

Extra help could include: Help with claiming benefits at the new address; help with changing electricity, water, phone and other utility supplies; advice about home aids and adaptations.

8. Circle Housing Merton Priory will continue to maintain the homes of residents across the three neighbourhoods throughout the planning process until regeneration starts, including ensuring a high quality responsive repairs service.

The Council will continue to work closely with CHMP, using the established system of performance reporting, to ensure that this commitment is met.

CHMP's response: CHMP is committed to ensuring that all homes across its stock including those identified for regeneration are maintained as per residents' tenancy and leaseholder agreements. Any repairs required will be remedied within the current contractual timescales in accordance with the nature and urgency of the repair. CHMP carries out independent quality checks of repairs undertaken and routine property checks will be ongoing throughout the regeneration programme.

Where it is mandatory CHMP will continue to ensure serviceable items are inspected and certified safe within the required periodic timeframe to ensure statutory and regulatory requirements are adhered to. In addition, periodic inspections and assessments will continue, with associated identified actions and or consequential works tracked and managed.

9. Any growth in the number of homes will be in accordance with the Council's Development Plan so that it is considered, responsible and suitable for the area.

This commitment is reflected in the Council's Estates Plan, which contains a thorough analysis of each neighbourhood. The Council's commitment in this area will need to be reflected in the planning applications made by CHMP.

CHMP's response: CHMP's regeneration proposals take into account the Council's Development Plan so that the growth in homes is proportionate, while addressing the borough's urgent need for high-quality new housing.

10. As a not for profit organisation, Circle Housing Merton Priory will not profit from any regeneration and will use any surplus to provide more housing or improve existing neighbourhoods.

This commitment will be monitored through the legal agreements between the Council and CHMP.

CHMP's response: As a not for profit organisation with a social purpose of enhancing life chances, Circle Housing invests any surplus back into building and maintaining homes and supporting communities.

Homeowners have raised concerns with the Council during Estates Local Plan consultations and throughout 2015 and 2016 about the residents' offer and in particular what "like for like" actually means. Whilst this is set out in the 2015 residents' offer, the Council has exercised its due diligence to residents in seeking clarification from CHMP on this important matter. CHMP has provided clarification as follows:

<p>Do resident homeowners get like for like?</p>	<p>The Residents' Offer details the Replacement Home Option, which is offered to those resident homeowners who were living on one of the three neighbourhoods on the 27th May 2015 (when the Residents' Offer was published). The Replacement Home Option confirms:</p> <ul style="list-style-type: none"> • If you are currently a freeholder you will be offered a freehold on your new property • If you are a leaseholder you will be offered a new 125-year lease on your new property • The new home will be at least as large as the home it replaces • Every Replacement Home will have private outdoor space • If you live in a house you will be offered a house, if a flat a new flat and a maisonette a new maisonette • The new home will have the same number of bedrooms as the existing home had when it was first built • There will be a Replacement Home for every resident homeowner who chooses to stay • They will be entitled to a £3,000 disturbance allowance
<p>If you are a freeholder now, will you be a leaseholder (and therefore liable for service charges) in the new development?</p>	<p>If you are a resident homeowner and a freeholder we will offer you a new freehold property.</p> <p>If you are a resident homeowner and a leaseholder we will be offering you a new 125 year leasehold at no cost and irrespective of how long you have to run on your current lease.</p>
<p>What circumstances will shared ownership or shared equity products be offered to resident homeowners? What circumstances are envisaged where these products will be offered to resident freeholders?</p>	<p>There is no shared ownership option (which involves paying rent on the part of the home owned by the Housing Association) in the Residents Offer.</p> <p>CHMP include a shared equity option (where no rent is payable) as a "safety net". This is to ensure that those residents who have a mortgage and for some reason are unable to transfer it to their new Replacement Home (perhaps because their circumstances have changed) will still be able to take up the offer of a new home and stay in their neighbourhood. In those circumstances we will meet the financing gap using shared equity. This helps us fulfil our commitment to provide a Replacement Home for any resident homeowner who chooses to stay and at no cost to them.</p> <p>Where one of CHMP's tenants exercises their Right to Buy after the 27th May 2015 (when the Residents Offer was published) CHMP will offer them a new home of the same size and typology on a shared equity basis.</p> <p>These are the only circumstances where shared equity is applied in the Residents' Offer.</p>

<p>Where will all resident homeowners live during the redevelopment process and who will pay for this?</p>	<p>CHMP will always try to move resident homeowners straight into their new Replacement Home, i.e. without the need to be temporarily housed. The phasing plans for all three neighbourhoods have been designed to accommodate this approach.</p> <p>For a small number of existing resident homeowners this may not be possible, for example as a consequence of their choice of location and its position in the phasing plan. CHMP may be able to offer a temporary Circle Housing home in their neighbourhood or another part of Merton, though this would need to be agreed with the London Borough of Merton who retain nomination rights as part of the 2010 Transfer Agreement.</p> <p>A disturbance payment of £3,000 will be available. Resident homeowners won't be charged rent as long as they agree to the terms set out in the Residents Offer regarding accepting the market value plus 10 per cent for their existing home, the value of the new home and the licence agreement for the temporary home.</p> <p>Anyone living in a temporary home for longer than one year will be entitled to an additional £3,000 disturbance payment.</p>
<p>Is "like for like" tenure; number of bedrooms; habitable rooms or house / flat?</p>	<p>The Replacement Home option means that if you live in a house which was originally built as a three bed roomed house, then the Replacement Home will be a three bed roomed house. The owner of a two bed roomed flat will be offered a new two bed roomed flat, etc. Every Replacement Home will be at least as large as the home it replaces.</p> <p>Every Replacement Home will have private outdoor space (i.e. a garden, balcony or roof terrace) irrespective of whether the original home had this or not.</p>

Potential Impacts of the Delivery of Estates Local Plan Upon Protected Characteristics

CHMP has undertaken an Equalities Impact Assessment as set out below:

Protected Characteristic	Positive	Negative
Race	<p>Consultation with all households on the three estates has helped to understand the current and future housing needs of the entire population of the estates. There is evidence that households from the BAME community on the three estates where regeneration is being considered are more likely to be overcrowded than all households on the estates.</p> <p>Regeneration deals with overcrowding within Circle's tenanted properties on the estates by rehousing each household in the right size property for them.</p> <p>Regeneration allows the opportunity to address issues of under and over occupation and this has been taken into account when formulating the proposed residents' offer.</p> <p>The regeneration proposals provide an opportunity to provide new good quality homes across a range of tenures (social affordable, leasehold, freehold and private rented sector). Good quality shared and public spaces are designed to feel safe and to encourage community cohesion. New homes will be safe, warm and economical to run.</p> <p>All existing CHMP tenants and resident homeowners will have the option to stay in their neighbourhoods if they wish to, this will promote community cohesion and build on the strength of the existing very diverse communities in the existing neighbourhoods.</p>	<p>Language barriers could limit the ability of some residents who are members of BAME communities to participate in ongoing consultation regarding their housing needs or their rights under the residents' offer.</p>
Religion/Belief	<p>Engagement with residents has been with a diverse range of religions and beliefs and has helped to understand and take account of their specific needs.</p> <p>For example, religious and cultural requirements for specific washing facilities and separate kitchens and living areas have become apparent and have been fed in to the detail regarding the design of new homes.</p>	<p>It is not considered that there will be a differential negative impact on persons of particular (or no) religion or belief as a result of the regeneration proposals.</p>

Protected Characteristic	Positive	Negative
Gender	<p>Better design through the regeneration could improve estate safety for everyone regardless of gender. There is no evidence that crime on the estates affects one gender more than others, however, personal safety and feeling safe is of particular concern to women and girls. Better design, including designing shared and open spaces to 'secure by design' principles can improve personal safety for everyone.</p> <p>The regeneration proposals provide an opportunity to provide new good quality homes across a range of tenures (social affordable, leasehold, freehold and private rented sector). Good quality shared and public spaces are designed to feel safe and to encourage community cohesion. New homes will be safe, warm and economical to run.</p> <p>The analysis of household composition within the lower super output areas for High Path and Eastfields indicate that there are proportionately higher numbers of households with dependent children headed by a single adult. From direct contact with these households CHMP is aware that these households are predominantly headed by women. Also that households with dependent children are more likely to be overcrowded. Regeneration will address overcrowding in CHMP tenant households by rehousing households, including overcrowded families, in homes of the right size for their needs.</p>	<p>It is not considered that there will be a differential negative impact on any gender as a result of the regeneration proposals.</p>
Gender Reassignment	<p>It is considered that there are no differential positive effects. Residents of the estates affected by gender reassignment will have the same opportunities to be consulted and to be provided with housing as other residents on the estates.</p>	<p>It is not considered that there will be a differential negative impact on persons affected by gender reassignment. Residents affected by gender reassignment will have the same opportunities to be consulted and provided with housing as other residents.</p>

Protected Characteristic	Positive	Negative
<p>Disability</p>	<p>Consultation and other data demonstrates that all three estates have residents with disabilities. Individual discussions with residents about their future housing needs would, once a decision to proceed is in place, allow CHMP to plan for the provision of lifetime homes and adapted properties for residents of household members with specific needs.</p> <p>A proportion of any new homes would be designed and built specifically to meet the needs of disabled residents. A better environment is also conducive to better mental health and wellbeing.</p> <p>Each of the three neighbourhoods has a number of households where one or more members of the household has a disability. There are few homes on each of the estates that were built specifically with the needs of people with disability in mind.</p> <p>Regeneration will allow CHMP to build all new homes to lifetime homes standards and 10% of homes will be adaptable to be fully wheelchair accessible. CHMP will be able to adapt new homes to the specific needs of individuals with disabilities and future housing will be much better tailored to the needs of disabled residents</p>	<p>There is the potential for residents with disabilities to find it more challenging to move home than residents without a disability due to the nature of their disability.</p>

Protected Characteristic	Positive	Negative
Age	<p>CHMP has consulted with all residents about their ambitions for future housing on their estates. There is the opportunity to provide the right type of housing for different households of all age groups.</p> <p>Engagement with older and younger residents will allow CHMP to take account of current and future housing needs when designing any future housing and to consider how to encourage understanding between generations.</p> <p>Coffee mornings have been held to allow older residents to discuss the proposals in a relaxed and informal environment.</p> <p>Abbey Primary school, which serves High Path estate held the first of a proposed series of annual regeneration weeks, which focussed on the children's ambitions for the potential new neighbourhood, energy efficiency and environmental issues.</p> <p>The regeneration plans are for households to be housed according to their needs. The evidence is that families with dependent children on the three estates are more likely to live in overcrowded conditions than other families in the surrounding area.</p> <p>Each of the proposed regeneration estates has a proportion of older residents who are CHMP tenants and resident homeowners. Older residents have participated in the consultation and their views have been taken into account in the design of the masterplans and the homes. A number of older residents have expressed concerns about moving home when it is their turn to move to their new home. The residents' offer sets out the help that will be provided to older residents, supporting them through their move by providing a named contact person to support them through their move, a removal, packing and unpacking service and a handypersons service to help with small jobs once they move into their new home.</p>	<p>There is the potential for both older and vulnerable residents to be worried about change and the impact on them, or to find it more challenging to move home. There is also the potential for older residents not to participate or to refuse to or worry about giving candid feedback.</p>

Protected Characteristic	Positive	Negative
Pregnancy and Maternity	Residents affected by pregnancy and maternity will have the same opportunities to be consulted and to be provided with housing as other residents.	It is not considered that there will be a differential negative impact on pregnant women as a result of the regeneration proposals.
Marriage/Civil Partnership	It is considered that there are no differential positive impacts. Married and residents in a civil partnership will have the same opportunities to be consulted and provided with housing as other residents on the estates.	It is not considered that there will be a differential negative impact. Married and residents in a civil partnership will have the same opportunities to be consulted and provided with housing as other residents.
Sexual Orientation	It is considered that there will be no differential positive impacts. Residents with a particular sexual orientation will have the same opportunities to be consulted and provided with housing as residents with other sexual orientation.	LGBT residents may feel uncomfortable speaking about their household composition or future housing needs, which may lead to them not being suitably housed in the regenerated estates.

CHMP Consultation on the Proposals

Opportunities have been provided for all CHMP tenants, resident homeowners (leaseholders and freeholders) and non-resident property owners on the three estates to be consulted about the future of the neighbourhoods.

Consultation has been carried out on the principle of the regeneration and on the details of the Residents' Offer to CHMP tenants, resident homeowners and non-resident homeowners and the proposed regeneration masterplans for the Estates.

All of the venues for consultation events were accessible, materials used were portable and could be moved for ease of access, use and interpretation. Where requested regeneration officers carried out home visits to residents and non-resident homeowners at times convenient for them so that they could see the materials including plans and resident offer information so that those who could not attend the consultation events for any reason were able to give their views.

Consultation and communication materials were provided in large print and translated formats for those who requested them, where it was known that translations were needed the information was provided in alternative formats as a matter of course for subsequent consultations and communications.

A market research survey was undertaken by Member Engagement Services in June / July 2015 and was undertaken using a professional translation service where necessary. Specific appointments were arranged for vulnerable residents to meet with MES where they could be accompanied by a carer, support worker or friend whilst they gave their views to the MES researcher.

CHMP Management

Circle Housing is implementing a programme across the group of amalgamating the individual housing associations within the group into one large association. Circle see this process known as 'Resurgence' as a key means of achieving greater efficiency and effectiveness and as necessary to ensure, regeneration schemes such as the one proposed in Merton, can be delivered. In Merton this would result in the disbandment of the CHMP Board and the creation of a local Community Panel. Negotiations are underway regarding the establishment of a local Community Panel specifically for Merton residents.

CHMP Phasing and Decanting Strategy

CHMP has provided the following information regarding their approach to the delivery of the Estates Local Plan. The tables overleaf outline the proposed Decant and Construction phasing for each estate due for regeneration. The current programme runs from 2016 through to 2029. It is important to note that phases are subjected to residents' consultation and planning permission being granted and may therefore change.

Due to the nature of the phasing structure and the high percentage of leaseholder/freeholders units included within the regeneration programme, blocks within each phase are likely to change. It is therefore not possible to programme decants and demolitions in accordance with the yearly decent homes failures, however a mitigation plan to manage this has been put in place.

Circle Housing is committed to ensuring that all homes across its stock including those identified for regeneration are maintained as per residents' tenancy and leaseholder agreements. Any required repairs will be remedied within the current contractual timescales in accordance with the nature and urgency of the repair. In addition, Circle carry out independent quality checks of repairs undertaken and routine property checks will be ongoing throughout the regeneration programme.

Where it is mandatory Circle Housing will continue to ensure serviceable items are inspected and certified safe within the required periodic timeframe to ensure statutory and regulatory requirements are adhered to. In addition, periodic inspections and assessments will continue, with associated identified actions and or consequential works tracked and managed.

Estate services such as cleaning and grounds maintenance will continue at each block until all residents are fully decanted, the current service schedules and scope of work will be the standard set within the current contract and in line with service charge cost. The standards of cleaning and grounds maintenance are monitored by Circle via periodic estate inspections and resident feedback.

Eastfields Estate - 470 Units (247 General needs)

Phase	Block	Number of units	Decant Date	Construction Date
1	Non- residential	N/A	N/A	2018/19
2	70 -110 Clay Ave	42	March 19	Mar 2019-Apr 2021
	47 – 57 Pains Close	16		
3	63 -68 Clay Av	6	November 2020	Nov 2020 – Dec 2022
	9-44 Pains Close	44		
	3 – 42 Potter Close	44		
4	22-62 Clay Ave	42	August 2022	Aug 2022 – Aug 2024
	13 – 44 Moore Close	32		
5	112- 128 Clay Ave	18	August 2023	Aug 2023 – Mar 2026
	10-36 Mulholland Close	36		
	Thrupp Close	44		
6	34 -90 Acacia Road	30	October 2025	Oct 2025 – Sep 2027
	1-20 Clay Ave	16		
	3-12 Moore Close	20		
7	92-190 Acacia Road	48	February 2027	Feb 2027 – Apr 2029
	37-61 Mulholland Close	32		

High Path Estate – 573 Units (365 General needs)

Phase	Block	Number of units	Decant Date	Construction Date
1	Non- residential	N/A	N/A	2017/18
2	Lovell house	11	May 2019	May 2017- May 2019
	Marsh Court	64		
	Pincott Road	6		
	Priory Close	59		
3	Becket Close	23	May 2021	May 2019 – Aug 2023
	Dowman Close	17		
	Gilbert Close	19		
	Hayword close	15		
4	Deburgh House	22	May 2023	April 2021 – May 2023
	Doel Close	10		
	Hilborough Close	16		
	Norfolk house	28		
	Vanguard House	11		
	Will Miles Court	17		
5	Hudson Court	64	February 2025	Feb 2023 - Feb 2025
	Merton Place	14		
	Mychell House	7		
	Ryder House	37		
	Tanner House	21		
6	Eleanor House	21	August 2027	Aug 2025 – Jan 2028
	May Court	64		
	Ramsey House	27		

Ravensbury Estate – 122 Units (93 General needs)

Phase	Block	Number of units	Decant Date	Construction Date
1	66-70 Ravensbury Grove (evens)	3	December 2016	Dec 2016 – Feb 2018
2	227-241 Morden Road (odds)	8	August 2018	Aug 2018 – Jul 2020
	Rutter Gardens	12		
	36-56 Ravensbury Grove (evens)	13		
3	Hatfield Close	37	August 2019	Aug 2019 – Aug 2021
	211-225 Morden Road (odds)	8		
	20-34 Ravensbury Grove (Evens)	10		
4	171-209 Morden Road (odds)	22	October 2020	Oct 2020 – Dec 2023
	2 – 16 Ravensbury Grove (evens)	9		