

# **Equality impact assessment of making positive ballots of residents a condition of GLA funding for estate regeneration schemes**

## **1. Introduction**

- 1.1 This impact assessment reviews the potential impacts on those with different protected equality characteristics, and relationships between those with different characteristics, of making positive ballots of residents of social housing estates (specifically, social tenants, resident leaseholders and freeholders, and residents of any tenure who have been on the local authority's Housing Needs Register (HNR) for at least a year) a condition of GLA funding for strategic estate regeneration projects.
- 1.2 Proposals to introduce this funding condition have been subject to a consultation on the principle and detail of the policy. The funding condition takes into account comments on the proposals that formed the subject of this consultation, including comments on their potential impacts both on those with different protected characteristics and on relationships between them.
- 1.3 The Mayor and Greater London Authority (GLA) are subject to the "public sector equality duty" set out in section 149 of the Equality Act 2010. The Mayor and the GLA, like all public bodies, must have "due regard" to the need to:
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
  - advance equality of opportunity between persons who share a protected characteristic and persons who do not share it;
  - foster good relations between persons who share a protected characteristic and persons who do not share it.
- 1.4 The policy has been designed and the funding condition prepared with these requirements firmly in mind. Section 2 of this assessment gives a summary of the potential impacts of this policy. Section 3 sets out how these could affect those with different protected characteristics, particularly in terms of any negative impacts that may amount to or contribute to discrimination, harassment or victimisation, and impacts that may promote or reduce equality of opportunity between those who share a protected characteristic and those who do not. It also considers relationships between those who share a protected characteristic and those who do not. Section 4 draws some conclusions from Sections 2 and 3. Where the assessment identifies potential negative impacts, it notes any justifications or mitigations for these. This reflects the way in which the GLA has carefully weighed and assessed possible negative impacts in the context of its wider policies and obligations.

## **2. Expected impacts of the funding condition**

- 2.1 This section identifies the three most significant impacts that the GLA expects to result from making positive outcomes in resident ballots on proposed estate regeneration schemes a condition of Mayoral funding for these schemes. It forms the basis for the following section, which outlines the ways in which the GLA considers these impacts will affect those with different protected characteristics and relationships between them.

- 2.2 **A stronger say for residents in estate regeneration schemes:** This policy will ensure that estate residents eligible to vote in ballots (i.e., social tenants, resident leaseholders and freeholders, and residents of any tenure who have been on the local authority's housing register for over a year) have a clear say over whether the planned estate regeneration schemes should proceed. This means that only schemes supported by residents will receive Mayoral funding.
- 2.3 **Estate regeneration schemes that meet residents' and wider needs:** By giving residents this clear say, the policy should help ensure that estate regeneration schemes that receive Mayoral funding do more to meet their needs and aspirations. This is likely to increase the likelihood of estate regeneration schemes achieving the following outcomes:
- **providing a right of return or remain for social tenants**, thereby protecting and preserving established communities and networks;
  - **delivering a fair deal for leaseholders and freeholders**, increasing the chances of leaseholders who wish to do so being able to remain in the area – for example, through shared equity arrangements for new homes – or to secure homes elsewhere that meet their needs;
  - **increasing the supply of affordable housing**, because residents eligible to vote – in particular those on the local authority's HNR – are likely to welcome the delivery of affordable homes;
  - **providing homes with the numbers of bedrooms needed by residents**, thereby relieving overcrowding and enabling would-be downsizers to move to smaller homes that better meet their needs;
  - **providing good quality homes**, with high standards of, for example, energy efficiency and accessibility, given that proposals for high quality homes are more likely to secure the backing of residents in a ballot; and
  - **securing the provision of social infrastructure**. Estate regeneration projects usually deliver a range of social infrastructure, including health facilities, schools and other amenities, such as improved public realm, green and community spaces. Schemes that contain proposals for the delivery of associated social infrastructure are more likely to secure the backing of residents in a ballot, and thus the policy will make landlords more likely to include such elements in schemes for which they need to secure residents' support.
- 2.4 Residents who are not eligible to cast a ballot, the wider local population and Londoners more generally may also benefit indirectly from these outcomes, if their particular needs and aspirations are shared by eligible residents. Insofar as these groups have needs and priorities different from those who are eligible to vote, their needs may not be better met as a result of ballots becoming a condition of Mayoral funding for estate regeneration schemes.
- 2.5 **Impact on supply of housing:** Estate regeneration schemes usually produce a significant net increase in the number of homes on an estate. The GLA assesses that this policy is likely to have a neutral impact on housing supply, and – insofar as this is linked to the overall supply of homes – on the supply of affordable housing.
- 2.6 The GLA's assessment is based on an expectation that the policy may lead to some schemes not proceeding in the short term, but should encourage more schemes to come forward in the medium to long term. First, the policy will encourage and enable residents to become more actively involved in the process of estate regeneration. This

should create a more positive environment, in which social landlords, developers and communities, including different groups within communities, can discuss the potential for estate regeneration in a more collaborative manner as proposals are developed – something likely to encourage more schemes to come forward in the long term. The policy may also help to prevent planned estate regeneration schemes from stalling as a result of deterioration in relationships between residents, social landlords and developers. Second, the policy is likely to give social landlords and developers confidence, at an early stage of estate regeneration schemes, that they have resident support for their plans. Doing so may create a more certain climate for investing in new homes through estate regeneration, enabling more schemes to come forward. Moreover, this policy will take effect in the context of wider Mayoral policies to increase overall housing supply and the supply of affordable housing, as outlined in the draft revised London Housing Strategy and draft London Plan. These policies are likely to counter any negative effect that the new funding condition has on overall housing supply.

2.7 It is possible that some estate regeneration projects may not come forward as a result of this policy, to the detriment of the supply of new housing. This may happen if residents of estates where regeneration is proposed decide that proposals are not satisfactory, and so oppose them in ballots. This is a significant possibility, as estate residents can and do oppose estate regeneration for various reasons, including concern about the disruption that inevitably results when estates are regenerated, dissatisfaction with the offer made to residents, or poor relationships with local authorities or housing associations and developers. If proposals for schemes do not address those considerations adequately, then the increased supply of housing that usually results from estate regeneration would not be achieved. However, the GLA expects that, if there is any such negative impact on the supply of homes, it is likely to be limited and short-term, as landlords and developers adapt to the new funding condition.

2.8 Due to the uncertainties inherent in projecting the impacts of this policy on housing supply, Section 3 of this impact assessment highlights potential impacts on those with protected characteristics should this policy have either a positive or a negative impact on the supply of housing.

### 3. **Assessment of how the impacts of the funding condition are likely to affect those with different protected characteristics and relationships between them**

3.1 Some of the impacts of the funding condition will be disproportionately experienced by some or all of those with different protected characteristics, because of the extent to which they are represented among cohorts who will feel these impacts – for example, among those living in social housing, eligible to vote, or in need of affordable housing. For example, the proportion of disabled people who live in social housing is higher than across the whole population. This means they are disproportionately likely to be able to vote in ballots and thus to benefit from the increased say in estate regeneration schemes that this confers.

3.2 In other cases, the impacts will be felt by people with a particular protected characteristic *because of* that characteristic. For example, disabled people are more

likely to be adversely affected by homes that are energy inefficient<sup>1</sup>, or have a poor standard of accessibility. This means that they will derive particular benefits where estate regeneration schemes go ahead, delivering homes that meet current standards for energy efficiency and accessibility and thus better meet their specific needs.

- 3.3 The baseline data for those with each of the protected characteristics is set out in the table below. This is followed by a summary of how the impacts of the funding condition are likely to affect those with different protected characteristics and relationships between them.

Protected characteristic	Baseline
Age – children	<ul style="list-style-type: none"> <li>• Children are over-represented among households who live in social rented housing in London, but slightly under-represented in the private rented sector (PRS).</li> <li>• Households with children are over-represented on London boroughs' HNRs.</li> <li>• Overcrowding is most likely to affect households that include children and can have adverse effects on children's development, educational achievement and health.</li> <li>• The health impacts of poor quality housing are particularly acute for young children<sup>2</sup>.</li> <li>• New social infrastructure may be particularly beneficial to households with children.</li> </ul>
Age – young people	<ul style="list-style-type: none"> <li>• Young people aged between 16 and 24 are slightly over-represented among those living in social rented housing in London, but under-represented in owner-occupied homes.</li> <li>• Young people are over-represented among private renters in London.</li> <li>• Young people are markedly under-represented on local authorities' HNRs.</li> <li>• Young people are more likely than those who are older to experience difficulties with housing costs<sup>3</sup>.</li> <li>• Some forms of supported or specialist housing are specifically for young people, including those who have experienced homelessness or are preparing to leave the care of a local authority.</li> </ul>
Age – older people	<ul style="list-style-type: none"> <li>• People aged over 65 are proportionately represented among social renters.</li> <li>• People aged over 65 are over-represented among owner-occupiers in London, but under-represented in the PRS.</li> <li>• Those aged over 60 are significantly under-represented on local authorities' HNRs.</li> <li>• The health impacts of poor quality housing are particularly acute for older people<sup>4</sup>.</li> </ul>

<sup>1</sup> National Institute for Health and Care Excellence, Quality Standard 117: Preventing excess winter deaths and illness associated with cold homes, 2016

<sup>2</sup> National Institute for Health and Care Excellence, Quality Standard 117: Preventing excess winter deaths and illness associated with cold homes, 2016

<sup>3</sup> New Policy Institute, London's Poverty Profile, 2015

<sup>4</sup> National Institute for Health and Care Excellence, Quality Standard 117: Preventing excess winter deaths and illness associated with cold homes, 2016

	<ul style="list-style-type: none"> <li>• Older people may be more likely to have limited mobility, meaning that they may struggle in accommodation that is neither accessible nor adapted (a particular problem with older housing stock).</li> <li>• This group may also derive particular benefits from new social infrastructure.</li> <li>• Some forms of supported or specialist accommodation – notably sheltered and extra-care accommodation – are specifically for older people.</li> </ul>
Disability	<ul style="list-style-type: none"> <li>• People with some form of disability or long-term illness are significantly over-represented in social rented homes in London, but slightly under-represented among owner-occupiers and under-represented in the PRS.</li> <li>• People with some form of disability or long-term illness are significantly over-represented on London boroughs' HNRs.</li> <li>• Households that include someone with disability are more likely to experience poverty<sup>5</sup> - and therefore more likely to be in need of affordable housing.</li> <li>• The health impacts of poor quality housing are particularly acute for disabled people<sup>6</sup>.</li> <li>• Disabled people may be more likely to have limited mobility, meaning that they may struggle in accommodation that is neither accessible nor adapted (a particular problem with older housing stock).</li> <li>• Disabled people may derive particular benefits from new social infrastructure.</li> <li>• Some forms of supported or specialist accommodation are specifically for people with a disability or long-term illness.</li> </ul>
Gender reassignment	<ul style="list-style-type: none"> <li>• There is limited data available on the tenure or housing needs of those who are proposing to undergo, undergoing or have undergone a process (or part of a process) for the purpose of reassigning their sex.</li> <li>• To the extent that this group is a subset of those who identify as Lesbian, Gay, Bisexual or Transgender (LGBT+), they may be more likely to experience homelessness<sup>7</sup> and/or discrimination that may place them at a disadvantage in seeking to rent or buy market housing<sup>8</sup>.</li> </ul>
Pregnancy and maternity	<ul style="list-style-type: none"> <li>• Households that include dependent children are over-represented in social rented housing, which may imply an over-representation of women who are pregnant or have given birth to a child within the previous 26 weeks (although no specific data is available).</li> <li>• Women who are pregnant or have given birth to a child within the previous 26 weeks may also be more likely to experience poverty and struggle to meet housing costs, given that women are disproportionately likely to be economically inactive<sup>9</sup>, low paid<sup>10</sup></li> </ul>

<sup>5</sup> New Policy Institute, London's Poverty Profile, 2015

<sup>6</sup> National Institute for Health and Care Excellence, Quality Standard 117: Preventing excess winter deaths and illness associated with cold homes, 2016

<sup>7</sup> See, for example, Crisis, Sexuality and Homelessness, 2005

<sup>8</sup> Stonewall, LGBT in Britain - Hate Crime and Discrimination, 2017

<sup>9</sup> New Policy Institute, London's Poverty Profile, 2015

<sup>10</sup> New Policy Institute, London's Poverty Profile, 2015

	<p>and/or subject to the poverty that affects single parent families<sup>11</sup>, and may also experience a reduction in income later in pregnancy or after giving birth.</p> <ul style="list-style-type: none"> <li>• Households with children are over-represented on London boroughs' HNRs, which may imply an over-representation of women who are pregnant or have given birth to a child within the previous 26 weeks (although no specific data is available).</li> <li>• Overcrowding is most likely to affect households that include children, a group that is likely to include some households that include a baby born within the previous 26 weeks.</li> <li>• The health impacts of poor quality housing are particularly acute for both pregnant women and young children<sup>12</sup>.</li> <li>• New social infrastructure may be particularly beneficial to households that include babies born within the previous 26 weeks.</li> </ul>
Race	<ul style="list-style-type: none"> <li>• People from a BAME background are significantly over-represented in social rented housing and the PRS, but slightly under-represented among owner-occupiers.</li> <li>• People from a BAME background are significantly over-represented on local authorities' HNRs, as well as being more likely to experience both poverty<sup>13</sup> and homelessness<sup>14</sup>.</li> <li>• BAME households in London are more likely to live in overcrowded accommodation than white households<sup>15</sup>.</li> </ul>
Religion or belief	<ul style="list-style-type: none"> <li>• People with some form of religion or belief are proportionately represented both in social rented homes and among owner-occupiers. However: <ul style="list-style-type: none"> <li>○ Muslims and Christians are more likely to live in social rented housing than Londoners overall.</li> <li>○ Londoners with some religious beliefs, particularly Hindus, Jews and Sikhs, are more likely to be owner-occupiers.</li> </ul> </li> <li>• People with some religious beliefs – Buddhists, Hindus, Muslims and those who describe themselves as having no religion – are over-represented among those living in the PRS.</li> <li>• There is no specific data on the extent to which those with some form of religion or belief, or those who hold a particular religion or belief, are represented on local authorities' HNRs. However, to the extent that those who hold some forms of religion or belief belong disproportionately to some BAME groups, they may be over-represented on HNRs.</li> <li>• There is no specific data on the extent to which people with some form of religion or belief, or those who hold a particular religion or belief, are more likely to experience poverty or homelessness. However, to the extent that households with some religious beliefs belong disproportionately to some BAME groups, they are likely to be over-represented among those who experience poverty and homelessness.</li> </ul>

<sup>11</sup> New Policy Institute, London's Poverty Profile, 2015

<sup>12</sup> Shelter, Chance of a lifetime: the impact of bad housing on children's lives, 2006

<sup>13</sup> New Policy Institute, London's Poverty Profile, 2015

<sup>14</sup> Ministry for Housing, Communities and Local Government, P1E data on statutory homelessness

<sup>15</sup> New Policy Institute, London's Poverty Profile, 2015

	<ul style="list-style-type: none"> <li>• People who hold some religious beliefs – Buddhists, Sikhs, Hindus and particularly Muslims – experience overcrowding at above – average rates<sup>16</sup>.</li> </ul>
Sex	<ul style="list-style-type: none"> <li>• Women are slightly over-represented in social rented housing in London and proportionately represented among owner-occupiers.</li> <li>• Men are over-represented among those living in the PRS.</li> <li>• While there is no specific data on the extent to which women or men are represented on local authorities' HNRs, given that households with dependent children are over-represented on HNRs, that the proportion of single parent households in the social rented sector is double that of the wider population, and that the majority of single parents are women, women may well also be over-represented on local authorities' HNRs.</li> <li>• In addition, women are more likely to experience housing need. First, they are disproportionately likely to be economically inactive<sup>17</sup>, low paid<sup>18</sup> and/or subject to the poverty that affects single parent families<sup>19</sup>. Second, women are disproportionately likely to experience homelessness, by virtue of the over-representation of single parent households<sup>20</sup> and those who have experienced violence from a partner among the homeless population<sup>21</sup>.</li> </ul>
Sexual orientation	<ul style="list-style-type: none"> <li>• There is limited data available on the tenure or housing needs of those who identify as LGBT+.</li> <li>• Those who identify as LGBT+ may be more likely to experience homelessness<sup>22</sup> and to experience discrimination that may place them at a disadvantage in seeking to rent or buy market housing<sup>23</sup>.</li> </ul>
Marriage and civil partnership	<ul style="list-style-type: none"> <li>• People who are married or in a civil partnership are under-represented in social rented housing, but are over-represented among owner-occupiers in London.</li> <li>• People who are married or in a civil partnership are significantly under-represented among private renters in London.</li> <li>• There is no data on the extent to which people who are married or in a civil partnership are represented on local authorities' HNRs.</li> </ul>

### 3.4 A stronger say for residents in estate regeneration schemes

- This policy is likely to confer a stronger say on households that include children, older people, people with a disability, women (including those who are pregnant or have given birth to a child in the last 26 weeks), and people from a BAME background. This is because households containing Londoners with these protected characteristics are

<sup>16</sup> Office for National Statistics, 2011 Census

<sup>17</sup> New Policy Institute, London's Poverty Profile, 2015

<sup>18</sup> New Policy Institute, London's Poverty Profile, 2015

<sup>19</sup> New Policy Institute, London's Poverty Profile, 2015

<sup>20</sup> Lone parent households in which the parent was female accounted for 37 per cent of homeless households accommodated in temporary accommodation by London boroughs at the end of 2016/17 (Ministry for Housing, Communities and Local Government, P1E data on statutory homelessness), compared to eight per cent of all London's households (Office for National Statistics, Labour Force Survey, Quarter 2 2016).

<sup>21</sup> Five per cent of the homeless households whom London authorities assisted during 2016/17 became homeless as the result of violence from a partner. (Ministry for Housing, Communities and Local Government, P1E data on statutory homelessness)

<sup>22</sup> Crisis, Sexuality and Homelessness, 2005

<sup>23</sup> Stonewall, LGBT in Britain – Hate Crime and Discrimination, 2017

over-represented in one of the cohorts eligible to vote in ballots and/or under-represented in one of the cohorts ineligible to vote in ballots.

- This same benefit is less likely to accrue to households that include young people, those from a BAME background, or Muslims. These groups are over-represented in social housing, but they are also over-represented in the PRS. (Private renters are not eligible to vote in ballots unless they are also on the local authority's HNR.)
- Young people, older people, and people with a disability are three of the groups for whom specialist or supported accommodation is typically provided. This means they may be disproportionately impacted by the decision to exempt some estate regeneration schemes containing specialist and supported accommodation from the requirement to hold ballots. This is mitigated and justified by the following:
  - Any such impact is likely to be minimal, as it seems that there are few estates made up entirely of supported or specialist accommodation, and the funding condition specifies that residents of supported or specialist accommodation would still be able to vote on the same basis as other residents where this accommodation accounts for only part of the housing on an estate where regeneration is planned.
  - The funding condition makes clear that, where need remains, supported or specialist accommodation should be re-provided, thus helping to protect the interests of groups who are more likely to be residents of this kind of accommodation.
  - As the report on the consultation explains, this exemption is justified insofar as it reflects the distinctive nature of supported or specialist housing, including the type and basis of provision and, in some cases, the rights of those living there.
- The limited data available on the tenure or housing needs of those with the gender reassignment protected characteristic and those who identify as LGBT+ means it is not possible to comment on how this impact of the policy will benefit or negatively affect these Londoners.
- Insofar as they are over-represented in the PRS, Buddhists, Hindus and those who describe themselves as having no religion may not benefit to the same extent as other groups from the stronger say that this policy will give residents in estate regeneration schemes. However, they are likely to benefit from the Mayor's wider policies to improve standards and affordability in the PRS.
- There is likely to be a neutral impact on people who are married or in a civil partnership, since while households containing people who are married or in a civil partnership are under-represented in social housing, they are over-represented among private renters and owner occupiers.

### **3.5 Estate regeneration schemes that meet residents' and wider needs**

- This policy is likely to benefit those with protected characteristics who are over-represented in social housing and on local authorities' HNRs (children, young people, disabled people, women (including those who are pregnant or have given birth within the previous 26 weeks), those with some forms of religion or belief (with Muslims and Christians over-represented in social rented housing) and those from a BAME background), as landlords will be more inclined to include higher proportions of affordable housing in proposals for estate regeneration. This will particularly benefit young people and women, including those who are pregnant or have given birth to a child within the previous 26 weeks, disabled people, those from BAME backgrounds and – by virtue of the latter – those with some forms of religion or belief, as they are more likely to experience poverty and/or difficulties with housing costs. In addition,



the policy will make it more likely that households which contain those with these characteristics will secure a right of return or remain than is currently the case and that they will benefit from the high-quality homes that are typically part of estate regeneration – and more likely to be so because of this policy.

- Insofar as households that include children, young people, women who are pregnant or have given birth to a child within the previous 26 weeks, or those from a BAME background are more likely to be overcrowded, these groups are more likely to benefit from estate regeneration schemes as a result of this policy. This is because the policy means that landlords are more likely to ensure that new homes have the number of bedrooms that residents need.
- Because young children, older people, disabled people and women who are pregnant are especially adversely affected by homes that are inaccessible and/or energy inefficient<sup>24</sup>, they are more likely to benefit from the high-quality homes that are typically part of estate regeneration – and more likely to be so because of this policy.
- This policy is likely to benefit households that include children, older people, disabled people, young children, disabled people, or women who are pregnant or have given birth to a child within the previous 26 weeks, as these groups may derive particular benefits from the social infrastructure that is typically part of estate regeneration and is more likely to come forward because of this policy.
- As a result of this policy, under-occupying social sector tenants, who are disproportionately older, are more likely to secure opportunities to move locally to a smaller home that meets their needs. This is because the policy means that landlords will need to secure residents' support for proposals.
- Insofar as they are over-represented among owner-occupiers, people who are married or in a civil partnership may not benefit to the same extent as some other groups from landlords being more inclined to include higher proportions of affordable housing in proposals for estate regeneration, in order to secure the support of residents who are eligible to vote. However, their over-representation among owner-occupiers is likely to reflect a lower need for affordable housing among those who are married or in a civil partnership.
- The limited data available on the tenure or housing needs of those with the gender reassignment protected characteristic or who identify as LGBT+ means it is not possible to comment on how this impact of the policy will benefit or negatively affect these Londoners.
- If this policy results in fewer estate regeneration schemes coming forward in the short term, then the benefits (i.e., the increased delivery of affordable homes, increased quality, energy efficiency and accessibility of homes, increased likelihood of social tenants securing a right to return, reduction in overcrowding, delivery of social infrastructure and support for downsizing) for those with protected characteristics that are outlined above may not be realised. However, the GLA assesses that any reduction in housing supply is likely to be short-term and that this policy will likely have a positive impact on housing supply in the long term, thus mitigating any potential negative impacts. This mitigation is further supported by the positive impacts outlined above and the Mayor's wider policies to seek an overall increase in housing supply, particularly the supply of affordable housing.

### **3.6 Impact on supply of housing**

---

<sup>24</sup> National Institute for Health and Care Excellence, Quality Standard 117: Preventing excess winter deaths and illness associated with cold homes, 2016

- Given that they are over-represented on local authorities' HNRs, households that include children, disabled people, women (including those who are pregnant or have given birth to a child within the previous 26 weeks), those from a BAME background, or those who hold some forms of religion or belief, this policy is likely to benefit these groups, in terms of providing an increase in the supply of affordable housing that will result from any increase in the overall supply of housing.
- By virtue of being more likely to experience poverty, homelessness and/or difficulties with housing costs, young people, women (including those who are pregnant or have given birth to a child within the previous 26 weeks), disabled people, those from a BAME background, and those who hold some forms of religion or belief are likely to benefit from any downward pressure on house prices that results from any increase in the overall supply of housing, due to more estate regeneration schemes going ahead.
- By virtue of being under-represented on local authorities' HNRs, older people are less likely to benefit from an increase in the supply of affordable housing that will result from any increase in the overall supply of housing. However, their under-representation on HNRs is likely to reflect lower levels of housing need among older people, in part because many of those in this group who need social housing have already secured it.
- Insofar as they are over-represented among owner-occupiers, people who are married or in a civil partnership are less likely to benefit from an increase in the supply of affordable housing that will result from any increase in the overall supply of housing. However, their over-representation among owner-occupiers probably reflects a lower need for affordable housing among those who are married or in a civil partnership.
- If this policy results in fewer estate regeneration schemes coming forward in the short term, then the benefits (i.e., the increased delivery of affordable homes and downward pressure on housing costs) for groups with protected characteristics outlined above may not be realised. However, the GLA assesses that any reduction in housing supply is likely to be short-term and that this policy will likely have a positive impact on housing supply in the long term, thus mitigating against any potential negative impacts. This mitigation is further supported by the positive impacts outlined above and the Mayor's wider policies to seek an overall increase in housing supply, particularly affordable housing.

### **3.7 Relations between persons who share a protected characteristic and those who do not**

- This policy is expected to contribute to fostering good relations between those who share certain protected characteristics and those who do not.
- First, giving estate residents a greater say over estate regeneration projects is expected to lead to more collaborative and consensual approaches to estate regeneration, in which all eligible residents have equal capacity to influence proposals, through being able to vote in a ballot. This should help ensure that landlords engage all residents who are eligible to vote in the period of engagement and negotiation that precedes a ballot, making it more difficult for a particular group or groups of residents to dominate consultation – something that potentially leaves others (feeling) excluded.
- Second, the overall impact of this policy is, as outlined in Section 4 below, beneficial to those who have tended to struggle to access affordable housing and/or lived in overcrowded homes and/or homes that are of poor quality, including energy inefficient homes, and/or lack the accessibility or adaptations that they need. These

are groups among which those with particular protected characteristics are disproportionately represented, as the preceding paragraphs of Section 3 explain. By promoting equality of opportunity for these groups, this policy is likely to foster good relations between those with particular protected characteristics and those without.

#### **4. Conclusions**

- 4.1 The preceding assessment shows that there are likely to be variations in the impacts of the funding condition for estate regeneration across and between those with different characteristics. Overall, the impacts are likely to benefit those who have tended to struggle to access affordable housing and/or lived in overcrowded homes and/or homes that are of poor quality, including energy inefficient homes, and/or lack the accessibility or adaptations that they need (groups among which those with particular protected characteristics are disproportionately represented).
- 4.2 Where the assessment identifies potential negative impacts, these do not disproportionately fall on those with particular protected characteristics. There are also three primary reasons for these potential negative impacts.
- 4.3 First, where those with some protected characteristics will be less likely to be able to vote – and thus to have a clear say in estate regeneration schemes – this is generally because they are less likely to be affected by such schemes. The two main exceptions to this are:
- those who live in supported or specialist accommodation that accounts for all of the housing on an estate where regeneration is proposed: It is unlikely that many estates will consist entirely of supported or specialist accommodation and thus unlikely that large numbers of estate residents will be unable to influence estate regeneration proposals through voting in a ballot. For those who are unable to vote, there should still be opportunities to influence proposals through the consultation that – as *Better homes for local people* makes clear – should be central to all plans for estate regeneration. The absence of a ballot reflects the distinctive nature of supported or specialist housing, including the type and basis of provision and, in some cases, particularly where accommodation is intended to be transitional, the rights of those living there. The interests of those living in supported and specialist accommodation on estates are also protected by the funding condition's stipulation that, where the need for supported or specialist accommodation remains, alternative provision should be made.
  - those who live in the PRS on an estate where regeneration is proposed: PRS tenants will not be eligible to vote unless they have been on the HNR for at least a year prior to the date of the ballot. However, this policy reflects the current situation and those PRS tenants who are most in housing need are likely to be on the HNR and thus able to vote. Also, as outlined above, *Better homes for local people* makes clear that all residents and wider stakeholders should be able to influence plans for estate regeneration, even if they are not eligible to vote in a ballot. In addition, the Mayor's wider housing strategy, in particular for improving standards and affordability in the PRS, should mitigate any negative impacts on these groups.
- 4.4 Second, where those with some protected characteristics are less likely to experience benefits that result from estate regeneration schemes – for example, an increased

supply of affordable housing, or new social infrastructure – this is typically because they have a lesser need for these benefits.


- 4.5 Third, most of the potential negative impacts identified will only arise if the policy results in fewer estate regeneration schemes coming forward. The GLA assesses that the policy is more likely to have a neutral impact on number of estate regeneration schemes that come forward, particularly over time. If fewer estate regeneration schemes take place, then any adverse impact on housing supply – and thus on the supply of affordable housing – should be mitigated by the wider Mayoral policies to increase overall housing supply and the supply of affordable housing, as outlined in the draft revised London Housing Strategy and draft London Plan.
- 4.6 Overall then, it is reasonable to assess that the funding condition will help to eliminate discrimination, harassment and victimisation, as well as to advance equality of opportunity and foster good relations between those who share particular protected characteristics and those who do not.

## **5. Data Sources**

- 5.1 This assessment has drawn data from a range of sources. The two key ones are the English Housing Survey 2014-16 (for data on the proportion of Londoners with protected characteristics on boroughs' HNRs) and the 2011 Census (for data on the proportion of Londoners with protected characteristics in different housing tenures). Data from both sources is summarised in table 1 below.
- 5.2 All other sources of data that have informed this report have been referenced in the body of the assessment.

**Table 1: Percentage of Londoners with protected characteristics on borough housing registers<sup>25</sup> and by tenure<sup>26</sup>**

	Borough Housing Registers	Social rented housing	Owner occupation	Private Rented Sector	London overall
<b>Age</b>					
Children (0-16)*	72	27	18	19	20
Young People (16-24)	2	14	9	15	12
Older People (60+)**		11	15	3	11
<b>Disability</b>	37	23	13	7	14
<b>Gender Reassignment</b>					
<b>Pregnancy or maternity</b>					
<b>Race (BAME background)</b>	57	53	34	42	40
<b>Religion or belief***</b>		72	72	67	71
<b>Sex****</b>		53	51	48	51
<b>Sexual orientation</b>					
<b>Marriage and civil partnership†</b>		17	37	21	28

 = no data available

\* Households on the register with at least one child

\*\* Housing register data relates to ages 60+, census data relates to ages 65+

\*\*\* percentage of people in this tenure with a religious belief

\*\*\*\* percentage female

† this refers to households not individuals

<sup>25</sup>GLA analysis of 2012/13 to 2014/15 English Housing Survey data

<sup>26</sup>GLA analysis of 2011 Census data