

Due Regard (Equality Analysis)

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

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

Name of procedure being analysed: Land at Naseby Close, Market Harborough

Name of lead officer: Judith Wise (Platform HA) / Tom Day (HDC)

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

Date assessment completed: 02 November 2020

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

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

This document is an update to the Due Regard dated 20 December 2019. This update is required due to the cabinet decision on 2 November 2020 to accept the offer from Platform Housing Group for the councils land holdings at Naseby Close and for Platform to develop an all affordable housing scheme, rather than a market housing scheme previously proposed by the Council.

The site layout, house designs, landscaping will remain as previously proposed in the planning application 19/01069/FUL | Demolition of existing bungalows on site (including amenity facilities) and detached bungalow and associated ancillary buildings. Development of 38no. residential units, associated amenity and construction of additional car parking to serve Naseby Square.

However, the switch to an all affordable housing development is a material change to the current planning application for market homes and therefore a new planning application needs to be submitted. The Council will lead on achieving this consent prior to formal sale and this will require a new consultation exercise to be undertaken and views invited on the revised proposal. The Council is aiming for this application to be presented to Planning Committee in February 2021.

This updated Due Regard will support the new planning application.

The key driver for the sale of Councils land is to support the delivery of the Council’s Corporate Delivery Plan, Critical Outcome (CO) 3 “Enable Delivery of Quality Homes for All” by providing affordable housing to those that need it and by delivering new housing that provides a range of house types, tenure, size and location.

The total site comprises former garage land historically owned by the Council along with land that is currently owned by Platform Housing Group (Naseby Square), and land recently acquired by HDC at 87 Granville Street and 3 Naseby Close.

Naseby Square is a scheme consisting of 61 bungalows a community hall, Lounge and office owned by Platform Housing Group. The development was built in approx. late 1950s early 1960s and as such the bungalows are designed to old specifications. Platform Housing Group have indicated these are difficult to heat and, due to their internal layout, difficult to adapt for people with physical disabilities. Due to the age of the design and internal accessibility limitations of the properties Platform Housing have found it difficult to find tenants for vacant bungalows. The proposal would require demolition of 21 of the existing bungalows at Naseby Square to enable the site to be developed. This includes a units used as a residents lounge and staff office. The bungalows in question are all currently vacant.

The Council’s garage site is currently an area that is substantially overgrown with dense vegetation and has been used for anti-social behaviour in terms of drug use, lighting of fires, and fly tipping.

The site acquired by the Council in August 2019 at 87 Granville Street contains an empty 3 bedroomed bungalow with a large garden area. This also has become overgrown due to the passage of time without maintenance.

As a partner of Harborough District Council, Platform Housing have regular meetings to discuss the potential provision of affordable housing and housing need identified throughout the district. Through discussions a proposal was formulated to consider the development of the total site to provide more up to date, modern housing. This could be used to relieve some of the pressure on the housing register by ensuring that people are accommodated rather than affordable housing being left vacant.

It was deemed important to ensure that those who will remain on the unaffected section of the current Naseby Square site are considered in the revised proposal and are the key community affected.

Step 2: Data collection & evidence

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

Residents: Remaining Naseby Square

There are 42 residents at Naseby Square. They are all single person households, the characteristics of these residents are:

- Age: 55 to 97 years
- Female – 23 Male – 19
- Disability: mobility issues due to old age

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

Changes have been made to positively respond to comments received during the previous planning application process, which commenced July 2019. The key changes are;

- Seven more bungalows are now being proposed compared to the planning application submitted on 2nd July 2019 which only had one.
- A larger community room than originally designed for Naseby Square residents and the provision of a disabled toilet and level access to a community garden.
- Pedestrian connections with Newcombe Street, Naseby Close, and Stuart Road.
- Environmental enhancements to the proposals comprising triple glazing for all of the new homes, external clothes drying areas for each unit, a communal bicycle storage area, and communal electric car charging points.

Housing Needs for Market Harborough

Housing and Economic Development Needs Assessment (HEDNA) 2016

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

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

Policy H2 (Affordable Housing) requires housing developments (of more than 10 dwellings or with a combined gross floorspace of more than 1,000 square metres) to provide a minimum of 40% of the dwellings as affordable housing. If bungalows form part of a development, they equate to the equivalent of 1 bungalow for 2 houses. The revised proposal is for 100% of dwellings to be affordable.

Challenges for First time buyers (FTB):

FTB buyers face real challenges to get on the housing ladder in this area:

- Harborough district has the highest house price to income ratio in Leicestershire - 9 times income needed (HEDNA2017).
- The average price paid by a FTB in the area was £239,694 for new build semi-detached house in Harborough in December 2019 (UKHousePriceIndex).
- The average price for new all build properties in the area was £344,209 in October 2019.
- Average earnings in the area for the 22-29 age range are £22,437 in 2019. This would enable a mortgage of £100,966 (4x earnings). Average earnings for the 30-39 age range is £27,327, which would enable a mortgage of £122,971.
- Nationally there was a 50% reduction in under 35s owning a house between 2001 and 2011 (HEDNA2017). After a decade of decline the proportion of 35-44 year olds in owner occupation has started to increase (EHS2018).
- Nationally the most common FTB deposit is £25,000.
- Nationally the average FTB is 33 years old.
- Nationally just over half FTBs bought with partner.
- Demographic data shows an underrepresentation of 20-40 year olds in the Harborough district with cities, including Leicester showing an overrepresentation for this age group compared to the national population. Anecdotally one reason for this may be house prices, which are lower in the city.

Harborough District Council Housing Register Data

The Council maintains a register of households that require affordable rent properties. Figures contained in the tables below are broken down into the wards households have selected as their 'area of preference', by bedroom need and, for 1 and 2 bedroom homes, whether the household is over 55 years old.

Some over 55's who have a need for a 1 bedroom may like to have a 2 bedroom property, but technically they do not have an assessed need for 2 bedrooms. The Spare Room Subsidy is applicable to households in social housing who are under state pension age. This means that a couple who are 55 years old are entitled to a 2 bedroom bungalow through the housing register allocations criteria, but they may be subject to the spare room subsidy until they are pension age, unless they can prove that they have a medical or other need for that second room. This will reduce their housing benefit (or housing element of Universal Credit) by 14% for the first bedroom they have spare and 25% for 2 or more spare bedrooms.

Table showing number of households requiring affordable rent properties by bedroom need:

Ward	Total Households	1 bed under 55	1 bed over 55	2 bed	2 bed over 55	3 bed	4 bed	5 bed	6 bed
Market Harborough-Welland	287	97	57	89	0	29	13	5	0
+/- on previous EIA (Dec 2020)	+67	+25	+8	+27		+5	+4	+2	-1
Have a mobility need		7	7	6		1	1	2	
Specific Mobility Needs									
Limited steps		4	3	4					
Level access required		3	1			1			
Ground floor			3	1			1	1	
Downstairs toilet				1					
Wheelchair accessibility (not full-time user)								1	

How the site meets housing needs for first time buyers and affordable rent.

The revised proposal is for Platform housing to build 38 affordable homes. These will be a mix of sizes and tenures which are designed to be attractive to both first time buyers and those looking to rent affordably.

To help FTB and lower income households to get a foot on the property ladder a proportion of the homes will be shared ownership. With Shared ownership residents can buy between a quarter and three-quarters of a property and pay an affordable rent on the remaining share to the housing association. Residents have the option to buy a bigger share in the property at a later date. These schemes are aimed at people who don't earn enough to buy a home outright

The Housing Register is constantly changing but there is a strong demand for affordable rent properties in Market Harborough. The provision of bungalows may be attractive to those on the register with mobility needs.

Overall, the proposed unit mix presented by Platform housing is designed to achieve scheme viability and an appropriate mix of units that will meet local housing need demand.

Table showing affordable Housing Mix for the Redevelopment at Naseby Close

Type	Affordable Rent	Shared Ownership
House – 1 Bed/2 Person	3	0
House – 2 Bed/4 Person	7	6
House – 3 Bed/5 Person	5	9
Bungalow – 2 Bed/3 Person	8	0
Total	23	15

Step 3: Consultation and involvement

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

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

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

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

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

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

Platform Housing Staff arranged and carried out meetings at all of the tenant's homes, to discuss their individual concerns and needs.

This gave all residents a direct opportunity to discuss, on a personal basis, the process for moving, properties that Platform had in the areas of their preference, what financial compensation was available and the timescales of the proposal. It was stressed at each meeting that there was no time pressure for them to move and offers of alternative properties would be presented until they found one that they liked. It was also stressed that any modifications and adaptations that may be required in an alternative property would be made prior to them moving in at a cost to Platform Housing Group. All residents chose to be rehoused with Platform Housing Group and not with another Landlord.

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

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

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

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

The revised proposal to bring forward an all affordable housing development is a material change to the current planning application for market homes and therefore a new planning application needs to be submitted. The Council will lead on achieving this consent prior to formal sale and this will require a new consultation exercise to be undertaken and views invited on the revised proposal. The Council is aiming for this application to be presented to Planning Committee in February 2021. To confirm the only material change is the tenure of the properties. The site layout, house designs, landscaping will remain as previously proposed.

Step 4: Potential impact

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

There are impacts to remaining residents at Naseby Square who will be impacted by the change in environment. They were concerned for their safety following antisocial behaviour on land which is currently overgrown and how secure they will be due to the new housing for couples and family housing which will mean a higher level of children in the area. They do not want to live in an area known for its young occupancy and would prefer an area of housing of their own age group. They are also concerned about the potential loss of the feeling of community as the result will be to split in half of the existing community. All of these residents are aged over 55 and some of these have mobility difficulties or disabilities.

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

Prior to the Government lockdown in March 2020, Platform Housing Group held a number of surgeries in the Community Lounge for residents, or where requested, in the privacy of their homes. Each surgery was publicised and facilitated by the dedicated Neighbourhood Officer and attended by a number of stakeholders including the Police. All issues identified were resolved.

During lockdown the Platforms Neighbourhood Officer made contact with all residents to check on their welfare. Platform has a Hardship Fund and made financial donations to food banks in the Harborough District to ensure that residents were able to access the service and the service was well supplied.

Harborough District Council and Platform Housing Group hold regular meetings as we continue to work within the constraints of Covid 19 to ensure that residents are safe and they have access to food and appropriate support services.

A regular newsletter giving updates on all events, meetings and outcomes has been sent to all residents, Local Councillors, the MP, Neil O'Brien and HDC staff.

Step 5: Mitigating and assessing the impact

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

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

We continue to be mindful of Covid 19 and will continue to work within the framework of Government advice. The Government has announced a minimum 4 week lockdown from the 5 November. Whilst current advice is that no one is required to shield, we will contact all residents to ensure they are well and have access to food and other essential items. Platform Housing Group has a Hardship Fund and will utilise this if required to support residents where a need is identified as well as make referrals for support to the Welfare Team and other stakeholders where appropriate.

Step 6: Making a decision

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

To Summarise;

- The impact is the disruption and disturbance to remaining residents at Naseby Square. This is due to the change in environment, disturbance, potential mess and noise for the remaining residents from the new building site
- The Tenants affected are all aged over 55, with varying physical conditions to be considered
- The strong community feeling between the tenants that has built up over time they have all lived there
- Constant internal communication between housing, lettings, development and maintenance teams concerning the effect of the proposal and wellbeing of the tenants involved is an important part of the project
- External meetings/contact with Harborough District Council, Councillors, the design team and the tenants themselves to provide updates and receive comments for action to provide a better process
- Consultations carried out with the tenants along with individual visits to determine what their individual concerns are that need to be addressed and action taken

- Housing officers keeping in regular contact with tenants to offer help and advice whenever required daily not just at arranged meetings. This assists residents to provide feedback privately as well as publicly at meetings
- The development will provide availability for alternative affordable housing which will benefit residents with various characteristics within the District
- The development will provide a mix of accommodation which is intended to bring a more diverse community and greater wellbeing for people who are struggling to get on the housing ladder or waiting on the housing register
- Remaining residents to be empowered and consulted with regard to landscaping etc to ensure they feel safe and secure in their homes and surroundings

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

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

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

Equality Improvement Plan

Equality Objective :

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

Officer Responsible: Judith Wise (Platform HG)

By when: March 2021

Equality Objective :

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

Officer Responsible: Mark Beddow

By when: March 2021

Signed off by: Judith Wise / Tom Day

Date: 2.11.20