

Appendix 3

Title of this Equality Impact Assessment:

Hackney Housing Strategy 2017-22

Purpose of this Equality Impact Assessment:

To assess the impact of the priorities and actions in the proposed Hackney Housing Strategy 2017-22

Officer Responsible: *(to be completed by the report author)*

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Director: John Lumley

Date: 23 August 2017

STEP 1: DEFINING THE ISSUE

1. Summarise why you are having to make a new decision

The previous Hackney Housing Strategy (2010-2015) was agreed by the full Council in November 2010. In the following year, 2011, the incoming government introduced fundamental reforms to social housing and the welfare system, and an updated Housing Strategy was adopted by the Council in October 2012.

Engagement with residents and stakeholders on refreshing the Housing Strategy began in 2015, and the new Strategy was timed so that it could take account of the findings of 'Hackney: a place for everyone', the measures introduced by the Housing & Planning Act 2016, and the housing policy and investment priorities of a new Mayor of London, following the mayoral election in May 2016.

Formal public consultation on the Housing Strategy took place from 27 March to 22 May 2017, including a borough-wide questionnaire survey, a workshop event with housing associations, and updates at meetings with Council tenant and resident representatives and private tenant focus groups.

Extensive internal engagement has also taken place with services from across the Council.

The Housing Strategy is expected to have the following benefits:

- clearly articulates the Council's proposed response to the huge housing challenges faced by the Council and its residents over the next five years and beyond
- provides a clear statement of the Council's vision and priorities for housing, for residents, partners and other stakeholders.
- for Council officers and partners in particular, helps shape actions and helps target resources towards meeting the highest housing needs
- following wide and thorough consultation, demonstrates to residents how the Council and partners propose to address their housing concerns.
- shows how housing and other services across Council will work together to help address the housing and housing-related needs and aspirations of residents
- highlights linkages and sets out how housing and housing providers can contribute to residents' health and wellbeing, as well as enabling residents to secure training and jobs
- together with planning policies and guidance, provides other housing providers with an overarching statement of the Council's priorities and approach
- sets out how the housing aspirations in the Council's Community Strategy will be delivered in the medium term, and informs the development of housing policies and guidance in the current review of the Local Plan
- demonstrates to government that the Council is addressing the requirements of the Housing & Planning Act 2016 and other legislative and policy proposals, and to the GLA that the Council's Strategy is aligned with the Mayor of London's Housing Strategy
- will directly shape a detailed action plan that will be drawn up if the proposed Housing Strategy is adopted.

2. Who are the main people that will be affected?

The Housing Strategy has a key role in helping meet the Mayor's vision that everyone in Hackney has a genuinely affordable, good quality, and stable home. All Hackney's residents will therefore potentially be affected by implementation of the Strategy, since it includes measures to increase the supply of housing across all tenure and price points. However, there is a particular focus in the Strategy on the need for genuinely affordable homes for those on low and medium incomes.

The main people that will be affected are:

- Households in high housing need, for example homeless and overcrowded households, including those on the Housing Register and in Temporary Accommodation,
- Households with low and medium incomes more generally, who are looking for genuinely affordable housing in the borough
- Existing social housing tenant households
- Households requiring some level of housing with support
- Private tenants and landlords

STEP 2: ANALYSING THE ISSUES

3. What information and consultation have you used to inform your decision making?

Many households in Hackney, and in London and the South East more generally, are experiencing an unprecedented housing crisis because of the lack of genuinely affordable housing. The Hackney Housing Strategy is underpinned by an evidence base that sets out nature and magnitude of the crisis and its impact on Hackney residents. This is kept updated with new or improved information as it becomes available. However, some of the key facts are:

- Despite the Council and partners' excellent track record in the provision of new affordable housing, growing demand in London and severe and worsening housing affordability have meant that housing need is rising faster than supply.
- There is a high existing need for genuinely affordable housing, with over 12,500 households on the Council's housing register, and around 3,000 households accepted as homeless and living in temporary accommodation.
- In future, a growing population will also add to housing needs. Hackney's population has grown by over 55,000 people since 2001, to around 274,000. The population is expected to reach over 318,000 by 2031.
- The average house price in Hackney is 17 times median household earnings¹, and private rent levels are also very high, with an average rent of £1,820 per month for two-bedroom flat² - a 36% increase since 2011.

¹ ONS, *Housing Summary Measures Analysis*, published 2017

- While the Council's own housing regeneration programmes are currently forecast to deliver over 3,000 new homes during the next 10 years, the number of new homes being built by housing associations in the borough has decreased by an annual average of 80%.
- With some of the highest house prices in the country, many households on low and medium incomes are unable to afford to buy. This has contributed to a rapid rise in the size of the private rented sector, which has doubled over ten years and now houses at least 30% of the borough's households. However, the private rented sector is much less well-regulated than affordable housing and there are problems of poor conditions and management, particularly at the lower rent end of the market.

While there is no statutory requirement to consult on the Housing Strategy, the Council decided to carry out thorough consultation with residents, partners and other stakeholders, beginning in 2015.

Under 'Hackney: a place for everyone', the Council heard from 4,500 local residents and businesses. There were two specific events to consult on strategic housing priorities, together with housing-related findings from a range of other engagement activities, for example:

- A housing stakeholder engagement event took place in November 2015, involving Housing Associations, private developers, voluntary organisations and officers from housing and housing-related services from across the Council.
- A housing public meeting took place in March 2016, hosted by the Mayor and a panel of experts and resident representatives.
- A borough-wide housing survey was carried out by Ipsos-MORI, which found that housing affordability was the top concern of Hackney residents.
- The housing concerns expressed in face-to-face interviews with residents were identified and compiled.

Public consultation on the Housing Strategy took place for six weeks from 27 March to 22 May 2017. This included a borough-wide questionnaire survey, which was widely promoted in the print media and social media, and hard copies were made available in Council offices. A total of 150 residents responded to the survey.

Other activities during this period included:

- Letters to the GLA and all housing associations working in the borough, seeking their views and asking housing associations to promote the survey to their tenants
- A presentation and workshop event, to which all housing associations working in the borough were invited
- Updates to meetings of council tenant and resident representatives
- Focus groups with private tenants, who tend to be harder to reach

A Consultation Report, summarising the findings of this public consultation, has been published on the Council's website: [Consultation Report](#)

The Housing Strategy proposals were supported by a clear majority of those who responded to the survey and by other stakeholders, such as housing associations

² *London Rents Map, average rents in Hackney, February 2017*

working in the borough. Those responding also provided a wide range of helpful and constructive comments, concerns and suggestions, and these were taken into account in developing the final proposed Strategy.

Equality Impacts

4. Identifying the impacts

Hackney is one of the most ethnically diverse local authority areas in the country. Just over a third (36%) of respondents to the 2011 Census in Hackney described themselves as White British. The remainder is made up of black and minority ethnic groups, with the largest group Other White, 16% followed by Black African, 11%. The number of Black Caribbean people has fallen slightly in the past 10 years. They now make up 7.8% of Hackney's population compared with 10.3% in 2001.

Hackney is home to a number of smaller national and cultural communities. Hackney has the largest group of Charedi Jewish people in Europe who predominately live in the North East of the borough and represent an estimated 7.4% of the borough's overall population

Hackney also has a well-established Turkish and Kurdish community; At least 4.5% of the Hackney population is Turkish (derived from the 2011 Census). These populations are often captured in the White British/Other White, Other Ethnic Group or, for Turkish people, Arab.

The challenge of housing affordability falls most heavily on those with low incomes, including especially those who are not currently housed in genuinely affordable, stable housing. But welfare reforms mean that even those already housed in social rented homes, and in receipt of benefits, are increasingly facing hardship.

Some ethnic groups are over-represented amongst those with low incomes. The lowest levels of incomes (below £15,000 p.a.) are found in the Turkish, African and Caribbean ethnic groups.

Fig. 1 Income by ethnic group (Hackney Housing Needs Survey, 2014)

Income Band	Ethnic Group							
	Asian	White British	Other White	Turkish	Caribbean	African	Black	Mixed and Other
Less than £5,000	12.5%	11.7%	10.6%	21.6%	22.8%	9.2%	17.1%	8.4%
£5,000-£10,000	27.8%	18.8%	17.1%	41.2%	34.6%	32.4%	32.0%	25.8%
£10,000-£15,000	11.9%	6.8%	9.2%	6.0%	12.0%	20.0%	8.2%	4.4%
£15,000-£20,000	7.4%	4.1%	4.4%	10.2%	10.2%	15.6%	14.8%	9.4%
£20,000-£30,000	8.8%	9.3%	14.9%	11.4%	10.2%	9.5%	11.4%	20.8%
£30,000-£40,000	7.5%	10.5%	14.4%	2.6%	4.6%	6.9%	7.7%	12.3%
£40,000-£60,000	11.3%	14.4%	15.0%	2.2%	4.6%	5.2%	1.9%	11.0%
£60,000 or more	13.1%	24.5%	14.4%	4.7%	1.1%	1.2%	6.9%	8.0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

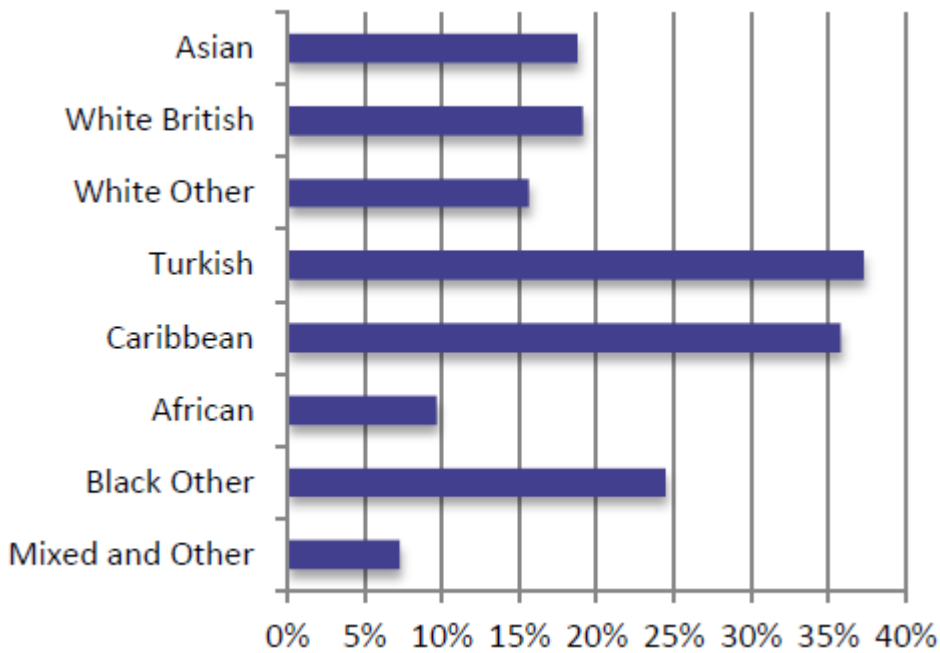
Hackney is a relatively young borough with just under 25% of its population under 20 years. The proportion of residents between 20-29 years has grown in the last ten years

and now stands at just over 20%. People aged over 55 make up 18% of the population. However, life expectancy is rising and the number of older people as a proportion of Hackney’s population is expected to grow.³

The index of Deprivation Affecting Older People (IDAOPI) had a value of 42 in 2015, which means that 42% of those aged 60 and over are either in receipt of Pension Credit, out of work benefits or where their income is less than 60% of the national median excluding housing benefits, but before housing costs. In 2015 Hackney ranked second for all local authorities in England for this indicator.

An important household characteristic which may have an impact on housing needs is health. A population which is suffering from more long-term illness or disabilities may require greater support to live in their homes or the provision of specialist housing. Figure 2 shows that households that consist of Turkish and Caribbean ethnic groups are most likely to contain a member with a long-term illness, disability or infirmity, followed by Black Other households.

Fig. 2 Percentage of households with long-term illness, disabilities or infirmities (Hackney Housing Needs Survey, 2014)



Characteristics of the main groups who will be positively affected

(i) Households waiting for housing on the Council’s housing register and homeless households accepted by the Council

There are currently 12,500 households on the Council’s housing register. Of the households who identified their ethnicity, 38% are from Black ethnic groups⁴. This compares to 23% of the borough’s population who are from Black ethnic groups. White and Asian ethnic groups make up 54% and 9% respectively of households on the housing register.

³ A Profile of Hackney, its People and Place, 2016, <https://www.hackney.gov.uk/Assets/Documents/Hackney-Profile.pdf>

⁴ Council records, housing register, July 2017

There were 803 households accepted by the Council as being homeless and in priority need in 2016-17. Of those who identified their ethnicity, 54% were from Black ethnic groups, 27% from White groups and 10% Asian. Black groups were therefore significantly overrepresented amongst households approaching the Council as homeless, compared to the borough's population as a whole.⁵

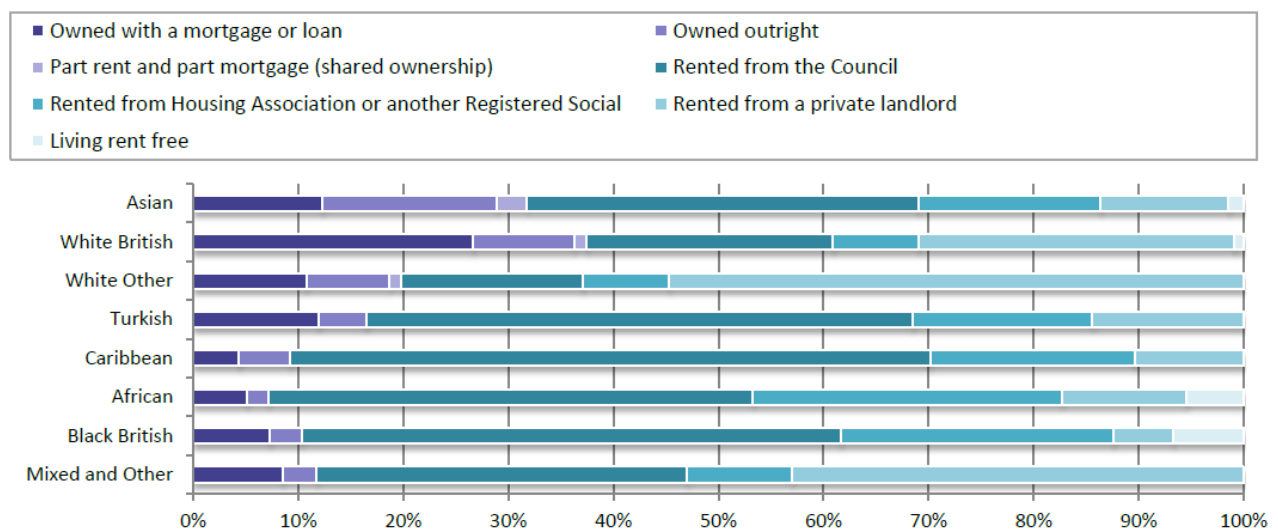
(ii) Existing social housing tenant households

Some 44% of Hackney's households live in social housing, whether provided by the Council or housing associations (Census 2011).

Black ethnic groups in Hackney are least likely to be living in owner occupation (10% of Black Other households, 9% Black Caribbean, 7% Black African), and are most likely to be living in social housing (80% of Black Caribbean households, 77% Black Other, 76% Black African).

In addition, 69% of Turkish households are living in social housing, 55% of Asian households, 45% of Mixed and Other households and 33% of White Other households.

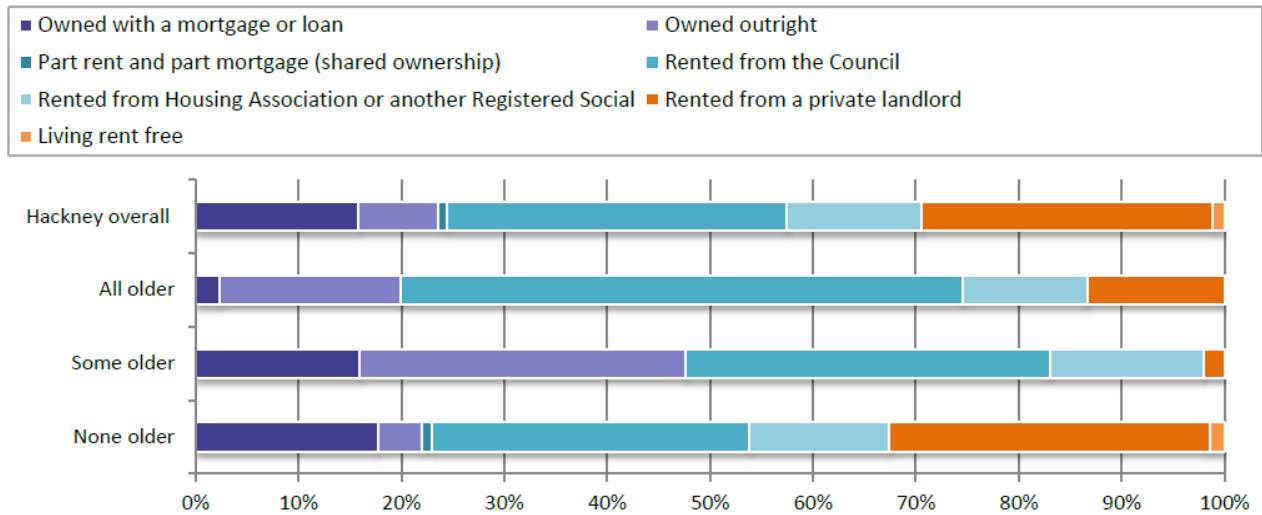
Fig. 3 Tenure by ethnic group (Hackney Housing Needs Survey, 2014)



Of Hackney households where all members of the household are older people, some 65% are renting in the social housing sector.

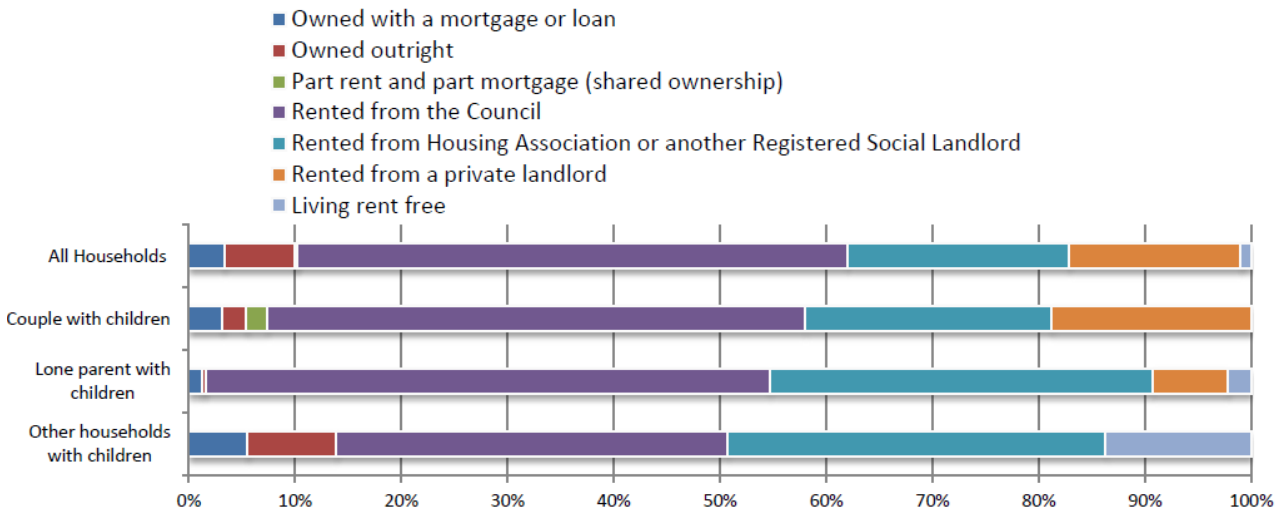
⁵ DCLG Live Table 784, Local authorities' action under the homelessness provisions of the 1985 & 1996 Housing Acts

Fig. 4 Tenure by age group (Hackney Housing Needs Survey, 2014)



In terms of households on lower incomes with dependent children, single parents are more likely to be living in council or housing association homes.

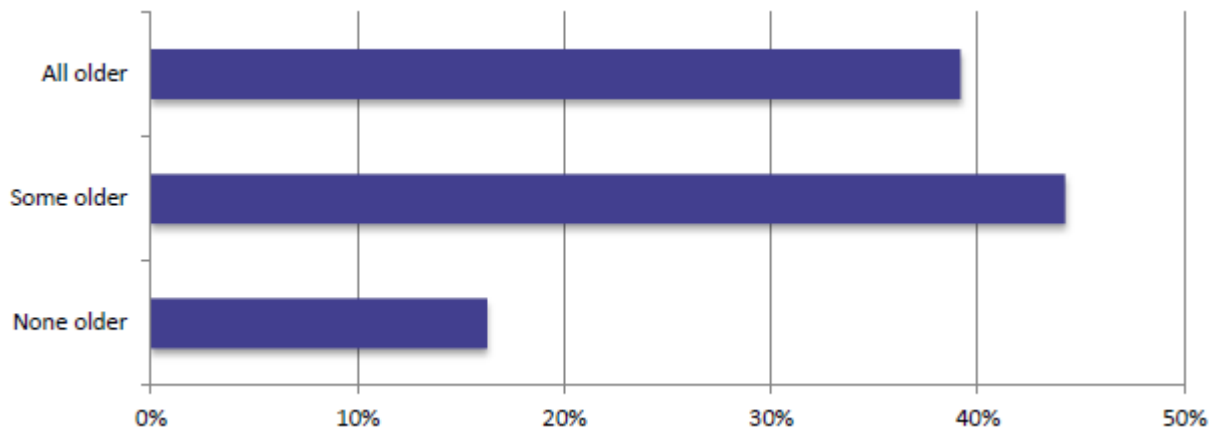
Fig. 5 Tenure by household type (income less than £20,000) (Hackney Housing Needs Survey, 2014)



(iii) Households potentially requiring some level of housing with support

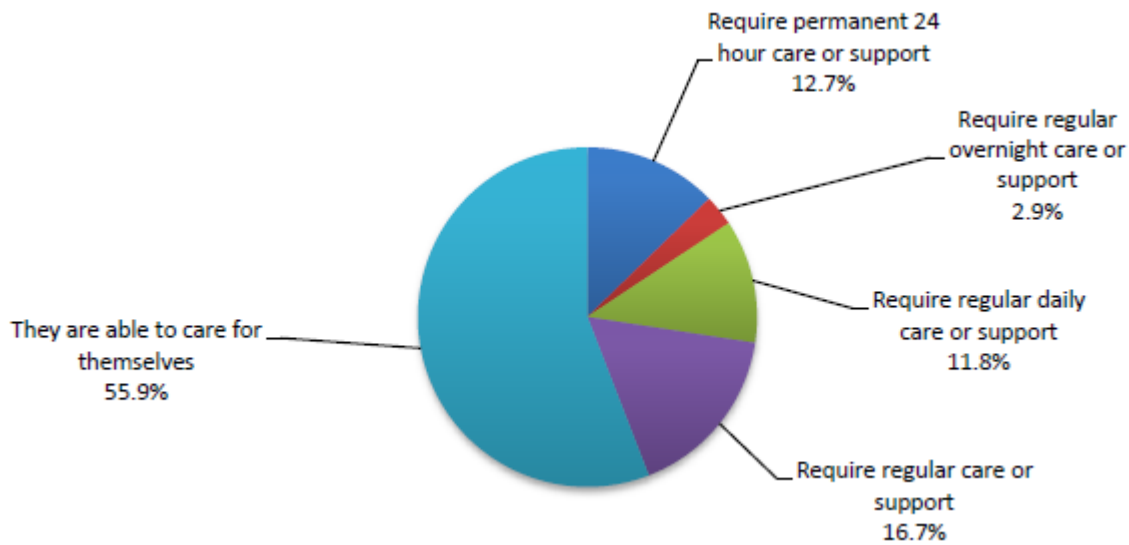
Findings from the Housing Needs Survey indicated that 39% of all older households and 43% of households which contain some older members have at least one member suffering from a self-reported health problem (Figure 6). This compares with 15% of households which have no older members.

Fig. 6 Percentage of households with health problems (long-term illness, disability or infirmity) by older person household (Hackney Housing Needs Survey, 2014)



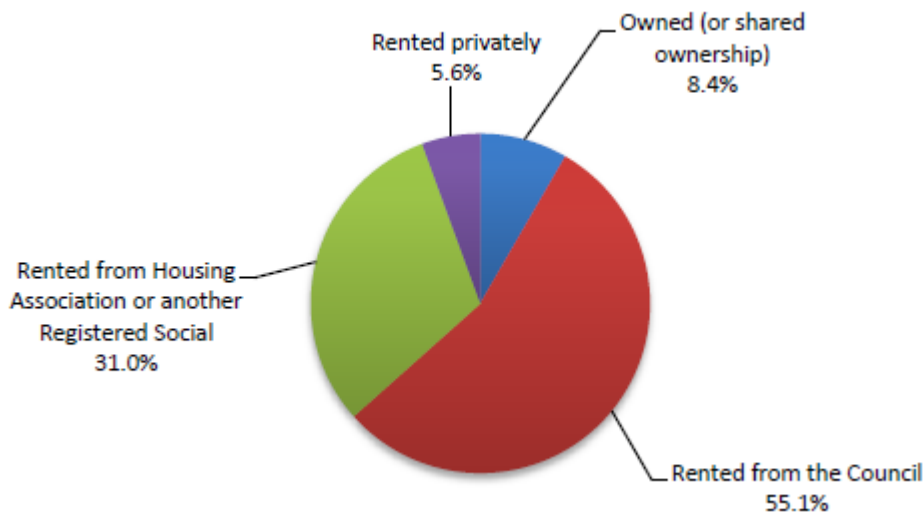
The chart below shows survey results that, of the household members with a health problem, 56% were able to care for themselves and the remaining 35% needed some form of care or support.

Fig. 7 Care needs of households with 1+ members experiencing health problems (Hackney Housing Needs Survey, 2014)



Of the 20% of households which contained someone who had a health problem 33% felt that their health problem affected their housing requirements. Of these households, only around 8% own their own home and are therefore normally responsible for their own adaptations; however over half (55%) rent from the council and over 3 in 10 rent from a housing association.

Fig. 8 Tenure of households with 1+ members experiencing health problems and feel that their health problem affects their housing requirements (Hackney Housing Needs Survey, 2014)



(iv) Private tenants

The proportion of households who rent from a private landlord has more than doubled in the past 10 years, and around a third of all Hackney's households are now private renters⁶.

A significant proportion of homes in the Hackney's private rented sector (PRS), 11% borough-wide, contain serious (Category 1) hazards, rising to 20% in some wards. 17% of occupants are on low incomes and 11% suffer fuel poverty due to poorly heated and/or insulated homes. 4,269 privately rented homes in the borough are Houses in Multiple Occupation (HMOs)⁷.

As housing affordability has worsened in Hackney (an increase in house prices of 76% in five years⁸), a growing number of households with dependent children are living in the PRS. The table below shows that 19 per cent of households in Hackney's PRS have dependent children:

⁶ Census, 2011, Building Research Establishment, Hackney Integrated Dwelling Level Housing Stock Modelling Report, August 2017

⁷ Building Research Establishment, Hackney Integrated Dwelling Level Housing Stock Modelling Report, August 2017

⁸ Land Registry index of house prices

Fig. 9 Household type by private rent (Hackney Housing Needs Survey, 2014)

Household Type	All Households	Private Rent Households
Single Person	30.2%	19.6%
<i>All aged 65+</i>	7.7%	3.9%
<i>Other</i>	22.5%	15.7%
Single Parent	14.0%	6.0%
<i>With dependent children</i>	10.1%	4.6%
<i>With all Children are non-dependent</i>	3.9%	1.4%
One Family	34.6%	32.1%
<i>All aged 65+</i>	2.1%	0.6%
<i>Adult couple with no children</i>	13.8%	18.7%
<i>Adult couple with dependent children</i>	16.2%	11.7%
<i>Adult couple with all Children are non-dependent</i>	2.6%	1.1%
Group of Adults	21.1%	42.3%
<i>With dependent children</i>	4.5%	2.6%
<i>All aged 65+</i>	0.2%	0.0%
<i>Any other religion</i>	16.4%	39.8%
Total	All Households	100.0%

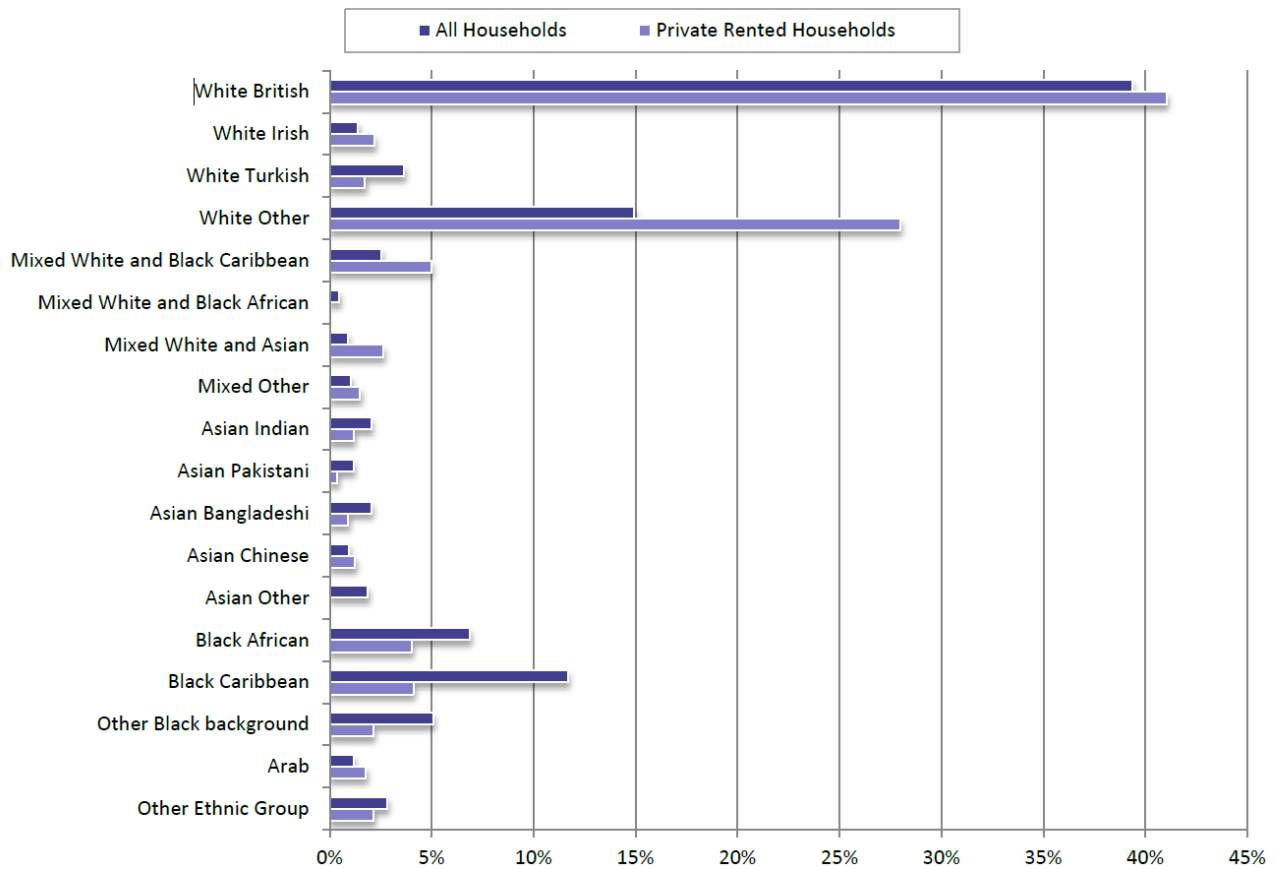
The PRS also includes 25% of households with low incomes of less than £15,000 per annum⁹.

Around 50% of Hackney’s young person households (under 25) are living in the private rented sector (compared to around a third of all borough residents). Young people without dependents in receipt of housing benefit face particular affordability issues in securing a privately rented letting, as they are only eligible for the much lower Shared Accommodation Rate (Local Housing Allowance). However, older people also live in the private rented sector – some 13% of all households where all members of the household are older.

The ethnic composition of households living in the PRS is different to that for all households living in the borough. White Other households are more likely to be housed in the PRS, followed by White British, Mixed White and Black Caribbean, and Mixed White and Asian households:

⁹ Hackney Housing Needs Survey, 2014

Fig. 10 Ethnicity by private rent (Hackney Housing Needs Survey, 2014)



4 (a) What positive impact could there be overall, on different equality groups, and on cohesion and good relations?

The positive impacts are considered below, under each of the five themes of the Housing Strategy:

1. Building high quality, well-designed, and genuinely affordable new homes

By increasing the supply of genuinely affordable social rented homes, the broad actions proposed under this theme would have particularly positive impacts for households in priority housing need on the Council’s housing register, and especially homeless households in Temporary Accommodation.

Residents who are allocated newly built homes would also benefit from the commitment to meet or exceed design and quality standards for homes, blocks and estates, as these would help address the health needs of residents, and meet the needs of people with disabilities. They would also help to keep homes fuel efficient and help tackle fuel poverty.

The promotion of new homes built specifically for private rent will help improve the quality of housing options for Hackney’s residents, including shared housing for young people and a proportion of homes at affordable ‘Living Rents’.

Delivering new supported housing in Hackney that meets the borough's highest unmet needs, will particularly benefit groups such as older people, people with mental health needs, and people with learning disabilities, some of whom may need specialist supported housing.

2. Making best use of new and existing homes

The proposed actions for protecting the existing social housing stock, for example ensuring like-for-like replacement of homes sold through the extension of Right to Buy and the forced sale of council homes, would have particularly positive impacts for households in priority housing need on the Council's housing register, and especially homeless households in Temporary Accommodation.

Proposals relating to ensuring the fire safety standards of block and estates, and improving energy efficiency and affordable warmth, will have a particularly positive impact on existing social housing tenants, though residents in all tenures will benefit.

A review of existing supported housing to assess whether it is still meeting the highest needs of residents, will benefit those in need of housing with support in the future, for example older people.

3. Addressing standards and affordability in the private rented sector

The proposal to expand our enforcement activity against poor conditions in the private rented sector, including by the proposed introduction of new discretionary property licensing schemes, will have a positive impact both for existing private tenants and those seeking privately rented lettings in future.

For existing tenants, expanding enforcement will improve housing conditions and management standards and improve the health and wellbeing of tenants, especially at the lower-rent end of the PRS market and Houses in Multiple Occupation (HMOs), which tend to house people with lower incomes.

The introduction of property licensing schemes would also help prevent a landlord from serving a notice under section 21 of the Housing Act 1988 (notice requiring possession) as long as the property remains unlicensed, and also would help to mitigate the risk of unlawful eviction by improving the management practices of private landlords.

The above positive impacts would particularly benefit younger people, who are overrepresented in the PRS, but also the growing number of households with dependent children and older people living in the sector.

Plans to review the Council's discretionary grant programmes to homeowners in order to improve their effectiveness, will help address cold homes and helping facilitate hospital discharges, especially for older and disabled residents.

4. Meeting people's housing needs and helping tackle housing-related health and support needs

The proposal to explore with housing associations a 'common housing register', is intended to maximise the social housing lettings available to applicants in the borough. This would, of course, have positive benefits for households on the Council's housing register and in Temporary Accommodation.

Building closer links between housing, health and Adult Social Care providers aims to improve services to residents across the private and social housing sectors, providing better and earlier support to residents with health needs.

Similarly, promoting health initiatives with social housing providers will, wherever possible, help people remain active, independent and healthy in their homes by providing flexible and affordable support services.

Reviewing refuge and move-on options for people at risk of domestic violence, as well as support options for those who do not enter a refuge, will have a positive impact on people facing these issues, most of whom are women.

5. Promoting employment and sustainable communities

Measures to expand the 'Hackney Works' programme, maximise the opportunities for new apprenticeships, and create affordable workspaces, are all intended to support residents to develop their skills and to find good quality and stable local employment. This will help enable residents who are unemployed or in poorly paid, insecure jobs to benefit from the significant economic growth in the borough, and to avoid the worst impacts of welfare reform.

Good quality and stable employment also has significant health and wellbeing benefits and contributes to reducing inequality.

These measures will have positive impacts for all low income residents in the borough, but particularly for social housing tenants who, as a group, have the lowest income levels and highest levels of unemployment.

4 (b) What negative impact could there be overall, on different equality groups, and on cohesion and good relations?

The proposals in the Housing Strategy have few potentially negative impacts for equality groups or for cohesion and good relations. Potentially negative impacts are listed below, and the action plan in section 6 describes the actions that will be taken to eliminate or mitigate them.

- The promotion of new homes built specifically for private rent could replace or 'squeeze out' potential affordable housing, affecting the future supply of homes available to those with low and medium incomes
- Expanded enforcement in the PRS and the fees charged to landlords for licensing schemes could result in:
 - i. the loss of private rented accommodation for low income tenants as landlords pull out of the market
 - ii. increased rent levels for low income tenants
- Expanded enforcement in the PRS could result in tenants being evicted by the landlord and becoming homeless

STEP 3: REACHING YOUR DECISION

5. Describe the recommended decision

The recommended decision is to adopt the proposed Housing Strategy.

As described above, taken together the proposals in the Housing Strategy will be overwhelmingly positive for equalities groups. They are intended to help improve the housing and related options for Hackney residents, particularly those on low incomes; who are in housing need; and who are experiencing poor housing conditions.

STEP 4 DELIVERY – MAXIMISING BENEFITS AND MANAGING RISKS

6. Equality and Cohesion Action Planning

The potential negative impacts are listed in the action plan below, together the actions that will be taken to mitigate them.

If the Housing Strategy is adopted by Cabinet, a detailed action plan will be developed with Council services. This action plan will be monitored to ensure implementation, and a report published on the Council's website annually detailing progress made and setting out corrective action / reasons where progress has not been made.

Any further risks of negative impacts associated with the individual actions, identified by lead officers as the detailed action plan is developed, will be recorded in annual monitoring and steps will be taken to mitigate the risks identified.

No	Objective	Actions	Outcomes highlighting how these will be monitored	Timescales / Milestones	Lead Officer
1	Promotion of new homes built specifically for private rent could replace or 'squeeze out' potential affordable housing	<p>The Council's planning guidance and practice will ensure the maximum provision of genuinely affordable Living Rent homes on 'Build to Rent' schemes.</p> <p>This will be secured through a detailed assessment of an economic viability appraisal for every proposed Build to Rent housing scheme that is submitted to the Council's planning service.</p>	The delivery of affordable homes, including the proportion of affordable housing secured, is negotiated by the planning service on a scheme-by-scheme basis, and monitored annually.	Scheme-by-scheme and annually	Ian Rae, Head of Planning

2	<p>Expanded enforcement in the PRS and the fees charged to landlords for licensing schemes could result in:</p> <p>(i) the loss of private rented accommodation as landlords pull out of the market</p> <p>(ii) increased rent levels for low income tenants</p>	<p>Fees for licensing schemes will be set at a level which will not be punitive over the life of a five-year licence.</p> <p>The proposed fee structure will consider ways of reducing the burden on good landlords, e.g. discounts for early registration and for membership of an accreditation scheme.</p> <p>Effective Public Consultation will assess the likelihood of these risks materialising prior to declaration of any scheme.</p>	<p>Fees will be benchmarked with neighbouring boroughs' licensing schemes.</p>	<p>Prior to declaration of any scheme and annually thereafter.</p>	<p>Kevin Thompson, Head of Private Sector Housing.</p>
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3	Expanded enforcement in the PRS could result in tenants being evicted by the landlord and becoming homeless	<p>An effective referral mechanism for tenants potentially affected to Housing Options and Advice services.</p> <p>Using the improved information on landlords, as a result of property licensing, to identify landlords who may be willing to work alongside the Council's homelessness team to enable easier access to PRS housing</p>	Numbers of cases referred monitored quarterly throughout 5-year life of any scheme.	Quarterly throughout the life of any scheme.	Kevin Thompson, Head of Private Sector Housing.
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