

## Blackshots Community Equality Impact Assessment – January 2024 Review

The Equality Act 2010 states that public bodies must have “due regard” to a variety of Equalities objectives (Equality Act 2010, Section 149) and consequently, Equality Analysis must be carried out to demonstrate that decision-makers are fully aware of the impact that changes may have on stakeholders.

The concept of ‘due regard’ was reinforced in 2012 during the review of the Public Sector Equality Duty (PSED) which “requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities”

‘Due regard’ is dependent on the relevance and potential impact of the decision being considered. The greater the relevance and impact, the higher the regard due.

As an authority, we have made a commitment to apply a systematic screening process to new policy, strategy, functions or service development including reviews or changes to existing policy, strategy, functions or services.

This is to determine whether the proposals are likely to have a significant impact on different groups within our community.

This process has been developed, together with [full guidance](#), to support officers in meeting our duties under the:

- Equality Act 2010
- Public Sector Equality Duty
- The Best Value Guidance
- The Public Service (Social Value) 2012 Act

In addition, the guidance supports officers to consider our commitments set out in the [Thurrock Joint Compact](#) with the voluntary sector.

As well as supporting you to look at whether there is, or will be, a significant impact, the guidance will also consider ways in which you might mitigate this in the future.

## About the service and reason for the development or review process

Name of service	Housing
Lead Officer	Keith Andrews – Strategic Lead – Housing Development
Contact Details	KAndrews@Thurrock.gov.uk

Why is this policy, strategy, function or service development/review needed?

The proposed demolition and associated decant of council tenants and purchase of leasehold dwellings and garages in three tower blocks (Bevan, Morrisson and Kier Hardie Houses) at Blackshots, Grays which would have a significant impact on existing residents, the wider community and those waiting for affordable housing in the Borough.

### 1. Consultation, data and intelligence

1.1 Please highlight the steps you have taken, or plan to take, to consult the whole community or specific groups affected by the policy, strategy, function or service development/review e.g., on-line consultation, focus groups, consultation with representative groups? For further guidance please contact: [consultations@thurrock.gov.uk](mailto:consultations@thurrock.gov.uk)  
***This is a vital step***

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An extensive initial consultation and engagement exercise has been completed with residents of Blackshots Estate with the results reported to Cabinet in December 2022. An initial analysis of feedback received highlights that the redevelopment of the estate is expected to have a positive impact for the health and wellbeing of residents.

More detailed consultation and engagement with existing residents has also now been completed through four on-site consultation events during the summer of 2023 alongside the preparation of a redevelopment proposal. Residents have also been engaged with on an individual basis through home visits with regard to the impact and needs of that resident as a result of their need to move in order to achieve vacant possession for each block.

An independent tenants and leaseholder advisor service has been engaged to be an advocate for tenants and active consultation. They have participated in the consultation events and established a programme of activities focusing on key issues regarding the vacation of the blocks and associated matters.

1.2 Please also provide details on the sources of data or intelligence you have used to inform your assessment of impact and how they have helped you to understand those that will be affected by the policy, strategy, function or service development/review outlined?

Data held on the Council housing management information system Northgate.

Thurrock Council 2017/18 Ward Profiles

Census 2021

Nomis 2011 Ward Labour Market Profile: Little Thurrock Blackshots

Thurrock Council 2022 Stock Condition Survey

This has helped us identify the relevant occupants of the tower blocks to be demolished and gives information on specific rehousing needs and requirements of occupants.

This information helps ensure that the arrangements for engagement and support for residents are accessible to all and meet the identified needs of those occupants directly impacted.

Stock condition data alongside complaints data helps identify the failing nature of the blocks and the need for permanent solutions to the failing external wall treatment and prevalence of damp and mould in the blocks.

Learning has been undertaken from work completed by LB Tower Hamlets at [Microsoft Word - Appendix 4 - Equalities Impact Assessment \(Oct 2021\) \(towerhamlets.gov.uk\)](#) which informs conclusions in this CEIA.

Following update from Treasury end of November, we anticipate we will progress to March Overview & Scrutiny followed by March Cabinet. Following this, planning application consultation to take place in Winter 24/25, vacant possession in Spring 2025, Planning application in Spring/Summer 2025, followed by site construction from Winter 2026-2028.

## 2. Community and workforce impact

1.1 What impacts will this policy, strategy, function or service development/review have on communities, workforce and the health and wellbeing of local residents?

Look at what you know? What does your research tell you?

Consider:

- National and local data sets – please see guidance
- Complaints
- Consultation and service monitoring information
- Voluntary and community organisations
- The Equality Act places a specific duty on people with ‘protected characteristics’. The table below details these groups and helps you to consider the impact on these groups.

	Positive	Neutral	Negative	What are the positive and negative impacts?	How will benefits be enhanced and negative impacts minimised or eliminated?
<b>Local communities in general</b>	✓			<p>Redevelopment will increase provision of healthy and affordable homes available for qualifying Thurrock residents and remove unhealthy and failing accommodation.</p> <p>Redevelopment of new homes will also include creation of new public realm and consequent improvements in safety, accessibility and design to promote healthy lifestyles.</p> <p>The construction process will have a short-term detrimental effect because of noise, dust and access however the benefits of the new development outweigh the temporary disadvantages.</p>	<p>Design and layout of replacement homes will support active lifestyles and provide a range of accommodation meeting local need</p> <p>New public realm will meet modern standards in relation to accessibility and greener travel options such as pedestrian and cycle pathways and electric vehicle charging.</p> <p>Construction contracts will include requirements to meet council design guidance in relation to the new homes and environment. Contracts will deliver social value outcomes to the locality and local people.</p>

					The adoption of Secured by Design principles will help prevent crime and anti-social behaviour
<b>Age</b>	✓			<p>Older people with disabilities are likely to be impacted more by redevelopment</p> <p>Older leaseholders may find it more difficult to raise mortgages on new homes</p> <p>Children and young people may lose access to local play space during construction</p> <p>A range of suitably sized affordable accommodation will be required in the development brief including increased numbers of adapted homes</p>	<p>Older leaseholders have access to independent advice and signposting to support services and how to access qualified financial advisors</p> <p>Phasing of development will aim to minimise loss of available play space during construction</p> <p>The development brief will reflect the mix of housing demand.</p>
<b>Disability</b>	✓			<p>Disturbance as a result of moving will impact those with a disability</p> <p>Those with sensory or learning disabilities may be disproportionately impacted by the change to environment or home.</p> <p>Dust and air quality changes during the construction phase for neighbouring residents not moving out of the estate during the construction period may negatively impact on those with respiratory disease. Noise and changing environment may disproportionately impact those remaining residents, particularly some vulnerable residents.</p> <p>Moving will improve the opportunity for existing residents to be more appropriately housed and for new residents to benefit from modern homes.</p>	<p>Targets will be set for the provision of the number of adapted homes in the new development.</p> <p>Independent tenants and leaseholder advice will continue to be available and meet the needs of people with a range of needs.</p> <p>The contractor will be required to minimise noise, disruption and dust during the construction phase. The impact of construction noise and traffic will be monitored as part of the council's management of the construction contract.</p> <p>The new public realm will be planned in accordance with current design guidance.</p>

			<p>New public realm will be more accessible for those with limited mobility.</p> <p>33% of those residing in postcodes RM162NR &amp; RM162QP are registered disabled.</p>	
<b>Gender reassignment</b>		✓	<p>The redevelopment proposals carry no perceived negative impacts from a gender reassignment perspective</p>	
<b>Marriage and civil partnership</b>		✓	<p>Marriage/Civil partnership status may have implications regarding property ownership and tenure however this will be the case irrespective of the redevelopment process.</p> <p>There are no specific implications for people with this protected characteristic</p>	
<b>Pregnancy and maternity</b>		✓	<p>Disruption for neighbouring residents not moving out of the estate during the construction period may negatively impact on pregnant mothers or families with new-born children.</p> <p>The replacement of the existing poor condition stock with new homes will eliminate the possibility of people enduring poor quality housing whilst pregnant or with newborn children.</p> <p>There will be no specific negative long-term implications for people with this protected characteristic once redevelopment has been completed</p>	<p>The contractor will be required to abide by industry standard practices such as the considerate contractor scheme in order to minimise nuisance and disruption to neighbouring residents during the construction phase.</p> <p>Should Allocations become aware of pregnancy, then the relevant document is requested. This would fall under the monitoring process. Normally expected due date paperwork or a MATB1 certificate is supplied to evidence the pregnancy. At 28 weeks, the unborn child is included on the bedroom calculation to ensure we offer a property that meets the needs of tenants in terms of size. The mental health of all tenants would be considered through the decant process. For instance, any evidence submitted to us in relation to mental health would be assessed by the relevant medical officer. If there is a</p>

					severe case of mental ill-health, for instance, where there may be suicidal tendencies, the property type offered to the tenant may be restricted to low rise properties. All applicants are dealt with equally and in line with the <a href="#">Allocations Policy</a> . However, if any needs are identified regarding MH, we would first advise that they speak with their GP. If they have an allocated support worker, we will liaise with them or our colleagues in ASC/CLS.
<b>Race (including Gypsies, Roma and Travellers)</b>		✓		There are no specific or different implications for people with this protected characteristic	<p>Redevelopment and rehousing plans are to be neutral from a race perspective and will be tested to ensure the plans are fair, unbiased and not influenced by someone's race.</p> <p>The council monitors the equality of its allocation policies on regular planned basis.</p> <p>If a person raises a particular issue with area/property type that could have any detrimental impact on a person's religious beliefs/race etc, then it would certainly be something we would take into consideration.</p> <p>Housing Allocations do ask applicants for their demography/equalities data, but it is their choice as to whether or not they respond to those questions.</p>
<b>Religion or belief</b>		✓		There are no aspects to the redevelopment plans that will prevent residents from practicing their religion/faith and so it is concluded that there will be no specific or different implications for people with this protected characteristic.	During the fact finding and rehousing process residents will be able to raise issues about their place of worship so that the disruption to lives can be minimised



<b>Sex</b>		✓		There will be no specific or identified negative implications for people with this protected characteristic	
<b>Sexual orientation</b>		✓		There will be no specific or identified negative implications for people with this protected characteristic	Design of the new home and public realm will meet secure by design standards which will offer a greater level of security to all, which may be relevant to LGBT+ residents.
<b>Any other community issues identified for this location?</b>  If the project is based in a specific location please state where, or whether Borough wide. Please include any detail of relevance – for example, is it an area with high unemployment , or public transport limited?	✓			<p>Population data for the ward shows higher than the Borough average of older people however residents of the block are typically younger with an average age of 40 years and so are less likely to have larger number of people with disability or poor health conditions.</p> <p>The ward has lower percentages of unemployed people at 6.5% compared to Thurrock overall at 8.5% and no negative implications are identified.</p> <p>Residents in the output area typically experience more deprivation than the rest of the borough based on Census 21 data. The creation of new homes and public spaces with opportunities for local employment and social value initiatives will be a positive factor.</p>	<p>Provision of new well designed and affordable accommodation and public spaces promoting healthy lifestyles will enhance the circumstances of the new and existing residents.</p> <p>Council procured contracts will require social value initiatives and opportunities for employment and skills development for local residents.</p>
<b>Workforce of Thurrock</b>		✓		There will be no specific or different implications for people with this protected characteristic	

<p><b>Council</b></p> <p>(e.g. in the case of service change/s)</p>				
<p><b>Health and wellbeing of residents</b></p> <p>Please see guidance.</p>	✓		<p>Redeveloping the towers will mean that existing residents do not suffer from the high levels of damp and mould reported.</p> <p>Redevelopment of new homes will also include creation of new public realm and consequent improvements in safety, accessibility and design to promote healthy lifestyles.</p> <p>The planned redevelopment will increase the supply of affordable housing in Thurrock thereby contributing to meeting the council's Health and Wellbeing strategy objectives.</p> <p>The redevelopment will seek to improve physical and mental health, reduce exposure to air pollution and to build community resilience and reduce antisocial behaviour through design and community engagement</p>	<p>Provision of new healthy and affordable accommodation will enhance the circumstances of the occupants.</p> <p>New public realm will meet modern standards in relation to accessibility and greener travel options such as pedestrian and cycle pathways and electric vehicle charging.</p> <p>New approaches to water and space heating will reduce the use of fossil fuels and be reliant on cleaner energy.</p> <p>Residents have already been able to influence the initial design proposals through consultation events during the summer of 2023 and will continue to be able to influence the design of new homes through community engagement activity throughout the project.</p>
<p><b>Socio-economic outcomes</b></p> <p>Please see guidance.</p>		✓	<p>Increased levels of affordable housing will benefit those unable to afford to access accommodation in the private sector.</p> <p>Residents in the output area typically experience more deprivation than the rest of the borough based on Census 21 data (specifically those households deprived in one or two dimensions).</p> <p>The creation of new homes and public spaces with opportunities for local employment and</p>	<p>Rent levels will all be set within the Local Housing Allowance cap for the area and so be within limits for eligible benefit claimants.</p> <p>Council procured contracts will require social value initiatives and opportunities for employment and skills development for local residents.</p>

				social value initiatives will be a positive factor.	
<b>Veterans and serving members of the armed forces</b>  Please see guidance.		✓		Whilst there will be no specific or different implications for people with this characteristic, please see mitigation.	The council has adopted a Veteran's charter and the Essex Military Covenant and the obligations on the Council as a result will be incorporated into the redevelopment proposals where appropriate.
<b>Unpaid Carers</b>		✓		There will be no specific or identified negative implications for people with this protected characteristic	All applicants are dealt with equally and in line with the <a href="#">Allocations Policy</a> . Carers can request a priority banding and this will be assessed according to the allocation policy.

### 3. Monitoring and Review

<p>3.1 How will you review community and equality impact once the policy, strategy, function or service has been implemented?  <i>These actions should be developed using the information gathered in <b>Section 1 and 2</b> and should be picked up in your departmental/service business plans.</i></p>		
<b>Action</b>	<b>By when?</b>	<b>By who?</b>
Baseline data on housing typology and accessibility and incidence of damp and mould complaints will be recorded at the point Members give approval for the redevelopment process to commence.	Spring/Summer 2024	Housing Service
The effectiveness and equity of the decant process will	March 2024	Housing Service

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be monitored through out the process to ensure fairness		
Data resulting from the newbuild project will be recorded at project completion and residents' satisfaction surveys at 6 and 12 months post completion will be analysed.	Within 12 months of project completion	Housing Service
During the duration of this redevelopment this CEIA will be periodically reviewed and refreshed as a working document.	Spring 2024 being the next gateway decision point	Housing Service
Resident satisfaction of the programme will be monitored throughout.	Review conducted in December 2023 and will be repeated in Spring 2024.	Resident engagement and Independent Tenant and Leaseholder consultants reporting to the Housing Service
Satisfaction surveys will be completed with new residents at 6 and 12 months after construction.	Post construction	Housing Service

#### 4. Next steps

It is important to ensure that the information gathered is used to inform any council reports that are presented to Cabinet or Overview and Scrutiny committees. This will allow members to be furnished with all the facts in relation to the impact their decisions will have on different equality groups and the community as a whole.

Take some time to précis your findings below. This can then be added to your report template and the Equality and Diversity Implications section for sign off by the Community Development and Equalities team at the consultation stage of the report cycle.

#### Implications/ Customer Impact

An extensive consultation and engagement exercise has already been completed with residents of Blackshots Estate with the results indicating a strong preference with 71% of those responding agreeing with the statement that “I think the buildings are coming towards the end of their life. Thurrock Council should look to replan the area with lower height homes with better energy efficiency and access to gardens and green spaces”

An initial analysis of feedback received together with this assessment highlights the redevelopment of the estate is expected to have a positive impact for the health and wellbeing of residents and contribute towards many of the goals within the council’s health and wellbeing strategy. This Community Equality Impact Assessment has been completed to account for the proposed redevelopment and will be the subject of an ongoing cycle of monitoring, review and refreshing by the project team.

Consultation events during 2023 demonstrated that residents support for demolition of the blocks had not changed and was still welcomed. There were concerns about the extent of the red line for development on the King George’s field and that will remain a focus for further work.

At a later stage, during construction, there will be a planning condition for the contractor to complete a Housing Impact Assessment. This will outline the impact of this project against many of these characteristics. This will lead to identification of further mitigation and enhancement measures.

The tenancy decant officer will continue to monitor ongoing issues and queries with residents throughout the decant process. The Independent Tenant & Leaseholder advisor has arranged drop-in sessions and workshops as well as providing 121 support with residents. A FAQs document will be shared with the wider community outlying the project & programme updates. During construction stage, a Construction Engagement Management Plan is required from the contractor to investigate how transport and traffic

## Implications/ Customer Impact

is managed throughout the site and wider area, as well as dust and mitigation measures.

Any contractor or consultant appointed by the council to fulfil works associated with the proposals will be directed to the council's CEIA and will be required to fulfil legislative requirements arising from the Equality Act 2010 and Public Sector Equality Duty as standard. Contracts for services and works will include social value measures to be delivered by the provider/contractor and will be directed in line with the council's social value framework and supporting priorities for communities. Contractors' policies will also be assessed within the procurement process.

## 5. Sign off

The information contained in this template should be authorised by the relevant project sponsor or Strategic Lead who will be responsible for the accuracy of the information now provided and delivery of actions detailed.

Name	Role – for example, project sponsor, head of service)	Date
Keith Andrews	Strategic Lead Housing Development	30 March 2023
Julian Wain	Strategic Place Advisor	17 May 2023
Ewelina Sorbjan	Assistant Director Housing – Project Sponsor	18 May 2023
Keith Andrews	Head of Housing Development	9 January 2024

Julian Wain	Strategic Place Advisor	25 January 2024
Ewelina Sorbjan	Assistant Director Housing and Development – Project Sponsor	26 January 2025