

# Torridon House Car Park

Equality Impact Assessment

May 2023

## Quality information

<b>Prepared by</b>	<b>Checked by</b>	<b>Verified by</b>	<b>Approved by</b>
William Keys Graduate Social Impact Consultant	Laura Walker Associate Director	Laura Walker Associate Director	Laura Walker Associate Director

## Revision History

<b>Revision</b>	<b>Revision date</b>	<b>Details</b>	<b>Authorized</b>	<b>Name</b>	<b>Position</b>
First draft	02/05/23	For client review	L Walker	Laura Walker	Associate Director
Final draft	05/05/23	Final version	L Walker	Laura Walker	Associate Director

**Prepared for:**

Westminster City Council

**Prepared by:**

AECOM Limited  
Aldgate Tower  
2 Lemn Street  
London E1 8FA  
United Kingdom  
aecom.com

© 2023 AECOM Limited. All Rights Reserved.

## Table of Contents

1.	Introduction .....	6
1.1	Purpose .....	6
1.2	Context .....	6
1.3	Report structure .....	7
2.	Methodology .....	9
2.1	Introduction .....	9
2.2	Desk-based review .....	9
2.3	Assessment of impacts .....	9
2.4	Conclusion and next steps .....	11
3.	Policy and legislative context .....	12
3.1	Legislation .....	12
3.2	National policy .....	12
3.3	Regional policy .....	13
3.4	Local policy .....	16
4.	Summary of the development .....	19
4.1	Current site .....	19
4.2	Planning application .....	20
4.3	Affordable housing for social rent .....	22
4.4	Construction works .....	22
5.	Equalities baseline .....	23
5.1	Introduction .....	23
5.2	Protected characteristics .....	23
5.3	Socio-economic profile .....	29
5.3.1	Deprivation .....	30
5.3.2	Employment .....	30
6.	Assessment of impacts .....	38
6.1	Introduction .....	38
6.2	Housing .....	38
6.3	Neighbourhood and Community .....	40
6.3.1	Potential beneficial impacts .....	40
6.3.2	Potential adverse impacts and mitigation .....	42
6.4	Wider impacts .....	45
6.5	Summary of potential impacts .....	45
7.	Conclusions and next steps .....	50
7.1	Conclusions .....	50
7.2	Next steps .....	50

## Figures

Figure 4-1 Site Location Plan .....	19
Figure 4-2 Key construction dates .....	22
Figure 5-1 Maida Vale ward boundary, with pin marking location of the proposed development .....	23
Figure 5-2 Location of schools in the project area .....	32
Figure 5-3 PTAL Access Level of the project area .....	35

## Tables

Table 4-1 Local amenities.....	20
Table 4-2 Accommodation schedule .....	21
Table 5-1 Population size and change (%) by geographical area from 2001 to 2021.....	24
Table 5-2 Age breakdown (%) by geographical area, 2021 .....	24
Table 5-3 Limiting long-term illness or disability (%) by geographical area, 2021 .....	25
Table 5-4 Gender identity (%) in Westminster and London, 2021 .....	26
Table 5-5 Legal partnership status (%) by geographical area, 2021 .....	26
Table 5-6 Ethnic group (%) by geographical area, 2021.....	27
Table 5-7 Religion or belief (%) by geographical area, 2021 .....	28
Table 5-8 Proportion (%) of residents by sex and geographical area, 2021.....	29
Table 5-9 Sexual orientation (%) in Westminster and London, 2021 .....	29
Table 5-10 Economic activity status (%) by geographical area, 2021.....	30
Table 5-11 Employee jobs by broad sector group (%) across different geographical areas, 2021 .....	31
Table 5-12 Educational attainment (%) by different geographical area, 2021 .....	32
Table 5-13 Tenure (%) by geographical area, 2021.....	33
Table 5-14 Household overcrowding and under-occupation (%) by geographical area, 2021 .....	34
Table 6-1 EIA assessment framework.....	38
Table 6-2 Summary of potential equality impacts of Torridon House car park redevelopment proposals .....	47

# 1. Introduction

## 1.1 Purpose

AECOM has been commissioned by Westminster City Council ('the Council') to undertake an Equality Impact Assessment (EIA) on three sites that form 'Package B' of the Council's infill programme. These are as follows:

- Adpar Street Car Park in Little Venice Ward;
- **Torridon House Car Park in Maida Vale Ward**; and
- Queens Park Court Car Park in Queens Park Ward.

As a public sector organisation, the Council has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that the development does not lead to unlawful discrimination (direct and indirect), and that it advances equality of opportunity and fosters good relations between those with a protected characteristic<sup>1</sup> and all others. An EIA is often used by public sector organisations to demonstrate how this duty has been discharged. It is the Council's policy that EIAs are undertaken and updated for projects throughout their development.

An EIA is a systematic assessment of the effects of plans, policies, or proposals on groups with protected characteristics as defined by the Equality Act 2010 as well as low income households. The purpose of this EIA is to consider how the development of the **Torridon House Car Park** contributes to the realisation of equality effects on residents and the community affected and will support the Council to fulfil its equality duties in relation to the PSED for the development proposal.

The EIA provides a consideration of potential direct and indirect equality impacts (both adverse and beneficial) associated with the construction and operational phases of the Torridon House Car Park development. The approach draws on evidence from secondary data sources as well as feedback from consultation and engagement processes and information from construction planning undertaken for the project.

## 1.2 Context

As part of the Council's Housing Revenue Account (HRA) Development Programme, the Council has identified a series of small-scale infill sites for redevelopment. These sites will contribute towards the programme objectives of:

- Increasing the supply of affordable housing; optimising value from its assets;
- Increasing the quality of HRA Portfolio; and
- Ensuring the portfolio meets local housing need.<sup>2</sup>

Torridon House Car Park is one of three sites which comprise 'Package B'<sup>3</sup>. The site is located within Maida Vale Ward with 37 car parking spaces, mostly serving residents of Torridon House, 52 storage sheds and a sub-station.

---

<sup>1</sup> Protected characteristics are defined under the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and marriage/civil partnership.

<sup>2</sup> City of Westminster (2022). Development Infills: Package B Main Contract Award. Available at: [Decision - Development Infills: Package B Main Contract Award | Westminster City Council \(moderngov.co.uk\)](#)

<sup>3</sup> Package B comprises of three development sites, including Adpar Street Car Park, Torridon House Car Park and Queen's Park Court Car Park.

In November 2019, the Council submitted a planning application (19/09329/COFUL)<sup>4</sup> to redevelop the car park in line with the Council's ambition to transform unused non-residential spaces across the Borough into homes for local residents. The proposals plan to demolish the existing storage sheds and construct a 3-storey and 5-storey residential block delivering 21 affordable homes. The development would contain units with a mixture of sizes (8 x 1 bed, 7 x 2 bed, 4 x 3 bed and 2 x 4 bed) with 40% of the floorspace for intermediate rent and 60% for social rent. The site will re-provide 17 car parking spaces, as well as 2 additional disabled spaces, storage units, cycle parking and landscaping for the new residential units. The site is situated within the administrative boundary of Westminster and comprises a site area of approximately 0.08 hectares. This application received planning consent in September 2020.

In October 2022, the Council published 'Our Strategy for a Fairer Westminster'<sup>5</sup> which places residents at the centre of decision-making to build an inclusive and diverse community. One of the key ambitions within this strategy is 'Fairer Housing' which prioritises the delivery of 'genuinely affordable housing', the majority of which is council rented units. The strategy sets a target of 70% council-owned developments by 2026.

This strategy led to a section 73 application (23/00163/NMA)<sup>6</sup> being submitted for Torridon House Car Park in January 2023. This proposed several non-material amendments to the consented scheme, namely a change in tenure for the 40% intermediate rent units to become available for social rent and deliver 100% social housing on the site.

The development was granted planning permission in October 2020 and the Council is now going through the appropriation process. This EIA reports demonstrates how the Council has paid due regard to the PSED in the design and delivery of the development and will support the Council in supporting decision making related to the appropriation of the land.

### 1.3 Report structure

Following on from this introduction section, the remainder of the report is structured as follows:

- **Section 2: Methodology** – setting out the approach to collecting evidence and assessment of impacts;
- **Section 3: Policy and legislation review** – providing context through review of relevant national, regional, and local policy and legislation associated with equalities and housing regeneration;
- **Section 4: Summary of the development** – an overview of the development;
- **Section 5: Equalities baseline** – using secondary data sources such as Census 2021 to form an understanding of residents living within the area;

---

<sup>4</sup> City of Westminster (2019). Planning – Application Summary. Available at: [19/09329/COFUL | Demolition of existing structures including storage sheds and redevelopment of existing car park to provide two blocks of three and five storeys providing a total of 21 x Use Class C3 \(residential\) units and other associated works, including the provision of storage units, car and cycle parking, landscaping, access gates and boundary treatment. | Torridon House Car Park 8 Randolph Gardens London NW6 5HP \(westminster.gov.uk\)](#)

<sup>5</sup> Westminster City Council (2022). Our Strategy for a Fairer Westminster 2022-2026. Available at:

<https://www.westminster.gov.uk/sites/default/files/media/documents/Fairer%20Westminster%20Strategy.pdf>

<sup>6</sup> City of Westminster (2023). Planning – Application Summary. Available at: [23/00163/NMA | Amendments to planning permission dated 30th September 2020 \(RN: 19/09329/COFUL\) for demolition of existing structures including storage sheds and redevelopment of existing car park to provide two blocks of three and five storeys providing a total of 21 x Use Class C3 \(residential\) units and other associated works, including the provision of storage units, car and cycle parking, landscaping, access gates and boundary treatment. Namely, the installation of air bricks, raising of window transoms to all windows, reduction in size of mansard rooflights, raising of parapets around the top of the apartment building by 200mm, introduction of mechanical opening to windows, reduction in number of storage units to allow an increase in size, replacement of low level wall with railings at ground floor level at the rear of the block of flats, reconstruction of the vehicle crossover and amendment to the approved tenure mix from 8 x intermediate units to 8 x social rented units. | Torridon House 8 Randolph Gardens London NW6 5HP \(westminster.gov.uk\)](#)

- **Section 6: Assessment of potential equality effects** – an appraisal of impacts and equality effects of the proposals using the evidence gathered; and
- **Section 7: Conclusions and next steps**– conclusion of equality impacts and the Council's due regard to the PSED. This section also contains continued actions recommended for enhancing positive equality impacts and minimising potential negative impacts based on available evidence to date.



## 2. Methodology

### 2.1 Introduction

This section sets out the approach to assessing the equality impacts of the development proposals for Torridon House Car Park. The assessment considers how the proposals could impact (both positively and negatively) current residents who share protected characteristics within and surrounding the site of the proposed development as well as residents moving into the new development. In considering the direct impacts of the development proposals, this EIA takes a 'worst case scenario'.

The approach for undertaking this EIA and compiling this report follows a three-stage process:

1. Desk-based review - including review of relevant national, regional, and local policies and legislation, the proposal documents and secondary datasets relating to groups with protected characteristics;
2. Assessment of potential impacts - informed by a consideration of the policy context, consultation responses, equalities baseline data; and
3. Providing recommendations and conclusions.

The approach is based on an understanding of the Equality Act 2010, particularly section 149 regarding the PSED, and supporting technical guidance produced by the Equality and Human Rights Commission (EHRC) as well as AECOM's in-house approach to conducting EIAs.

### 2.2 Desk-based review

In addition to a review of recent relevant national, London-wide and local policies and legislation, the desk-based review included the following:

- Review of all relevant documentation regarding the planning application including design information, relevant assessment work and construction management plan information;
- Review of national and local datasets to develop an equalities baseline profile of groups with protected characteristics within and surrounding the site including Census data; and
- Review of the consultation and engagement activities to date in relation to the proposals undertaken by the Council to identify any issues of relevance to this EIA.

### 2.3 Assessment of impacts

The assessment of equality impacts takes into account the information gathered through the above activities. A judgement is made as to how the development would contribute to the realisation of effects for people with protected characteristics as defined in the Equality Act 2010. These protected characteristics are:

- **Age:** this refers to persons defined by either a particular age or a range of ages. This can include children (aged under 16), young people (aged 16-25), older people or pensioners (i.e. those aged 65+), the elderly/very old (i.e. those aged 85+);
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. It can also include people who have progressive conditions such as HIV, cancer, or multiple sclerosis (MS) - even where someone is able to carry out day to day activities;

- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- **Marriage and civil partnership:** marriage or civil partnership can be between a man and a woman or between two people of the same sex;
- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.

Although income is not classed as a protected characteristic under the Equality Act 2010, the assessment also considers equality implications from the perspective of low income households.

The assessment considers both disproportionate and differential impacts on groups with protected characteristics. A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on the general population overall at a particular location. For the purposes of this EIA, disproportionality arises:

- where an impact is predicted for the study area, where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in Westminster or London; or
- where an impact is predicted on a community resource which is predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for elderly people).

A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability associated with their protected characteristic.

In some cases, protected characteristic groups are subject to both disproportionate *and* differential equality effects. The EIA considers impacts on groups of people and not those on specific individuals.

The criteria used to determine disproportionate or differential impacts with respect to protected characteristics groups include:

- People who share a protected characteristic form a disproportionately large number of those adversely affected by the proposals;
- Amongst the population affected by the proposals, people who share protected characteristics are particularly vulnerable or sensitive to a possible impact in relation to their possessing a specific protected characteristic;

- The proposals may either worsen or improve existing disadvantage (e.g. housing deprivation or economic disadvantage) affecting people who share a protected characteristic;
- People with shared protected characteristics amongst the affected population may not have an equal share in the benefits arising from the proposals. This can be either due to direct or indirect discrimination or where the groups experience particular barriers to realising such benefits, unless suitable mitigations are proposed to overcome those barriers; and
- The proposals may worsen existing community cohesion amongst the affected local population or exacerbate conflicts with community cohesion policy objectives.

## **2.4 Conclusion and next steps**

The final section of this report sets out conclusions on the equality impacts as well as setting out recommendations for mitigating against any residual or newly identified adverse impacts and opportunities for enhancing equality of opportunity.

## 3. Policy and legislative context

### 3.1 Legislation

#### Equality Act 2010 and the Public Sector Equality Duty (PSED)

The Equality Act 2010 is a major piece of UK legislation which provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 of the Equality Act sets out the PSED to which Westminster City Council, as a public body, is subject to in carrying out all its functions.

Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected characteristics groups to participate in public life or in other activities where their participation is disproportionately low.

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

The duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation as described Section 2.5 of this report.

Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.

### 3.2 National policy

#### National Planning Policy Framework (July 2021)

The National Planning Policy Framework (NPPF)<sup>7</sup> was originally published in March 2012, with revisions in July 2018, February 2019 and most recently in July 2021. The NPPF reconsolidates the economic, social and environmental objectives of the Government's planning system. While the NPPF does not contain specific guidance on equalities, it does

---

<sup>7</sup> Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:

- The economic role contributes to building “*a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*”;
- The social role supports strong, vibrant and healthy communities by “*ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being*”; and
- The environmental role contributes to protecting and enhancing the “*natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy*”.

The NPPF identifies key principles that local planning authorities should ensure that they consider, including:

- Local strategies to improve health, social and cultural wellbeing for all;
- The delivery of sufficient community and cultural facilities and services to meet local needs; and
- The requirement to plan for the needs of different groups within communities, including how the size, type and tenure of housing should be assessed and reflected in planning policies.

In Chapter 5, the NPPF outlines how planning policy should deliver a sufficient supply of homes that meets the needs of groups with specific housing requirements. Local housing need assessments should inform the minimum number of homes needed and the size, type and tenure of housing should be assessed and reflected in local planning policies to accommodate different groups in the community, such as those who require affordable housing, families with children, older people and people with disabilities.

### 3.3 Regional policy

#### The London Plan 2021

The London Plan 2021<sup>8</sup> is a new plan aiming to be more ambitious and focused than previous London Plans. It is underpinned by the concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable. As the overall strategic policy framework for London, it sets out integrated economic, environmental, transport and social goals for the development of the capital over the next 20-25 years. A number of policies outlined in the Plan are relevant to the proposed redevelopment, including tackling deprivation, promoting equality and inclusivity, and enabling different groups to share in the benefits of development, specifically:

- GG1 ‘Building strong and inclusive communities’ requires early engagement with stakeholders and local communities in the development of proposals, ensuring London continues to generate economic and other opportunities that are beneficial to everyone. Continue to support and promote the creation of a London where all Londoners including children and young people, older people, disabled people and people with

---

<sup>8</sup> GLA (2021). The London Plan. The Spatial Development Strategy for Greater London. Available at: [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

other protected characteristics, can move around with ease and enjoy the opportunities the city has to provide.

- GG4 'Delivering the homes Londoners need' understands that for many Londoners the type of home they want, and should reasonably be able to expect, is out of reach – and this consequently has implications for the makeup and diversity of the city. Creating a new housing market in which all those involved in planning and development must: support the delivery of the strategic target of 50% of all new homes being genuinely affordable, and create inclusive communities where houses meet high standards of design and provide for identified needs.
- Policy SD10 'Strategic and local regeneration' requires Boroughs to identify Strategic areas for Regeneration in Local Plans and develop policies that are based on a thorough understanding of the demographic of the communities, their needs and local circumstances. In order for regeneration initiatives to contribute to Good Growth it is important they tackle poverty, disadvantage, inequality and the causes of deprivation, address social, economic and environmental barriers and they benefit existing residents and businesses in an area. Regeneration initiatives must be undertaken in collaboration with local communities, involving a broad spectrum of groups, people and businesses to develop a shared vision of the area.
- Policy D4 'Inclusive design' requires Boroughs to support the creation of inclusive neighbourhoods by embedding inclusive design and collaborating with local communities to ascertain needs. An inclusive design approach helps to ensure the diverse needs of all Londoners are integrated into Development plans and proposals from the outset.
- Policy H1 'Increasing housing supply' sets out Boroughs ten-year housing targets which must be included in their Development Plan Documents (Westminster's ten year target for net housing completion is 9,850).
- Policy H4 'Delivering affordable housing' outlines the strategic target for 50% of all new homes delivered across London to be genuinely affordable. The London SHMA (Strategic Housing Market Assessment) identified that 65% of London's need is for affordable housing; this policy therefore aims to maintain and advance the opportunity for all members of society to access
- Policy H8 'Loss of existing housing and estate development' requires that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Boroughs, housing associations and their partners must also consider alternatives before considering the demolition and replacement of affordable homes. Regardless of whether an estate regeneration project includes the demolition and replacement of affordable homes, it is important that all such schemes are delivered with existing and new residents in mind.
- Policy H15 'Specialist older persons housing' sets out a commitment between Boroughs and care providers to identify sites suitable for specialist older persons housing, taking account of local type and tenure of demand, creating inclusive neighbourhoods and the increasing need for accommodation suitable for people with dementia.

### **Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2022)**

The Mayor's Equality, Diversity and Inclusion Strategy<sup>9</sup> (EDIS) was published in May 2018. It sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality.

---

<sup>9</sup> GLA (2018). Mayor's Equality, Diversity and Inclusion Strategy. Available at: <https://www.london.gov.uk/what-we-do/communities/mayors-strategy-equality-diversity-inclusion>

The strategy presents 39 equality, diversity and inclusion strategic objectives. These were replaced in November 2022 by the Mayor who published a new set of 14 equality objectives<sup>10</sup>. These include working with councils and other partners to:

- Increase the provision of genuinely affordable homes for the benefit of those groups and communities that are most likely to live in overcrowded, poor quality or unaffordable housing.
- Increase the number of homes that meet Londoners' diverse housing needs including, year-on-year, the pace of provision of affordable specialist and supported housing.
- Address the specific barriers that prevent some rough sleepers exiting rough sleeping and rebuilding their lives.
- Improve Londoners' air quality and access to green space and lower the city's carbon emissions so that inequalities in exposure to harmful pollution and climate risks are reduced.
- Address the specific barriers faced by those groups of Londoners most likely to experience financial hardship, helping them understand and access their entitlements and available support.

Objectives also include working with employers, education and skills providers, and voluntary and community organisations, so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London. This includes providing employability and skills support for those who are disadvantaged in London's enterprise and jobs market and increasing the diversity of the workforces in vital sectors in London. These include the digital, construction, creative and built environment sectors.

The strategy aims to encourage inclusive growth in London through better planning and provision of business support, including access to finance for people from ethnic minority groups, women, and disabled-led businesses, and to help save and sustain diverse cultural places and spaces by promoting good growth. Finally, the EDIS includes widening access to youth services, addressing health inequalities, and closing the digital exclusion gap.

### London Housing Strategy (2018)

This strategy's central priority is to build many more homes for Londoners - particularly genuinely affordable homes. This includes policies for:

- Identifying and bringing forward more land for housing;
- Improving the skills, capacity and building methods of the industry;
- Ensuring homes are genuinely affordable;
- Working towards half of new homes built being affordable;
- Protecting London's existing social housing;
- Well-designed, safe, good quality, and environmentally sustainable homes; and
- Meeting London's diverse housing needs.

---

<sup>10</sup> GLA (2022). Mayor's Equality, Diversity and Inclusion Strategy. Available at: <https://www.london.gov.uk/programmes-strategies/communities-and-social-justice/mayors-strategy-equality-diversity-and-inclusion/mayors-equality-diversity-and-inclusion-strategy-objectives-2022>

## 3.4 Local policy

### City Plan 2019 – 2040 (2021)

The City Plan 2019 – 2040 was adopted in April 2021 and contains a number of policies which are relevant to promoting equality and tackling existing disadvantage, and to the renewal of Westminster, including:

- **Objective 1** of the City Plan is to “increase the stock of high-quality housing and provide variety in terms of size, type and tenure to meet need and promote mixed and inclusive communities, with a clear focus on affordability and family homes.”
- **Objective 2** of the City Plan is to “ensure those from disadvantaged backgrounds benefit from the opportunities [job growth] presents.”
- **Objective 8** of the City Plan is to “promote quality in the design of buildings and public spaces ensuring that Westminster is attractive and welcoming”
- **Policy 1 Westminster’s spatial strategy** sets out the ambition for the Borough to grow, thrive and inspire by:
  - Supporting intensification and optimising densities in high quality new developments that showcase the best of modern architecture and integrate with their surroundings, to make the most efficient use of land.
  - Delivering at least 20,685 homes with 35% of new homes affordable.
- **Policy 7 Managing development for Westminster’s people** requires development to be ‘neighbourly’: considering daylight, sense of enclosure and privacy, protecting and enhancing the local natural and historic environment, not overburdening local infrastructure, contributing to greening, improving sustainable infrastructure and making appropriate waste management arrangements.
- **Policy 8 Stepping up housing delivery** requires the number of new homes to be built in Westminster to exceed 20,685 over the plan period. Existing housing will be protected, except where redevelopment or affordable housing would better meet need.
- **Policy 9 Affordable housing** requires that the affordable housing provision will be divided between ‘intermediate’ affordable housing for rent and sale (60%) and social and affordable rent (40%). The Council will maximise the provision of additional affordable housing in designated housing renewal areas.
- **Policy 11 Housing for specific needs** sets out that residential development will provide a housing mix to secure mixed and inclusive communities and contribute towards meeting Westminster’s housing needs for different groups.
- **Policy 12 Housing quality** proposes that all new homes be designed to a standard that ensures the safety, health and well-being of its occupants.

The EIA for the City Plan outlines some measures for helping to mitigate the impact of intermediate housing affordability criteria:

- Households on the council’s social housing register have high priority for intermediate housing.
- Targets will be set to ensure a proportion of new intermediate housing is affordable to households on the register with lower quartile incomes – and so may be affordable to households also registered for social housing.
- Westminster Employment Service also helps homeless households into employment which will help homeless households to be eligible for intermediate housing. (Currently c50% of homeless households are in some form of employment).



## Westminster Housing Renewal Strategy (2010)

In 2010, the Council published a Housing Renewal Strategy<sup>11</sup> that set out plans for housing renewal over a number of years and a number of programmes are underway. The key objectives of the strategy are to:

- Increase the supply and quality of affordable homes to meet a variety of local needs, including housing for families;
- Improve the quality of the local environment with outstanding green and open spaces and housing that promotes low energy consumption and environmental sustainability;
- Promote a high quality of life for people of all ages and backgrounds, in safe, cohesive and healthy neighbourhoods, supported by a range of high-quality housing and excellent community facilities;
- Enable people to maximise economic opportunity in Westminster with support for training, employment and enterprise, and housing tenures which help those in work to remain in the city; and
- Create a more distinct sense of neighbourhood, ending the physical divide between Westminster's estates and surrounding local streets.

## Housing Strategy: Direction of Travel Statement (2015)

In 2015, a Housing Strategy Direction of Travel Statement was published, which set out the Council's intentions to deliver existing housing renewal programmes and to work towards housing renewal becoming business as usual. The strategy built on the draft Housing Strategy that was consulted on in June and July 2015. It sets out the direction that the Council intends to take with regards to new affordable housing, intermediate housing, disposal of affordable properties, reviewing CityWest<sup>12</sup> homes, the private rented sector and energy efficient homes.

It also provides a direction for residents' health, housing and support for vulnerable people, older peoples' housing, flexibility in allocating social housing and homelessness.

## Our Strategy For a Fairer Westminster 2022-26<sup>13</sup>

The Fairer Westminster Strategy for 2022 to 2026 was set to help build a more inclusive city that celebrates diversity. The Council's ways of working will be centred around diversity and inclusion, openness and transparency, and partnership and collaboration.

Five key outcomes are detailed in the Strategy, which will support decisions at the Council. These include Fairer Communities; Fairer Housing; Fairer Economy; Fairer Environment; and Fairer Council. The target strategies for Fairer Housing and Fairer Communities are most relevant to this report and detailed below:

### Fairer Housing:

- The housing needs of residents, families and social care users are met through the provision of greener and more genuinely affordable housing, the majority of which is for council rent, aiming for 70% on council-owned developments.
- Homelessness is reduced due to increased support.

---

<sup>11</sup> Westminster Council (2010). Westminster Housing Renewal Strategy. Available at: [http://transact.westminster.gov.uk/docstores/publications\\_store/wcc\\_housing\\_renewal\\_report2010\\_lowres.pdf](http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf)

<sup>12</sup> CityWest Homes provides housing services for over 12,000 social housing tenants and 9,000 leaseholders for Westminster City Council. It was set up as an arms-length management organisation (ALMO) in 2002 and returned to Council control in September 2018.

<sup>13</sup> City of Westminster (2022). Fairer Westminster strategy. Available at: <https://www.westminster.gov.uk/our-new-strategy-build-fairer-westminster>

- Private rented sector properties are well managed.
- Our tenants and lessees are consistently satisfied with our housing services, and the improved condition and energy efficiency of our housing stock.

**Fairer Communities:**

- Poverty and inequality are reduced, making Westminster a healthier and more equitable place.
- The city is a safe place where all discrimination is tackled and everyone feels welcome.
- Westminster provides excellent public health and social care services, and physical activity opportunities that ensure all adults can stay healthy and thrive as they age.
- Westminster is a great place for children to grow up, with its cultural and learning opportunities, active communities, and excellent schools.
- Community and voluntary sector organisations are empowered to prosper in Westminster.

## 4. Summary of the development

### 4.1 Current site

The Torridon House Car Park site (outlined in Figure 4-1) is 0.08 hectares and is located on the northern edge of the Maida Vale Ward in the City of Westminster, in close proximity to the border of the London Borough of Brent. The proposed site is bound by residential properties on Andover Place and Randolph Gardens and Naima Jewish Preparatory School. The car park is located opposite Torridon House and primarily serves these residents.

The existing site comprises 37 parking spaces and 52 storage sheds, as well as a sub-station, and was accessible via Andover Place and Kilburn Park Road. Licences held for this site are managed by the Westminster City Council Housing team and are only eligible for 'off-street' parking<sup>14</sup>. Westminster City Council owns the freehold of the site and is currently undergoing the appropriation process.

**Figure 4-1 Site Location Plan**



The surrounding access roads of Kilburn Park Road and Carlton Vale link to the A5 located to the east of the site, providing a connection to the highway network. The site is also close to Kilburn Park Underground Station and Maida Vale Underground Station, providing frequent and direct services to Paddington, Oxford Circus and Waterloo. The nearest National Rail services are provided from London Marylebone, an 11-minute journey via the underground or 11-minute cycle. While a bus service runs along Kilburn Park Road and operates five day services and two night services linking to Victoria, Clapham Junction and White City.

<sup>14</sup> Car park licences and resident's parking permits are not interchangeable. Car park licences are managed by the Westminster City Council Housing team and are only eligible within 'off-street' parking facilities such as car parks. Whereas resident's permits are obtained through Westminster City Council directly and are only eligible for 'on-street' parking in resident parking zones, such as resident bays and paid-for bays. Further details are available here: [Where you can park with a resident permit | Westminster City Council](#)

The surrounding roads are considered safe for cyclists and pedestrians. The surrounding cycle network provides advanced cycle stop lines along all arms of the A5. While wide pedestrian footways supported by Zebra and Puffin crossings support pedestrian safety.

The site is located a 3-minute walk from Randolph Gardens and 4-minute walk northeast of Paddington Recreation Ground which provides a 27-acre park with a café, outdoor sports equipment and children’s play area.

The car park is also 120m northeast of the Grade 1 listed St Augustine’s Church which is bound by Forty Tree Green – a green open space that offers sports facilities and fronts Randolph Gardens.

The site does not directly intersect with a Conservation Area, however, is approximately 5m south of the Maida Vale Conservation area.

Table 4-1 below outlines distances to key local amenities surrounding the proposed site.

**Table 4-1 Local amenities**

Key Local Amenities	Distance	Walking Time (mins)	Cycling Time (mins)
Primary School – St Augustine’s CE Primary School	0.2km	2	1
Secondary School and Sixth Form – St Augustine’s CE High School	0.5km	5	1
Railway Station – Kilburn High Road	0.5km	6	2
Supermarket – Aldi	0.8km	10	3
Park and Green Space – Paddington Recreation Ground	0.5km	4	2
Hospital – Hospital of Saint John and St Elizabeth	1.3km	8	17
Medical Centre – Kilburn Park Medical Centre	0.5km	6	1

## 4.2 Planning application

The approved planning application includes the following:

- Demolition of existing structures including storage sheds and redevelopment of existing car park to provide two blocks of three and five storeys providing a total of 21 x Use Class C3 (residential) units and other associated works, including the provision of storage units, car and cycle parking, landscaping, access gates and boundary treatment;
- The proposal will provide 21 new homes including 17 x apartments and 4 x mews houses at 100% social rent;
- Re-provision of 17 car parking spaces and 2 additional disabled parking spaces;
- Provision of 37 cycling spaces and 1 visitor cycle parking space;
- The development will meet the minimum Nationally Described Space Standard for dwellings of different sizes;

- Provision of private amenity space to all units in the form of balconies or terraces that meets the standard for units of that size; and
- Shared communal amenity space (132 sqm) will be provided between the main residential block and mews houses.

The section 73 application includes the following amendment to condition 1:

- The installation of air bricks;
- Raising of window transoms to all windows;
- Reduction in size of mansard rooflights;
- Introduction of mechanical opening to windows;
- Raising of parapets around the top of the apartment building by 200mm;
- Reduction in the number of storage units to allow and increase in size;
- Replacement of low level wall with railings at ground level at the rear of the block of flats;
- Reconstruction of vehicle crossover; and
- Amendment to the approved tenure mix from 8 x intermediate units to 8 x social rented to create a 100% affordable scheme.

The mixture of dwelling sizes remains the same as per the accommodation schedule seen in Table 4-2 below.

**Table 4-2 Accommodation schedule**

	1B 2P	2B 4P	3B 5P	4B 6P	Total number of units
<b>Apartment mix</b>					
Level 00	2 <sup>15</sup>	1 <sup>16</sup>	-	-	3
Level 01	2	2	-	-	4
Level 02	2	2	-	-	4
Level 03	2	2	-	-	4
Level 04	-	-	-	2	2
<b>House mix</b>					
Terrace House	-	-	4	-	4
<b>Total number of units</b>	<b>8</b>	<b>7</b>	<b>4</b>	<b>2</b>	<b>21</b>
<b>Percentage of units</b>	<b>38%</b>	<b>33%</b>	<b>19%</b>	<b>10%</b>	<b>100%</b>

Source: City of Westminster (2020)

<sup>15</sup> One 1B2P wheelchair accessible dwelling

<sup>16</sup> One 2B 4P wheelchair accessible dwelling

### 4.3 Affordable housing for social rent

Social housing is provided by local councils to local residents who register to the social housing waitlist, typically low income families and vulnerable individuals.

In Westminster, the shortage of available homes has limited the number of applicants who are offered a home and has accumulated a long waiting time. As of November 2021, there were over 4,100 households waiting: 2,300 homeless households, 1,300 tenants awaiting transfer and 490 households in other priority groups.<sup>17</sup> The waiting time for re-housing varies dependent on the property size required, from over two years for a studio or 1 bed to 19 years for 4 or more beds.

The redevelopment of Torridon House Car Park will deliver 21 social rent residential units. These will be:

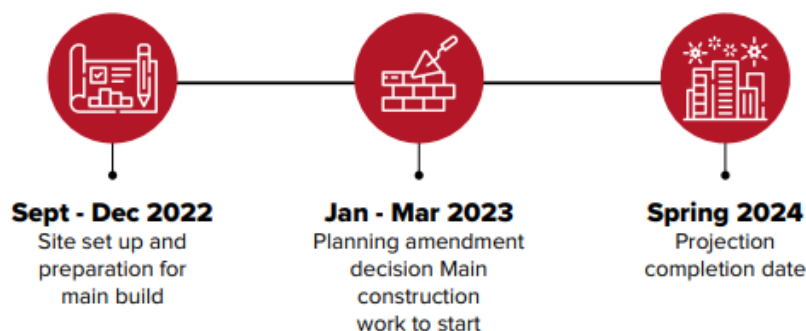
- Retained by the Council and available for social rent;
- Comprised of 8 1 bedroom apartments, 7 2 bedroom apartments, 3 4 bedroom apartments and 4 3 bedroom mews houses; and
- Allocated through a Local Lettings Plan (LLP) which will ensure that households in the Maida Vale area have top priority.

### 4.4 Construction works

Construction work consists of demolishing the existing structures, including storage sheds, and constructing a new residential building with 21 residences across three and five-storeys.

As shown in Figure 4-2 below, site mobilisation was undertaken in November 2022 followed by the section 42 application and commencement of the main contract between January-March 2023. The project is estimated for completion in Spring 2024.

Figure 4-2 Key construction dates



The construction site will operate between:

- 8:00 – 18:00 Monday to Friday
- 8:00 – 13:00 Saturdays
- No works will be carried out on Sundays, bank holidays or public holidays

Should construction activities need to be undertaken out of these hours, Osborne will seek formal permission from the Code of Construction practice team and residents will be notified ahead of the work taking place. The Council has also made a commitment that site deliveries will only take place after 10am to cause minimum disruption.

<sup>17</sup> City of Westminster (2023). How to apply for social housing. Available at: [How to apply for social housing | Westminster City Council](#)

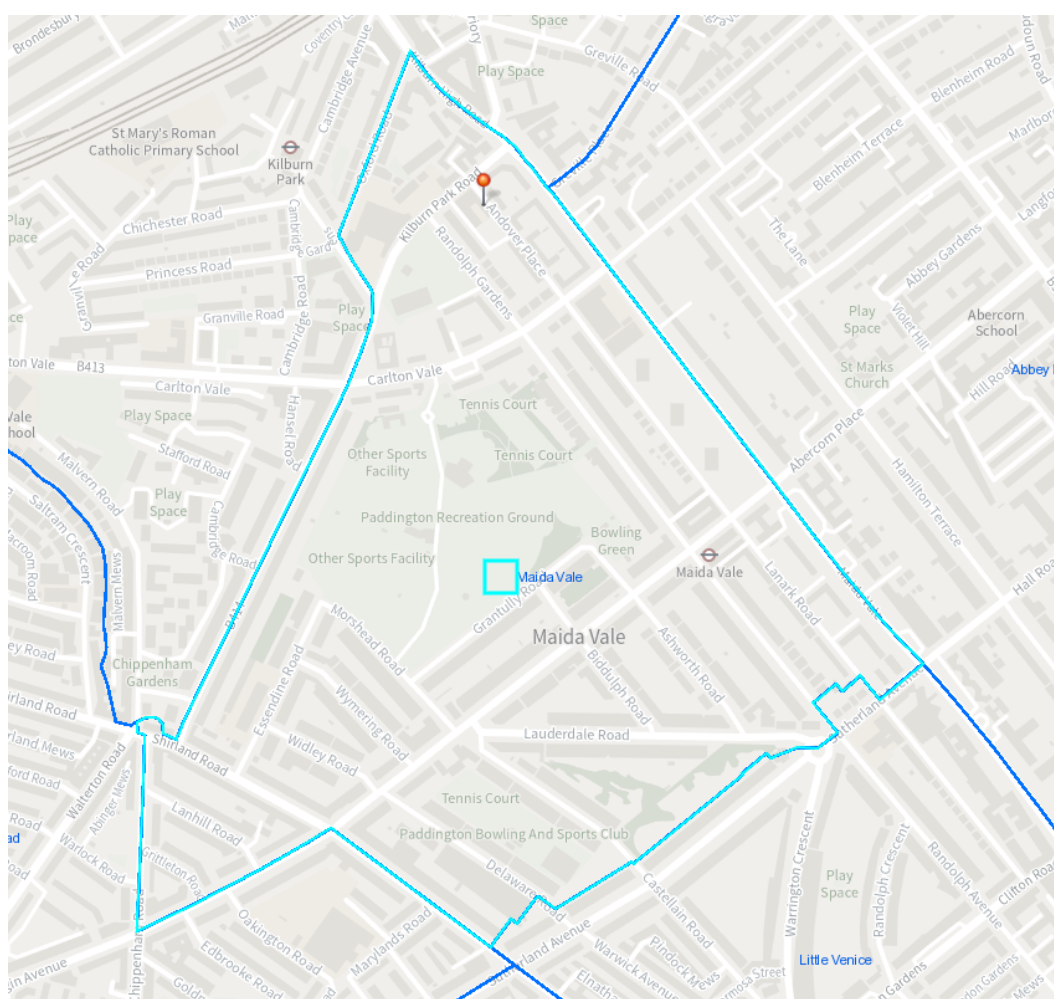
## 5. Equalities baseline

### 5.1 Introduction

A baseline profile of the population living around the site is necessary to enable an assessment of the potential impacts the development may have on groups with protected characteristics.

This section outlines the equalities baseline relevant to the proposals. This includes analysis of Census 2021 data and other datasets from the Office for National Statistics (ONS). Where possible, the most recently available data is presented at four geographical levels relevant to the study area. These are, in increasing size, Westminster Lower Super Output Area (LSOA Westminster 002D - E01004710), the Maida Vale Ward (E05013800), Westminster Borough, and London.

**Figure 5-1 Maida Vale ward boundary, with pin marking location of the proposed development**



Source: City of Westminster (2023)<sup>18</sup>

### 5.2 Protected characteristics

#### 5.2.1 Population

According to the most recent data available, the Westminster LSOA is home to 1,953 people, while Maida Vale Ward is inhabited by 11,660 people. As Table 5-1 shows, both

<sup>18</sup> City of Westminster (2023). Ward finder. Available at:  
<https://lbhf.maps.arcgis.com/apps/webappviewer/index.html?id=968c0f263cc241d4934638b4d7e81c6b>

geographies exhibited a population increase between 2001 and 2021 (by 30.3% and 20.9% respectively). While the remaining geographies also experienced population growth, the increase in the LSOA is significantly higher than the increase in Westminster Borough (30.3% compared to 12.7%). A growing population indicates that the demand for housing is continually rising.

**Table 5-1 Population size and change (%) by geographical area from 2001 to 2021<sup>19</sup>**

Year	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
2001	1,499	9,647	181,286	7,322,400
2011	1,648	10,210	219,396	8,204,400
2021	1,953	11,660	204,236	8,799,728
<b>Percentage Change</b>	+30.3%	+20.9%	+12.7%	+20.2%

## 5.2.2 Age

Table 5-2 provides the population age breakdown in 2021 across four geographical areas. Westminster LSOA has a higher proportion of children aged 0-15 (17.5%) than Maida Vale Ward (16.1%) and Westminster Borough (13.2%). While both Maida Vale and the LSOA have a lower proportion of people aged 65 and over (9.2%) compared to Westminster and London.

The proportion of children at all geographical levels has decreased between 2020 and 2021. The largest decrease can be observed at the LSOA and Ward level, where the proportion of children went down from 20.2% to 16.1% in Maida Vale and from 21.6% to 17.5% in the LSOA.<sup>20</sup>

**Table 5-2 Age breakdown (%) by geographical area, 2021<sup>21</sup>**

Age range (years)	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
0-15	17.5	16.1	13.2	19.2
16-64	73.3	74.7	74.8	68.8
65 and over	9.2	9.2	12.1	11.9

Greater London Authority population projections estimate that by 2040 the greatest population increase is expected in the 65 and over age group. In Maida Vale the projected increase in the elderly population is around 52%, compared to 35% in Westminster Borough. In contrast, the population aged 15 and under is expected to decrease at both the Ward and Borough level; projections estimate a 53% decrease at the Ward level, compared to only 7% decrease in Westminster generally.<sup>22</sup>

<sup>19</sup> ONS: Census 2001: Usual resident population (KS001); Census 2011: Population Density 2011 (QS102UK); Census 2021: Number of usual residents in households and communal establishments (TS001). All available at:

<https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp>

<sup>20</sup> ONS: 2020 Population estimates – small area based by single year of age – England and Wales; 2021 Population estimates – local authority based by five-year age band. All available at:

<https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp>

<sup>21</sup> ONS (2021) Age by single year (TS007); <sup>21</sup> ONS: 2020 Population estimates – small area based by single year of age – England and Wales. All available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp>

<sup>22</sup> GLA (2017) Population projections change between 2021 and 2040. Ward population projections; Housing-led population projection. Both available at: [GLA Population Projections - Custom Age Tables - London Datastore](https://www.gla.gov.uk/population-projections)



The high proportion of children and elderly is significant here, as those groups can be disproportionately affected by environmental impacts during site construction. For example, evidence shows that traffic-related noise causes increased health risks for older people<sup>23</sup> and lowers health-related quality of life in children<sup>24</sup>. Both groups are also more vulnerable to the effects of poor air quality compared to the overall population. Elderly people are also more vulnerable to the environmental, safety and accessibility impacts of construction activities associated with construction projects.

### 5.2.3 Disability

According to data gathered in the 2021 Census, 16.9% of the LSOA population has a disability that limits their day-to-day activities, compared to 14.0% of people at the Ward level. Figures for both Westminster and London are slightly lower (13.8% and 13.2% respectively).

At the LSOA level the proportion of people who reported their day-to-day activities are limited a lot is notably higher than that in other geographies (8.8% compared to 6.3% in Maida Vale, 6.5% in Westminster and 5.7% in London).

**Table 5-3 Limiting long-term illness or disability (%) by geographical area, 2021<sup>25</sup>**

Level of disability	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
Day-to-day activities limited a lot	8.8	6.3	6.5	5.7
Day-to-day activities limited a little	8.1	7.7	7.3	7.5
Long-term physical or mental health conditions but day-to-day activities not limited	3.2	4.4	4.7	5.2
No long-term physical or mental health conditions	79.9	81.6	81.5	81.5

Disabled people, including those with weak respiratory systems, or people who suffer from other health problems associated with weaker lungs, may be disproportionately impacted by emissions and dust, both traffic-related and as a result of construction of the infrastructure.<sup>26</sup> Additionally, in cases where disability causes people’s daily activities to be significantly limited, construction can impose further limitations in terms of disruption of accessibility.

### 5.2.4 Gender reassignment

Until the 2021 Census, there were no official statistics relating to gender reassignment; the data collected was only relating to sex (gender assigned at birth). The 2021 Census included the optional question “Is the gender you identify with the same as your sex registered at birth?”, for which the findings are presented at the Borough and London geographies in Table 5- 4 below.

Of those who responded, the majority (90%) of Westminster’s population identified with the same gender as their sex registered at birth, while 0.7% identified with a different gender.

<sup>23</sup> Halonen, J. et al (2015). Road Traffic noise is associated with increased cardiovascular morbidity and mortality in London. *European Heart Journal*. 36(39), 2653-2661

<sup>24</sup> Hjortebjerg, D. et al (2016). Exposure to road traffic noise and behavioural problems in 7-year-old children: a cohort study. *Environmental health perspectives*, 124(2), 228-234.

<sup>25</sup> ONS (2021): Disability (TS038). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2056>

<sup>26</sup> Font, A. et al (2014). Degradation in urban air quality from construction activity and increased traffic arising from a road widening scheme. *Science of the Total Environment*, 497, 123-132.

Similarly, in London 91.2% of the population identified with their gender assigned at birth, while 1% identified with an alternative gender.

**Table 5-4 Gender identity (%) in Westminster and London, 2021<sup>27</sup>**

Gender identity	Westminster	London
Gender identity the same as sex registered at birth	90.0	91.2
Gender identity different from sex registered at birth but no specific identity given	0.4	0.5
Trans woman	0.1	0.2
Trans man	0.1	0.2
Non-binary	0.1	0.1
All other gender identities	0.0	0.0
Not answered	9.2	7.9

### 5.2.5 Marriage and civil partnership

Across all four geographies, the majority of the population aged 16 and over have never married. The LSOA (54.6%), Ward (53.8%) and Borough (54.4%) level all sit above the London average of never married residents (46.2%).

According to the 2021 Census, the proportion of the population who are married to someone of the opposite sex is highest in London (39.3%) compared to the other geographies; particularly at the LSOA and Borough level where married population was estimated at 31.6% and 31.1% respectively. Additionally, the LSOA has the smallest divorced population at 6.9%, compared to the Ward (7.4%), Borough (7.6%) and London (7.3%) levels.

The proportion of people aged 16 and over and in a same-sex marriage was the highest in Maida Vale (0.8%) compared to the LSOA (0.5%), Westminster (0.6%) and London (0.4%) levels.

**Table 5-5 Legal partnership status (%) by geographical area, 2021<sup>28</sup>**

Legal partnership status	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
Never married	54.6	53.8	54.4	46.2
Married: opposite sex	31.6	32.6	31.1	39.3
Married: same sex	0.5	0.8	0.6	0.4
In a registered civil partnership: opposite sex	0.1	0.2	0.1	0.1
In a registered civil partnership: same sex	0.1	0.3	0.4	0.2
Separated	2.5	2.3	2.4	2.3
Divorced	6.9	7.4	7.6	7.3
Widowed	3.6	2.6	3.4	4.2

<sup>27</sup> ONS (2021). Gender identity (detailed) (TS070). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2087>

<sup>28</sup> ONS (2021). Legal partnership status (TS002). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2022>

## 5.2.6 Pregnancy and maternity

Census 2011 data shows that 13.3% of households within the Maida Vale Ward were lone-parent households, of which 8.6% have dependent children. In comparison, lone parents represented 22% of households in the Westminster LSOA, of which 14.3% had dependent children.<sup>29</sup> The 2021 Census reported a slight decrease in lone-parent households across both geographies, to 12.5% lone-parent households with 7% dependent children at the Ward level, and 17.3% lone-parent households with 10% dependent children at the LSOA level.<sup>30</sup>

Pregnant women are more vulnerable to the adverse effects of air pollution as a result of construction activities, including an increasing risk of miscarriage, as well premature births and low birth weights.<sup>31</sup>

## 5.2.7 Race

Table 5-6 shows the percentage breakdown of ethnic groups by geographical area. Overall, non-white ethnic groups compose half of the LSOAs population (50.8%), compared to lower proportions in Maida Vale (41.7%), Westminster (44.9%) and London (46.2%).

The Arab population is the largest minority group at both LSOA and Ward level (13.9% and 9.2% respectively), compared to the Borough (7.6%) and London (1.6%) geographies. Black Africans are the second largest minority group in the Westminster LSOA (6.8%) and Maida Vale (4.3%).

**Table 5-6 Ethnic group (%) by geographical area, 2021<sup>32</sup>**

Ethnic group		Westminster 002D LSOA	Maida Vale Ward	Westminster	London
<b>White</b>	English, Welsh, Scottish, Northern Irish or British	20.8	29.5	28.0	36.8
	Irish	3.0	2.3	1.8	1.8
	Gypsy or Traveller	0.0	0.0	0.0	0.1
	Roma	0.6	0.9	0.7	0.4
	Other	25.8	25.6	24.6	14.7
<b>Mixed/ Multiple Ethnic Groups</b>	White/ Black Caribbean	0.7	0.9	1.0	1.5
	White and Black African	0.9	1.1	1.0	0.9
	White and Asian	1.3	2.1	1.8	1.4
	Other	2.2	3.2	2.7	1.9
<b>Asian/ Asian British</b>	Indian	1.8	3.0	3.9	7.5
	Pakistani	1.5	1.0	1.2	3.3
	Bangladeshi	3.8	2.8	3.7	3.7
	Chinese	1.5	1.6	3.2	1.7
	Other Asian	3.8	3.6	4.7	4.6

<sup>29</sup> ONS (2011). Household composition (KS105EW). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=605>

<sup>30</sup> ONS (2021). Household composition (TS003). Available at:

<https://www.nomisweb.co.uk/query/construct/submit.asp?forward=yes&menuopt=201&subcomp=>

<sup>31</sup> Leiser, C. et al. (2019). Acute effects of air pollutants on spontaneous pregnancy loss: a case-crossover study. *Fertility and sterility*, 111(2), 341-347

<sup>32</sup> ONS (2021). Ethnic group (TS021). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

Ethnic group		Westminster 002D LSOA	Maida Vale Ward	Westminster	London
<b>Black/ African/ Caribbean/ Black British</b>	African	6.8	4.3	8.1	7.9
	Caribbean	2.4	1.8	2.1	3.9
	Other Black	1.2	0.8	0.8	1.7
<b>Other Ethnic Group</b>	Arab	13.9	9.2	7.6	1.6
	Other	7.9	6.5	5.9	4.7

### 5.2.8 Religion or belief

Among those identifying with a religion, Christians are the majority at the Ward (36%), Borough (37.3%) and London (40.7%) levels. While at the LSOA level Muslims are the largest religious group (34.9%), composing a significantly higher proportion of the population compared to Maida Vale (20.8%), Westminster (20.0%) and London (15.0%). Consequently, the amount of people not identifying with any religion is significantly lower at the LSOA level than the other geographies: 16.5% compared to over 25%.

**Table 5-7 Religion or belief (%) by geographical area, 2021<sup>33</sup>**

Religion	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
<b>Christian</b>	31.2	36.0	37.3	40.7
<b>Buddhist</b>	0.7	0.9	1.3	0.9
<b>Hindu</b>	0.6	1.6	2.2	5.1
<b>Jewish</b>	0.6	2.7	2.8	1.7
<b>Muslim</b>	34.9	20.8	20.0	15.0
<b>Sikh</b>	0.1	0.3	0.3	1.6
<b>Other religion</b>	0.9	1.0	0.9	1.0
<b>No religion</b>	16.5	26.8	25.9	27.1
<b>Religion not stated</b>	14.6	9.9	9.4	7.0

### 5.2.9 Sex

Table 5-8 reveals that Westminster LSOA has slightly higher proportion of female residents (50.6%) compared to males (49.4%). This observation is consistent across all four geographies, although the Maida Vale Ward presents the largest proportion of females compared to males, at 52.0% and 48.0% respectively.

<sup>33</sup> ONS (2021). Religion (TS030). Available at:  
<https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

**Table 5-8 Proportion (%) of residents by sex and geographical area, 2021<sup>34</sup>**

Sex	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
Female	50.6	52.0	51.6	51.5
Male	49.4	48.0	48.4	48.5

According to 2021 estimates, life expectancy in the Maida Vale Ward is 85.9 for females, and 80.8 for males.<sup>35</sup> Although females tend to live longer than men across all these geographies, life expectancies are lower at the Ward level than in the Borough and slightly higher than in London. Females live an average of 87 years in Westminster Borough and 84 years in London, while males an average of 85 in the Borough and 80 years in London.<sup>36</sup>

### 5.2.10 Sexual orientation

Table 5-9 presents the breakdown of adults by their identified sexual orientation for Westminster Borough and London. Westminster Borough had a higher proportion of adults identifying as Gay or Lesbian (3.5%) compared to London (2.2%). London has a marginally higher proportion of adults identifying as Pansexual (0.4%) and Queer (0.1%), than Westminster Borough (0.3% and 0.0% respectively).

No sexual orientation data was available at the LSOA and Ward level.

**Table 5-9 Sexual orientation (%) in Westminster and London, 2021<sup>37</sup>**

Sexual orientation	Westminster	London
Straight or Heterosexual	83.3	86.2
Gay or Lesbian	3.5	2.2
Bisexual	1.5	1.5
Pansexual	0.3	0.4
Asexual	0.1	0.0
Queer	0.0	0.1
All other sexual orientations	0.0	0.0
Not answered	11.2	9.5

## 5.3 Socio-economic profile

The socio-economic profile of the area considers several factors including levels of deprivation, employment, education, health, housing, transport, and connectivity; as well as

<sup>34</sup> ONS (2021). Sex (TS008). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

<sup>35</sup> ONS (2021). Life expectancy by census ward. Male and Female. Available at:

<https://www.ons.gov.uk/visualisations/dvc479/map/index.html>

<sup>36</sup> ONS (2021). Life expectancy estimates, all ages, UK. Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyestimatesallagesuk>

<sup>37</sup> ONS (2021). Sexual orientation (detailed) (TS079). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2086>

access to services and facilities; public realm and open space; safety, security and well-being; and community cohesion.

These factors are pertinent to those with protected characteristics and inequality and, as such, provide additional baseline information relevant to the assessment of equality effects.

### 5.3.1 Deprivation

According to the English Indices of Deprivation 2019, the proposed Torridon House car parking redevelopment is in one of the 30% most deprived LSOAs of England and Wales.<sup>38</sup>

Supplementary indices for deprivation also rank the area:

- In the top 20% most deprived areas nationally for Income Deprivation Affecting Older People Index (IDAOPI) which measures the proportion of those aged 60+ who experience income deprivation; and
- In the top 20% most deprived areas nationally for Income Deprivation Affecting Children Index (IDACI) which measures the proportion of all children aged 0 to 15 living in income deprived families.

### 5.3.2 Employment

The Torridon House carpark development is located within the top 20% most deprived areas in terms of employment deprivation which measures the proportion of the working age population involuntarily excluded from the labour market.<sup>39</sup>

Table 5-10 below indicates both economic activity and inactivity levels of populations at varying geographical levels. Of those who are economically active in the LSOA, 52.1% are in employment while 5.8% are unemployed. This is the highest percentage of unemployment across all geographies. Additionally, the LSOA has the highest percentage of economic inactivity (40%) compared to the Ward (31.6%), Borough (37.9%) and London (33.8%) levels.

The Ward level has the highest percentage who are in employment (61.3%), compared to the LSOA (52.1%), Westminster (55.6%) and London (59.4%). The LSOA also has the highest percentage of economic inactivity (40%) compared to the Ward (31.6%), Borough (37.9%) and London (33.8%) levels.

**Table 5-10 Economic activity status (%) by geographical area, 2021<sup>40</sup>**

Economic activity status	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
<b>Economically active: in employment</b>	52.1	61.3	55.6	59.4
<b>Economically active: unemployed</b>	5.8	5.1	4.0	4.1
<b>Economically inactive</b>	40.0	31.6	37.9	33.8

<sup>38</sup> Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 002D LSOA. Index of Multiple Deprivation. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

<sup>39</sup> Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 002D LSOA. Employment Deprivation Domain. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

<sup>40</sup> ONS (2021). Economic Activity status (TS066). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

Table 5-11 presents a detailed breakdown of employment sectors by geographical area for 2021. At the Ward level, the majority (70.4%) of residents work as managers, directors, senior officials, in professional occupations, and associate professional & technical occupations compared to 57% at the LSOA level. Notably, the LSOA has a relatively higher proportion of people in caring, leisure & other service occupations (10%) compared to Maida Vale (6%), Westminster (6.1%) and London's (7.7%).

**Table 5-11 Employee jobs by broad sector group (%) across different geographical areas, 2021<sup>41</sup>**

Occupation	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
<b>Managers, directors, senior officials</b>	18.4	20.1	22.5	14.6
<b>Professional occupations</b>	22.3	31.8	30.6	25.8
<b>Associate professional &amp; technical occupations</b>	16.3	18.5	17.3	15.3
<b>Administrative &amp; secretarial occupations</b>	6.9	6.7	6.6	8.5
<b>Skilled trades occupations</b>	5.4	3.7	3.4	7.5
<b>Caring, leisure &amp; other service occupations</b>	10.0	6.0	6.1	7.7
<b>Sales &amp; customer service occupations</b>	6.2	5.2	5.1	6.3
<b>Process plant / machine operatives</b>	5.2	2.7	2.7	5.0
<b>Elementary occupations</b>	9.2	5.5	5.7	9.2

The redevelopment sits within the top 20% most deprived LSOAs in England and Wales in terms of income deprivation.<sup>42</sup> In 2017, median household income in Maida Vale Ward was £42,600, which is only slightly lower than that of Westminster £42,800.<sup>43</sup> Additionally, in the same year, the average lower quartile income was £27,500.

In September 2020, the claimant rate in the Westminster Borough was 5.5% (estimated 2% increase since 2019), where men and those aged 50 and over being groups claiming the most benefits.<sup>44</sup>

### 5.3.3 Education

Table 5-12 below presents levels of educational attainment at various geographies. Westminster LSOA has the largest proportion of residents with no qualifications (18.2%), compared to the Ward (12.2%), Westminster (12.9%) and London (16.2%) geographies. While Maida Vale Ward has the highest proportion of residents with qualifications level 4 and above (59.2%), compared to 43.2% at the LSOA level.

<sup>41</sup> ONS (2021). Occupation (TS063). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

<sup>42</sup> Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result:

Westminster 002D LSOA. Income Deprivation Domain. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

<sup>43</sup> City of Westminster (2018). Maida Vale Ward profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster,providing%20sporting%20facilities%20and%20open%20space%20for%20all.>

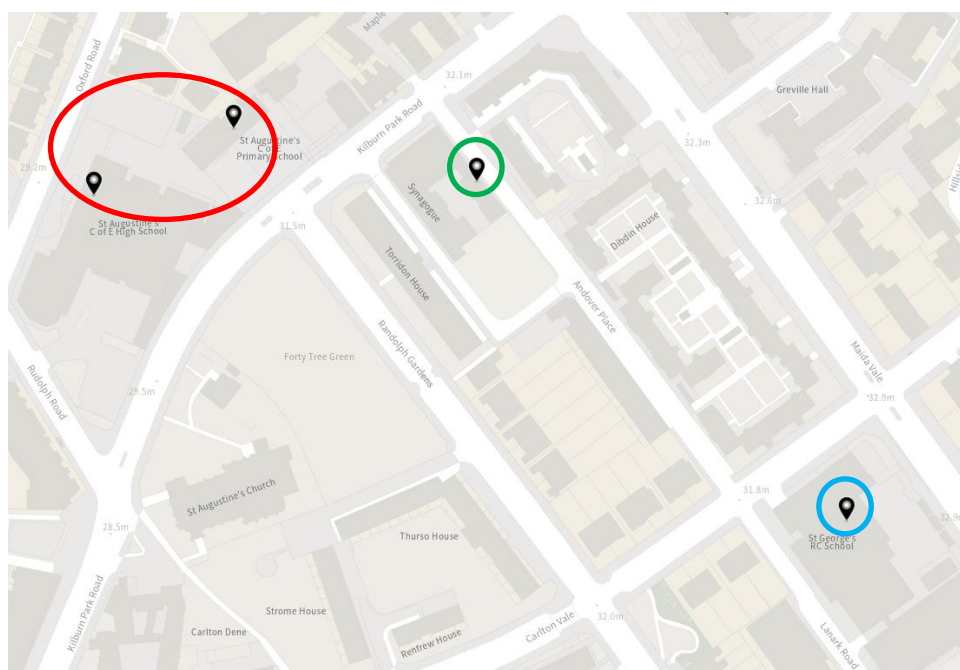
<sup>44</sup> City of Westminster (2020). Westminster Employment Service. Background Information for Scrutiny Committee. Available at: <https://committees.westminster.gov.uk/documents/s39523/WES%20Presentation%20091120.pdf>

**Table 5-12 Educational attainment (%) by different geographical area, 2021<sup>45</sup>**

Educational attainment	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
No qualifications	18.2	12.2	12.9	16.2
Level 1 qualifications	7.5	5.7	4.9	7.7
Level 2 qualifications	10.4	7.6	6.9	10.0
Apprenticeship	2.7	1.8	2.1	3.2
Level 3 qualifications	13.2	10.8	12.4	13.2
Level 4 qualifications and above	43.2	59.2	57.7	46.7
Other qualifications	4.8	2.7	3.2	3.1

There is one school within immediate vicinity of the site, Naima Jewish Preparatory School, circled in green in Figure 5-2 below. There are two other schools, St Augustine's C. of E. secondary school, and St Augustine's C. of E. primary school, located within the LSOA, these are circled in red below. St George's Roman Catholic secondary school, circled in blue, is located nearby in a neighbouring LSOA.

**Figure 5-2 Location of schools in the project area**



Source: London Datastore. (2023)<sup>46</sup>

### 5.3.4 Health

Compared with the national average, the health of people in Westminster is varied. Westminster is in the 20% most deprived local authorities in England and Wales in the health deprivation and disability domain, and about 27% (6,900) of children live in low-income families.<sup>47</sup> On the other hand, life expectancy for men and women is higher than the national average. Despite this, life expectancy in Westminster can vary drastically depending on the

<sup>45</sup> ONS (2021). Highest level of qualification (TS067). Available at: [Westminster Employment Services](https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=)

<sup>46</sup> Mayor of London (2023). School Atlas. Filter: State-funded schools. LSOAs. Available at: <https://apps.london.gov.uk/schools/>

<sup>47</sup> Public Health England (2020). Local Authority Health Profile 2019. Westminster. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E09000033.html?area-name=Westminster>



exact dwelling location. Men living in the least deprived areas live 13.5 years longer than men living in the most deprived areas, while for women this gap is 7.4 years.<sup>48</sup>

In terms of health issues within the Borough, rates of childhood obesity, incidence of tuberculosis and sexually transmitted infections among adults, are all worse than the national average. High rates of childhood obesity are especially important here, as there is access to Paddington Recreation Ground and other green open spaces near the site. It provides children with opportunities for physical exercise, which may be reduced if it is negatively impacted during construction. Conversely, health indicators such as excess weight in adults, the rate for alcohol-specific hospital admission among those under 18, teenage pregnancy, and rates of self-harm, are all lower than the England average.

In terms of health facilities in the Ward, there are two general practices observable on Google Maps<sup>49</sup>: Third Floor Medical Centre and Maida Vale Medical Centre. Additionally, Kilburn Park Medical Centre located on Albert Road<sup>50</sup>, which while outside the Ward bounds, is relatively close to the site and the proposed Torridon House redevelopment sits within the practice’s catchment area.<sup>51</sup> There are no opticians in the Ward, but there are two dental practices: The Dental Design Studio and Elgin Dental Care and Implant Clinic.<sup>52</sup>

### 5.3.5 Housing

In 2017, there were approximately 4,663 residential properties in Maida Vale Ward.<sup>53</sup> According to the 2021 Census, as shown in Table 5-13, the majority (45.9%) of households in Westminster LSOA were socially rented, while 29.8% were privately rented. The proportion of socially rented houses in the LSOA is significantly higher than that of Maida Vale (27%), Westminster (28.3%) and London (23.1%), and consequently the lowest proportions of private rented. The data also indicates that at the LSOA level 23.5% of houses are owned, compared to 29.6% at the Ward level. This is significantly lower than the London proportion of 45.2% households being owned.

**Table 5-13 Tenure (%) by geographical area, 2021<sup>54</sup>**

Tenure	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
Owned	23.5	29.6	27.4	45.2
Social rented	45.9	27.0	28.3	23.1
Private rented	29.8	42.6	43.3	30.0

The median property price for Maida Vale Ward was £807,000 in 2017, which is 24% less than the median price in Westminster by 24%.<sup>55</sup>

<sup>48</sup> ibid

<sup>49</sup> Google Maps (2023). Accessed in April 2023.

<sup>50</sup> Kilburn Park Medical Centre. Practice Boundary Area. Available at: <https://kilburnparkmedicalcentre.co.uk/new-patients/catchment-area/>

<sup>51</sup> Primary Care NHS. (2023). Practice Boundary Area. Available at: <https://www.primarycare.nhs.uk/publicfn/catchment.aspx?oc=E84042&h=400&w=600&if=0>

<sup>52</sup> Google Maps (2023). Accessed in April 2023.

<sup>53</sup> City of Westminster (2018). Maida Vale Ward profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster.providing%20sporting%20facilities%20and%20open%20space%20for%20all>

<sup>54</sup> ONS (2021). Tenure (TS054). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

<sup>55</sup> City of Westminster (2018). Maida Vale Ward profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster.providing%20sporting%20facilities%20and%20open%20space%20for%20all>

Table 5-14 shows occupancy rates (based on the ONS definition – number of bedrooms occupied)<sup>56</sup> derived from 2021 Census. Notably, there is a significantly higher proportion of overcrowded households at the LSOA level (19.1%), compared to the Ward (11.2%), Borough (10.3%) and London (11.1%) levels.

**Table 5-14 Household overcrowding and under-occupation (%) by geographical area, 2021<sup>57</sup>**

Overcrowding (bedrooms)	Westminster 002D LSOA	Maida Vale Ward	Westminster	London
+2 above standard	8.7	10.8	12.2	21.8
1 above standard	18.9	30.3	26.5	27.1
Standard	53.3	47.8	51.1	40.0
1 below standard	13.6	9.0	8.1	8.9
2+ below standard	5.5	2.2	2.2	2.2

### 5.3.6 Transport and connectivity

Maida Vale Ward has very good public transport accessibility compared to other areas of London. There are several underground tube stations nearby: Kilburn Park (6-minute walk) and Kilburn High Road Overground Station (6-minute walk) which lie north of the Ward; and Maida Vale (8-minute walk) southeast of the site. The stations provide access to the Bakerloo line linking the area directly with Paddington, Oxford Circus and Waterloo, as well as to the London Overground which provides a service to London Euston. The nearest major rail station is Paddington to the south, about 30-minute walk from the site. Paddington rail station provides access to various tube lines and serves as a link to Heathrow Airport and Great Western Railway.

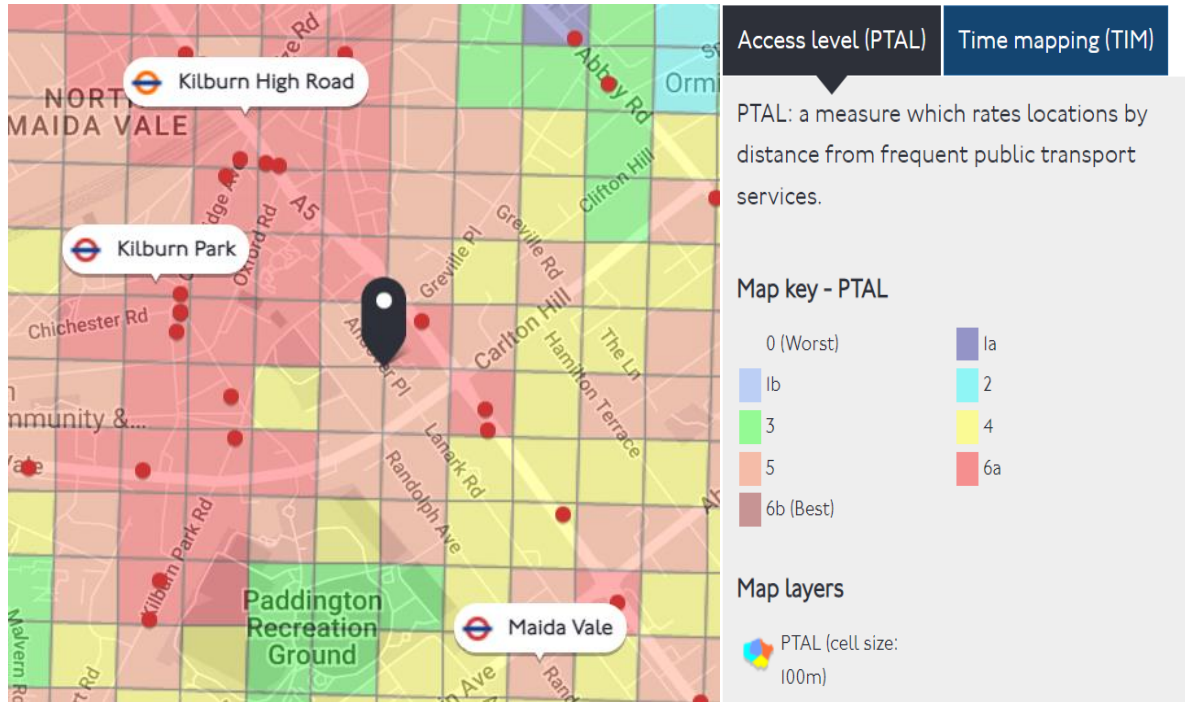
Kilburn Park Road bus stops KJ and KD are located within a 2-minute walk of the site, these stops are served by three day buses; the 16 (between Mora Road and Victoria Station), the 98 (between Pound Lane/Willesden Bus Garage and Red Lion Square), and the 332 (between Brent Park and Bishop’s Bridge / Paddington Station), as well as three night buses; the N16 and N32 (between Edgware Bus Station and Victoria Station), and the N98 (between Stanmore Station and Red Lion Square).

As outlined in Figure 5-3, the project site has a high Public Transport Accessibility Level (PTAL) rating of 5, on a scale of 0-6. This high rating is due to the plethora of nearby public transport options.

<sup>56</sup> This analysis uses the 'bedroom standard' measure of overcrowding, which determines how many bedrooms households need based on the ages, genders and relationships of members. Households are overcrowded if they have fewer bedrooms than they need. They are under-occupied if they have more bedrooms than they need.

<sup>57</sup> ONS (2021). Occupancy rating for bedrooms (TS052). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

**Figure 5-3 PTAL Access Level of the project area**



Source: Transport for London (2023)<sup>58</sup>

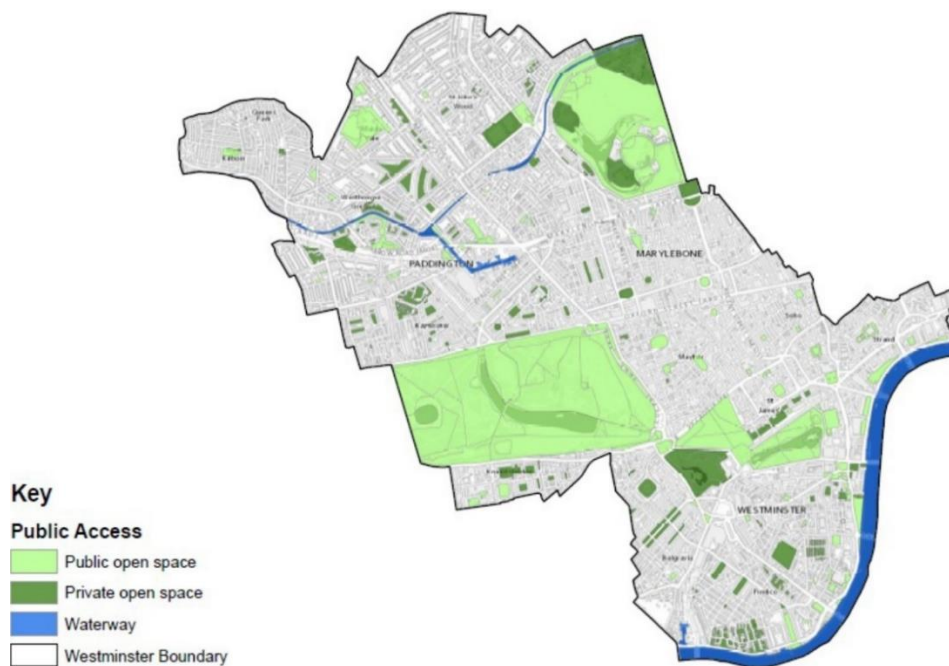
### 5.3.7 Public realm and open space

Forty Tree Green and Randolph Gardens Open Space are adjoining green spaces located less than a 1-minute walk from the site, on the opposite side of Torriron House to Kilburn High Road. The space is overlooked by St Augustine’s Church and contains a football pitch as well as walking paths and benches. Paddington Recreation Ground is located a 5-minute walk away to the south, this space has a variety of sports facilities, walking paths and a playground.

The open and green spaces in Westminster Borough are reproduced below in Figure 5-4.

<sup>58</sup> Transport for London (2023). Public Transport Accessibility Level. Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

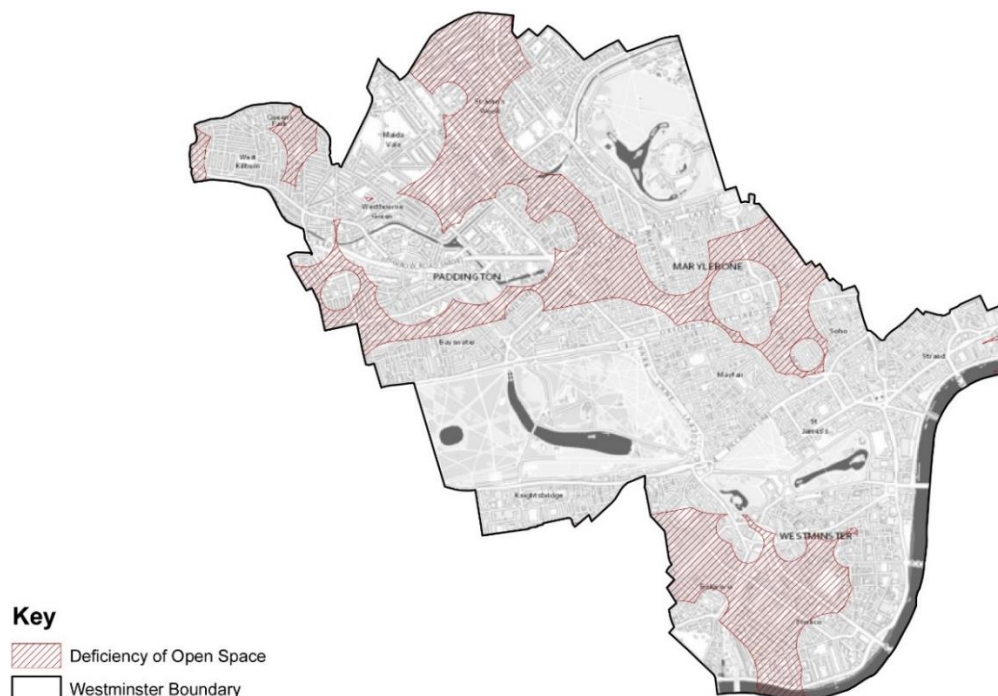
Figure 5-4: Westminster Map of Open and Green Spaces



Source: City of Westminster (2019)<sup>59</sup>

Figure 5-5 shows areas in Westminster Borough that are deficient of open and green spaces. According to the Partnership Approach to Open Spaces and Biodiversity data, Maida Vale Ward is not an open space-deficient area.

Figure 5-5: Westminster map of open space deficiency areas



Source: City of Westminster (2019)<sup>60</sup>

<sup>59</sup> City of Westminster (2019). Partnership Approach to Open Spaces and Biodiversity. Available at: <https://www.westminster.gov.uk/media/document/ev-env-007---a-partnership-approach-to-open-spaces-and-biodiversity>  
<sup>60</sup> ibid

### 5.3.8 Safety and security

In February 2023, the top three reported crimes within Maida Vale Ward were violence and sexual offences (21 instances), followed by anti-social behaviour (16 instances) and other theft (10 instances).<sup>61</sup> The Ward had a rate of 5.4 crimes per 1,000 residents for this monthly period, compared to 27.2 across the Borough.<sup>62</sup>

Over the last two years, from 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2023, the Metropolitan Police Service recorded 360 crimes in the Westminster LSOA, majority of which were violence against a person without injury (78 instances), followed by violence against a person with injury (53 instances), other theft (48 instances) and public fear alarm or distress (30 instances). Violence without injury was also recorded amongst the top three most frequent crimes in the Ward and Borough geographical levels within the same period.<sup>63</sup> The 2021 City Survey showed that 83% of the Ward residents feel “very safe” in the area and 14% feel “fairly safe”.<sup>64</sup>

### 5.3.9 Community cohesion

To ensure healthy communities which are functional, safe, and enjoyable places to live and work, it is important to promote community cohesion and good relations between different groups. Encouraging civic engagement and ensuring dialogue with all people in the community, particularly those belonging to protected characteristic groups, is an important step in working towards community cohesion. For people belonging to protected characteristic groups, their feelings of a lack of cohesion (or exclusion) may be more acute than those of other people.

According to the City Survey 2017, 88.14% of the community within Maida Vale Ward agree that people from different backgrounds get on well.<sup>65</sup> In 2021 City Survey, 94% thought that “People showing hostility or prejudice based on disability, race, religion, transgender identity or sexual orientation” is not a problem in the area.<sup>66</sup>

In terms of civic engagement, in the City Survey 2017 about 16.2% of the residents spend “a great deal” or “a fair amount” of time helping to improve the community, while further almost 30% declare they are “very” or “fairly” interested in helping to improve the community.<sup>67</sup> No data was available for the 2021 City Survey.

<sup>61</sup> Metropolitan Police (2023). Maida Vale. Top reported crimes in this area. Available at: <https://www.met.police.uk/area/your-area/met/westminster/maida-vale/about-us/top-reported-crimes-in-this-area>

<sup>62</sup> Metropolitan Police Service. Overview of Crimes. Filters: start date and end date = February 2023; Geographical level = Borough; Area name = Westminster. Available at: <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>

<sup>63</sup> Metropolitan Police (2023). Recorded Crime: Geographic Breakdown. MPS LSOA Level Crime; MPS Ward Level Crime; MPS Borough Level Crime. Available at: <https://data.london.gov.uk/dataset/recorded-crime-summary>

<sup>64</sup> City of Westminster (2021). Maida Vale profile. Available at: [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjG\\_LGszbP-AhW8RkEAHf1SBQgQFnoECACQAQ&url=https%3A%2F%2Fwww.westminster.gov.uk%2Fmedia%2Fdocument%2Fmaida-vale-ward-profile---2022&usq=AOvVaw34b6\\_frGx-RjuEJWp7DqHd](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjG_LGszbP-AhW8RkEAHf1SBQgQFnoECACQAQ&url=https%3A%2F%2Fwww.westminster.gov.uk%2Fmedia%2Fdocument%2Fmaida-vale-ward-profile---2022&usq=AOvVaw34b6_frGx-RjuEJWp7DqHd)

<sup>65</sup> City of Westminster (2018). Maida Vale profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster.providing%20sporting%20facilities%20and%20open%20space%20for%20all>

<sup>66</sup> City of Westminster (2021). Maida Vale profile. Available at: [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjG\\_LGszbP-AhW8RkEAHf1SBQgQFnoECACQAQ&url=https%3A%2F%2Fwww.westminster.gov.uk%2Fmedia%2Fdocument%2Fmaida-vale-ward-profile---2022&usq=AOvVaw34b6\\_frGx-RjuEJWp7DqHd](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjG_LGszbP-AhW8RkEAHf1SBQgQFnoECACQAQ&url=https%3A%2F%2Fwww.westminster.gov.uk%2Fmedia%2Fdocument%2Fmaida-vale-ward-profile---2022&usq=AOvVaw34b6_frGx-RjuEJWp7DqHd)

<sup>67</sup> City of Westminster (2018). Maida Vale profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster.providing%20sporting%20facilities%20and%20open%20space%20for%20all>

## 6. Assessment of impacts

### 6.1 Introduction

The assessment of equality impacts considers the potential impacts on affected people sharing protected characteristics arising from the Torrindon House car park development. It considers both direct and indirect impacts associated with:

- Construction and operation impacts on residents living in the area surrounding the site; and
- Operational impacts on future residents of the site.

The assessment is based on the development as set out in the planning application (2020) and considers both beneficial and adverse impacts. This is a high-level assessment based on the legislation and policies in action, information and data sources available for review in this report and addresses impacts relevant to the key equality themes set out in the framework in Table 6-1.

**Table 6-1 EIA assessment framework**

Theme	EIA objectives
Housing	<ul style="list-style-type: none"><li>• Enable older people to live independent lives</li><li>• High-quality housing meeting the needs of residents</li><li>• Increase in affordable housing for local people</li></ul>
Neighbourhood and Community	<ul style="list-style-type: none"><li>• Clear, transparent, inclusive and meaningful engagement with local residents, stakeholders and the local community</li><li>• Mitigation of potential negative environmental and safety impacts of construction on local residents</li></ul>
Wider impacts	<ul style="list-style-type: none"><li>• Provide employment and educational opportunities, for disadvantaged and underrepresented groups</li><li>• Maximising social value for local communities</li></ul>

### 6.2 Housing

#### Net increase in social rent housing in Westminster

The planning application proposes the redevelopment of the existing car park to provide two blocks of three and five storeys providing 21, 100% social rent, Use Class C3 (residential) units. The proposed residential accommodation is as follows:

- 8 x 1-bed 2-person apartments (including 1 x accessible apartment)
- 7 x 2-bed 4-person apartments (including 1 x accessible apartment)
- 2 x 4-bed 6-person apartments
- 4 x 3-bed 5-person houses

These homes will be retained by the Council and made available through a local lettings plan that ensures households on the social housing waiting list are prioritised. The latest wait list figures (from November 2021) reveal that there are currently over 4,100 households in Westminster on the social housing waiting list.<sup>68</sup> The Supply and Allocation of Social Housing

<sup>68</sup> City of Westminster (2022) How to apply for social housing. Available online at: <https://www.westminster.gov.uk/housing/register-social-housing/how-apply-social-housing>

2022/23 Cabinet Report identifies that the demand for social housing will continue to exceed estimated supply during 2022/23 and consequently identifies priority groups to receive projected lettings. This includes homeless households (45% of projected social housing lettings 2022/23), existing WCC tenants (32%) including those that are overcrowded and need to move on medical grounds, and those on the housing register (23%) including people moving from supported housing and on medical grounds.

Specific groups with high needs for access to social housing and high representation amongst those living in the project area include people from Asian and Middle Eastern households, economically inactive people, those aged 25-44 and 45-65, and households with children and lone parents.<sup>69</sup> It is therefore likely that some people belonging to these groups will benefit from the new development.

### **Increased affordable housing provision for local residents**

In pursuing the housing strategy targets that comprise part of the Fairer Westminster Strategy, the Council has developed a Local Lettings Plan (LLP) for the redevelopment. The purpose of an LLP is to prioritise meeting local housing need in line with the Council's Housing Allocations Policy. The Westminster Housing Allocation Scheme<sup>70</sup> (as of March 2020) requires applicants to be a permanent resident of Westminster for three years at the date of application and prioritises groups as identified within section 167 of the Housing Act 1996.

Census 2021 reveals that 45.9% of housing tenure in the project LSOA is social rented, compared to 27.0% in Maida Vale and 28.0% in Westminster; the LLP will therefore ensure that the new housing meets the needs of the local population. Furthermore, there are high proportions of disabled, Arab, Other White, Muslim, and economically inactive residents within the LSOA, are therefore people belonging to these groups may have a disproportionate need for affordable housing.

### **Net increase in wheelchair accessible housing in Westminster**

The design contains provision of two new fully accessible flats that are designed to Part M4(3) Wheelchair User standards. These are both located on the ground floor to provide ease for wheelchair users with level access into the building. This provision meets London Local Plan Policy 3.8 commitments that 10% of all dwellings provided must be accessible.

The provision of wheelchair accessible housing could enable disabled people or older and elderly people with limited mobility to remain at home living independently. This benefit is likely to be felt acutely if local residents are allocated the new accessible flats, as the LSOA has a higher proportion of disabled residents whose day-to-day activities are limited to some extent (16.9%), in comparison to Maida Vale (14.0%), Westminster (13.8%), and London (13.2%).

### **Net increase in family housing resulting in potential for reduced household overcrowding in Westminster**

Nearly 20% of households in the project area LSOA are classified as overcrowded according to Census 2021, for comparison, the proportion of households classified as overcrowded is 10.3% in Westminster and 11.1% in London. Overcrowding disproportionately affects low-income households, ethnic minority groups, and children,<sup>71,72</sup> with the impacts of living in an

<sup>69</sup> Westminster Council (2018) Cabinet Report: Supply and Allocation of Social Housing 2022-23 <https://committees.westminster.gov.uk/ieDecisionDetails.aspx?ID=1721>

<sup>70</sup> City of Westminster (2020). Housing Allocation Scheme March 2020. Available at: <https://www.westminster.gov.uk/housing-policy-and-strategy/allocations-scheme>

<sup>71</sup> UK Parliament (2021) Overcrowded housing (England). Available online at: <https://commonslibrary.parliament.uk/research-briefings/sn01013/>

<sup>72</sup> Mayor of London (2022) London needs an overcrowding action plan from the Mayor. Available online at: <https://www.london.gov.uk/press-releases/assembly/london-needs-an-overcrowding-action-plan>

overcrowded household including increased likelihood of close-contact infectious diseases, psychological stress, and sleep disturbance.<sup>73</sup> The provision of new 3-bed and 4-bed homes will help to reduce overcrowding significantly, in particular for households with dependent children where there is greater chance of room-sharing.

## 6.3 Neighbourhood and Community

### 6.3.1 Potential beneficial impacts

#### Community engagement and consultation

Equality legislation emphasises the importance of supporting positive relations between different groups, whilst local community cohesion policy supports group interaction, fair treatment, equal opportunity, and a sense of common belonging, including empowering local communities to shape decisions affecting their lives.

The Torridon House development is in one of the 20% most deprived LSOAs nationally, creating a complex and nuanced range of community needs. The extent to which benefits of the proposals are shared amongst all members of the community, including people with protected characteristics, will depend in part on engagement efforts to reflect their views in the planning process.

The development is situated in a demographically diverse neighbourhood, with a number of affected stakeholders being from different backgrounds and having different perspectives on the project. Of particular note, given their close proximity to and historical use of the car park, are:

- The Torridon House residents, located directly next to the site, some of whom are involved with the Randolph Gardens Residents' Association;
- The pupils, parents, and teachers from Naima Jewish Preparatory School which is located on the northern boundary of the site; and
- Residents from Dibdin House, located adjacent to the site, and their residents' association.

The Council has held two public consultation sessions so far. Firstly, in May 2019, WCC held early-stage drop-in sessions to introduce the plans for the development and take on board feedback. These were held on the 2<sup>nd</sup> May 2019 between 2pm-6pm, and the 8<sup>th</sup> May 2019 between 5pm-8pm at St Augustine's Church. In advance of the sessions, invitation letters were sent to the following stakeholders:

- Ward councillors
- Dibdin House Residents' Association
- Torridon Management Organisation
- Naima Jewish Preparatory School
- Local residents
- Local businesses
- Users of the storage sheds and car parking spaces
- Local community groups

---

<sup>73</sup> WHO (2018) WHO Housing and Health Guidelines. Available online at: <https://www.ncbi.nlm.nih.gov/books/NBK535289/#:~:text=close%2Dcontact%20infectious%20diseases,sleep%20disturbance.>



Approximately 80 people attended the session, with a number of attendees being parents and staff from Naima Jewish Preparatory School. A number of boards were provided at the sessions, containing information relating to the project background, information about the site, provision of affordable housing, early proposals, and ideas for the design. Comment forms were provided in order to receive feedback.

In relation to the school, numerous security concerns were raised in relation to the new building overlooking the school grounds, particularly as the playground is open-air and will be overlooked by some of the new building's balconies. Other concerns included already limited car parking provision in the area, which is to be further reduced as a result of the new residences; implications on sunlight for residents in surrounding flats; noise and air pollution in an already busy and polluted area; and overdevelopment and overcrowding in an already densely populated area.

Following this early-stage session, the Council issued invitations to detailed design drop-in sessions, held at St Augustine's Church on the 18<sup>th</sup> and 19<sup>th</sup> September 2019 between 4:30-7:30pm. An additional session was held in the Torridon House foyer on the 26<sup>th</sup> September 2019 between 4pm-6pm to allow residents further opportunity to see the detailed design proposals for the site. These sessions gave stakeholders the opportunity to view and comment on the revised design proposals, following changes after the previous session in May. In advance of the sessions, the same stakeholders were invited to attend, as well as Torridon Management Organisation.

Thirty-eight people attended the second session, primarily local residents as well as one of the site's local ward councillors. A number of boards were provided at the sessions, containing responses to feedback, information about the revised proposals, what had been changed, the infills programme, and feedback and next steps.

A high proportion of comments received at the second round of drop-in sessions were positive and recognised the improvements made since the first consultation. New issues raised included concerns over the new residents moving into the social housing, already limited parking provision, and construction noise and activity.

Following receipt of feedback from the two sessions, some key issues were mitigated or removed. Firstly, the issue of the new building overlooking the school was removed by redesigning the balconies to eliminate overlooking; secondly, re-provision of 19 car parking spaces including 17 for existing license holders was confirmed; thirdly, in relation to daylight/sunlight impacts, a new roof profile was designed to minimise loss of light on Dibdin House.

Additional engagement has been carried out through stakeholder meetings, namely with Torridon Tenant Management Organisation and Naima Jewish Preparatory School. There is also a dedicated project page on the WCC website, as well as email correspondence being sent out via email, and regular contact with key political stakeholders.

The Council is also undertaking ongoing engagement with local residents through the publication of the quarterly newsletter 'Torridon Car Park' – the first issue was sent out in October 2022, and the second in February 2023. The purpose of this newsletter is to inform local residents on current and upcoming stages of the development, as well as providing contact details of the Osborne Project Manager and Resident Liaison Officer. The Council has also committed to hand delivered any future communications, including the newsletter, to neighbouring residences.

To ensure good relations are fostered between groups involved and/or affected with the project, it is recommended that the Council should continue to ensure that all feedback received during consultation and engagement activities is properly documented and archived. This will ensure that should objections arise from stakeholders; the Council are well placed to evidence the reasoning behind their decisions.

## Increased social interaction and cohesion

The nature of the social housing development provides an opportunity for increased social interaction and cohesion. New residents from similar backgrounds, or who share similar housing experiences in Westminster, are likely to find mutual bonds that provide opportunity for social interaction. Furthermore, issues around social isolation, particularly amongst elderly people, serve to be mitigated through the provision of modern, affordable, and accessible housing that can boost confidence and quality of life. The development of a housing association, similar to that exists at Torridon House, will maximise these potential social benefits by providing a forum for resident interaction.

Furthermore, the ongoing stakeholder engagement and consultation activities, alongside providing an opportunity for issues or queries to be raised, also act as a platform for people in the local community to meet, interact, and gain a better understanding of each other's perspectives on the project, as well as wider topics.

### 6.3.2 Potential adverse impacts and mitigation

The Torridon House development could potentially result in adverse impacts affecting protected characteristic groups living in the local community during demolition, construction and operation. The following sections summarise these potential impacts including how the Council has implemented mitigation against these as a fulfilment of the PSED outlined in the Equality Act 2010.

#### Loss of car parking facilities

The existing car park is managed by the Council and comprises 37 spaces as well as sheds that are used for Torridon House tenants' storage. The scheme will result in the loss of 18 of these spaces; the new layout will re-provide 17 car parking spaces for existing license holders, as well as provide 2 additional disabled parking spaces for the new residents.

Currently, there are 25 licensee holders who use the existing car park, 19 being Torridon House residents and 6 belonging to Naima Preparatory School – overall 8 of these license holders will therefore lose a car parking space. At the point of works starting all licence holders were offered alternative spaces at Scottish Towers (located approximately a 5-minutes' walk from Torridon House) at the same cost and arrangements of registration. There has been no decision made on how the new car parking spaces will be allocated.

As raised during stakeholder consultation and engagement, existing parking facilities in the project area are already at near-capacity levels. The site is located within the Westminster Controlled Parking Zone (CPZ) 'C1' meaning that parking restrictions are enforced from 8:30am-6:30pm Monday-Friday, the CPZ comprises both residents bays and paid-for bays which charge an hourly rate of £1.70. WCC parking survey data reveals that during the overnight period (00:00 – 06:00), 183 of 208 available spaces within a 200m radius of the site are occupied, giving a parking stress level of 88% which exceeds WCC's desired capacity of 80%. Furthermore, of these 208 spaces, 155 are classified as residents bays of which 142 are used – giving a parking stress level of 92%.

Reducing the number of available parking bays therefore has the potential to have differential and disproportionate negative impacts on existing residents who may have to walk increased distances to their vehicle. This is most notable for those who require a private car due to mobility restrictions such as older people or disabled people or for those who depend on their car for work purposes such as taxi drivers, delivery drivers or carers.

It is possible that the re-allocation of parking spaces will be a contentious issue given the number of concerned parties, varying reasons for having a parking space, and also as parking was evidenced as a re-occurring theme during stakeholder consultation. To mitigate potential tensions between license holders, it is crucial that an unbiased approach to parking allocation is adopted. Thorough consultation with license holders should be undertaken,

taking into account the individual needs for a car parking space, with final decisions being evidenced by logical reasoning.

In an attempt to manage the development and mitigate the effects of a loss of car parking facilities, the Council has produced a transport statement. The statement outlines that the new residential units will be provided with a lifetime car club membership, paid for by the Council, car club membership will give the residents access to a car without the need of owning one and not needing to purchase a residential permit. However, there is currently no inclusion of mitigation for the existing license holders who will lose a car parking space. Although new developments (particularly in areas with a high PTAL ranking and in line with existing policy) aim to reduce car dependency, it is crucial that an unbiased needs-based approach to the re-provision of parking spaces is adopted by the Council.

### Construction phase impacts on local residents and facilities

Local residents surrounding Torridon House Car Park are likely to experience construction impacts as a result of the development, including adverse noise and air quality impacts. Construction impacts could disproportionately impact protected characteristic groups who spend more time at home, including older people, people with disabilities and long-term limiting illnesses, and pregnant women or women on maternity leave or those caring for small children.

In relation to poor air quality, the main potential effects during construction are dust deposition and elevated PM<sub>10</sub> concentrations. Children, older people, and disabled people are more vulnerable to adverse health effects as a result of these construction related emissions. Especially in the case of disabled people, those with weak respiratory systems, or suffering from health problems more generally associated with weaker lungs, may be disproportionately impacted by emissions and dust created through construction and maintenance activities. Pregnant women are also more vulnerable to the adverse effects of air pollution including an increasing risk of miscarriage as well premature births and low birth weights.<sup>74</sup>

An Air Quality Assessment was undertaken by WCC in support of the planning application, it identified that during demolition and construction the main potential impacts are dust soiling (potentially causing annoyance effects) and locally elevated concentrations of PM<sub>10</sub> (potentially causing health effects). The study area is considered to be of 'medium' sensitivity to potential dust impacts due to the close proximity of a number of residential receptors and Naima Preparatory School within 20m of the site. The study area is considered to be of 'low' sensitivity to potential PM<sub>10</sub> impacts due to the baseline PM<sub>10</sub> concentrations and distance of sensitive receptors. Overall, the predicted risk to human health of dust impacts during construction are assessed to be negligible. To mitigate air quality impacts during construction the assessment includes measures such as; planning site layout so that machinery and dust causing activities are as far as possible away from sensitive receptors, ensure all on-road vehicles comply with the London Low Emission Zone, and ensuring effective water suppression is used during demolition operations.

The construction works are also likely to result in increased noise levels in the surrounding area. Some residents will be more sensitive to the effects of these construction impacts than others. For example, those who spend more time at home will be subjected to longer periods of adverse noise impacts including older people, people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children. Some groups with protected characteristics also have differential sensitivity to noise. For example, people with dementia have an increased sensitivity to noise and light. Children are also susceptible to increased noise levels in some instances particularly with

---

<sup>74</sup> Leiser, C, Hanson, H, Sawyer, K, Steenblik, J, Al-Dulaimi, R, Madsen, T, Gibbins, K, Hotaling, J, Oluseye Ibrahim, Y, VanDerslice, J & Fuller, M (2019) Acute effects of air pollutants on spontaneous pregnancy loss: a case-crossover study, *Fertility and Sterility*, Volume 111, Issue 2, 2019, Pages 341-347.

regards to cognitive impairment. Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise.

A Noise and Vibration Impact Assessment has also been undertaken by WCC in support of the planning application. In terms of both noise and vibrations the site is considered suitable for the development. The only point of concern raised in the assessment was regarding noise in external amenity areas, namely balconies belonging to flats in Torridon House that overlook the site. At these locations sound levels are likely to marginally exceed the proposed lowest-observed-adverse-effect-level (LOAEL) during the daytime. However, the exceedance of sound levels within the balcony areas overlooking Andover Place should be balanced against other factors, such as the convenience of living in such a desirable location and the preference of having a balcony, therefore the sound levels should be considered acceptable.

A Resident Liaison Officer has also been appointed as a contact for residents to report construction related issues including noise and air impacts.

### **Traffic impacts on surrounding residents and facilities**

Construction related traffic could result in adverse accessibility impacts for local residents during construction. This includes the potential obstruction of residences by construction vehicles and potential closure of surrounding roads. The site is accessed via Andover Place which routes north-south on to Carlton Avenue. Carlton Avenue provides access to the A5 / Maida Vale.

There are a number of nearby facilities that will likely be impacted by the movement of construction vehicles; Naima Preparatory School, St Augustine's CE High School and CE Primary School, and St Augustine's Church are all within less than 200m of the site and will be impacted by the movement of construction vehicles, particularly during peak-traffic hours. This could result in potential impacts on children, young people and worshippers visiting the church.

Osborne the construction contractor has confirmed in their Construction Phase Plan that traffic management plans for within and outside the site boundary will be planned prior to commencement on site by the project team. Liaison with local authorities and highway departments will take place to agree the safest, most considerate routes of access/egress to the site. Timing of deliveries to avoid the busiest periods of the day and to accommodate local commercial units will also be considered.

### **Right to light impacts on neighbouring properties**

Given the close proximity of neighbouring buildings and the proposed scheme, the Torridon House redevelopment is likely to generate right to light (RtL) impacts on neighbouring residential properties. For properties, particularly residential properties, which do experience a loss of light, equality effects may arise for residents who share protected characteristics. This may arise where a resident is more sensitive than other people, due to a protected characteristic, for example a disability.

Although there is no existing specific National Planning Policy relating to the prospective impacts of developments on daylight and sunlight, the Building Research Establishment (BRE) Report 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' is the established national guidance and has been followed in Torridon House's Daylight and Sunlight Assessment, completed in April 2020. Overall, 68 windows have been assessed, belonging to Torridon House, Dibdin House, Andover Place, and Naima Preparatory School.

In terms of both daylight and sunlight, it has been concluded that there will be no adverse impact on neighbouring residents, and that the development is entirely acceptable for planning.

## Cumulative impacts of other simultaneous developments

There will be ongoing works to the opposite side of Torridon House to Andover Place and the car park. The nature of these works is replacement of the windows and doors in the ground floor flats of the building, also being completed by Osborne. There is potential for cumulative equality impacts of these two developments happening simultaneously, in particular in relation to air quality and noise impacts, and traffic disruption caused by construction vehicles.

To minimise potential adverse impacts, the residents in these ground floor flats should be consulted with. Anyone with protected characteristics that may cause them to have a heightened sensitivity to two sets of ongoing construction works should be advised of timings, and if possible, not be in the area during the works.

A Resident Liaison Officer has also been appointed as a contact for residents to report construction related issues.

## 6.4 Wider impacts

### Potential creation of new construction-related employment opportunities

The construction of the new development is likely to create an opportunity for construction-related jobs and there is potential for those seeking work in the local area to benefit from this employment, particularly as the area experiences low levels of educational attainment and high levels of unemployment compared to the Ward level.

Those likely to benefit from these job opportunities include young people, especially those from ethnic minority backgrounds who suffer from disproportionately higher rates of unemployment.<sup>75</sup> However, equality effects may arise where employment or training is not available to groups with protected characteristics, for example where recruitment criteria or policies make it harder for some groups to access opportunities.

The Council has developed a Responsible Procurement Delivery Plan identifying areas in which the Council could deliver Social Value to local residents, businesses and communities across the three Package B sites – Adpar Street Car Park, Torridon House and Queen’s Park Court. The plan outlines a priority area of supporting unemployed residents into meaningful employment as a means of improving life chances and preventing the mental and physical consequences of unemployment. To achieve this Social Value, the on-site architects (David Miller Architects) have committed to recruiting one Westminster resident in an Apprentice Studio Assistant (Level 3) role with training provided through the City of Westminster College and offering two 16 weeklong work placements to local Westminster students and residents. In addition, all job opportunities that arise from this development project will be shared with Recruit London, WCC’s in house employability service, two weeks in advance of the wider general market.

## 6.5 Summary of potential impacts

Table 6-2 provides a summary of the potential construction and operational impacts of the proposals. This provides an assessment of groups with protected characteristics who are likely to be disproportionately or differentially affected by each of the impacts. As defined in section 2 of this report:

- A *disproportionate* equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on the general population overall at a particular location.

<sup>75</sup> ONS (2022) Annual Population Survey: Unemployment. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

- A *differential* equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability associated with their protected characteristic.

In some cases, protected characteristic groups are subject to both disproportionate *and* differential equality effects.

The table also provides a brief overview of planned mitigation to minimise adverse impacts as well as activities in place to enhance opportunities resulting from beneficial impacts.

It is envisaged that this table can be used to monitor equality effects as the development progresses.

**Table 6-2 Summary of potential equality impacts of Torrison House car park redevelopment proposals**

Impact	Disproportionately/Differentially Affected Protected Characteristic Groups <sup>76</sup>											Overview of potential impacts	Planned mitigation/ EIA recommendations	
	Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Low Income Households			
	Children	Young People	Older People											
<b>Housing</b>														
<b>Beneficial</b>	Net increase of 21 social housing units			✓		✓						✓	The provision of social housing could support the local population into finding housing that meets their needs, in particular for elderly people, some ethnic minority groups, and those on low incomes who are overrepresented in housing waiting list statistics.	<b>Planning Mitigation:</b> Local Lettings Plan to be developed to prioritise people in Maida Vale who are on the social housing waiting list.
	Increased affordable housing provision for local residents			✓		✓						✓	A Local Lettings Plan (LLP) for the allocation of affordable housing is likely to meet the housing needs of local residents. Key priority groups identified include those who are homeless, overcrowded households and those who require relocation based on medical grounds.	<b>Planning Mitigation:</b> Local Lettings Plan to be developed to prioritise people in Maida Vale who are on the social housing waiting list.
	Net increase in wheelchair accessible housing			✓				✓						Provision of wheelchair accessible homes considers the accessibility requirements of disabled and elderly residents. The availability of these units as social rent assists the cost of living for disabled people who face additional living costs.
<b>Neighbourhood and community</b>														
<b>Beneficial</b>	Community engagement and consultation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Local residents, Residents Associations stakeholders and councillors, including those with protected characteristics living in proximity of the site, have been provided opportunities to engage with WCC through the design development of the proposal.	<b>Planned Mitigation:</b> Resident Liaison Officer on site who can be by email and phone with any resident enquiries and will hand deliver future correspondence from WCC to local residents.  Quarterly 'Torrison Car Park' newsletter updating residents on current and upcoming works.  <b>EIA Recommendation:</b>

<sup>76</sup> As there are no disproportionate or differential effects identified for marriage/civil partnership this protected characteristic has not been included in the table. Low income is not a protected characteristic but is considered as part of the EIA process by the Council.

Impact	Disproportionately/Differentially Affected Protected Characteristic Groups <sup>76</sup>												Overview of potential impacts	Planned mitigation/ EIA recommendations
	Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Low Income Households			
	Children	Young People	Older People											
														Produce a document log of stakeholder feedback and any actions taken by the Council in response.
Adverse with mitigation	Loss of car parking facilities			x				x			x		These Scheme will result in the loss of 18 car parking spaces and increased parking stress in the local area. In particular, for protected characteristic groups who rely on private vehicles for access to services, in particular those with existing licenses in Torrison Car Park who are going to be displaced by the new development.	<p><b>Planned Mitigation:</b></p> <p>Relocation of license holder spaces to Scottish Towers.</p> <p>Reprovision of 17 spaces for license holders within the Torrison Car Park scheme area, as well as two additional disabled spaces for new residents.</p> <p>Production of a Transport Statement to address and mitigate any parking stress that may arise from the new development.</p>
	Construction phase impacts on local residents and facilities	x	x	x	x	x	x	x	x	x	x	x	Protected groups are more vulnerable to the health, security, safety and accessibility adverse impact relating to the construction phase. In particular, noise, vibration and air quality impacts can have particularly significant effects on surrounding residents.	<p><b>Planned Mitigation:</b></p> <p>Completion of air quality, and noise and vibration impact assessments to ensure construction phase works do not exceed regulations.</p> <p>Production of a Construction Phase Plan, Environmental Engagement Plan, and Traffic Management Plan to minimise adverse disruption and ensure the construction works are delivered without incident or excessive impact on the surrounding area.</p> <p>Resident Liaison Officer on site who can be contacted by email and phone with any resident queries or complaints.</p>



Impact	Disproportionately/Differentially Affected Protected Characteristic Groups <sup>76</sup>											Overview of potential impacts	Planned mitigation/ EIA recommendations	
	Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Low Income Households			
	Children	Young People	Older People											
Traffic impacts on surrounding residents and facilities			x				x					x	There are a number of nearby facilities that may be negatively impacted by disruption to traffic movements during construction.	<b>Planned Mitigation:</b> Production of a Construction Phase Plan and Traffic Management Plan to ensure construction vehicle movement is done outside of peak-traffic hours.
Right to light impacts on neighbouring properties			x				x					x	The development may cause daylight and sunlight alterations to properties in the vicinity of the new residential block. A daylight and sunlight assessment identified 68 windows that would be potentially adversely impacted.	<b>Planned Mitigation:</b> None of the 68 windows assessed were deemed to be adversely impacted beyond guidelines.
Cumulative impacts of other simultaneous developments			x				x					x	There will be construction works happening to the ground floor flats of Torrison House, on the opposite side to the car park, during the same period as the development.	<b>EIA Recommendation:</b> Engage with the residents in the affected flats and ascertain if there is anyone with protected characteristics, and subsequently agree on suitable mitigation.
<b>Wider impacts</b>														
<b>Beneficial</b>	Creation of new construction-related employment opportunities			x			x					x	Local residents seeking employment are likely to benefit from the creation of construction-related jobs, particularly young people and ethnic minorities who are overrepresented in unemployment.	<b>Planned Mitigation:</b> Commitments made by the on-site architects (David Miller Architects) in the Responsible Procurement Delivery Plan to offer an Apprentice Studio Assistant (Level 3) role and two 16 weeklong work placements.

## 7. Conclusions and next steps

### 7.1 Conclusions

This EIA has identified potential positive impacts on many protected characteristic groups and how the Torridon Car Park development will contribute to improvements in the area through an increase in affordable housing which meets the needs of local residents. The EIA has identified potential beneficial equality effects of the proposed development as follows:

- A net increase in social housing in the form of 21 new, 100% social rent Use Class C3 units.
- A net increase in affordable housing provision. The Council has committed to a Local Lettings Plan to prioritise the provision of affordable homes to local elderly residents in the most need.
- A net increase in wheelchair accessible housing through the provision of two fully accessible ground-floor residences.
- Reduced overcrowding in the area, through the provision of multi-bedroom residences which can be targeted at families with children who are on the social housing waiting list.

Westminster City Council has demonstrated due regard to their PSED through a series of mitigation activities throughout the planning application stage. These include:

- Extensive community engagement with local residents, including affected properties and car park licence holders. Two public exhibitions were supported by consultation meetings with key stakeholders to address any concerns and inform the design process.
- A Transport Statement was produced as a means of exploring the issue of parking stress in the local area as a result of the proposal and identifies management strategies such as existing street capacity, car clubs and levels of car ownership.
- An Air Quality Assessment and Acoustic Design Statement were published alongside the planning application in 2020. These considered the potential environmental impacts of construction and confirmed that the proposal did not exceed any national or local regulations.
- Production of a Construction Phase Plan, an Environmental Management Plan and Section 61 consent outlining an approach to minimising any adverse environmental impacts throughout the construction phase of the development.
- A Daylight and Sunlight Statement was produced and identified that neighbouring properties may experience RtL injuries. A high-density scheme in a close urban setting which is redevelops a building will result in impacts on neighbouring properties which cannot realistically be avoided. However, residents will be entitled to compensation for any reduction in the value of their property or standard of living caused by the development.
- The Contractor has appointed a dedicated Resident Liaison Officer who can be contacted by residents via email and phone.

### 7.2 Next steps

The key issues identified through this EIA for different groups with protected characteristics are summarised alongside provisional high-level recommendations in Table 6-2. This identifies priority groups for which there are differential and disproportionate impacts.

Monitoring of equality impacts should be included as part of a Monitoring and Evaluation Plan for the proposed development. This should use Table 6-2 of this report as a basis on which to track and update impacts throughout continued design, development and construction. The Monitoring and Evaluation Plan should also seek to review how the proposed benefits of the scheme will be realised by groups with protected characteristics. This could draw on the experience of local residents with regards to their involvement in identifying limitations of the application and their experience of the new housing. It is recommended that a member of the project team is given responsibility for tracking and updating the equalities actions within the monitoring plan.

The proposals will require the continued procurement of services for the construction of the new housing and landscaping improvements. The PSED will apply to the procurement process because it is a non-delegable duty and procurement is a 'function' of the Council. Therefore, in circumstances where the Council chooses to "contract out" part or all of a function (for example construction of the housing) to another entity (for example a contractor), the Council cannot absolve itself from its responsibility to fulfil the PSED.

The Council should ensure that compliance with PSED is factored in throughout any further procurement, for example;

- In the PIN and OJEU notices;
- As part of the criteria to be assessed at the selection stage, the evaluation methodology should be designed with the EIA in mind and tenderers' soft and hard proposals on how to address issues identified in the EIA should be clearly set out; and
- As a contractual condition of the Contract entered into with the developer, ensuring that the condition is properly monitored and the terms of the Contract are enforced.

Guidance on embedding the PSED into the procurement process from the Equality and Human Rights Commission<sup>77</sup> states will be that the Council will be able to factor in a potential contractor's ability to fulfil contractual obligations related to the PSED in its evaluation of tenders and has the right not to award the contract to the most economically advantageous tender where the Council has established that the tender would not comply with current obligations in environmental, social or employment law.

The EIA is a predictive assessment and considers the effects of the development on groups of people rather than on individuals. The recommendations outlined are therefore suggested to minimise effect on recognised groups with protected characteristics living in the area at the time of the assessment.

- This EIA should be considered as a live document, and should be updated, refreshed and the actions within it monitored on a regular basis. This should include a monitoring update on the status of identified potential impacts and associated mitigation. This may result in updates both to assessment of the impacts and to the recommendations relating to the proposed mitigation measures.

---

<sup>77</sup> Equality and Human Rights Commission (2013) Buying Better Outcomes: Mainstreaming equality considerations in procurement - A guide for public authorities in England  
[https://www.equalityhumanrights.com/sites/default/files/buying\\_better\\_outcomes\\_final.pdf](https://www.equalityhumanrights.com/sites/default/files/buying_better_outcomes_final.pdf)

