

Adpar Street Car Park

Equality Impact Assessment

Westminster City Council

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Quality information

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1. Introduction

1.1 Purpose

AECOM has been commissioned by Westminster City Council ('the Council') to undertake an Equality Impact Assessment (EIA) of the 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 characteristic¹ 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 Adpar Street Car Park site 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.

This EIA provides a consideration of potential direct and indirect equality impacts (both adverse and beneficial) associated with the construction and operational phases of the **Adpar Street 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.²

Adpar Street Car Park is one of three sites which comprise 'Package B'³. The site is located within Little Venice Ward and has 32 car parking spaces available to licence holders.

¹ 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.

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

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

In June 2020, the Council submitted a planning application (20/03389/COFUL)⁴ 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 car park and construct a 4-storey block of sheltered residential dwellings delivering 20 affordable homes for 'independent living'. All homes will be 1 bedroom 2 person units with 100% of the floorspace for social rent. The site will re-provide 12 car parking spaces for existing licensees, as well as 2 additional disabled spaces, amenity space, cycle parking, refuse storage and landscaping improvements. The site is situated within the administrative boundary of Westminster and comprises a site area of approximately 0.2 hectares.

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 data to form an understanding of residents living within the area;
- **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.

⁴ City of Westminster (2020). Planning – Application Summary. Available at: [20/03389/COFUL | Demolition of existing car park and redevelopment to provide a 4-storey block of sheltered residential dwellings \(Use Class C3\) and other associated works, including amenity space, car parking, cycle parking, refuse storage, and landscaping improvement works. | Garages At Adpar Street London \(westminster.gov.uk\)](https://www.westminster.gov.uk/planning/20/03389/COFUL-Demolition-of-existing-car-park-and-redevelopment-to-provide-a-4-storey-block-of-sheltered-residential-dwellings-Use-Class-C3-and-other-associated-works-including-amenity-space-car-parking-cycle-parking-refuse-storage-and-landscaping-improvement-works-Garages-At-Adpar-Street-London)

2. Methodology

2.1 Introduction

This section sets out the approach to assessing the equality impacts of the development proposals for Adpar Street 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 2021 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 2.3 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)⁵ 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

⁵ 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

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 2021⁶ 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

⁶ 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

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.

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

The Mayor's Equality, Diversity and Inclusion Strategy⁷ (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.

⁷ 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 objectives⁸. 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; and
- 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.

⁸ 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 Strategy⁹ 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 CityWest¹⁰ 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 2022-26¹¹

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.

⁹ Westminster Council (2010). Westminster Housing Renewal Strategy. Available at: http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf

¹⁰ 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.

¹¹ 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 Adpar Street Car Park site (outlined in Figure 4-1) is located in Hall Place Estate on the eastern edge of Little Venice Ward in the City of Westminster. The proposed site is bound by a children's playground and green space to the north, Adpar Street to the east, Braithwaite Tower to the south and Hall Place to the west. Adpar Street is a cul-de-sac providing vehicular access to Devonshire House, a four-storey sheltered accommodation block, and Braithwaite Tower, a 22-storey residential block. The site is also immediately to the northeast of the City of Westminster College.

The existing site comprises a single storey covered car park built in the 1970's and accessed through a gated entrance on Adpar Street. The car park provides 32 parking spaces of which 23 were issued licences and, according to a parking survey, 13 were occupied during peak hours. Licences held for this site are managed by the Westminster City Council Housing team and are only eligible for 'off-street' parking¹². Westminster City Council owns the freehold of the site and is currently undergoing the appropriation process.

The site lies within the Edgware Road Housing Zone. This was established in 2014 as a strategically located housing zone that proposes over 1,113 additional homes across a 10-year period.

Figure 4-1 Site location plan



¹² 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, Adpar Street and Hall Place, join Cuthbert Street which links to the A5, providing a connection to the wider highway network. The site is also close to Edgware Underground Station (5-minute walk) which provides frequent and direct services to destinations along the Bakerloo, District, Hammersmith and City and Circle Lines including Paddington, King’s Cross and Euston. The nearest National Rail services are provided from London Marylebone, a 14-minute cycle or 13-minute journey via the underground. While a bus service runs along Orchardson Street (100m from the site) and operates five day services and two night services linking to Victoria, Euston and Trafalgar Square.

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 pedestrian footways, tactile pathing, dropped kerbs, puffin crossings and pedestrian refuge islands support pedestrian safety.

The site is located 1.5km south of Paddington Recreation Ground (20-minute walk), which provides a 27-acre park with a café, outdoor sports equipment and children’s play area.

The site does not directly intersect with a Conservation Area; however the boundary of Paddington Green Conservation Area is located approximately 320 metres west of the site.

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 – Ark Paddington Green Primary Academy	0.3km	3	1
Secondary School – International Community School	1.0km	12	5
College – City of Westminster College	0.3km	4	1
Railway Station – London Marylebone	1.1km	14	5
Grocery Shop	0.2km	4	2
Park and Green Space	1.2km	13	6
Hospital – St Mary’s Hospital	1.0km	13	6
Medical Centre – Belgaum Medical Centre	0.8km	11	3

4.2 Planning application

The approved planning application includes the following:

- Demolition of existing car park and redevelopment to provide a 4-storey block providing a total of 20 x sheltered residential dwellings (Use Class C3) and other associated works, including amenity space, car parking, cycle parking, refuse storage, and landscaping improvement works;
- The proposal will provide 1 bedroom 2 persons wheelchair accessible units for people aged 60 years and over with 24-hour emergency alarm systems available for 100% social rent;

- Re-provision of 12 car parking spaces for existing licensees and 2 additional disabled parking spaces for the new units;
- Provision of private amenity space in the form of balconies across all 20 units, ranging in size from 5sqm to 12.5sqm;
- Provision of communal amenity space on the third floor level in the form of a winter garden and external terrace 118sqm in size; and
- Landscaping improvements to the area in front of Braithwaite Tower.

4.3 Sheltered accommodation for over 60's

Sheltered accommodation is a self-contained residential unit with communal facilities available to buy or rent by those aged over 60. These units are designed specifically for elderly residents to live independently. As per THE COUNCIL's definition of sheltered housing, each home within the new development will be overseen by a scheme manager on-site a few hours each day of the working week and will have 24-hour emergency alarm systems installed.

While Adpar Street sheltered accommodation will sit adjacent to Devonshire House, there will be no dependencies between the two services. Adpar Street will have its own office and management facilities

The redevelopment of Adpar Street Car Park will deliver 20 sheltered accommodation units. These will be:

- Retained by the Council and available for social rent;
- Comprised of one bedroom two person units; and
- Allocated through a Local Lettings Plan (LLP) prioritising people 60 years and over who have been long-term residents in the local area.

4.4 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.¹³ 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 Adpar Street Car Park will deliver 100% social rent units which will be retained by the council and available through a Local Lettings Plan.

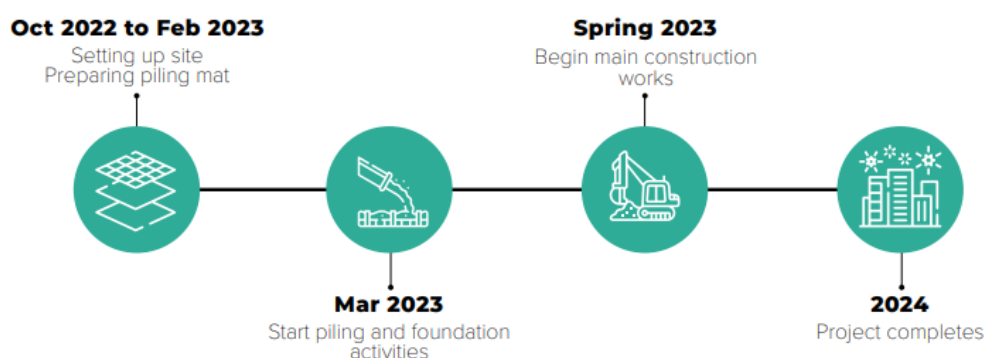
4.5 Construction works

Construction work consists of demolishing the existing car park and constructing a new residential building with 20 apartments across four-storeys.

As shown in Figure 4-2 below, site mobilisation was undertaken between October 2022-February 2023 followed by piling and foundation activities in March. The main construction works are expected to start in Spring 2023 for project completion in 2024.

¹³ City of Westminster (2023). How to apply for social housing. Available at: [How to apply for social housing | Westminster City Council](#)

Figure 4-2 Key construction dates



To date, Osborne have undertaken the following activities:

- Setting up the full site, including extending the hoarding line around the landscaping area;
- Installing noise, vibration, dust monitoring equipment and site cabins; and
- Preparing the ground for the piling mat

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.

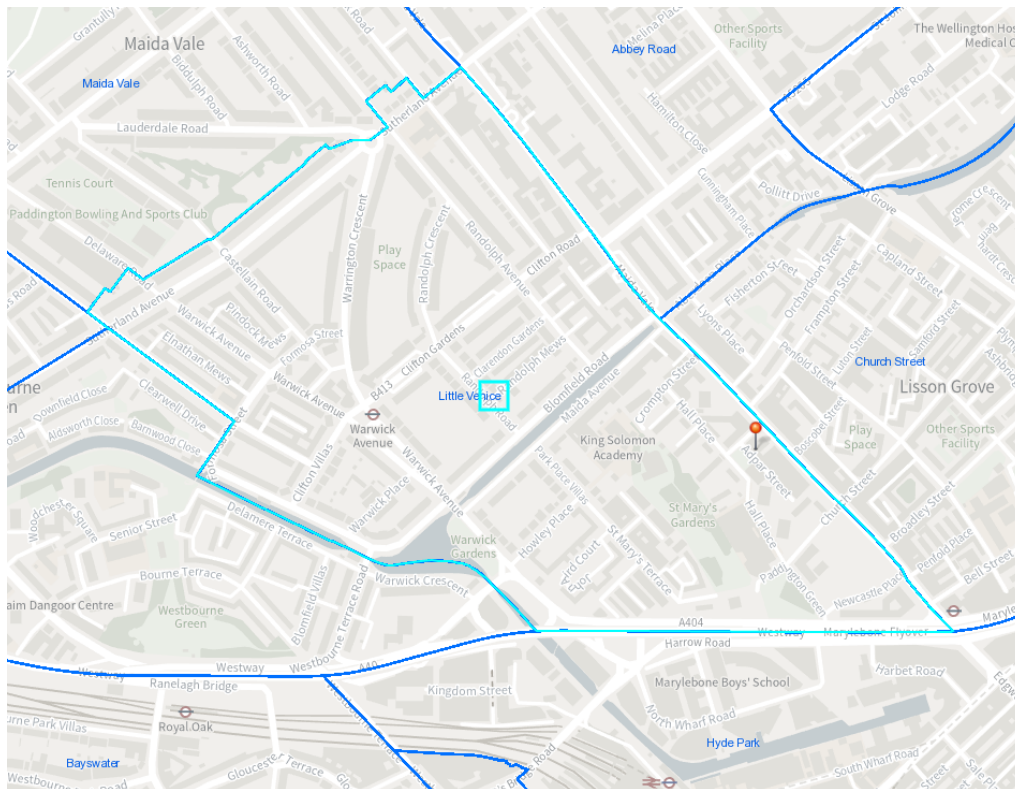
5. Equalities baseline

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 2021¹⁴ 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 (Westminster 009E, E01004702), the Little Venice Ward (E05013799), Westminster Borough, and London.

Figure 5-1 Little Venice Ward boundary, with pin marking location of the proposed development



Source: City of Westminster (2023)¹⁵

5.2 Protected characteristics

5.2.1 Population

According to the most recent data available, the Westminster 009E LSOA is home to 2,808 people, whilst Little Venice is home to 10,366 people. As Table 5-1 shows, both areas have experienced a population increase between 2001 and 2021, (by 52.8% and 28.0% respectively). However, between 2011 and 2021, Little Venice experienced a slight population decline, of 267 people or -2.5%. Whilst the remaining geographies experienced

¹⁴ It should be noted that although the most recent Census for England and Wales took place in March 2021, full Census 2021 data is scheduled for release in March 2023. As such, 2011 data is presented for all four geographies supported by 2021 data at the available geographical levels.

¹⁵ City of Westminster (2023). Ward finder. Available at: <https://lbhf.maps.arcgis.com/apps/webappviewer/index.html?id=968c0f263cc241d4934638b4d7e81c6b>

population growth in the same time period, the increase in the LSOA is higher than in Westminster Borough (12.7%) and London (20.2%).

Table 5-1 Population size and change (%) by geographical area from 2001 to 2020¹⁶

Year	Westminster 009E LSOA	Little Venice Ward	Westminster	London
2001	1,837	8,100	181,286	7,322,400
2011	2,000	10,633	219,396	8,204,400
2021	2,808	10,366	204,236	8,799,728
Percentage Change	+52.8%	+28.0%	+12.7%	+20.2%

5.2.2 Age

Table 5-2 provides the population age breakdown in 2021 across the four relevant geographical areas. The Westminster LSOA has the highest proportion of children aged 0-15 (21.8%), compared to Little Venice (14.5%) and Westminster (16.9%). Moreover, the LSOA has the lowest proportions of middle aged 16-64 residents (66.7%) and residents aged 65+ years (11.5%). In contrast, Little Venice Ward has the highest proportions of both these age groups, 72.6% and 12.9% respectively.

Table 5-2 Age breakdown (%) by geographical area, 2020¹⁷

Age range (years)	Westminster 009E LSOA	Little Venice Ward	Westminster	London
0-15	21.8	14.5	16.9	20.6
16-64	66.7	72.6	70.5	67.2
65 and over	11.5	12.9	12.6	12.2

Greater London Authority population projections estimate that by 2040 the greatest population increase is expected in the 65 years and over age group. In Little Venice the projected increase in the elderly population is 64%, compared to 35% in Westminster. In contrast, the population aged 15 and under is expected to decrease at both Ward and Borough level; projections estimate a 21% decrease at Ward level, compared to only 7% decrease in Westminster generally.¹⁸

The current high proportion of children and older residents 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 people¹⁹ and lowers health-related quality of life in children²⁰. Both groups are also more vulnerable to the effects of poor air quality compared to the overall population. Elderly

¹⁶ ONS: Census 2001: Usual resident population (KS001); Census 2011: Population Density 2011 (QS102EW); Mid-year population estimates ward level; Population estimates – small area based by single year of age – England and Wales; Census 2021: Population change between 2011-2021, Local Authorities in England and Wales. All available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp>

¹⁷ ONS: 2020 Population estimates – small area based by single year of age – England and Wales; ¹⁷ 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>

¹⁸ 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/custom-age-tables-london-dataset)

¹⁹ 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

²⁰ 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.

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 Census 2021, 20.1% of the LSOA population has a disability that limits their day-to-day activities by some degree, compared to 13.4% at the Ward level, 13.8% for Westminster and 13.2% for London.

The LSOA has a significantly higher proportion of residents whose day-to-day activities are limited a lot, at 12.5, compared to 6.1% in the Ward, 6.5% in Westminster and 5.7% in London.

Table 5-3 Limiting long-term illness or disability (%) by geographical area, 2021²¹

Level of disability	Westminster 009E LSOA	Little Venice Ward	Westminster	London
Day-to-day activities limited a lot	12.4	6.1	6.5	5.7
Day-to-day activities limited a little	7.7	7.3	7.3	7.5
Long-term physical or mental health conditions but day-to-day activities not limited	4.0	4.4	4.7	5.2
No long-term physical or mental health conditions	75.9	82.3	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.²² 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 and the UK Census only collected data 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 findings are presented at the Borough and London geographies in Table 5-4.

Of those who responded, the majority (90%) of Westminster's population identify with the same gender as their sex registered at birth, while 0.7% identify with a different gender. Similarly, in London 91.2% of the population identify with their gender assigned at birth, and 10% identify with an alternative gender.

²¹ ONS (2021): Disability (TS038). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2056>

²² 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.

Table 5-4 Gender identity (%) in Westminster and London, 2021²³

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 residents aged 16 and over have never married. As highlighted in Table 5-5, the LSOA (54.2%), Ward (49.2%) and Borough (54.4%) all sit above the London average of never married residents (46.2%).

According to Census 2021, the proportion of the population who are married to someone of the opposite sex is highest in London (39.3%), and lowest in the LSOA (30.4%). The LSOA had the highest proportion of widowed residents (4.7%), whereas Little Venice and Westminster had the joint lowest (3.4%).

Table 5-5 Legal partnership status (%) by geographical area, 2021²⁴

Legal partnership status	Westminster 009E LSOA	Little Venice Ward	Westminster	London
Never married	54.2	49.2	54.4	46.2
Married: opposite sex	30.4	36.7	31.1	39.3
Married: same-sex	0.1	0.7	0.6	0.4
In a registered civil partnership: opposite sex	0.1	0.1	0.1	0.1
In a registered civil partnership: same-sex	0.0	0.4	0.4	0.2
Separated	3.9	2.2	2.4	2.3
Divorced	6.7	7.3	7.6	7.3
Widowed	4.7	3.4	3.4	4.2

5.2.6 Pregnancy and maternity

Census 2011 data shows that 8.2% of households within the Little Venice Ward were lone-parent households, of which 5.0% had dependent children. In comparison, lone parent households represented 21.4% of households in the LSOA, of which 14.0% had dependent children. The 2021 Census reported an increase in the proportion of lone-parent households in Little Venice, the proportion being 9.4%, of which a lower proportion, 4.4%, had

²³ ONS (2021). Gender identity (detailed) (TS070). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2087>

²⁴ ONS (2021). Legal partnership status (TS002). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2022>

dependent children. There was a slight increase in the proportion of lone parent households at the LSOA level, increasing to 21.6%, of which 9.6% had dependent children.

Pregnant women are more vulnerable to the adverse effects of air pollution as a result of construction activities, including an increasing risk of miscarriage (Leiser et al, 2019) as well premature births and low birth weights.²⁵

5.2.7 Race

Table 5-6 shows the percentage breakdown of ethnic groups by geographical area. The White ethnic group makes up the majority of the population in the Westminster LSOA (35% overall, 16.0% being English, Welsh, Scottish, Northern Irish, or British), the majority of the White ethnic group being Other White (16.7%), compared to 27.9% in Little Venice, 24.6% in Westminster, and 14.7% in London.

The Other Ethnic Group makes up a significant proportion of the LSOA population, 33% overall with 20.6% being 'Arab' and 12.4% 'Other.' This is greater than all other comparable geographies. Within the LSOA, there are also significant proportions of Black African (6.5%), Other Asian (5.2%), Bangladeshi (4.5%), and White and Black African (2.5%) residents.

Table 5-6 Ethnic group (%) by geographical area, 2021²⁶

Ethnic group		Westminster 009E LSOA	Little Venice Ward	Westminster	London
White	English, Welsh, Scottish, Northern Irish or British	16.0	30.1	28.0	36.8
	Irish	1.3	2.0	1.8	1.8
	Gypsy or Traveller	0.0	0.0	0.0	0.1
	Roma	1.0	0.7	0.7	0.4
	Other	16.7	27.9	24.6	14.7
Mixed/ Multiple Ethnic Groups	White/ Black Caribbean	0.7	0.5	1.0	1.5
	White and Black African	2.5	1.3	1.0	0.9
	White and Asian	1.0	2.2	1.8	1.4
	Other	2.6	2.4	2.7	1.9
Asian/ Asian British	Indian	1.7	3.2	3.9	7.5
	Pakistani	0.9	1.1	1.2	3.3
	Bangladeshi	4.5	2.0	3.7	3.7
	Chinese	1.0	1.6	3.2	1.7
	Other	5.2	4.1	4.7	4.6
Black/ African/ Caribbean/ Black British	African	6.5	2.8	8.1	7.9
	Caribbean	4.7	1.9	2.1	3.9
	Other Black	0.7	0.5	0.8	1.7
	Arab	20.6	8.9	7.6	1.6

²⁵ 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

²⁶ ONS (2021). Ethnic group (TS021). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=608>

Ethnic group		Westminster 009E LSOA	Little Venice Ward	Westminster	London
Other Ethnic Group	Other	12.4	6.6	5.9	4.7

5.2.8 Religion or belief

According to Census 2021 (see Table 5-7), the LSOA is made up of majority Muslim residents, at 50.1%. This is significantly higher than Little Venice (21.1%), Westminster (20.0%) and London (15.0%). Christian residents also make up a significant proportion of the LSOA population, albeit lower compared to the other geographies, at 27.6%.

Table 5-7 Religion or belief (%) by geographical area, 2021²⁷

Religion	Westminster 009E LSOA	Little Venice Ward	Westminster	London
Christian	27.8	35.1	37.3	40.7
Buddhist	0.4	1.1	1.3	0.9
Hindu	0.9	1.8	2.2	5.1
Jewish	0.7	4.2	2.8	1.7
Muslim	50.6	21.1	20.0	15.0
Sikh	0.1	0.2	0.3	1.6
Other religion	0.2	0.6	0.9	1.0
No religion	12.2	24.9	25.9	27.1
Religion not stated	7.0	10.9	9.4	7.0

5.2.9 Sex

Table 5-8 highlights that the LSOA has the greatest disparity between female (54%) and male (46%) residents, followed by Little Venice with 52% females and 48% males.

Table 5-8 Proportion (%) of residents by sex and geographical area, 2021²⁸

Sex	Westminster 009E LSOA	Little Venice Ward	Westminster	London
Female	54.0	52.0	51.6	51.5
Male	46.0	48.0	48.4	48.5

According to 2021 estimates, life expectancy in Little Venice is 80.5 years for males and 85.4 years for females.²⁹ Contrastingly, females live longer in Westminster (87 years), but less long in London (84 years), whilst males live longer on average in the Borough (85 years) and slightly less long in London (80 years).³⁰

²⁷ ONS (2021). Religion (KS209EW). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2049>

²⁸ ONS (2021). Sex (TS008). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2028>

²⁹ ONS (2021). Life expectancy by census ward. Male and Female. Available at:

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

³⁰ ONS (2021). Life expectancy estimates, all ages, UK. Available at:

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

5.2.10 Sexual orientation

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

Table 5-9 Sexual orientation (%) in Westminster and London, 2021³¹

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; 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 Adpar Street development is in one of the 20% most deprived LSOAs of England and Wales.

Supplementary indices for deprivation also rank the area:

- In the top 10% 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 10% 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 Adpar Street redevelopment is located within the top 10% most deprived areas in terms of employment deprivation which measures the proportion of the working age population involuntarily excluded from the labour market.³²

Table 5-10 below indicates both economic activity and inactivity levels of the population at varying geographical levels. Of those who are economically active in the LSOA, 43.3% are

³¹ ONS (2021). Sexual orientation (detailed) (TS079). Available at:

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

³² Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result:

Westminster 009E LSOA. Employment Deprivation Domain. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

employed whilst 4.2% are unemployed, these are the lowest and highest proportions respectively. Furthermore, the LSOA also has a significantly higher proportion of economically inactive residents (49.3%), compared to all other geographies, Westminster being the second highest at 37.9%.

Table 5-10 Economic activity status (%) by geographical area, 2021³³

Economic activity status	Westminster 009E LSOA	Little Venice Ward	Westminster	London
Economically active: in employment	43.3	59.4	55.6	59.4
Economically active: unemployed	4.2	3.4	4.0	4.1
Economically inactive	49.3	35.6	37.9	33.8

Table 5-11 presents a detailed breakdown of employment sectors by geographical area for 2021. At the LSOA level the majority (51.5%) of residents work as managers, directors, and senior officials (12.3%), or in professional occupations (23.5%), or as associate professionals & in technical occupations (15.7%), compared to 74% at Ward level, the highest of all the geographies. The LSOA has significant proportions of residents working in administrative and secretarial occupations (10.4%), as well as in elementary occupations (12.3%).

Table 5-11 Employee jobs by broad sector group (%) across different geographical areas, 2011³⁴

Occupation	Westminster 009E LSOA	Little Venice Ward	Westminster	London
Managers, directors, senior officials	12.3	23.7	22.5	14.6
Professional occupations	23.5	31.0	30.6	25.8
Associate professional & technical occupations	15.7	19.3	17.3	15.3
Administrative & secretarial occupations	10.4	6.1	6.6	8.5
Skilled trades occupations	5.5	3.0	3.4	7.5
Caring, leisure & other service occupations	6.8	5.7	6.1	7.7
Sales & customer service occupations	9.2	4.6	5.1	6.3
Process plant / machine operatives	4.3	2.1	2.7	5.0
Elementary occupations	12.3	4.7	5.7	9.2

³³ ONS (2021). Economic Activity status (TS066). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2083>

³⁴ ONS (2021). Occupation (TS063). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2080>

The Adpar Street development is located within the top 10% most deprived LSOAs in England in terms of income deprivation.³⁵ In 2017, the median household income in Little Venice Ward was £46,800, which is higher than the Westminster average of £42,800.³⁶

5.3.3 Education

Table 5-12 below presents levels of educational attainment at the various relevant geographies according to Census 2021. The LSOA had the highest proportion of residents with no qualifications (24.4%), by a significant margin compared to Little Venice (12.2%), Westminster (12.9%) and London (16.2%).

Table 5-12 Educational attainment (%) by different geographical area, 2021³⁷

Educational attainment	Westminster 009E LSOA	Little Venice Ward	Westminster	London
No qualifications	24.4	12.2	12.9	16.2
Level 1 qualifications	6.7	4.4	4.9	7.7
Level 2 qualifications	8.6	6.1	6.9	10.0
Apprenticeship	2.5	1.8	2.1	3.2
Level 3 qualifications	15.2	11.4	12.4	13.2
Level 4 qualifications and above	38.8	60.8	57.7	46.7
Other qualifications	3.7	3.3	3.2	3.1

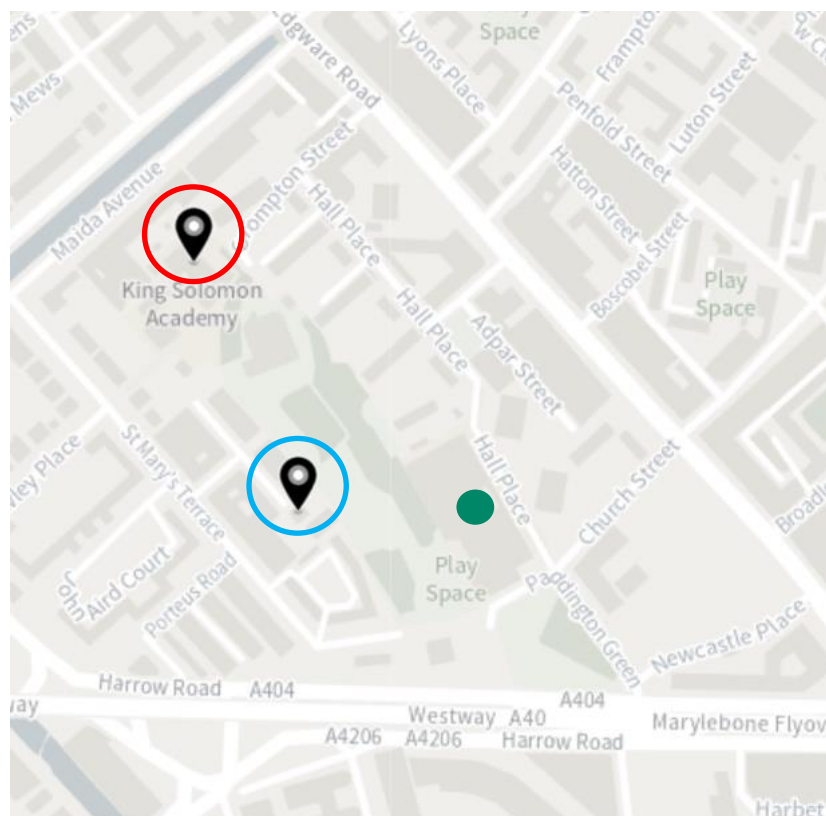
There are two schools in the area of the site, Ark King Solomon Academy Younger Years Site, a younger years mixed community school indicated by the red circle in Figure 5-2, and L' Ecole Bilingue, an independent mixed primary school where pupils are taught English and French. City of Westminster College, which provides further education courses, is also located in the site vicinity, indicated by the green dot in Figure 5-2.

³⁵ 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>

³⁶ City of Westminster (2018) Little Venice Ward profile. Available at: <https://www.westminster.gov.uk/media/document/little-venice-ward-profile>

³⁷ ONS (2021). Highest level of qualification (TS067). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2084>

Figure 5-2 Location of schools in Little Venice Ward



Source: London Datastore. (2023)³⁸

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.³⁹ Moreover, the LSOA ranks in the 40% most deprived in the health deprivation and disability domain.⁴⁰ Life expectancy for men and women is higher than the national average. Despite this, life expectancy in Westminster can vary drastically depending on the 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.⁴¹

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.

³⁸ London Datastore. (2023). Available at: <https://apps.london.gov.uk/schools/>

³⁹ 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>

⁴⁰ Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 009E LSOA. Health Deprivation and Disability Domain. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁴¹ 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>

5.3.5 Housing

In 2017, there were 5,170 residential properties in Little Venice Ward, with the median price being £995,000 which is which is 7% less than the median price in Westminster.⁴² According to Census 2021, the LSOA had a significantly higher proportion of social rented housing (56%) than all the other geographies, Westminster being the second highest at 28.3%. Consequently, the LSOA had the lowest proportions of owned (15.3%) and private rented properties (27.1%) compared to the other geographies.

Table 5-13 Tenure (%) by geographical area, 2021⁴³

Tenure	Westminster 009E LSOA	Little Venice Ward	Westminster	London
Owned	15.3	35.4	27.4	45.2
Social rented	56.0	20.9	28.3	23.1
Private rented	27.1	43.1	43.3	30.0

Table 5-14 highlights the occupancy ratings of houses across the relevant geographies (based on the ONS definition – number of bedrooms occupied)⁴⁴ according to Census 2021. Notably, the LSOA has a significantly higher proportion of overcrowded households (24.2%) compared to Little Venice (10.7%), Westminster (10.3%) and London (11.1%).

⁴² City of Westminster (2018) Little Venice Ward profile. Available at: <https://www.westminster.gov.uk/media/document/little-venice-ward-profile>

⁴³ ONS (2021). Tenure (TS054). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2072>

⁴⁴ 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.

Table 5-14 Household overcrowding and under-occupation (%) by geographical area, 2011⁴⁵

Overcrowding (bedrooms)	LSOA	Little Venice Ward	Westminster	London
+2 above standard	7.1	14.3	12.2	21.8
1 above standard	21.3	30.4	26.5	27.1
Standard	47.4	44.6	51.1	40.0
1 below standard	18.4	8.7	8.1	8.9
2+ below standard	5.8	2.0	2.2	2.2

5.3.6 Transport and connectivity

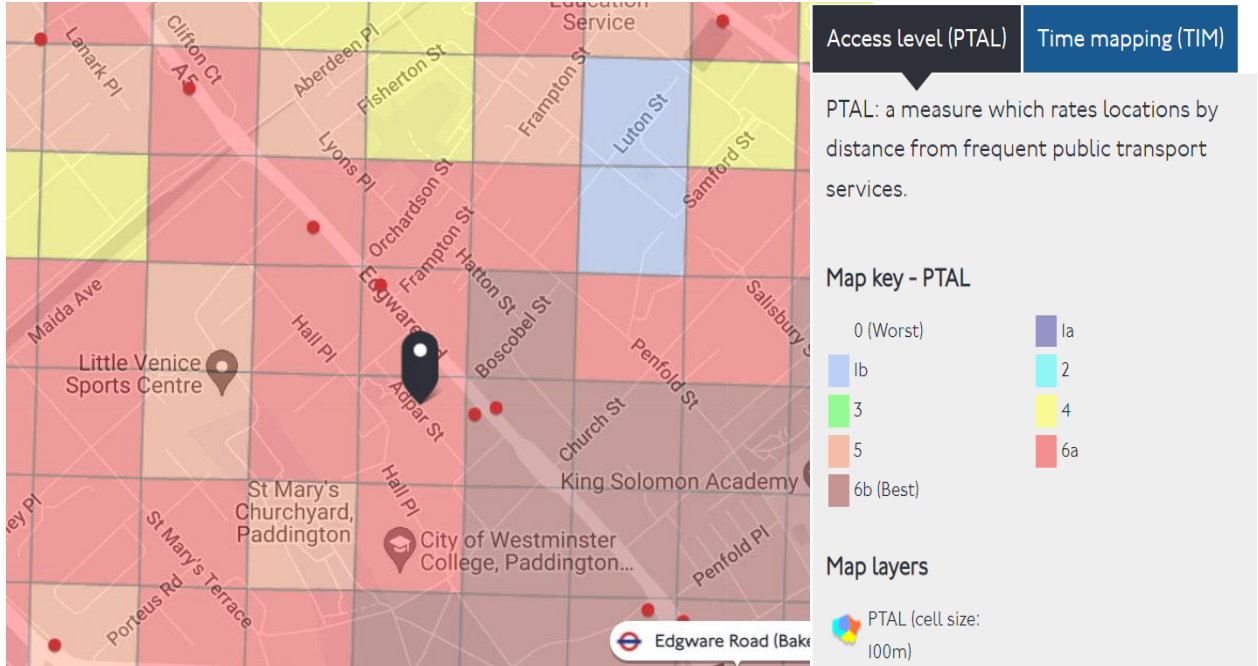
Little Venice Ward has very good public transport accessibility to other areas of London, there are several underground and overground stations nearby to the site: Edgware Road (5-minute walk), Warwick Avenue (12-minute walk), and Paddington (15-minute walk). Edgware Road is served by the Bakerloo line which connects to north-west and central London, as well as the Circle, District, and Hammersmith & City Lines which from east-to-west and around central London; Warwick Avenue is also served by the Bakerloo line; Paddington is also served by the Circle, District, and Hammersmith & City Lines as well as national rail services.

Church Street Market bus stops EB and EN are located within a 5-minute walk of the site, these are served by 4 day buses; the 6 (between Bertie Road and Aldwych), 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 wide range of nearby public transport options.

⁴⁵ ONS (2011). Occupancy rating for bedrooms (QS412EW). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=544>

Figure 5-3 PTAL access levels



Source: TfL (2023)⁴⁶

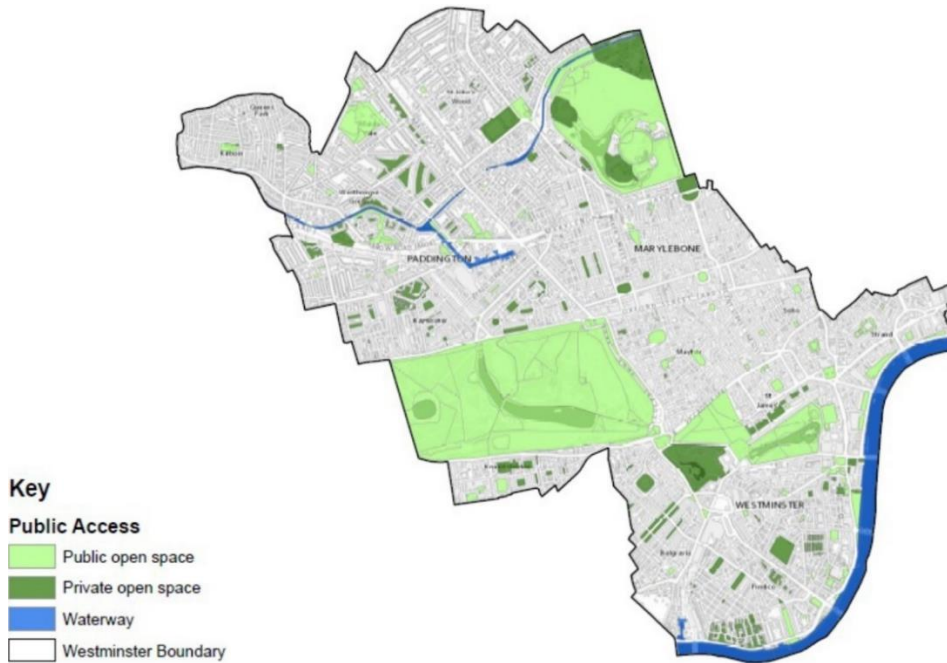
5.3.7 Public realm and open space

There is a small children’s playground located directly to the north-westerly boundary of the site, as well as St Mary’s Churchyard and the adjoining Paddington Green located within a 5-minute walk of the site. These two spaces have a variety of walking paths and benches.

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

⁴⁶ TfL (2023). Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcats/webcats>

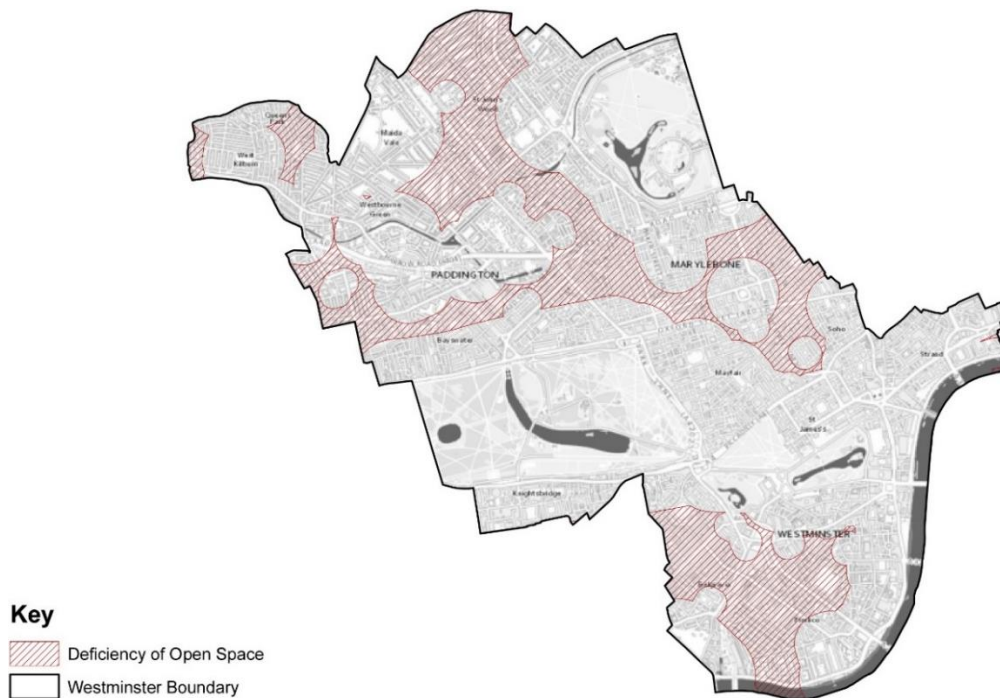
Figure 5-4 Westminster map of open and green spaces



Source: City of Westminster (2019).⁴⁷

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, the majority of Little Venice is not an open-space deficient area.

Figure 5-5 Westminster map of open space deficiency areas



Source: City of Westminster (2019)⁴⁸

⁴⁷ 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>

⁴⁸ 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>

5.3.8 Safety and security

In February 2023 the top three reported crimes within Little Venice Ward were violence and sexual offences (23 instances), Other theft (14 instances), and anti-social behaviour (13 instances).⁴⁹ The Ward had a rate of 5.5 crimes per 1,000 residents for this monthly period, compared to 27.2 across the Borough.⁵⁰

Over the last two years, from 1st April 2021 to 31st March 2023, the Metropolitan Police Service recorded 1,795 offences in Little Venice, majority of which were violence against a person the person (454 instances), theft (311 instances), and vehicle offences (242 instances).

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 2017 City Survey, 92.36% of Little Venice residents 'definitely agreed' or 'tended to agree' with the statement 'People from different backgrounds get on well', with 24.48% of respondents stating they spend either a great deal or fair amount of time helping to improve the community.⁵¹

⁴⁹ Metropolitan Police (2023). Little Venice. 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>

⁵⁰ 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>

⁵¹ City of Westminster (2018) Little Venice Ward profile. Available at: <https://www.westminster.gov.uk/media/document/little-venice-ward-profile>

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

6.2 Housing

6.2.1 Potential beneficial impacts

Net increase in sheltered housing in Westminster

The application includes the provision of 20 new sheltered accommodation units available for social rent. Accommodation proposals include a site manager and 24-hour emergency alarm systems.

The Little Venice Ward has an ageing population, with the percentage of over 65's expected to increase by 64% by 2040. This development responds to the predicted increased in demand for supported living and services responding to varying levels of care needs in the future. As such, this development is likely to be a benefit to older people living in the Ward.

Sheltered accommodation provides an alternative to extra care or residential care for elderly people who wish to live independently. The proposals best address these needs through following the HAPPI design guidance principles.⁵² The design acknowledges that older residents are likely to spend more time at home and provides both private and communal

⁵² Housing our Ageing Population Panel (2009). Housing our Ageing Population: Panel for Innovation'. Available at: [Happi_Final_Report.pdf \(housinglin.org.uk\)](https://www.housinglin.org.uk/Happi_Final_Report.pdf)

amenity space in the form of balconies and an outdoor terrace within the development. These spaces provide light, ventilation and accessible gathering spaces which could help to improve the mental wellbeing of less mobile residents who may otherwise feel socially isolated. Balconies are adjoining to provide opportunities for interaction between neighbours, while the top floor terrace encourages social contact and mutual interdependence throughout the year with half of this space enclosed as a 'winter garden'. Small window seats are also found at the end of each communal corridor to encourage interaction within these circulation routes. Further, a mobility scooter storage room has been provided on the ground floor near the scheme manager's office with easy access from inside the building.

All sheltered accommodation units will be available for social rent. Evidence shows that Little Venice Ward is within the top 10% most deprived areas nationally for Income Deprivation Affecting Older People Index (IDAOPI). Therefore, this development could particularly benefit over 65's who would like to live independently but struggle to afford market rent. To increase the potential for the development benefitting local older people, the Council plan to develop a Local Lettings Plan prioritising long-standing elderly residents of Little Venice Ward.

Net increase in wheelchair accessible housing

All 20 units within the Adpar Street development will be fully accessible and designed to Part M4(3) Wheelchair User standards. The provision of wheelchair accessible housing could enable disabled older people or those with limited mobility to remain at home living independently.

This development exceeds the London Plan Policy 3.8 commitment for 10% of all new developments meeting Building Regulation requirement M4(3) 'wheelchair user dwelling'. To provide sufficient access for wheelchairs and adequate storage space, the design also exceeds the minimum GIA floorspace standard of 50sqm by providing a minimum GIA floorspace of 55sqm to 85sqm. Evidence reveals that over 20% of local residents have a limiting disability compared to 13.4% at the borough level. Therefore, this development could particularly benefit disabled older people and demonstrates that the Council are going above and beyond building standards to deliver housing which meets the need of the local population.

These homes will be available for social rent through a Local Lettings Plan. The provision of affordable homes could also alleviate financial pressures of market rent for disabled elderly people who typically face additional living costs.

Affordable housing provision to local residents

The Council will allocate the sheltered accommodation through a Local Lettings Plan (LLP). 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 Scheme⁵³ (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.

The Allocation Scheme also reveals a high demand for, and insufficient supply of, affordable housing in the Borough. Evidence reveals a high take-up of affordable housing in the local area surrounding Adpar Street car park. Affordable social rent currently composes over half (56%) of the tenure split in the LSOA compared to 28% at the borough level. Thereby, this development is meeting the housing needs of the local population.

⁵³ City of Westminster (2020). Housing Allocation Scheme March 2020. Available at: [Allocations scheme | Westminster City Council](#)

The Supply and Allocation of Social Housing 2022/23 Cabinet Report⁵⁴ 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 Council 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. These projections should inform the LLP for the Adpar Street scheme and prioritise older people within these key groups.

The development particularly benefits vulnerable local older residents as the Council plans to prioritise people over 60 years old who have been long-term residents of the local area. Sheltered accommodation is targeted at people over 60 years old who may require care and support to live independently. Thereby, vulnerable local residents could benefit acutely from the availability of 20 new affordable units.

Improved security for new residents

The Council regard 'Designing Out Crime' as an integral component of planning to reduce the vulnerability of people and property to crime by removing opportunities provided by the built environment. Consequently, the Council has established close liaison procedures with a Designing Out Crime Officer on the development of this proposal.

This could be of benefit to older people and disabled future residents of the development as these groups are more likely to be vulnerable to perceived and actual security risks.

Design updates to improve natural surveillance have been made following the security concerns from the Designing Out Crime Officer. An external window has been added to the management office to provide passive surveillance of the outside entrance to the cycle store. While windows have been added to the previously blank north facing gable wall for additional passive surveillance and security of the immediate area. Additional security measures prompted by the 'Designing Out Crime' commitment include a second lobby door to provide a secure line for residents.

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 proposed Adpar Street Car Park 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 Council held three pre-application meetings with the Local Planning Authority between January 2019-February 2020 to propose and develop the site plans. These discussions considered elements of the design, including the provision of a roof level terrace, re-provision of parking spaces to address parking stress around the site and the inclusion of scooter parking to reduce reliance on private vehicles. In addition to assess potential

⁵⁴ Westminster Council (2018). Cabinet Report: Supply and Allocation of Social Housing 2022-2023. Available at: [Decision - Supply & Allocation of Social Housing Report 2022-2023 | Westminster City Council](#)

construction impacts such as daylight and sunlight impacts on surrounding buildings and how construction traffic will be managed.

Throughout the design process, the Council also held a series of public consultation events with key local stakeholders including Hall and Braithwaite Residents Association, City of Westminster College, Adpar Street Car Park licence holders, Ward Councillors and Local residents of Devonshire House, Braithwaite Tower, Hall Tower and Philip Court. This includes two public exhibition events held in Braithwaite Tower, neighbouring the site, from 2nd December-4th December 2019 and 3rd March-5th March 2020. Exhibition boards were used to disseminate information on the current proposal plans and attendees were provided opportunity to ask questions or raise concerns regarding the new development.

A total of 40 people attended the first drop in session, the majority of which were residents of Hall Place Estate. While the majority of respondents were supportive of the new development, the Statement of Community Involvement⁵⁵ reveals concerns in regard to parking. Stakeholders felt that the local area would suffer increased parking stress and the loss of a secure covered car parking facility. Further concerns were raised about the recent developments in the local area causing obstruction and displacement, in addition to overdevelopment of the local area creating high density living.

A total of 30 people attended the second drop in session. Feedback recognised improvements made since the previous exhibition, including the re-provision of 12 parking spaces, particularly welcomed the need for new homes for the elderly and the Council's approach to building design.

Alongside exhibition events, the Council held a series of community consultation meetings to discuss the design in line with the individual concerns of each stakeholder group and the potential to implement change as mitigation. For example, electric vehicle charging points have been included in response to the requests of current licensees and clarification that the Adpar Street scheme will operate independently from the adjacent Devonshire House sheltered housing was provided to the LPA.

The Council is undertaking ongoing engagement with local residents through the publication of the quarterly newsletter 'Adpar Street News'. The purpose of this newsletter is to inform local residents on current and upcoming stages of the development. The Council has also committed to hand deliver any future communications, including the newsletter, to neighbouring residences including Devonshire House and Braithwaite Tower.

A Resident Liaison Officer has also been appointed to safeguard and support local residents during the construction stage of the development. The Liaison Officer will have a specific phone number and email contact for resident queries to be filtered directly to the contractor.

To confirm that good relations are fostered between groups involved and/or affected by the proposed Adpar Street scheme going forward, it is recommended that the Council should ensure that all feedback received during consultation and engagement activities is properly documented and archived. This should also include any objections from stakeholders and any actions taken against these by the Council supported by reasoning.

Increased social interaction and cohesion in the area

The nature of the social housing development provides an opportunity for increased social interaction and cohesion. Through the LLP, 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,

⁵⁵ City of Westminster (2020). Statement of Community Involvement. Available at: [20/03389/COFUL | Demolition of existing car park and redevelopment to provide a 4-storey block of sheltered residential dwellings \(Use Class C3\) and other associated works, including amenity space, car parking, cycle parking, refuse storage, and landscaping improvement works. | Garages At Adpar Street London \(westminster.gov.uk\)](https://www.westminster.gov.uk/media/20/03389/COFUL_Demolition_of_existing_car_park_and_redevelopment_to_provide_a_4-storey_block_of_sheltered_residential_dwellings_(Use_Class_C3)_and_other_associated_works_including_amenity_space_car_parking_cycle_parking_refuse_storage_and_landscaping_improvement_works_|_Garages_At_Adpar_Street_London_(westminster.gov.uk))

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.

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.

Improved public realm for the wider community

The Adpar Street scheme proposes landscaping improvements to the area surrounding the site. These improvements seek to remove hard boundaries in order to open up pedestrian routes and create a softer and safer public realm for local residents.

The green area adjacent and to the rear of Braithwaite Tower has a small retaining wall and fence around the perimeter. These boundaries will be removed and softened to increase the flow of pedestrian routes and safety of borders. The existing narrow pathway linking Hall Place to Adpar Street is shaded and a blind spot for anti-social behaviour. Consequently, the design will widen this pathway and receive paving improvements.

Further public realm improvements are focused on the scheme's northern boundary wall to the children's playground. Low level treatment, including climbing plants and buffer planting, will be implemented to combat anti-social behaviour within the park and deter ball games.

These improvements are likely to have benefits for those with accessibility and mobility restrictions such as older people, disabled people and people with pushchairs or young children. Designing out anti-social behaviour may also result in potential benefits for groups who are more vulnerable to perceived or actual security issues for example, women, older people, disabled people, ethnic minority groups, certain religious groups and the LGBTQ+ community.

6.3.2 Potential adverse impacts and mitigation

The Adpar Street 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 their PSED outlined in the Equality Act 2010.

Loss of car parking facilities

The Adpar Street development will result in the loss of 20 car parking spaces. The proposal has been developed as 'car-free' as a result of the urban site location and to encourage a shift to sustainable modes of transport.

The existing 1970's single storey covered car park was accessed via a gated entrance on Adpar Street and comprised of 32 parking bays with 23 licences managed by the Westminster Housing Team. However, the deteriorating structure of the car park reduced the number of available spaces and new renters were not accepted. A parking survey of Adpar Street Car Park undertaken by the Council revealed that 13 spaces were occupied during peak hours.

During construction, alternative parking for current licence holders was secured in the nearby West End Gate development. Berkeley Homes and the Council development team agreed a lease on spaces commencing on 1st June 2021 and expiring on the 31st of May 2023, after which a renewal will be sought for those extending their parking licence. The entrance to this car park is located 0.1 miles (2-minute walk) from the current car park, opposite Hall Tower. While the West End Gate car park is in close proximity to the site,

licence holders with limited mobility may suffer adverse accessibility impacts through elongated walking distances from their house to their car during the construction process.

The Adpar Street scheme will re-provide 12 car parking spaces and current licence holders will be prioritised in the allocation of these spaces on a right to park basis. The new car park will be available for residential use only and any new licence applicants will be vetted when applying. An additional two disabled parking spaces will be provided exclusively for residents of the proposed sheltered accommodation units.

However, the number of licensees exceeds the number of spaces available in the new development and evidence reveals that parking demand already exceeds the Council's planned capacity. The site is located within the Westminster Controlled Parking Zone comprised of resident bays and paid-for bays with parking restrictions between 8:30-18:30 Monday-Friday. A Council parking survey reveals that 92% of parking spaces were occupied within 200m radius of the site between 19:00-23:00 on surveyed weekdays, exceeding the desired occupation of 80%.⁵⁶ This leaves only 8% spare capacity (18 spaces) for licence holders and new residents of the development. This could result in the need for those who rely on a private vehicle due to mobility restrictions to have to walk longer distances between their homes and vehicle. Thereby, despite the re-provision of 12 parking spaces, the loss of spaces through the Adpar Street scheme could have an adverse impact on local residents such as older people and disabled people who require parking close to their homes.

As a means of managing developments without parking provision, the Council are committed to producing a transport statement⁵⁷ to explore the issue of parking stress. This includes exploring the provision of car club spaces in the local area. Car clubs seek to reduce the need for car ownership through offering short-term rental (usually by the hour) of vehicles for residents, visitors and businesses. The Council has identified 11 car club spaces within 550m of the site managed by Zipcar. The transport statement for Adpar Street Car Park concludes that levels of car ownership, car club availability and existing on street capacity, as well as the decreasing car ownership, mean that the number of spaces re-provided by the scheme is suitable to meet local demand.

Construction impacts on local residents

Local residents surrounding Adpar Street Car Park are likely to experience construction impacts as a result of the development, including adverse air quality and noise impacts.

These impacts are likely to be exacerbated as a result of cumulative construction impacts associated with ongoing major works at Devonshire House, a sheltered accommodation block running adjacent to the car park on Adpar Road. Contractors have been employed to replace windows, roofing and clearing asbestos from top floor flats. The works commenced, and are expected for completion, are the same time as the Adpar Street Car Park scheme. Thereby, local residents of Hall Estate could experience exacerbated air quality and noise impacts as a result of two major schemes operating in close proximity and to the same timescales.

Further, the nearby West End Gate development was recently completed in 2022 by the Berkeley Group. While the scheme has provided 1-4 bedroom apartments and penthouse apartments with associated concierge and leisure facilities, construction impacts included

⁵⁶ City of Westminster (2020). Planning – application summary. Available at: [20/03389/COFUL | Demolition of existing car park and redevelopment to provide a 4-storey block of sheltered residential dwellings \(Use Class C3\) and other associated works, including amenity space, car parking, cycle parking, refuse storage, and landscaping improvement works. | Garages At Adpar Street London \(westminster.gov.uk\)](#)

⁵⁷ City of Westminster (2020). Planning – application summary. Available at: [20/03389/COFUL | Demolition of existing car park and redevelopment to provide a 4-storey block of sheltered residential dwellings \(Use Class C3\) and other associated works, including amenity space, car parking, cycle parking, refuse storage, and landscaping improvement works. | Garages At Adpar Street London \(westminster.gov.uk\)](#)

parking suspensions, road diversions and noise. The new development sits 0.2 miles away from Hall Estate bordered by the main road and Church Street.

Construction impacts could disproportionately impact protected characteristic groups who spend a larger proportion of time indoors and are less mobile, including elderly people, disabled populations and pregnant women on maternity leave. The elderly residents of Devonshire House could be particularly affected.

In the case of poor air quality, as a result of construction-related emissions, children, older people, and disabled people are more vulnerable to adverse health effects. 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.⁵⁸

The Air Quality Impact Assessment⁵⁹ submitted alongside the planning application in 2020 confirmed that mitigation measures will be implemented to minimise the risk of adverse dust effects and the proposed development is not expected to generate additional vehicle movements or significant emissions to air. The assessment identifies dust and fine particulate matter as the most important consideration during demolition and construction activities. The production of dust can cause temporary soiling of surfaces, in particular the windows of neighbouring properties and cars of residents. However, the magnitude of dust emissions based on the building volume of the existing one-storey car park and new four-storey apartment block are considered 'small'.

The assessment recognises the 'high sensitivity' of neighbouring residential properties and schools to dust and the 'medium sensitivity' of the children's playground and thereby outlines mitigation measures following the Greater London Authority guidance. This includes: developing a dust management plan; regular site inspections to monitor compliance with the management plan, with increased frequency during windy periods and when activities with high dust potential are undertaken; recording all dust and air quality complaints to identify the causes and take action; erecting solid screens and barriers around dusty activities; and regularly dampening hard surfaced haul routes to minimise trackout.

Evaluation of the proposed energy strategy also confirmed no on-site emissions will be generated and the proposed development is considered 'air quality neutral'. Thereby the scheme is compliant with regional and national regulations and does not exceed national air quality objectives, so no further site-specific mitigation is required.

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.⁶⁰ Children are also susceptible to increased noise levels in some instances particularly with

⁵⁸ 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.

⁵⁹ City of Westminster Council (2020). Air Quality Assessment. Available at: [20/03389/COFUL | Demolition of existing car park and redevelopment to provide a 4-storey block of sheltered residential dwellings \(Use Class C3\) and other associated works, including amenity space, car parking, cycle parking, refuse storage, and landscaping improvement works. | Garages At Adpar Street London \(westminster.gov.uk\)](https://www.westminster.gov.uk/20/03389/COFUL%20-%20Demolition%20of%20existing%20car%20park%20and%20redevelopment%20to%20provide%20a%204-storey%20block%20of%20sheltered%20residential%20dwellings%20(Use%20Class%20C3)%20and%20other%20associated%20works,%20including%20amenity%20space,%20car%20parking,%20cycle%20parking,%20refuse%20storage,%20and%20landscaping%20improvement%20works.%20-%20Garages%20At%20Adpar%20Street%20London)

⁶⁰ Social Care Institute for Excellence – Dementia Friendly Environments <https://www.scie.org.uk/dementia/supporting-people-with-dementia/dementia-friendly-environments/noise.asp>

regards to cognitive impairment.⁶¹ Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise.

A Noise Impact Assessment⁶² has been undertaken to identify the state risk category and best practice measures to mitigate noise and vibration impacts. The noise assessment undertaken by an acoustics team concluded that the noise levels are likely to meet guidance levels and the site is considered suitable for the residential development based on noise impacts.

To minimise the adverse cumulative construction impacts associated with the development, the Contractor has developed a Construction Phase Plan to consider site logistics, health and safety and emergency arrangements. Further, an Environmental Management Plan (EMP) has been developed and the proposal has received Section 61 consent under the Control of Pollution Act 1974. The Council's Code of Construction practice team will monitor compliance with the noise and vibration mitigation measures agreed in the Section 61 application and outlined in the EMP. This includes carrying out real-time noise and vibration monitoring at appropriate site locations for submission to the Council each month. In a case where the noise levels sit above trigger levels, further investigation shall be undertaken to identify the cause and confirm Best Practicable Means are being enforced. Where construction activities which exceed action levels are identified, the construction activity responsible will be ceased pending investigation.

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

Right to light impacts on neighbouring properties

Given the close proximity of neighbouring developments and the proposed scheme, the Adpar Street development 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.

The surrounding area has a mix of building heights ranging from single-storey garages and commercial spaces to 23-storey residential tower blocks. A planning proposal with minimal right to light impacts would comprise of 2-storeys on the Adpar Street side and 3-storeys on the Hall Place side, however the immediate area has 3-4 storey buildings to the north and 6-storeys to the south so the planning proposal for this site has been increased to 4-storeys.

The Council commissioned a Daylight and Sunlight Statement in October 2020 to calculate the change in light levels between the existing development and proposed development on neighbouring buildings. The report ultimately concludes that the proposal is considered acceptable given the urban context and is broadly compliant with the Building Research Establishment's (BRE) targets.

However, the assessment does identify 13 windows in the neighbouring Devonshire House development which do not meet daylight and sunlight targets. As a result of Devonshire House being a sheltered accommodation development, disproportionate impacts are likely to be felt by protected characteristic groups, namely elderly and disabled elderly people, who typically spend the majority of their time at home. To minimise the right to light impacts against Devonshire House of the pre-application proposal, the Council has incorporated a mansard roof to break down the mass of the top storey and maintain guideline levels of light to habitable rooms in Devonshire House. Further to this, the Council should engage with the

⁶¹ World Health Organisation Children and Noise <https://www.who.int/ceh/capacity/noise.pdf>

⁶² City of Westminster (2020). Noise Impact Assessment. Available at: [20/03389/COFUL | Demolition of existing car park and redevelopment to provide a 4-storey block of sheltered residential dwellings \(Use Class C3\) and other associated works, including amenity space, car parking, cycle parking, refuse storage, and landscaping improvement works. | Garages At Adpar Street London \(westminster.gov.uk\)](https://www.westminster.gov.uk/media/20/03389/COFUL%20-%20Demolition%20of%20existing%20car%20park%20and%20redevelopment%20to%20provide%20a%204-storey%20block%20of%20sheltered%20residential%20dwellings%20(Use%20Class%20C3)%20and%20other%20associated%20works,%20including%20amenity%20space,%20car%20parking,%20cycle%20parking,%20refuse%20storage,%20and%20landscaping%20improvement%20works.%20Garages%20At%20Adpar%20Street%20London%20(westminster.gov.uk))

affected properties and inform residents of their entitlement to compensation for any reduction in the value of their property or standard of living as a result of the new residential development.

Traffic impacts for neighbouring properties during construction

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 construction site entrance is currently located on Hall Place. While this entrance provides site access via a cul-de-sac which prevents the obstruction of through traffic, five car parking spaces on Hall Place have been suspended to allow construction vehicles access to the site. These suspensions will be in place until the build is completed. Residents who previously occupied these spaces may experience temporary displacement and elongated walking distances to their place of residents. These suspensions could also generate knock-on parking stress impacts within the local area, particularly for local residents such as disabled people and older people who are more dependent on private vehicles to access key services. Parking issues could also potentially be experienced by carers visiting vulnerable people in neighbouring properties such as Devonshire House.

The Council has an agreement with the City of Westminster College for large construction vehicles to access the site via the side entrance of the college intersecting with Paddington Green and Church Street. This should prevent the need for road closure as a result of large vehicles onloading and offloading construction materials and therefore minimise additional traffic impacts on local residents.

Potential for safety impacts during construction

Local residents, particularly children and young people, could potentially be at risk to safety hazards resulting from the on-site and construction traffic activities during the construction period. There is a children's playground for children 0-5 years of age accompanied by an adult located immediately north of the site which will remain open during construction.

The construction management plan for the site should include measures to ensure safety such as hoardings and site security. In addition to this, education sessions in local schools led by the Contractor could raise awareness of the potential dangers entering construction sites. These sessions could form part of procurement requirements and social value commitments as well as part of wider community engagement commitments for the contractor.

6.4 Wider impacts

Creation of new construction-related employment opportunities

The construction of the new development is likely to create an opportunity for construction-related jobs. 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.⁶³ 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.

⁶³ 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>

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. 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, the Council’s in house employability service, two weeks in advance of the wider general market.

Creation of social value opportunities for City of Westminster College

The City of Westminster College sits to the north of Adpar Street Car Park and has been identified as a key stakeholder in the delivery of Social Value opportunities within the Responsible Procurement Delivery Plan.

The Council plan to build on their relationship with Westminster College throughout the construction process through the delivery of talks and presentations on aspects of project management, cost planning, health and safety and the sustainability of development projects. To achieve this, the on-site architects (David Miller Architects) will offer the opportunity for construction students at the City of Westminster College to participate in an educational school visit focused on the built environment and specifics of the Council’s infill programmes. The Council has also made a commitment to provide site tours of another infill programme within Package B, Torridon House Car Park, for City of Westminster College students. These opportunities could enrich student’s curriculum and target the knowledge and skills of specific courses including construction.

This could have a beneficial impact on young people from underrepresented groups given that the college is located in area of high deprivation and a high proportion of ethnic minority groups.

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.
- 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 Adpar Street development proposals

Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ⁶⁴											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											
Housing														
Beneficial	Net increase of 20 sheltered accommodation units.			✓									The provision of sheltered accommodation units could support the older people within Little Venice Ward to live independently.	Planning Mitigation: Local Lettings Plan to be developed to prioritise elderly applicants living in Little Venice Ward.
	Net increase of 20 wheelchair accessible social rent units.			✓			✓						Wheelchair accessible homes are designed for disabled elderly residents and elderly residents who require mobility support to live independently. The availability of these units as social rent supports the cost of living for disabled people who face additional living costs.	Planning Mitigation: Local Lettings Plan to be developed to prioritise elderly applicants living in Little Venice.
	Increased affordable housing provision to local residents.			✓			✓						A Local Lettings Plan (LLP) for the allocation of affordable housing is likely to meet the housing needs of vulnerable elderly local residents. Key priority groups identified by projected lettings include those who are homeless, overcrowded households and those who require relocation based on medical grounds.	Planning Mitigation: Local Lettings Plan to be developed to prioritise elderly applicants living in Little Venice.
	Improved security for new residents.			✓									A commitment to 'Designing Out Crime' could ensure the safety and security of vulnerable residents of the new sheltered accommodation units.	Planned Mitigation: Design changes in response to feedback from the Designing Out Crime Officer has been incorporated into the latest proposal design.
Neighbourhood and community														
Beneficial	Effective consultation and community engagement with affected groups to contribute to sharing benefits of the proposals.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Local residents and Residents Associations, including those with protected characteristics living in adjacent social and sheltered housing, have been provided an opportunity to engage with	Planned Mitigation: Resident Liaison Officer on site who can be contacted by email and phone with any resident enquiries and will hand deliver future

⁶⁴ 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 ⁶⁴												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											
													the Council throughout the design development of the proposal.	correspondence from the Council to local residents. EIA Recommendation: Produce a document log of stakeholder feedback and any actions taken by the Council in response.
Improved public realm for the wider community.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Landscaping improvements to the immediate area, including Braithwaite Tower and the children's playground, to soften boundaries and minimise crime. This will benefit groups who are more subject to accessibility, mobility and security issues.	Planned Mitigation: Removal of hard boundaries from green areas adjacent to and to the rear of Braithwaite House. Low level treatment to the northern boundary wall to the children's playground.
Adverse with mitigation	Loss of car parking facilities.			x				x				x	The scheme will result in the loss of 20 car parking spaces and increased parking stress in the local area. In particular, protected characteristic groups who rely on private vehicles for access to services could experience disproportionate impacts.	Planned Mitigation: Relocation of licence holder spaces to West End Gate development. Reprovision of 12 parking spaces within the new Adpar Street scheme. Production of a Transport Statement to address and mitigate any parking stress that may arise from the new development.
	Potential construction impacts on local residents.	x	x	x	x	x	x	x	x	x	x	x	Some protected groups are more vulnerable to the health, security, safety and accessibility adverse impact relating to construction. They may be as a result of differential sensitivities or disproportionate impacts as a result of a high proportions of certain ethnic minority group or religious groups residing in the area. Recent West End Gate development and major ongoing works at Devonshire House, could exacerbates impacts on local residents and disruption in their local area.	Planned Mitigation: Production of a Construction Phase Plan, Environmental Management Plans and Section 61 consent to minimise the adverse disruption throughout the construction of the new development. Resident Liaison Officer on site who can be contacted by email and phone with any resident queries or complaints.

Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ⁶⁴											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										
Right to light impacts on neighbouring residential properties.			x									A Daylight and Sunlight Assessment was undertaken and identified 13 windows in Devonshire House that may experience impact on their RtL. Equality effects may potentially be realised where there are known sensitivities to changes in light or a reduction in value of housing.	EIA Recommendation: Residents who can expect RtL injury are entitled to compensation for any reduction in the value of their property or standard of living.
Traffic impacts for neighbouring residents during construction.			x			x					x	The Council chose to locate the site entrance on Hall Place as a cul-de-sac which will not block through flowing traffic. This has required the suspension of 5 car parking spaces on the road, with potential to disproportionately impact protected characteristic groups who may rely on private vehicles for access to services.	Planned Mitigation: Location of an alternative site entrance along the City of Westminster College side road for large construction vehicles to access the site without the need for road closure.
Potential for safety impacts during construction.	x											Construction of the development could potentially have safety and environmental impacts on children using the children's playground to the north of the site.	EIA Recommendation: Education sessions in local schools led by the Contractor to highlight the potential dangers of playing on construction sites.

Wider impacts													
Beneficial	Creation of new construction-related employment opportunities		✓			✓		✓				figures.	Planned Mitigation: 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.
	Creation of opportunities for City of Westminster College.		✓									Young people of the City of Westminster College could benefit from educational opportunities relating to the construction project.	Planned Mitigation: Commitments made by the on-site architects (David Miller Architects) in the Responsible Procurement Delivery Plan to offer College students the opportunity to engage in a school visit and site tour of Torridon House Car Park.

7. Conclusions and next steps

7.1 Conclusions

This EIA has identified potential positive impacts on many protected characteristic groups and how the Adpar Street development could contribute to 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 20 sheltered accommodation units on-site. These will serve the ageing population of Little Venice Ward and enable residents over 60 years old to live independently.
- All 20 units will be wheelchair accessible, enabling elderly residents with limited mobility to remain at home living independently and maintain positive mental and physical wellbeing.
- A net increase in social rent units. The Council has committed to a Local Lettings Plan to prioritise the provision of affordable homes to local elderly residents in the most need.
- Improved security for the future residents of the Adpar Street scheme through implementing recommendations of the Designing Out Crime Officer.
- Improved public realm for the wider local community through integrating landscaping improvements to the immediate area to soften boundaries and minimise crime and anti-social behaviour.
- Construction of the development will provide direct employment opportunities which could be shared by groups with protected characteristics as outlined in the Responsible Procurement Delivery Plan.
- Construction could also provide educational opportunities to local young people studying at the City of Westminster College as outlined in the Responsible Procurement Delivery Plan.

Westminster City Council has demonstrated due regard to the PSED through a series of mitigation activities throughout the planning application stage on potential adverse impacts. 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 to report on any issues relating to construction issues.

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 Commission⁶⁵ 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.

⁶⁵ 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

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.

