

Church Street (Sites A, B and C)

Equality Impact Assessment Addendum

September 2023

This Equality Impact Assessment (EqIA) Addendum has been prepared by AECOM, on behalf of Westminster City Council (WCC), in order to provide further information to support planning condition 157 of the Church Street (Sites A, B and C) planning permission.

Planning permission was granted on 30 June 2023 for the following development (also known as Church Street Sites A, B and C):

Hybrid planning application consisting of: An application for full planning permission for SITE A, for the demolition of all buildings on Site A and erection of mixed-use buildings providing ground floor flexible commercial use floorspace (use class E), a library (use class F1), market storage (use class B8), residential units (Use Class C3), landscaped amenity space, disabled car parking, cycle parking, market infrastructure and associated works; and An application for outline permission for SITES B, C and Church Street Market (all matters reserved) for: 1. The demolition of buildings and structures; 2. The erection of buildings and works of alteration to existing buildings for the following uses: a) Flexible Commercial Floorspace (Use Class E); b) Community Floorspace (Use Class F1 and F2); c) Public houses, wine bars, or drinking establishments Floorspace (Use Class Sui Generis); d) Market Storage (Use Class B8), and e) Residential Floorspace (Use Class C3) and ancillary residential facilities. 3. Associated infrastructure; 4. Streets, open spaces, landscaping and public realm; 5. Car, motorcycle and bicycle parking spaces and delivery/servicing spaces; 6. New pedestrian and vehicular access; 7. Market infrastructure and ancillary facilities; 8. Utilities including electricity substations; and 9. Other works incidental to the proposed development.

WCC Ref: 21/08160/COOUT

The planning permission is subject to Condition 157 which states that:

157 You must submit an addendum to the Equalities Impact Assessment prior to commencement of any construction. The addendum will refresh the Equalities Impact Assessment submitted with the application and update the current position on how the identified impacts summarised in Table 9-2 have been assessed, monitored and/or resolved.

The purpose of this September 2023 Addendum is to refresh the EqIA submitted with the planning application and provide an update on progress made on the Planned and Recommended Mitigations which are outlined in 'Table 9-2 – Summary of potential equality impacts of proposed Church Street regeneration' to allow Condition 157 to be successfully discharged.

The update has been informed by two meetings and subsequent communications with the WCC project team. The update has also involved; revising the equalities baseline and socio-economic profile to reflect the most recently available data for the area, reviewing the policy and legislation section, and reviewing and updating the impact assessment section where relevant.

In addition to the planning requirements, the purpose of the EqIA and its iterative updates has been to support and evidence how WCC has fulfilled its responsibility as a public authority in paying due regard to the requirements of the Equality Act 2010 and Public Sector Equality Duty (PSED).



CHURCH STREET

SITES A, B AND C PLANNING APPLICATION EQUALITY IMPACT ASSESSMENT

SEPTEMBER 2023

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Revision History

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V2	4 th October 2019	Final draft for review	7 th October 2019	Mary Zsamboky	Technical Director
V3	15 th November 2019	Final Version	15 th November	Mary Zsamboky	Technical Director
V4	24 th April 2020	Site A design update Draft	5 th May 2020	Mary Zsamboky	Technical Director
V5	8 th June 2020	Site A design update Final	10 th June 2020	Mary Zsamboky	Technical Director
V6	27 th August 2021	Draft Planning Application EqIA	27 th August 2021	Mary Kucharska	Associate Director
V7	8 th September 2021	Draft Planning Application EqIA	8 th September 2021	Mary Kucharska	Associate Director
V8	27 th September 2021	Draft Planning Application EqIA	27 th September 2021	Mary Kucharska	Associate Director
V9	8 th October 2021	Planning Application EqIA	8 th October 2021	Mary Kucharska	Associate Director
V10	4 th January 2023	Planning Application EqIA - updated	4 th January 2023	Laura Walker	Associate Director
V11	26 th September 2023	Planning condition 157 – EqIA addendum	26 th September 2023	Alan White	Principal Social Impact Consultant

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1. Introduction

1.1 Introduction

AECOM has been commissioned by Westminster City Council ('the Council') to provide an Equality Impact Assessment (EqIA) for the Church Street Estate Regeneration – Sites A, B & C.

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 regeneration of the area 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 EqIA is often used by public sector organisations to demonstrate how this duty has been discharged. It is the Council's policy that EqIAs are undertaken, initially carried out at the earliest stages of project, and updated as the project develops.

An EqIA is a systematic assessment of the potential or actual effects of plans, policies, or proposals on groups with protected characteristics as defined by the Equality Act 2010. The purpose of this EqIA is to consider how the regeneration of Church Street would contribute to the realisation of equality effects on businesses, residents and the community affected and will support the Council to fulfil its equality duties in relation to the PSED in relation to the regeneration proposal. This EqIA report is to be submitted as part of a Hybrid Planning Application by the council for the site at Church Street. The hybrid planning application will comprise a part detailed application covering Site A and a part outline application for the balance of the site which will comprise two further phases (Site B and Site C).

The Council has been keen to produce an EqIA at the initial stages of the scheme development so as to ensure that plans going forward meet the project's aim to build on the strong pre-existing neighbourhood of Church Street. This report therefore provides an update to three previous versions of the EqIA:

- An initial EqIA which was produced for the regeneration proposals in November 2019;
- An updated EqIA (June 2020) based on changes to the regeneration plans arising from the design update of Site A in March/April 2020; and
- A further update based on additional amendments to the design of Site A between August and November 2022.

The EqIA provides a consideration of potential direct and indirect equality impacts (both adverse and beneficial) associated with the construction and operational phases of the regeneration proposals. The approach draws on evidence from secondary data sources, the Housing Needs Assessment for Church Street, primary research undertaken for the purpose of this EqIA in May 2019 and findings from the Environmental Impact Assessment (EIA) and Health Impact Assessment produced for the planning application.

1.2 Background

The draft Church Street Masterplan was launched in September 2017 and, following an intensive consultation, Westminster City Council Cabinet agreed the final draft in December 2017. The Masterplan vision for the area includes:

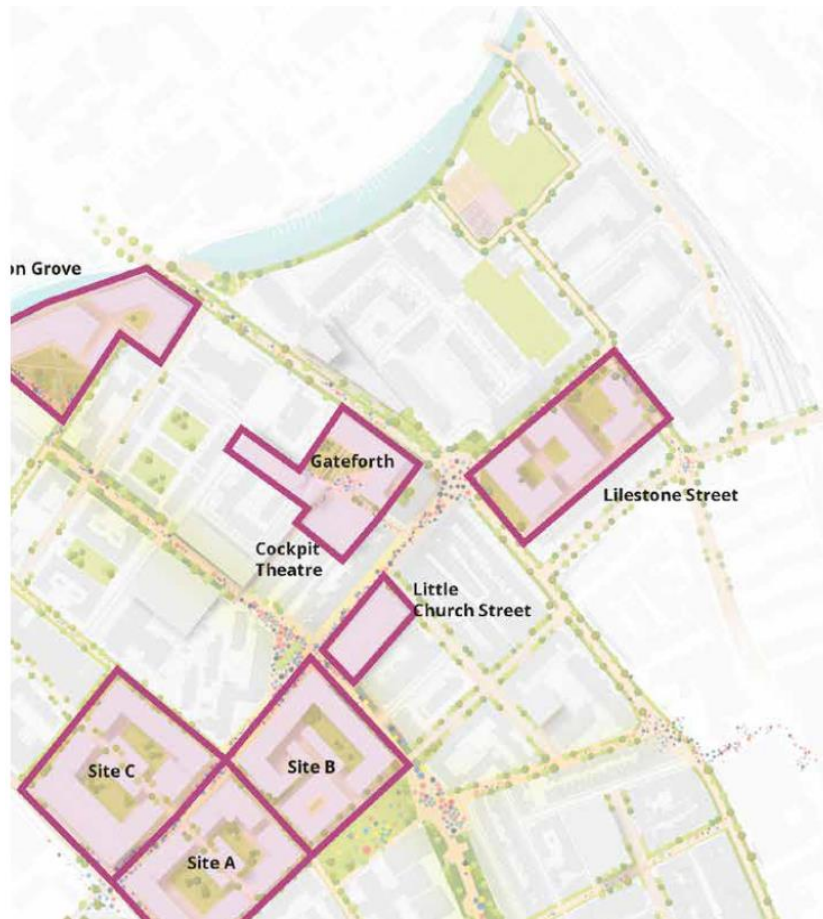
- Around 1,750 new homes of all types, including more affordable homes for local people
- A 40% increase in publicly accessible open space
- An improved street market with van parking spaces and storage facilities
- Affordable and flexible workspace and business support facilities
- A new cultural quarter centred around the antiques market and Cockpit Theatre

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.

- 7,000m² retail space provision
- A health and well-being hub and a new community hub
- Improved access throughout the area by balancing the relationship between pedestrians, cars and bicycles

Figure 1-1 shows the location of the key sites within the Church Street Masterplan area.

Figure 1-1 Church Street Masterplan – Proposed development sites



In summer 2018, the Council's Development Team engaged a consultant to develop a range of options for the three largest development sites within the Masterplan, Sites A, B & C and Church Street market infrastructure. Four options for these sites and the Market were developed ranging from maintenance to full regeneration. In addition, options were also developed for Gayhurst House and 6-12 Lilestone Street as part of the Lisson Grove Programme.

After a period of public consultation on these options in spring 2019, a Preferred Way Forward (PWF) based on partial redevelopment was approved by the Cabinet Member in May 2019. The PWF was then developed into a partial Outline Business Case in November 2019 and was further developed into a full Outline Business Case for submission at the end of May 2020.

A second period of consultation was undertaken in 2021, with the first phase occurring for 4 weeks from 3rd March-31st March 2021 and second, and the second from 30 June – 28 July 2021, with residents, businesses and market traders living and working in Sites A, B & C, the Church Street market infrastructure.

The Council are to submit a hybrid planning application which will comprise a part detailed application covering Site A and a part outline application for the balance of the site which will comprise two further phases (Site B and Site C) in September 2021.

Each phase of the development is expected to take between three to five years to complete, however there will be overlap between each phase. With this in mind the total length of the programme is currently estimated to be

around thirteen years to deliver the development from commencement on site. Works are currently programmed to begin on site A in the second quarter of 2023.

Figure 1-2 Timescale of events in the development of the regeneration of Church Street



1.3 Planning Application update to the EqIA (2021)

An initial EqIA report was produced in November 2019 with the assessment based on the partial redevelopment of sites A, B and C. As the financial viability work for the outline business case for Site A progressed, AECOM was commissioned to carry out further updates to reflect the Site A design amendments in June 2020 and November 2022. This considered the potential impacts associated changes to the initial design including an increase in the number of residential units, a reduction in retail floorspace, removal of proposed enterprise space allocation on the site, market trader facilities with access from Church Street, new allocation of space for the Church Street library and increased public open space including play space (New Street Gardens and Library Gardens).

Since, the initial EqIA there were two further rounds of consultation undertaken in 2021, as well as changes in design and planning policy. Therefore, the Council considered it appropriate to review the initial EqIA to ensure it was updated and relevant prior to the planning application submission. The following updates have been made:

- Updates to Policy Context where applicable;
- Update to the summary of planned regeneration where applicable;
- Details of consultation activities and feedback from March 2021 and June-July 2021;
- Update of Equalities Baseline, where applicable including issues relating to the Covid-19 Pandemic;
- Update of equality impacts and effects as well as the status of planned and recommended mitigation measures to mitigate against adverse impacts identified in the previous versions this report.

1.4 Pre-demolition commencement update to the EqIA (August 2023)

- Planning permission was granted on 30 June 2023 for the Church Street Sites A, B and C development.
- The first stage of construction is the demolition of the existing buildings at the Site, starting with Site A. Construction will be split into two phases, one with residential and commercial development and one just residential. The aim of WCC is to commence work on-site before Christmas 2023.

- In line with the project advancement, the following updates to the EqIA have been made:
 - Review of the legislation and policy to ensure that it is up-to-date.
 - Update of the equalities baseline and socio-economic profile so that they present the most recently collected Census data.
 - Review of the summary of impacts table with WCC to reflect the most recent updates in terms of the previously outlined mitigation measures and recommendations relating to each potential equality impact.

1.5 Report structure

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

- **Section 2: Methodology** – setting out our approach to collecting evidence and assessment of impacts;
- **Section 3: Policy and legislation review** – providing context through relevant national, regional and local policy and legislation associated with equalities and housing and regeneration;
- **Section 4: Summary of planned regeneration** – an overview of the planned regeneration as set in the Preferred Way Forward recommendations for Sites A, B and C and Site A design update against current on-site provision;
- **Section 5: Consultation** – a summary of consultation undertaken to date on the proposed regeneration;
- **Section 6: Equalities baseline** – using secondary data sources such as Census 2011 data to form an understanding of the community residing and working within the area;
- **Section 7: Primary research: Church Street residents** – analysis of the HNA data to understand potential impacts on residents;
- **Section 8: Primary research: Church Street businesses** - findings of the business and on-street surveys undertaken for the purpose of the EqIA;
- **Section 9: Assessment of potential equality effects** – an appraisal of impacts and equality effects of the PWF and Site A design update using the evidence gathered; and
- **Section 10: Recommendations and conclusions** – high level recommendations and conclusions for enhancing positive equality impacts and minimising potential negative impacts based on available evidence to date.

2. Methodology

2.1 Introduction

This section sets out the approach to assessment of equality effects of the Church Street Estate Regeneration – Sites A, B & C. The assessment considers how the regeneration could directly impact (both positively and negatively) commercial and residential leaseholders, tenants and occupiers who share protected characteristics within the footprint of the proposed Church Street Estate Regeneration.

It also considers the potential equality effects of the proposals for those employees and customers of affected businesses as well as for local residents sharing protected characteristics, including direct impacts of loss of use of services available and indirect impacts associated with changes to the public realm immediately surrounding the site.

In considering the direct effects of the regeneration proposals, this EqIA takes a 'worst case scenario'.

2.2 Approach overview

The approach for undertaking this EqIA and compiling this report follows a four-stage process:

1. Desk-based review - including relevant national, regional and local policies and legislation, the proposed regeneration plan and secondary datasets relating to groups with protected characteristics;
2. Primary research - including the Housing Needs Assessment, business survey and an on-street survey;
3. Appraisal of potential impacts - informed by a consideration of the policy context, consultation responses, equalities baseline data, primary research survey findings; and
4. Recommendations and conclusions.

The approach is based on our 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 EqIAs.

2.3 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 and recent documentation regarding the proposed regeneration under key equality themes of housing, business and employment, public realm, transport and accessibility, crime and safety and relevant Covid-19 impacts;
- Review of national and local datasets to develop an equalities baseline profile of groups with protected characteristics within and surrounding the regeneration area;
- Review of recent impact assessments produced, notably the socioeconomic analysis of Church Street Masterplan (2017) and Environmental Impact Assessment (EIA) (2021); and
- Review of the consultation activities undertaken to date in relation to the proposals undertaken by the Council to identify any issues of relevance to this EqIA.

2.4 Primary research

2.4.1 Church Street Housing Needs Assessment

A Housing Needs Assessment survey was undertaken by the Council with households in Sites A, B, C in Autumn 2018. The survey took place with:

- Council tenants
- Registered provider tenants
- Homeless households living in temporary accommodation provided by the council

- Private tenants i.e. of non-resident leaseholders
- Resident leaseholders
- Non-resident leaseholders

The survey consisted of interviews undertaken directly with households and collected information on all occupants of the household including age, disability, employment status, ethnicity and other demographics. It also collated data on the type of property and property facilities as well as requirements and preferences for moving out of Church Street. This data has been used to summarise the key issues for residents with regards to those with protected characteristics. The result of this analysis can be found in Section 6 of this report.

2.4.2 Church Street business surveys

Two separate surveys were designed in order to gather the views of those affected by the proposed regeneration of Church Street. Surveys were prepared for businesses and market stall-holders within the proposed regeneration area and an on-street survey was prepared for customers of the businesses and the market.

The surveys were developed to capture a combination of quantitative and qualitative information to ensure that relevant factual information was collected, whilst also allowing respondents to share their wider views on the proposal and how they are likely to be affected. Questions were relevant to the needs and circumstances of this particular project. Diversity monitoring questions that were drawn from data in the 2011 Census were also included.

The surveys adhered to best practice principles of survey design following Market Research Society guidelines. This included an attempt to avoid the use of leading questions and to take care in the choice of wording (e.g. clear, language) and type of questions (e.g. closed, open), the application of logical sequencing and simple layout, and consideration of questionnaire length.

Both surveys were designed to follow the Market Research Society's Code of Conduct² to ensure the highest level of data integrity and compliance with the General Data Protection Regulations and Data Protection Act 2018³.

The surveys were conducted by a team of trained market research interviewers with prior experience on similar projects associated with the equality impacts of regeneration and regeneration schemes. Interviewers were each provided with a briefing pack and tablet loaded with the survey forms prior to the start of the survey period.

All members of the survey team were requested to wear AECOM ID and were provided with a letter of authority, which was pre-agreed with the Council. This helped to legitimise their activities and to instil confidence in respondents with regards to the purpose and independence of the survey.

The survey team were managed by a supervisor who was fully briefed by the project manager on-site. The supervisor was responsible for ensuring that team members were on-site at the times required and to record and update on progress with the interviews to AECOM.

The surveys were conducted with businesses and organisations occupying units in Sites A, B and C as well as market stall-holders located on Church Street. On-street surveys with customers took place on Church Street.

The survey team visited the area between 14th May 2019 and 21st May 2019 during different time periods and days of the week in order to maximise availability of respondents and therefore the response rate.

Table 2-1 summarises the approach for each of the different survey types and the response rate achieved.

Table 2-1 Survey details and response rates

Type of Survey	Description of survey activities	Response rates
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² Market Research Society (September 2014) MRS Code of Conduct available at https://www.mrs.org.uk/standards/code_of_conduct (Last checked August 2021)

³ Data Protection Act 2018 available at <https://www.gov.uk/data-protection> (last checked August 2021)

Businesses	<p>A list of commercial property interests in the area was collected by AECOM and agreed with Westminster City Council in April 2019. The list consisted of tenants and occupiers within the site of the proposed regeneration. In total, the survey team attempted to make contact with up to 150 businesses and market stall holders who were deemed to be occupiers.</p> <p>Each business was visited up to three times between the 14th May and 21st May. The survey was either completed or an appointment to conduct the survey at a later date was made to maximise participation in the survey.</p>	<p>In total 128 business interviews were conducted with occupiers.</p>
On-street surveys	<p>Respondents were stopped and asked to participate in the survey on-street. This included a mix of customers exiting the businesses in the project area and passers-by. Screening criteria was applied to include only those that visited the project area at least once per week. Anyone responding that they lived in the area bounded by the development was asked to complete the resident survey also. Interviewing took place on Church Street.</p>	<p>In total 100 members of the general public were interviewed on Church Street.</p>

2.4.3 Survey Analysis

Once the surveys were completed all datasets were checked, cleaned and coded in the case of open-ended responses. Analysis was undertaken producing frequencies of responses as well as identifying any significant differences in responses by different groups with protected characteristics. Results of the surveys are provided in Section 6 of this report.

2.5 Assessment of impacts

An assessment of equality impacts has been undertaken and takes into account the information gathered through the above activities. A judgement has then been made as to how the regeneration process would contribute to the realisation of the equality effects of the planned development for affected people with protected characteristics as defined in the Equality Act 2010 as:

- **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 (i.e. those aged 80+);
- **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 and civil partnerships can be between a man and a woman or between two people of the same sex. Civil partners must not be treated less favourably than married couples;
- **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.

The assessment considers both disproportionate and differential impact. A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location. For the purposes of this EqIA, disproportionality can arise in two main ways, either:

- where an impact is predicted for the area, where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in the wider local authority district and/or county/region; or
- where an impact is predicted on a community resource predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for very 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 sensitivity or vulnerability associated with their protected characteristic, irrespective of the number of people affected.

In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects. The EqIA will consider impacts on groups of people rather than on individuals.

Criteria used to determine differential or disproportionate impacts of the regeneration with respect to equality protected characteristics include:

- People who share a protected characteristic form a disproportionately large number of those adversely affected by the regeneration;
- Amongst the population affected by the regeneration, people who share protected characteristics are particularly vulnerable or sensitive to a possible impact in relation to their possessing a specific protected characteristic;
- The regeneration may either make 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 realised as a result of the regeneration. 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 regeneration may worsen existing community cohesion amongst the affected local population or exacerbate conflicts with community cohesion policy objectives.

Although income is not classed as a protected characteristic under the Equality Act 2010, the assessment also considers the additional impact of disproportionate and differential effects on those groups with protected characteristics from low-income households.

2.6 Recommendations and conclusions

The final section of this report sets out conclusions on the equality impacts of the proposed regeneration as well as setting out recommendations for mitigating against adverse impacts and opportunities enhancing equality of opportunity. It also sets out some indicative milestones for refresh of the EqIA.

3. Policy and legislation context

3.1 Legislation

3.1.1 Equality Act 2010 and the Public Sector Equality Duty

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 Council, as a public body, is subject in carrying out all its functions, including in the exercise of its CPO powers.

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 groups to participate in public life or in other activities where their participation is disproportionately low.

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

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

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

3.1.2 Compulsory Purchase Order

Compulsory purchase powers are provided to enable acquiring authorities to compulsorily purchase land to carry out a function which Parliament has decided is in the public interest. Anyone who has land acquired is generally entitled to compensation. Local authorities have CPO powers under the Acquisition of Land Act 1981, the Town and Country Planning Act 1990 and other specific Acts of Parliament in order to promote development and regeneration. The CPO process comprises a number of stages, including Resolution, Inquiry, Decision and Compensation stages. The acquiring authority does not have the powers to compulsorily acquire land until the CPO is confirmed by the relevant Government minister. However, they can acquire by agreement at any time and the general presumption is that they should endeavour to do so before acquiring by compulsion.

The Government guidance on CPO process⁴ includes an explanation of how the PSED should be considered. The guidance confirms that in exercising compulsory purchase powers public sector acquiring authorities must have regard to the effect of any differential impacts on groups with protected characteristics.

The guidance acknowledges that an important use of compulsory purchase powers is to help regenerate run-down areas. Although low income is not a protected characteristic in itself, it is not uncommon for people from

⁴ Ministry of Housing, Communities & Local Government (2018) Guidance on Compulsory purchase process and the Crichel Down Rules available at <https://www.gov.uk/government/publications/compulsory-purchase-process-and-the-crichel-down-rules-guidance>

ethnic minorities, the elderly, or people with a disability to be over-represented in low-income groups. As part of the PSED, acquiring authorities must have due regard to the need to promote equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This means that the acquiring authority may need to develop a process which promotes equality of opportunity by addressing particular problems that people with certain protected characteristics might have (e.g., making sure that documents are accessible for people with sight problems or learning difficulties and that people have access to advocates or advice).

3.2 National Policy

3.2.1 National Planning Policy Framework (July 2021)

The National Planning Policy Framework (NPPF)⁵ was adopted in July 2018 and updated with minor revisions in February 2019 and most recently, July 2021. It consolidates the Government's economic, environmental and social planning policies for England into a single document and describes how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the Government's development aims.

While the NPPF does not contain specific guidance on equalities, it does 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 and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure”;*
- *The social role supports strong, vibrant and healthy communities by “providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being”; and*
- *The environmental role contributes to protecting and enhancing the “natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt 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;
- The requirement to plan for the needs of different groups within communities.

In Chapter 8, the NPPF outlines how planning policy should help promote healthy communities by taking a positive and collaborative approach to enable development to be brought forward. The NPPF emphasises that planning policies and decisions should aim to create places which offer: opportunities for social interaction and meetings between members of the community through the delivery of mixed-use developments, strong neighbourhood centres and active street frontages; safe and accessible environments which include social, recreational and cultural facilities and services the community needs; a sufficient choice of school places to meet the needs of existing and new communities; and access to high quality open spaces and opportunities for sport and recreation.

⁵ Department for Communities and 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

3.3 Regional Policy

3.3.1 London Plan (2021)

The London Plan⁶ was adopted with amendments in March 2021. The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within the city. A number of policies outlined in the Plan are relevant to the proposed regeneration, including tackling deprivation, promoting equality and enabling different groups to share in the benefits of development, specifically:

- **Policy GG1: Building Strong and Inclusive Communities** which builds on the idea that “good growth is inclusive growth” and requires that planning and development involves community and stakeholder engagement, provides access to good quality community spaces, and supports the creation of a London for all Londoners, where all people including protected characteristic groups (PCGs) are able to move around and enjoy the city’s opportunities with ease, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation;
- **Policy SD 10: Strategic and Local Regeneration** which requires development and regeneration opportunities address inequality and deprivation across London, by allocating Strategic Areas of Regeneration and Local Areas of Regeneration. The policy also highlights the need to work collaboratively with local stakeholders and understand local community’s needs so that regeneration can address the local area’s most urgent issues;
- Policies **HC1 and HC3**, which highlight heritage conservation and the importance of strategic and local views;
- Policies **S1 to S7** concerning the provision of social infrastructure, including health and social care, education, sports and recreation facilities, are all relevant to equal opportunities;
- Housing policies **H1 – H16** concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities;
- Design policies **D6, D7 and D7**, which relate to accessible design and tall buildings, which are especially relevant here;
- Employment policy **E11: Skills and Opportunities** for all requires that strategic development proposals should support local employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, and that low pay and gender and ethnicity pay gaps are critical issues; and
- Employment policy **E9: Retail, Markets and Hot Food Takeaways**, which highlight the importance of a diverse and competitive retail sector, stating specifically the crucial role played by street markets in creating and sustaining London’s vibrant character, while also serving the shopping and leisure needs of specific ethnic groups.

3.3.2 Inclusive London: Mayor’s Equality, Diversity and Inclusion Strategy (2018)

The Mayor’s Equality, Diversity and Inclusion Strategy⁷ (EDIS) was published in May 2018. The strategy 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, as well as the challenges and disadvantage facing London can be a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential.

The strategy sets out 33 equality, diversity and inclusion objectives which include working with councils and other partners to:

- Increase the supply of homes that are genuinely affordable to buy or rent.

⁶ Greater London Authority (2016) London Plan <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan>

⁷ GLA (2018); Mayor’s Equality, Diversity and Inclusion Strategy <https://www.london.gov.uk/what-we-do/communities/mayors-strategy-equality-diversity-inclusion>

- Improve property conditions, management standards, security and affordability for private renters. Including supporting the growing numbers of households with children in private rented homes, as well as groups who are more likely to live in the sector.
- Better protect Londoners living in social housing, including those affected by estate regeneration projects, to ensure that their views are properly heard and acted upon.
- Improve the supply of homes available to meet Londoners' diverse housing needs, including for accessible and adapted housing, specialist and supported accommodation, and Gypsy and Traveller sites.
- Regenerate the most deprived parts of London in a way that supports good growth and opens up opportunities for the most disadvantaged groups.
- Protect and provide the social infrastructure needed by London's diverse communities.
- Promote the use of inclusive design through planning, procurement and commissioning of projects and programmes.
- Support effective ways to involve communities in the development of their neighbourhoods and the wider city.

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 skills, enterprise and jobs market and increasing the diversity of the workforces in vital sectors in London. These include digital, construction, creative and the built environment.

The strategy aims to encourage inclusive growth in London through better planning and provision of business support, including access to finance for BAME, women and disabled-led businesses, and to help save and sustain diverse cultural places and spaces by promoting good growth.

3.3.3 London Housing strategy (2018)

The London Housing Strategy was formally adopted in May 2018⁸. The Strategy identifies its emphasis to deliver significant new housing across all tenures to address demand and support London's continued economic growth. Its long-term ambition is to increase supply of homes, while also addressing issues such as affordable housing needs, quality of housing and types of tenures offered. The Strategy has a particular focus on low- and middle-income working households, whilst also addressing the needs of vulnerable and older households.

Key messages from the Strategy include:

- **Policy 3.1: Increasing the Supply of Land for New Homes** which sets of how land supply for new homes should be boosted. Policy 3.1 increased supply can be achieved through increasing intensification, higher densities, and co-location of various purposes – as well as through “proactive involvement in London's land market to unlock and accelerate the pace of development.”
- **Policy 4.1: Genuinely Affordable Homes** which sets out the ways in which homes should be “genuinely affordable” to Londoners, on the basis of affordability tests
- **Policy 5.1: Well-Designed, Safe and Good Quality Homes** which states new and existing developments in London should have homes that are safe, accessible, good quality and environmentally sustainable.
- **Policy 5.1: Meeting London's Diverse Housing Needs**, which states all homes in London should be able to meet the needs of a range of groups, including disabled and older people. The policy also mentions that housing provision for Syrian refugees to be a key part of housing provision, as social integration should be an essential part of housing provision in London.

⁸ LHS (2018) https://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf

3.3.4 Better homes for local people - The Mayor's Good Practice Guide to Estate Regeneration (February 2018)

The Mayor's Good Practice Guide to Estate Regeneration sets out the expectations for how local authorities and housing associations should engage with residents as part of all estate regeneration schemes, whether or not they include the demolition of homes. The guide outlines the Mayor's three Better Homes for Local People principles, specifically:

1. **An increase in affordable housing** - Local authorities should consider alternative options for demolition. Should demolition be pursued then like-for-like provision of floorspace for affordable housing on estate regeneration projects should be provided. Gap funding is available through GLA housing grant funding to ensure financial viability of affordable housing provision if required. Where possible, local authorities should also be trying to increase the density of estates to maximise potential for an increase in affordable homes. Landlords should adopt local lettings policies for new affordable homes for rent to help ensure that local people benefit from the additional homes being built.
2. **Full rights to return or remain for social tenants** - Where estate regeneration plans involve the demolition of existing homes Councils and housing associations should seek to phase projects wherever possible, with the aim of ensuring that households can remain on the estate by moving no more than once. Social tenants who have to move as a result of estate regeneration plans, either through a single move or a temporary move off the estate, should be:
 - provided with a full right to a property on the regenerated estate of a suitable size, at the same or a similar level of rent, and with the same security of tenure. Households who are currently overcrowded should be offered homes large enough for their needs. Households who under-occupy their current homes should not automatically qualify for a new home with the same number of bedrooms. For example, landlords may choose to limit the number of bedrooms offered to under-occupiers to a maximum of one greater than their need.
 - awarded high priority in the local allocations policy should they need to move into a new home temporarily as a result of estate regeneration. Any offer of alternative accommodation should be reasonable, in that it meets the needs of the household in terms of the number of bedrooms and any special requirements (such as wheelchair accessibility or adaptations).
 - offered the maximum home loss compensation permitted by legislation by landlords if they meet the statutory criteria and are displaced from their homes due to estate regeneration.
 - awarded 'disturbance costs' of moving home by the landlord. This means paying the reasonable costs of moving, such as removal costs, telephone and utility connection and installation costs, and the provision of new carpets and curtains. Tenants who must move more than once should receive home loss payments for each move.

Furthermore, Councils and landlords should work together to make sure that private tenants on estates being considered for regeneration are aware of their options and rights, including signposting them towards alternative housing options. Councils may also have duties towards private tenants under homelessness legislation. Additional support and assistance should be offered to more vulnerable households living on estates, regardless of their tenure. In some cases, this may mean that they want to move out of the area or into specialist accommodation.

Where councils or housing associations propose to let homes on short-term tenancies, they should ensure that new tenants are fully informed about any plans to regenerate the estate and are aware of their rights, including how they differ from those on secure tenancies. Short-term tenants should be reminded of these differences to avoid confusion at a later stage. They should also be given as much advance notice as possible of planned regeneration, so that alternative accommodation can be found if necessary.

3. **A fair deal for leaseholders and freeholders** - Leaseholders and freeholders affected by estate regeneration should be treated fairly and fully compensated if their homes are to be demolished. Where it is necessary to acquire homes owned by leaseholders and freeholders, landlords should:
 - always seek to do so by negotiation in the first instance to help avoid a compulsory purchase process, which creates uncertainty for the household and can lead to significant delays.
 - offer market value (plus home loss payments where appropriate) in the first instance. Where compulsory purchase is required, the rights of resident and non-resident leaseholders and

freeholders are set out in legislation. The purchase should be based on a value of the home undertaken by an independent valuer, paid for by the landlord if requested by the leaseholder or freeholder. The valuation must reflect the value of the property before the impact of any regeneration or proposed regeneration is taken into account.

- consider enabling resident leaseholders and freeholders to combine market value and home loss payments towards the purchase price for a new home.
- consider paying for other costs that might be borne by resident leaseholders and freeholders, such as the cost of moving home or setting up new utility connections.

Councils and housing associations are also encouraged to consider other ways to support resident leaseholders and freeholders including:

- support to use their equity to buy a home on the open market in the local area, with the Council or housing association owning the difference between the value of this equity and the market price of the home (either on a shared equity or shared ownership basis).
- offer the right to a new home on the regenerated estate through shared equity or shared ownership basis.
- Enable home swaps, or early buy-back arrangements.
- Provide assistance throughout any process of buying a new home.

3.4 Local policy

3.4.1 Private Rented Sector Strategy 2021-2025 (January 2021)⁹

On 6th January 2021, Westminster Council published a five-year private rented sector strategy detailing its plans to improve housing market conditions for tenants and to ensure the sector is well managed. The strategy identifies the need to ensure properties are good quality, and that all stakeholders including tenants, landlords and lettings agents are informed of their rights and responsibilities. This includes that support can be provided where needed, including taking action when the law is broken. The strategy includes the four interconnected aims:

- **Aim one:** Improve conditions in the private rented sector and ensure lawful practices
- **Aim two:** Support and engage with tenants, landlords and lettings agents
- **Aim three:** Improve knowledge and intelligence about the sector and work with other organisations that give advice and support to tenants, landlords and lettings agents
- **Aim four:** Help to improve the energy efficiency of the private rented sector

3.4.2 City Plan 2019 – 2040 Regulation 19 Publication Draft (April 2021)

Westminster's City Plan¹⁰ is the key policy document for determining planning applications in Westminster and contains the most up-to-date policies. This document was formally adopted in April 2021, following the publication of the Inspector's report on 19th March 2021.

The City Plan 2019 – 2040 contains a number of policies which are relevant to promoting equality and tackling existing disadvantage, and to the renewal of Church Street specifically, including:

- **Objective 2** of the City Plan is to "Enable job growth across a range of sectors vital to the UK economy and ensure those from disadvantaged backgrounds benefit from the opportunities this presents".
- **Policy 1 Westminster's spatial strategy** sets out the ambition to deliver growth via, among others, the renewal of Church Street / Edgware Road Housing Renewal Area. This policy also contains the requirement for 35% of new homes to be affordable.

⁹ Private Rented Sector Strategy (2021)

<file:///C:/Users/amani.bhobe/Downloads/Private%20Rented%20Sector%20Strategy%202021-2025.pdf>

¹⁰ Westminster Council (2019) City Plan 2019 – 2040 Regulation 19 Publication Draft
<https://www.westminster.gov.uk/cityplan2040>

- **Policy 6 Spatial Development Priorities - Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas** outlines the priorities in the regeneration of the Church Street /Edgware Road Housing Renewal Area. It indicates that the Church Street Masterplan constitutes the framework for development and is a material consideration for any planning application. This will include at 2,000 high quality new homes in accordance with the Church Street Masterplan, improved facilities for Church Street Market Infrastructure and the renewal of the Ebury Bridge Estate. The policy also states there will be at least 350 new jobs, and new community facilities, including new health and wellbeing facilities.
- **Policy 9 Affordable housing** requires that the affordable housing provision will be between 'intermediate' affordable housing for rent and sale (60%) and social or affordable London rent (40%). The Council will maximise the provision of additional affordable housing in designated housing renewal areas.
- **Policy 10 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. This policy includes provisions for family sized homes, specialist housing, older people's housing, purpose-built student accommodation, and provisions for gypsies and travellers.
- **Policy 14 Town centres, high streets and the CAZ** sets out that the intensification of town centres, high streets and the CAZ will be supported in principle. This policy provides a section on markets, which states that "suitably located, well designed and managed markets" are key aspects of the culture and diversity of the city, and specifically mentions Church Street as a key council-run market within Westminster. The policy also states that existing markets will be enhanced through partnerships with traders, residents and businesses, in line with the council's Market strategy.
- **Policy 43 Public realm** sets out that development should create "a well-designed, clutter free public realm" and high-quality soft landscaping should be integrated as part of the streetscape design. Furthermore, pressures on space in Westminster mean the council has emphasised that inclusivity and accessibility are priorities for public realm development and maintenance, with an emphasis placed on disabled people, children and those with dementia and mobility requirements.
- **Policy 17 Community infrastructure and facilities** states that community facilities and floorspace will be protected and that major development will contribute to employment, education and skills initiatives.

3.4.3 Church Street Masterplan City of Westminster (December 2017)

The Church Street masterplan, which was adopted by the Council in December 2017, builds on the themes in the Futures Plan. The Futures Plan is a renewal plan for the Paddington Green, Church Street and Lisson Grove area, prepared during 2011 and published in 2012.

The masterplan seeks to deliver real change for the community by creating great places, opportunities for a healthy and prosperous lifestyle, new homes and more jobs. The masterplan addresses four interconnected themes and drivers of change:

- **Homes** – Developing new and better homes;
- **Health & Wellbeing** – Provide new community, health and wellbeing facilities and increase accessible open space;
- **Market & Economy** – Improve the market, provide affordable workspace and employment opportunities; and
- **Making Connections** – Create a new pedestrian priority street and improve the public realm offering.

The masterplan is divided into a number of broad geographical study areas which are Limestone Street, Church Street Sites (A, B and C), Lisson Grove, Gateforth and Cockpit Theatre, Little Church Street, A number of sites have previously been identified for regeneration by the Futures Plan and are currently being developed or will be developed before the first main masterplan sites come forward.

3.4.4 Westminster Housing Renewal Strategy (2010)

In 2010 the Council published a Housing Renewal Strategy¹¹ 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.

3.4.5 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 including at Church Street. The strategy built up on the draft Housing strategy that was consulted on in June and July 2015. It sets out the direction that the Council intends to take with regards to new affordable housing, intermediate housing, disposal of affordable properties, reviewing CityWest home, 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.

3.4.6 Policy for Tenants in Housing Renewal Areas (August 2019)

The Council's Policy for Tenants in Housing Renewal Areas¹² sets out the rehousing options, headline financial compensation and the general processes that will be followed when homes occupied by council tenants need to be acquired. It also sets out the general approach to be taken when homes occupied by other tenants (including private and temporary accommodation) need to be acquired.

The policy states that all tenants will be supported by a named officer and have access to an independent advisor. Additional assistance will be provided to vulnerable tenants and the Council may work with third parties, including family members, social services and health practitioners to identify and address any special needs. Tenants will be entitled to claim two sorts of financial payment:

- **A home loss payment** – a statutory payment amount set by the Government to compensate them for having to move at a time which is not of their choosing; and
- **A disturbance payment** – to cover all the reasonable costs of moving. If a tenant has opted to return to the Housing Renewal Area but needs to move away temporarily while the new homes are built, they will be entitled to two disturbance payments.

Council tenants, including introductory, secure or flexible or those in community supportive housing, has the right to a new social home in the Housing Renewal Area. They have the following options:

- Option 1: Move straight into one of the new social homes, if this is possible; or
- Option 2: Move into another social home in Westminster for a temporary period, but then move into one of the new social homes in the Housing Renewal Area when they are ready.

¹¹ Westminster Council (2010) Westminster Housing Renewal Strategy
http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf

¹² Westminster Council (2019) Policy for Tenants in Housing Renewal Areas
https://www.westminster.gov.uk/sites/default/files/policy_for_tenants_in_housing_renewal_areas_2019_final.pdf

Tenants that do not want to move into one of the new homes can also take the following option:

- Option 3: Move into another social home in Westminster, this might be in the same general area, or in another part of Westminster. It could also be into Community Supportive Housing (sheltered housing) for those that are eligible and 60 or over.

For tenants that want to become home owners:

- Option 4: Tenants will have high priority for any new intermediate homes built in the housing renewal area and which are for sale, so they can get on the housing ladder. To qualify for this option, tenants will need to be eligible for "intermediate housing"¹³ and be able to afford to buy the new intermediate homes.

The policy sets out the rehousing process for tenants as follows:

- Stage 1: The Housing Needs Survey – at this stage the tenant considers their options and the Council finds out about who is in the household, the type of new home needed and any particular needs the tenant has.
- Stage 2: The Assessment – at this stage a detailed assessment is undertaken of the size and type of new home needed.
- Stage 3: Rehousing begins – at this stage the option chosen is confirmed in writing and generally cannot be changed. Rehousing will then start.

All homeless households that have been placed in temporary accommodation by the Council will be visited and advised of the relevant timescales, such as when they will need to move and the processes that will be followed. They will generally be offered alternative temporary accommodation but households in temporary housing do not have a right to remain in or return to the Housing Renewal Area and the above options do not apply to them. Temporary accommodation can be in different locations and some is outside London. All households in temporary accommodation in housing renewal areas will be prioritised for alternative temporary accommodation in London. Households with the highest needs will always be prioritised for temporary accommodation in Westminster and adjoining boroughs. In order to avoid households moving twice, where a household in temporary accommodation is estimated to be within twelve months of being able to successfully bid or be made offers for social housing, they will be awarded additional priority to bring this forward.

The policy states that every effort to communicate will be made by the Council with private tenants as early as possible to explain what is happening and when. All private tenants will be visited at least once and informed where they can get further advice, particularly if they are at risk of being homeless as a result of housing renewal. Those at risk of homelessness will be referred to the Council's Early Intervention Trailblazer Service. Additional support will be offered to vulnerable households where it is needed.

The policy was consulted on in January and February 2019 and the responses helped to shape them. The policy was also subject to an EqlA. An easy-to-read summary leaflet version of the policy will also be produced.

3.4.7 Policy for Leaseholders in Housing Renewal Areas (August 2019)

The Council's Policy for Leaseholders in Housing Renewal Areas¹⁴ sets out headline financial compensation and assistance leaseholders will receive from the Council where their properties are identified for acquisition, as well as the Council's overall approach to acquiring properties.

Resident leaseholders have five options if they wish to remain in the housing renewal area (Options 1-5) and one option if they want to move away (Option 6):

- Option 1 - Buy one of the new homes with an equity loan or on a shared equity basis;
- Option 2 - Buy one of the new homes on a shared ownership basis;
- Option 3 - Buy one of the new homes outright;
- Option 4 - Buy another leasehold property in the housing renewal area;
- Option 5 - Become a social or an intermediate tenant in the housing renewal area; and

¹³ Intermediate housing refers to housing for working people that aren't eligible for social housing but can't afford market housing. This is let through the Council's intermediate housing service called Homeownership Westminster.

¹⁴ Westminster Council (2018) Policy for Leaseholders in Housing Renewal Areas
https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

- Option 6 - Receive help and support to move away from the housing renewal area.

The policy also covers arrangements for buying with Options 1, 2 and 3 including temporary housing where required, process for buying, and new homes.

There is only one option for non-resident leaseholders, which is to sell their property to the Council and receive the statutory financial compensation. This includes receipt of market value of the property being acquired plus a basic loss payment, which is 7.5% of the market value of the property (this is capped by the Government at £75,000). Non-resident leaseholders are also entitled to a disturbance payment in relation to costs incurred in acquiring a replacement property, within one year.

The policy went through public consultation in 2018 and replaces the previous version published in 2014. The policy was also subject to an EqlA. An easy-to-read summary leaflet of the policy has also been produced¹⁵.

3.4.8 A strategy for Westminster City Council's markets 2019-2022

Within the City of Westminster there are nine regular street markets with approximately 300 pitches including Church Street. In 2018, Westminster City Council ran a public consultation on the markets over 12 weeks. The results of the consultation were used to inform the market strategy¹⁶, which is a three-year framework to take forward the priorities identified during the consultation.

3.4.9 Westminster Council's City for all objectives (2018-2019)

Westminster City Council's ambition set out under the 'City for All' vision is to be a place where all people are born into a supportive and safe environment, grow and learn throughout their lives, build fantastic careers in world-leading industries, have access to high quality, affordable homes and retire into the community with dignity and pride. The ambition is to be realised under the following areas.

- City of opportunity;
- City that offers excellent local services;
- Caring and fairer city;
- Healthier and greener city; and
- City that celebrates its communities.

3.4.10 Westminster's equality objectives

Under the Equality Act 2010, local authorities must prepare and publish one or more objectives they think they should achieve to do any of the things mentioned in the aims of the PSED. The aim of the equality objectives is to help focus attention on the priority equality issues within an organisation in order to deliver improvements in policy making, service delivery and employment. Objectives should be updated at least every four years, be specific and measurable and published in a way that is accessible to the public. Westminster City Council's corporate equality objectives¹⁷ are:

- Staff will represent the demographic of our communities at all levels of the organisation.
- Understand our diverse communities and embed that understanding in how we shape all that we do across the Council.
- Support Westminster's communities to be sustainable, socially inclusive and empowered to act, when they are best placed to do so.
- Demonstrate inclusive leadership, strategic partnership and a clear organisational commitment to be a leader in equality, diversity and inclusion in the city.

¹⁵ Westminster Council (2018) Leaseholders: Policy for Leaseholders in Housing Renewal Areas 2018
<https://www.westminster.gov.uk/housing-policy-and-strategy/leaseholder-policy-housing-renewal-areas>

¹⁶ Westminster Council (2018) A strategy for Westminster City Council's markets 2019-2022
<https://committees.westminster.gov.uk/documents/s31725/4.1.%20Market%20Strategy%20Final%20Doc.pdf>

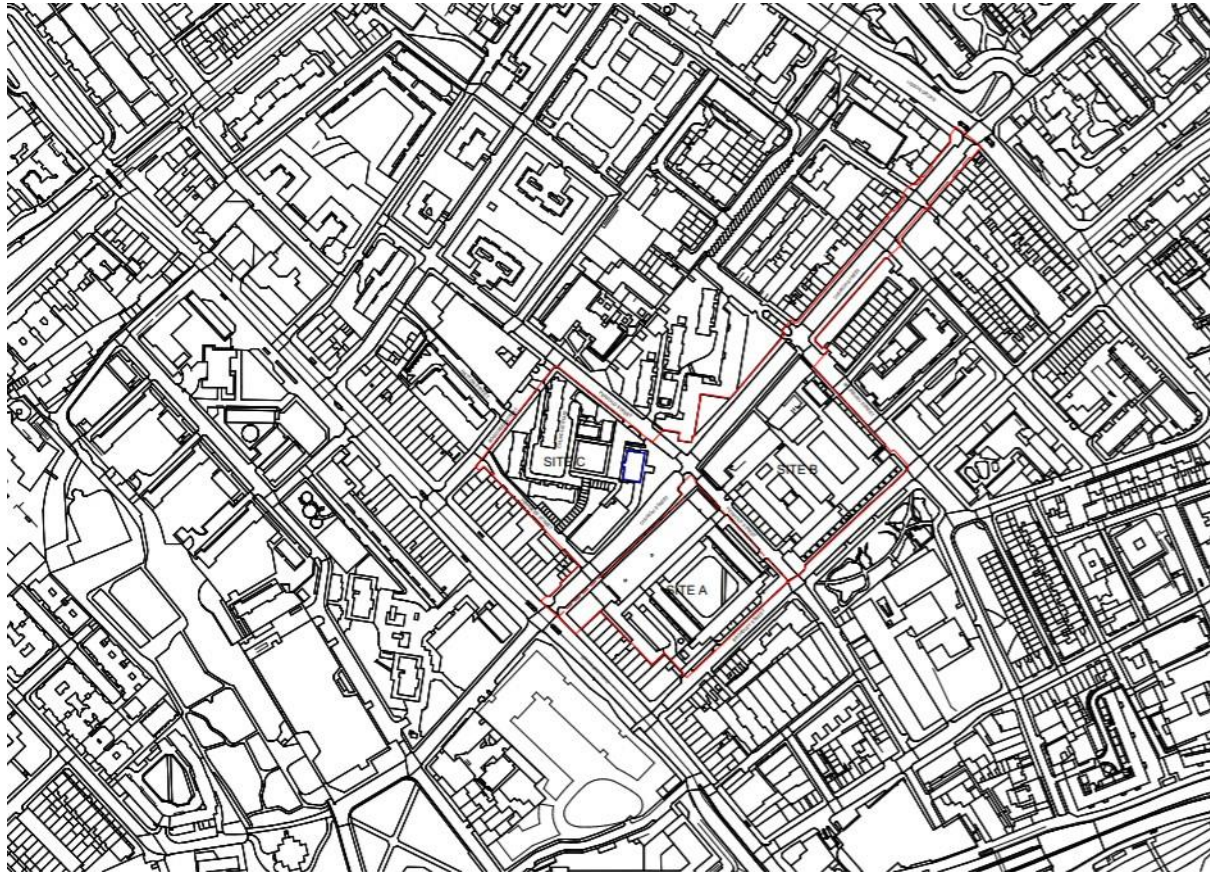
¹⁷ Westminster City Council [2022] Equality objectives [online] available at: <https://www.westminster.gov.uk/equality-and-diversity#our-equality-objectives>

4. Summary of planned regeneration

4.1 The current site

The Church Street area is approximately 44 hectares and is located west of Regent's Park, close to major public transport hubs (Marylebone, Edgware Road and Paddington stations) and to many city centre amenities such as London's West End. The area covered by the masterplan is closely aligned with the Church Street ward and is bound by Regent's Canal, to the north, Edgware Road to the West, the National Railway line serving Marylebone station to the east, and Marylebone and Rossmore Roads to the south.

Figure 4-1: Site Location Plan



Source: WCC, 2021

Sites A, B and C are identified as the following:

- Site A - land bounded by Edgware Road, Church Street, Penfold Street and Broadley Street (Site A);
- Site B - land bounded by Penfold Street, Church Street, Salisbury Street, and Broadley Street (Site B);
- Site C - land bounded by Edgware Road, Boscobel Street, Penfold Street and Church Street (Site C); and
- Church Street Market infrastructure

The Church Street area contains a diverse mix of land uses, with a good range of services and amenities catering for the neighbourhood. This street is characterised predominantly by retail, restaurants and cafes, and accommodates the Church Street Market infrastructure, one of the older street markets in London. The area is also home to a significant concentration of social and entrepreneurial organisations. Office space is relatively limited in the area although a small concentration of office buildings can be found on or in close proximity to Marylebone Road. The area currently possesses three primary schools, and a secondary school, along with a number of community and youth facilities.

The area also contains a number of residential and commercial leaseholders and sub-leaseholders. The majority of the properties are non-residential and currently occupied.

4.2 Church Street Masterplan

The Church Street Masterplan for the area was approved by Cabinet Committee in December 2017 and identified the following potential regeneration sites:

- Church Street sites A, B & C;
- Lisson Grove (part of which includes the current Council offices land, referred to as the Orchardson Street site);
- Lilestone Street (includes Penn House and 4 Lilestone to the front, Gayhurst House & 6-12 Lilestone Street to the middle and Greenside Community Centre to the rear);
- Gateforth and Cockpit Theatre; and
- Little Church Street.

4.3 Church Street Estate Regeneration - Sites A, B and C

4.3.1 Preferred way forward

In summer 2018, the Council's Development Team engaged a multidisciplinary consultant to work up a full range of options for the three largest development sites within the Church Street Masterplan; Sites A, B & C and Church Street market infrastructure. The Council and its Consultants developed four options for these sites and the Market. These are as follows:

- **Option 1 Maintenance:** 'Business as usual', with maintenance continuing at current levels, and no change for leaseholders or tenants.
- **Option 2 Refurbishment:** All homes refurbished.
- **Option 3 Part refurbishment, part regeneration:** Many buildings in sites A, B and C replaced, with the remainder undergoing refurbishment as in Option 2.
- **Option 4 Full regeneration:** All of the homes and shops in sites A, B and C would be replaced.

Following public consultation on the above options, Council officers developed a Preferred Way Forward (PWF) based on Option 3 (part refurbishment and part regeneration) to progress Sites A, B & C and Church Street market infrastructure. Although not included in Option 3, properties on Edgware Road in Site C were also included in the scope of regeneration for the PWF. In addition, Kennet House which was originally included in Option 3 was to be retained due to public demand.

Table 4-1 provides details of the residential commercial and other property interest that will be affected by the regeneration proposals for Sites A, B and C.

Table 4-1 Breakdown of residential and other interests in the Preferred Way Forward.

Site	Approx. no of residential properties	Westminster City Council Residential Freeholds	Other Residential Freeholders	Commercial and other interests
A	176	Blackwater House, Cray House, Ingrebourne House, Lambourne House, Pool House	n/a	Retail units, market storage and basement parking and market pitches in front of these buildings on Church Street
B	177	Eden House, Lea House, Medway House, Ravensbourne House, Roding House, Wandle House	n/a	Retail units, basement parking and the Church Street Library and market pitches in front of these buildings on Church Street

Site	Approx. no of residential properties	Westminster City Council Residential Freeholds	Other Residential Freeholders	Commercial and other interests
C	139	Colne House, Darent House, Derry House, Isis House, Windrush House, Mole House	Nos 288 to 240 Edgware Road	Retail units, market storage and basement parking and market pitches in front of these buildings on Church Street

The Cabinet Member for Finance, Property and Regeneration approved the proposals in connection with progressing Option 3, to:

- Authorise Officers to consider the inclusion of the properties on Edgware Road on Site C in the scope of regeneration of Option 3;
- Authorise Officers to enter into voluntary negotiations with leaseholders in any or all blocks within Sites A, B & C (with the exception of Kennet House) to apply the acquisition budget to acquire all leasehold interests by agreement at open market value and offer compensation in line with the Council's Policy on Leaseholders in Housing Renewal Areas; and
- Authorise the implementation by Officers of the Council's Policy for Tenants in Housing Renewal Areas (as updated from time to time) to include all blocks in Sites A, B & C (with the exception of Kennet House).

4.4 Hybrid planning application (2021)

The Hybrid Planning Application seeks part-detail/part-outline planning permission for the following:

- Detailed planning application for Site A, for the demolition of all buildings on Site A and erection of mixed-use buildings providing ground floor flexible commercial use floorspace (use class E), a library (use class F1), market storage (use class B8), residential units (use class C3), landscaped amenity space, car parking, motorcycle parking, cycle parking, market infrastructure and associated works.
- A Phased Outline planning application (Sites B, C and the Church Street Market infrastructure) (all matters reserved) for the balance of the site for:
 1. The proposed demolition of buildings and structures;
 2. The erection of buildings and works of alteration to existing buildings for the following uses:
 - a) Flexible Commercial Floorspace (Use Class E);
 - b) Community Floorspace (Use Class F1);
 - c) Sui Generis Floorspace (Use Class Sui Generis); and
 - d) Residential Floorspace (Use Class C3) and ancillary residential facilities.
 3. Associated infrastructure;
 4. Streets, open spaces, landscaping and public realm;
 5. Car, motorcycle and bicycle parking spaces and delivery/servicing spaces;
 6. New pedestrian and vehicular access;
 7. Market infrastructure and ancillary facilities;
 8. Utilities including electricity substations; and
 9. Other works incidental to the proposed development.

4.5 Housing provision

The existing residential units, comprising predominantly a mixture of social housing and private rented accommodation will be part redeveloped and part refurbished.

The existing unit mix for each Site is set out in Table 4-2 (a, b and c) below.

Table 4-2a: Site A Unit Mix

	Bedroom	Social rented	Market	Total
Site A	1	58	6	64
	2	0	22	22
	3	40	18	58
	4	0	1	1
Total	N/A	98	47	145

Table 4-2b: Site B Unit Mix

	Bedroom	Social rented	Market	Total
Site B	1	62	38	100
	2	3	36	39
	3	19	15	34
	4	1	2	3
Total	N/A	85	91	176

Table 4-2c: Site C Unit Mix

	Bedroom	Social rented	Market	Total
Site C	1	27	11	38
	2	8	10	28
	3	8	7	15
	4	2	6	8
Total	N/A	45	34	79

The scheme proposes a total of 1121 residential dwellings with a diversity of tenure mix equating to a net increase of approximately 629 homes.

New homes will be designed in accordance with the Nationally Prescribed Space Standards. Furthermore, 10% of the proposed new homes will be designed to be adaptable for wheelchair users. Subject to viability, the development will target a 50% Affordable Housing provision with an overall increase in 129 social housing units. The proposed headline split is currently set at 60:40 between intermediate and social housing, respectively. Table 4-3 sets out the proposed tenure mix for the planning application.

Table 4-3: Tenure Mix

	Site A	Indicative Unit Mix (Whole Site)
Market Sale	215 units	567 units
Social Reprovision	98 units	228 units
New Social	73 units	156 units
New Intermediate	43 units	170 units
Total Units*	429	1121
<i>Family (3+bedrooms)</i>	82 units	176 units
<i>Wheelchair accessible housing</i>	53 units	122 units

*(including family and wheelchair accessible housing)

The overall floorspaces for the whole application, across Sites A, B and C are set out in Table 4-4 below.

Table 4-4: Tenure Mix

Use Class (id)	Area (sqm) GIA
Residential floorspace (C3)	103,000
Storage and distribution floorspace (B8)	4,900
Flexible commercial floorspace (E)	3,187
Community floorspace (F1)	1,000
Parking and delivery hubs	8,500
Plant and service spaces	5,500
Sui generis	174

It is worth noting that Site A is split into two urban blocks, separated by a new pedestrianised street referred to as 'New Street Gardens' and will consist of 429 residential units. The heights on Site A will be generally 9-11 storeys. On Church Street the height is 10 and 11 storeys reducing to 8 storeys on the Edgware Road frontage. The 10-storey elements have two-storey Road frontage is effectively 7 storeys. There is a localised point of height of 14 storeys on the corner of Broadley Street and Penfold Street adjacent to Broadley Gardens.

4.6 Retail and commercial provision

Church Street Market infrastructure will be provided for in the regeneration with capacity for 220 stalls. The market will also experience improvements in terms of design, layout, appearance, storage, parking (4 market van spaces), provision of utilities and welfare facilities including toilets.

Along Church Street will be new fit for purpose retail units for new and existing businesses including a new supermarket. However, there will be a net reduction in the number of retail units available across the regeneration area.

Site A will deliver 398sqm GIA of Class E floorspace, 922sqm of delivery and storage facility for market traders (Class B8) and 1,511 sqm GIA of parking.

As described above, Sites B and C are proposed in outline form so will comprise maximum parameters for development. However, Site B comprises a single courtyard block with a mix of uses. Commercial and/or Community use on Church Street and corners of Salisbury and Penfold. Community and/or commercial space on corner of Broadley and Salisbury.

Site C comprises a single courtyard block with a wing extending along Venables Street to Church Street. The building will have a mix of use space. The proposed building will introduce an active frontage of commercial / community use to Venables Street enhancing the quality of the pedestrian connection between Boscobel Street and Church Street.

4.7 Community and landscape

A new library will be provided replacing the existing library located in Site B. This will be located in a prominent and highly visible location on Church Street contributing to the mix of uses and activity on the street in site A. The library will also provide flexible space accommodating existing services provided at the current site. In total Site A will include 605sqm GIA of community floorspace (Class F1).

At the time of planning application, the Masterplan is set to deliver 2,478 m² of public open space (15.4% of total proposed open space) at Site A and 16,043 m² of public accessible open space (41.8% of the total site area) along with 6,808 m² of communal amenity space (17.7% of the total site area) overall. Furthermore, the proposed development scheme itself will deliver 5,664m² (+8,570m² offsite) of child play space.

Public open space will be provided at New Street Gardens running between Church Street and Broadley Street in Site A. This will also include inclusive and local play space for 5–11-year-olds as well as open space for local residents and visitors. Private outdoor space will be provided through ground floor courtyards and podium gardens.

Site B and C will deliver a minimum 3% accessible car parking per dwelling will be provided within any Site, with additional accessible car parking spaces provided through conversion of other space where demand necessitates in the future.

Commercial car parking is to be retained at approximately 4 spaces in Site A. 50% of residential spaces will have active electric vehicle charging, the remaining 50% to have passive electric vehicle charging. It is proposed that 100% active provision for electric charging will be provided for market van spaces.

5. Consultation

This section presents an overview of consultation undertaken to date by the Council in relation to the proposed development.

5.1 Public Consultation on Sites A, B & C options (2019)

Preceding the 2021 Pre-Planning Consultation, an Options Consultation was undertaken over an 8-week period from 7 March – 30 April 2019 with residents, businesses and market traders living and working in Sites A, B & C, the Church Street market infrastructure and the wider Church Street community.

The consultation process was widely publicised with over 6,000 invitation flyers distributed, 160 posters displayed, invitation letters sent to all resident – tenants and leaseholders in Sites A, B & C and invitation e-mails sent to resident's associations, the Neighbourhood Forum, schools, Councillors, the local MP, business forum, Church Street library, community organisations, Central Area Panel and various youth clubs.

During this time, the Council used 35-37 Church Street as a consultation base from which it hosted an exhibition with models and visualisations of the options. It was open every weekday from 10am to 4pm, with some weekend and evening openings. Workshops and themed drop-in events for engaged resident groups, business forum, market traders and youth groups were also held. A website with consultation information was also set up.

The consultation team also visited local schools and community organisations. Meetings were held with stakeholders including the committee of the Church Street Ward Neighbourhood Forum, ward Councillors, Church Street library etc.

All residents on the three sites were door-knocked to inform and encourage participation. Targeted door-knocking exercise was also undertaken to engage with the underrepresented sections of the community.

A total of 236 people attended the exhibition and 75 people attended the themed drop-ins and workshops. A total of 165 people provided written feedback including 100 respondents living on Sites A, B & C.

5.2 Findings from the public consultation

This section summarises the key findings of the consultation on Sites A, B and C and Lilestone as reported in the Consultation report (May 2019) including issues associated with groups with protected characteristics.

Overall, consultation responses indicated strong support for regeneration of Church Street Sites A, B & C. When taking in to account the responses to both the general and detailed views on the options, alongside written support from stakeholders, and the poster campaign, the community displays a slightly higher preference for Option 3. The majority of respondents 63% of respondents thought Option 3 met or exceeded the needs of the community and this was the highest scoring of all of the options, the response rate amongst social housing tenants was even higher at 73%.

5.2.1 Consultation with residents

Many residents expressed support for change while also communicating concern about the level of disruption and the impact this would have on them individually and on the community.

A key theme from discussions with residents was frustration at the perceived slow pace of change, linked with the fact that the uncertainty that this created was unsettling.

Within the individual buildings in Church Street Sites A, B and C, a majority of the residents who took part in the consultation acknowledged that these buildings were no 'longer fit for purpose'. They specifically cited issues with:

- access;
- heating and ventilation; and
- anti-social behaviour.

However, there was a strong view from residents living in Kennet House that this building had merit, that those living there wanted to stay and that it should be retained.

Where residents were social tenants, concerns were primarily focused on when they might have to move and exactly what alternative accommodation they would be offered.

A number of social tenants were very specific in their questioning, seeking specific information about the blocks that they might move to and the precise sizes of any new homes.

In addition to concerns about moving, some older residents were specific in saying their existing homes were not suitable for the following reasons:

- the lack of lift access;
- unable to bathe;
- difficulties using their toilets; and
- the heating system.

5.2.2 Consultation with Ward Councillors

The three Church Street Ward Councillors submitted a detailed written response to the consultation. The key points raised were:

- The library should retain its own discrete site on Church Street itself. Church Street should not just be for retail/hospitality”.
- Concerns about the future location of Westminster Adult Education Services, stating that this must remain in Church Street Ward.
- They requested current Church Street residents must be given priority over the social and intermediate homes that are built. Leaseholders who wish to remain must also be supported to do so.
- They favour a modified version of Option 3. However, they raised concerns about the increased density and note that it is ‘disappointing that the Council is not being more ambitious in its allocation of social and genuinely affordable housing’.
- They questioned the calculations put forward in the consultation in relation to social housing. They state that the ‘figures should represent how many affordable homes are delivered on the uplift in numbers.

5.3 Pre-Planning Consultation (2021)

A pre-planning consultation was undertaken in two stages, first over 4 weeks from 3rd March-31st March 2021 and second, over a 4-week period from 30 June – 28 July 2021, with residents, businesses and market traders living and working in Sites A, B and C, the Church Street market infrastructure and the wider Church Street community. The second round of Pre-Planning Consultations have concluded.

The consultation process was widely publicised with invitation flyers distributed, posters displayed, and invitation letters sent to all residents (tenants and leaseholders both) in Sites A, B and C, along with invitation e-mails sent to resident’s associations, the Neighbourhood Forum, schools, Councillors, the local MP, business forum, Church Street library, community organisations, Central Area Panel and various youth clubs. The Council also organised webinars and set up a pop-up stand on Church Street Triangle following the easing of Covid-19 restrictions, in order to offer local community members an opportunity to interact with Council representatives in person. A website providing consultation information and an opportunity to provide feedback was also available.

At present, findings from the online consultation are available and these are presented below.

5.4 Findings from Public Consultation

This section summarises the key findings of the consultation on Sites A, B and C in March and June-July 2021. The consultation findings are presented online at churchstreetdesign.commonplace.is, where all comments from respondents are displayed under the various sections.¹⁸

5.4.1 March 2021

In March 2021, the online consultation process involved gathering feedback using five main themes, presented as individual webpages online. These are:

- Tell us how you feel about the renewal proposals
- SITES A, B & C – New homes
- SITES A, B & C – Shops and markets
- SITES A, B & C – Health and Wellbeing
- SITES A, B & C – Getting around

Each webpage roughly received between 260-300 comments. Overall, initial consultation responses indicated strong support for regeneration of Church Street Sites A, B and C.

The main issues highlighted through feedback are summarised in Table 5-1 below.

Table 5-1: Online Consultation Feedback (March 2021)

Consultation Theme	Number of Responses	Question Asked	Main Issues
Tell us how you feel about the renewal proposals	265	How informed do you feel about the renewal plans for Church Street Sites A, B & C? Please mark on a scale from 1 to 5 (5 feeling most informed)	Most respondents answered 5, however, there was still a small percentage of individuals that marked 3 and lower.
SITES A, B & C – NEW HOMES	296	Which elements from the list are most important to you about the design?	Most respondents stated 'generous outdoor spaces including balconies' was very important aspect of development along with dual aspect windows to maximise light and air. Several comments also highlighted concerns about buildings being too tall and close together, which they felt might lead to a huge density of construction and affect Church Street's character.
SITES A, B & C – SHOPS & MARKETS	274	What aspects of the shops and markets proposals do you think are most important?	Most respondents answered improved pitches and facilities for traders, increased market spaces, new retail space and wi-fi to be the most important aspects of the proposals. Some respondents commented that shopkeepers may not be able to afford new rents in the development's units, while others highlighted that too much change might change the character of Church Street altogether.
SITES A, B & C – HEALTH AND WELLBEING	277	What features would you most like to see in new proposed green spaces?	Most respondents answered play spaces, outdoor fitness spaces and seating areas were key features they would like to see. However, the height of buildings remained a prominent concern even for those commenting on the health and

¹⁸ Church Street Consultation Feedback (2021) <https://churchstreetdesign.commonplace.is/>

Consultation Theme	Number of Responses	Question Asked	Main Issues
			wellbeing proposals, as some respondents felt a lack of natural light could create a “dark, gloomy” atmosphere.
SITES A, B & C – GETTING AROUND	265	Which features do you feel are the most important for ensuring residents and visitors can move around the area easily and safely?	Respondents largely felt safety, comfort and security both in terms of making routes brighter and through better parking and cycling routes to be important issues. However, a few respondents commented on the perceived ‘overdevelopment’ of Church Street and on the need for a clean, safer market selling good quality products.

5.4.2 June-July 2021

Online consultation in June 2021 followed the same structure as the consultation conducted in March, and involved five main webpages, presented as follows:

- How do you feel about the regeneration plans?
- Getting Around
- Health and Wellbeing
- Shops and Markets
- New Homes

Each section received between 250-270 comments. Overall, initial consultation responses indicated strong support for regeneration of Church Street Sites A, B and C.

The main issues are summarised in Table 5-2 below.

Table 5-2: Online Consultation Feedback (June-July 2021)

Consultation Theme	Number of Responses	Question Asked	Main Issues
How do you feel about the regeneration plans?	256	How informed do you feel about the renewal plans for Church Street Sites A, B & C? Please mark on a scale from 1 to 5 (5 feeling most informed)	While most respondents answered either 4 or 5, however, there was still a small percentage of individuals that marked 3 and lower.
Getting Around	255	How do you feel about our proposals to make cycling safer and easier?	Respondents largely answered ‘positive’ to the question posed. There were some neutral and negative comments, including safety concerns with increased cycling, and concerns around parking.
Health and Wellbeing	267	How do you feel about our proposals to care for the environment?	Most respondents answered positive to the question asked, with few commenting neutral or somewhat positive. There were few additional comments on health and safety, and in the rare cases that additional comments were provided, they had to do

Consultation Theme	Number of Responses	Question Asked	Main Issues
			with public toilets being clean and with rubbish collection and control.
Shops and Markets	266	How do you feel about our plans to make the market cleaner and more welcoming?	Most respondents answered 'positive' to the question asked, with few commenting neutral or somewhat positive.
New Homes	265	Following feedback, we have provided more detail about how the new buildings fit within the area. Looking at the booklet, how do you feel about proposals for the new buildings?	Most respondents answered 'positive', showing a change from the issues with tall buildings that were raised in the previous consultation. Further comments left by respondents included questions about how rough sleepers will be included in the new development homes and about how despite the new plans, the planned buildings may still be too tall for a narrow street.

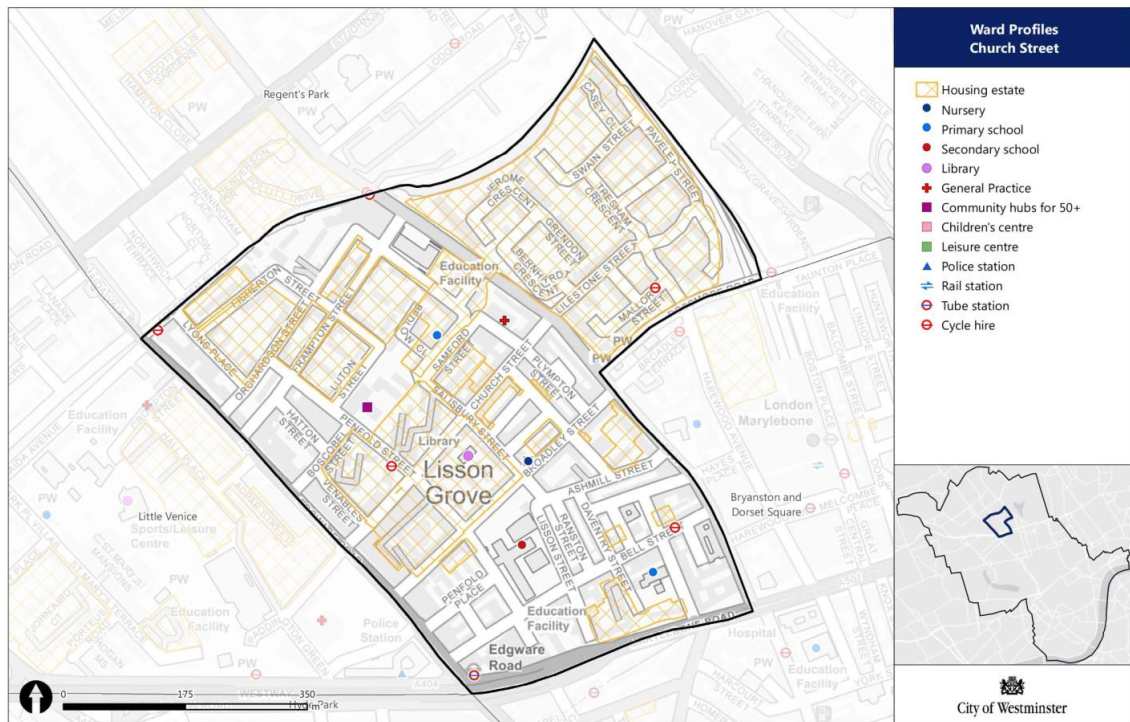
6. Equalities Baseline

6.1 Introduction

A baseline profile of the population living and working within the study area is necessary for the identification of potential equality impacts in order that an assessment can be made as to the potential level of impact the regeneration may have on groups with protected characteristics.

The section outlines the equalities baseline relevant to the proposed regeneration. This includes analysis of Census 2021 data and other datasets from the Office for National Statistics (ONS) for the Church Street Ward (see Figure 6-1), for Westminster borough and for London. Wherever possible the most recently available data is presented at all geographical levels relevant to the study area.

Figure 6-1 Church Street Ward



6.2 Protected characteristics

6.2.1 Population

According to 2021 Census data, Church Street Ward is home to 11,670 people. As shown in Table 6-1, the population of Church Street almost doubled between 2001 and 2021, increasing at a significantly higher rate in comparison to Westminster and London growth rates.

Table 6-1 Population growth 2001 - 2021¹⁹

Year/Population	Church Street	Westminster	London
2001	6,490	181,286	7,172,036
2011	11,760	219,396	8,173,941
2021	11,670	204,236	8,799,728
% Change	+79.8%	+12.7%	+20.2%

¹⁹ ONS: Census 2001: Usual resident population (KS001); Census 2011: Population Density 2011 (QS102UK); Census 2021: Number of usual residents in households and communal establishments (TS001). All available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp>

Source: ONS Census 2001, 2011 and 2021

6.2.2 Age

Table 6-2 outlines age breakdown across the different geographical areas encompassed within the baseline area. This shows that Church Street has the highest proportion older people (12.5% aged 65 and over) compared to Westminster (12.1%) and London (11.9%). The proportion of residents aged 0 – 15 years old across the Church Street ward (16.9%) is higher than for Westminster (13.2%) but not London (19.2%).

Table 6-2 Age breakdown (%) by different geographical areas²⁰

Age (years)	Church Street	Westminster	London
0-15	16.9	13.2	19.2
16-64	70.6	74.8	68.8
65 and over	12.5	12.1	11.9

Source: ONS Census 2021

Greater London Authority (GLA) Population Projections estimate that by 2040, the proportion of 0-15-year-olds living in Westminster will decrease by approximately 5% on 2017 levels, while it will increase by 38% in Church Street. The working age population of 16-64-year-olds is projected to increase over the same period by 13% and 61% in Church Street. The greatest population increase is expected in the 65 and over age group, which will increase considerably. Westminster's population aged 65+ is projected to increase by 43% over 20 years and the population aged 85+ is projected to double in the same timeframe. The population of Church Street is also projected to increase considerably on 2017 levels, by 70% and 94% respectively.²¹

6.2.3 Disability

The proportion of residents at ward level in the 2021 Census who reported that their day-to-day activities were limited a lot (11.6%) was higher than the Westminster average of 6.5% and the London average of 5.7%. The proportion of residents with day-to-day activities limited a little is also higher (9.6%) than across the borough (7.3%) and London (7.5%). Correspondingly, the proportion of residents who reported they had no long term physical or mental health condition was lower in Church Street (75.3%) compared to Westminster (81.5%) and London (81.5%).

Table 6-3 Limiting long-term illness or disability (%) by different geographical areas²²

Level of disability	Church Street	Westminster	London
Day-to-day activities limited a lot	11.6	6.5	5.7
Day-to-day activities limited a little	9.6	7.3	7.5
No long term physical or mental health condition	75.3	81.	81.5

Source: ONS Census 2021

According to the Department for Work and Pensions (2018) Church Street has approximately twice the percentage of Disability Living Allowance Claimants (4.3%) than Westminster (2.1%) and London (2.2%).

Church Street ward also has the fourth highest prevalence of people with learning disabilities (0.41) amongst its population of all wards within Westminster.

²⁰ ONS (2021) Census 2021: TS007 Age by single year. Available at:

<https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?theme=93&subgrp=Topic+Summaries>

²¹ GLA Population Projections - Custom Age Tables, (2017); available at: <https://data.london.gov.uk/dataset/gla-population-projections-custom-age-tables/resource/4c7f998b-ae3a-4558-8ae1-b976a2b16382/download> and https://files.datapress.com/london/dataset/gla-population-projections-custom-age-tables/2018-04-06T13:55:51.53/Ward_Housing_led_projection_age_range_creator_2016.xls, accessed April 2019.

²² ONS (2021). Census 2021: TS038: Disability. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/dataset/gla-population-projections-custom-age-tables)

Additionally, disability with regards to this assessment also include people who have progressive conditions such as HIV, Cancer, MS. In these cases, people with these conditions may still be able to carry out day to day activities but face certain requirements with regards to accessing services such as health-care and support networks. There is currently insufficient data to know the prevalence of these progressive conditions amongst Church Street residents.

6.2.4 Gender reassignment

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 6-4.

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.

Table 6-4 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

Source: ONS Census 2021

Trans people are at greater risk of being victims of hate crime. Increased footfall and natural surveillance as a result of Site A redevelopment will potentially reduce incidences of hate crime and boost the confidence of LGBTQ+ people.

6.2.5 Marriage and civil partnership

Table 6-5 outlines the legal partnership status of residents across the three geographies. Church Street ward has the highest proportion of residents who have never married, at 54.7%, a marginally higher level than for the whole of Westminster 54.4%, and significantly higher than for London, 46.2%. Correspondingly, Church Street ward has the lowest proportion of residents who are married, at 28.7%, followed by Westminster 31.7%, and London 39.7%. Church Street ward has the highest proportion of widowed residents (5.1%), compared to London (4.2%) and Westminster (3.4%).

Table 6-5 Legal partnership status (%) by geographical area, 2021²⁴

Legal partnership status	Church Street Ward	Westminster	London
Never married	54.7	54.4	46.2
Married: opposite sex	28.4	31.1	39.3
Married: same-sex	0.3	0.6	0.4
In a registered civil partnership: opposite sex	0.1	0.1	0.1
In a registered civil partnership: same-sex	0.1	0.4	0.2

²³ ONS (2021). Gender identity (detailed) (TS070). Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/census/2021/ts070)

²⁴ ONS (2021) Census 2021: TS002 – Legal partnership status. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/census/2021/ts002)

Legal partnership status	Church Street Ward	Westminster	London
Separated	3.5	2.4	2.3
Divorced	7.8	7.6	7.3
Widowed	5.1	3.4	4.2

Source: ONS Census 2021

6.2.6 Pregnancy and maternity

Table 6-6 provides a breakdown of the different household compositions and the proportions of different household types with dependent children. Church Street (10.2%) has the highest proportion of lone parent family households with dependent children, compared to married or civil partnership households with dependent children. This proportion of households is significantly higher than the level across Westminster (5.3%).

Church Street also has high proportions of other household types with dependent children at 6.1%.

Table 6-6 Household composition and lone-parent households (%) by geographical area, 2021²⁵

Household composition	Church Street Ward	Westminster	London
Single family household	47.7	45.6	58.0
Single family household: Married or civil partnership couple: Dependent children	9.4	9.9	15.8
Single family household: Cohabiting couple family: With dependent children	2.2	1.3	3.0
Single family household: Lone parent family: With dependent children	10.2	5.3	7.8
Other household types	15.4	11.7	12.7
Other household types: With dependent children	6.1	2.5	4.7

Source: ONS Census 2021

Pregnant women can be more susceptible to experience negative effects associated with development and the built environment. For example, pregnant women can be more susceptible to poor air quality, which can have a negative impact on birth weight. Pregnant women will also need good access to health care facilities, particularly towards the latter stages of pregnancy. Accessibility is therefore an important issue for this group. With regards to income, housing and wellbeing, young mothers (and fathers) may be more likely to suffer from deprivation and struggle to find affordable housing.

6.2.7 Race

Table 6-7 shows that although the largest ethnic group in the area, the proportion of White British residents at the ward level (17.2%) is considerably lower than both Westminster borough (28.0%) and London (36.9%) rates. The proportion of 'Other' white residents (14.2%) is also lower than in the borough (24.6%) and London (14.7%).

The proportion of Black African residents (8.8%) in the ward is higher than in Westminster (8.1%) but only slightly higher than the London average (7.9%).

Church Street also has a significantly large proportion of Bangladeshi residents (16.4%) compared with Westminster and London (both 3.7%). There is also a large presence of Arab residents (15.6%) compared with the averages for Westminster (7.6%) and London (1.6%). These figures indicate a concentration of the Arab minority in Westminster, particularly represented in the Church Street area, together with a concentration of the Bangladeshi minorities in this particular area.

²⁵ ONS (2021). TS003 – Household composition. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

Table 6-7 Ethnic groups (%) by different geographical areas²⁶

Ethnic group		Church Street	Westminster	London
White	British	17.2	28.0	36.8
	Irish	1.1	1.8	1.8
	Gypsy or Traveller	0.0	0.0	0.1
	Roma	0.5	0.7	0.4
	Other	14.2	24.6	14.7
Mixed/ Multiple Ethnic Groups	White and Black Caribbean	1.0	1.0	1.5
	White and Black African	1.2	1.0	0.9
	White and Asian	0.9	1.8	1.4
	Other	2.2	2.7	1.9
Asian/ Asian British	Indian	1.8	3.9	7.5
	Pakistani	1.3	1.2	3.3
	Bangladeshi	16.4	3.7	3.7
	Chinese	2.1	3.2	1.7
	Other	4.3	4.7	4.6
Black/ African/ Caribbean/ Black British	African	8.8	8.1	7.9
	Caribbean	2.3	2.1	3.9
	Other Black	0.8	0.8	1.7
Other Ethnic Group	Arab	15.6	7.6	1.6
	Other	8.4	5.9	4.7

Source: ONS Census 2021

In terms of nationality, less than half (47%) of Church Street residents were born in the UK, 1.5% were born in Ireland, 8.8% were born in the EU and 42.5% were born outside of the EU (Census 2011). EU nationals have arrived mainly from 2001 member countries (6.8%) and from accession countries (2%).²⁷

The GLA produces ethnic group population projections which are updated annually at both local authority and ward level. The Ethnic Group population projections disaggregate the GLA's borough-level population projections into ethnic groups. The outputs have been produced for 17 ethnic groups. Table 6-8 summarises the 2016-based housing-led projected ethnic population for Westminster. The Bangladeshi and Black African population, which form a significant proportion of Church Street's population, are expected to decrease. The White British and Arab population, another large group in Church Street are projected to increase, with the largest increase in Westminster experienced by the Arab population.

²⁶ ONS (2021). Census 2021: TS021 – Ethnic group. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/dataset/ts021)

²⁷ City of Westminster (2018) Church Street Ward Profile 2018. Available to download online.

Table 6-8 Ethnic group projections - Westminster

Ethnic Group	2011	2016	2021	2031	2041	2016-41 # Change	2016-41 % Change
All persons	219,582	247,614	262,317	275,466	285,280	37,666	15%
White British	77,474	73,967	77,267	81,550	83,931	9,964	13%
White Irish	4,977	4,860	4,555	4,144	4,041	-819	-17%
Other White	53,066	71,564	77,738	82,529	86,671	15,107	21%
White & Black Caribbean	1,868	1,682	1,546	1,392	1,355	-327	-19%
White & Black African	1,931	2,174	2,202	2,128	2,121	-53	-2%
White & Asian	3,585	4,424	4,776	4,826	4,889	465	11%
Other Mixed	4,013	5,093	5,616	5,881	6,000	907	18%
Indian	7,214	8,419	9,055	9,619	10,063	1,644	20%
Pakistani	2,328	2,607	2,731	2,816	2,867	260	10%
Bangladeshi	6,293	6,296	5,716	4,604	3,972	-2,324	-37%
Chinese	5,893	5,803	5,881	5,898	6,016	213	4%
Other Asian	10,109	12,623	13,663	14,675	15,407	2,784	22%
Black African	9,138	9,994	10,491	11,001	11,350	1,356	14%
Black Caribbean	4,458	3,974	3,509	2,954	2,712	-1,262	-32%
Other Black	2,884	2,955	2,909	2,829	2,803	-152	-5%
Arab	15,728	20,518	22,892	25,518	27,158	6,640	32%
Other Ethnic Group	8,623	10,660	11,769	13,104	13,924	3,264	31%
BAME	84,065	97,222	102,756	107,243	110,637	13,415	14%
White	135,517	150,391	159,560	168,223	174,643	24,252	16%

Source: GLA 2016-based housing-led ethnic group projections

6.2.8 Religion or belief

The proportion of Muslim residents in Church Street (48.6%) is significantly higher than across all geographies (20.0% in Westminster and 15.0% in London), while all other religions are less represented. The proportion of respondents reporting No Religion is lower in Church Street (14.9%) compared to Westminster (25.9%) and London (27.1%).

Table 6-9: Religion or belief (%) by geographical area²⁸

Religion	Church Street	Westminster	London
Christian	26.6	37.3	40.7
Buddhist	0.8	1.3	0.9
Hindu	0.8	2.2	5.1
Jewish	0.5	2.8	1.7
Muslim	48.6	20.0	15.0
Sikh	0.1	0.3	1.6
Other religion	0.5	0.9	1.0
No religion	14.9	25.9	27.1
Religion not stated	7.1	9.4	7.0

²⁸ ONS (2021). Census 2021: TS030 – Religion. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk/dataset-selection-query)

Source: ONS Census 2021

6.2.9 Sex

Church Street has a slightly higher proportion of female residents (52.2%) compared to males (47.8%). A similar trend is observed nationally.²⁹

6.2.10 Sexual orientation

Table 6-11 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 6-10: Sexual orientation (%) in Westminster and London³⁰

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

Source: ONS Census 2021

People who identify as LGBTQ+ are at greater risk of being victims of hate crime³¹. Increased footfall and natural surveillance as a result of Site A redevelopment will potentially reduce incidences of hate crime and boost the confidence of LGBTQ+ people.

6.3 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.

6.3.1 Deprivation

According to the English Indices of Deprivation 2019 (IoD2019), Church Street³² is primarily located in one of the 20% most deprived Lower Super Output Areas in England and Wales. It is also within:

- The top 10% most deprived areas nationally for the 'wider barriers' sub-domain which includes issues relating to access to housing such as affordability and homelessness;
- The top 5% most deprived areas nationally for the 'outdoors' living environment sub-domain which contains measures of air quality and road traffic accidents;
- The top 10% in terms of employment deprivation which measures the proportion of the working age population in an area involuntarily excluded from the labour market; and

²⁹ ONS (2021). Census 2021: TS008 – Sex. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

³⁰ ONS (2021). Sexual orientation (detailed) (TS079). Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

³¹ True Vision (2022). Sexual Orientation Hate Crime. Available at: [Sexual Orientation & Transgender Hate Crime - True Vision \(report-it.org.uk\)](#)

³² For the purpose of this report deprivation in Church Street will refer to the Lower Super Output Area (LSOA) named Westminster 009K

- The top 20% most deprived areas for crime deprivation which measures the risk of personal and material victimisation at the local level.

Furthermore, in terms of income deprivation Church Street is amongst the top 10% most deprived nationally. Supplementary indices for deprivation also rank Church Street:

- 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; and
- In the top 5% most deprived areas nationally for Income Deprivation Affecting Older People Index (IDAOPI) which measures the proportion of those aged 60+ who experience income deprivation.

6.3.2 Employment

According to 2021 census data, 40.9% of Church Street residents are economically active and in employment, 5.2% are economically active and unemployed, and 50.3% are economically inactive. Levels of unemployment in Church Street are slightly greater than in Westminster (4.0%) and London (4.1%).³³

Table 6-11 presents a detailed breakdown of employment sectors by geographical area. This highlights that there is a higher proportion of employee jobs in elementary and caring, leisure and service occupations and a lower proportion in highly skilled jobs within Church Street compared to Westminster and London.

Table 6-11 Employee jobs by broad sector group (%) across different geographical areas³⁴

Occupation	Church Street	Westminster	London
Managers, directors, senior officials	12.1	22.5	14.6
Professional occupations	20.1	30.6	25.8
Associate professional & technical occupations	13.6	17.3	15.3
Administrative & secretarial occupations	8.8	6.6	8.5
Skilled trades occupations	6.9	3.4	7.5
Caring, leisure & other service occupations	10.2	6.1	7.7
Sales & customer service occupations	11.2	5.1	6.3
Process plant / machine operatives	5.7	2.7	5.0
Elementary occupations	11.5	5.7	9.2

Source: ONS Census 2021

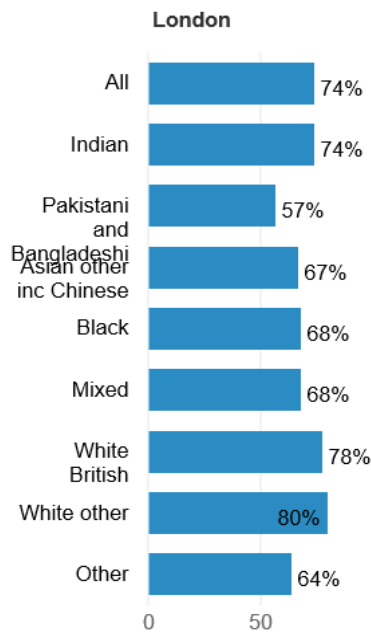
Figure 6-2 shows the percentage of people aged 16-64 years in employment within each ethnic group for London in 2017³⁵. This shows a lower rate of employment for BAME groups (except Indian). Furthermore, employment rates for people aged 16-25 are lower than the overall population and the disparity between ethnic groups is even greater.

³³ ONS (2021). TS066 – Economic activity status. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

³⁴ ONS (2021). TS063 – Occupation. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

³⁵ Racial Disparity Unit (2018) <https://www.ethnicity-facts-figures.service.gov.uk>

Figure 6-2 Percentage of people aged 16 to 64 years in employment within each ethnic group



Source: Racial Disparity Unit (2019) <https://www.ethnicity-facts-figures.service.gov.uk>

6.3.3 Education

Education attainment (Table 6-12) at ward level for Church Street shows a significantly higher percentage of residents with no qualifications (25.2%) relative to London as an average (16.2%) and Westminster (12.9%).

Correspondingly, the proportion of residents with level 4 qualifications and above in Church Street (37.0%) is lower than the London average of 46.7% and Westminster of 57.7%.

Table 6-12 Educational attainment (%) by different geographical areas³⁶

Educational attainment	Church Street	Westminster	London
No qualifications	25.2	12.9	16.2
Level 1 qualifications	8.1	4.9	7.7
Level 2 qualifications	9.4	6.9	10.0
Apprenticeship	2.7	2.1	3.2
Level 3 qualifications	14.3	12.4	13.2
Level 4 qualifications and above	37.0	57.7	46.7
Other qualifications	3.3	3.2	3.1

Source: ONS Census 2021

There are no schools within the immediate regeneration site, however there are several schools located within Church Street ward. These include the following primary schools: Gateway Primary School, St Edward's Catholic Primary School, Christ Church Bentinck CofE Primary School, Paddington Green and Portman Early Childhood Centre. Secondary schools include Ark King Solomon Academy, Paddington Academy, St. Marylebone and North Westminster Community School.

³⁶ ONS (2021). TS067 – Highest level of qualification. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

Table 6-13: Estimated Walking Distance

School Name	Walking Distance from Church Street
Gateway Primary School	6 min (0.3 mile)
St Edward's Catholic Primary School	6 min (0.3 mile)
Christ Church Bentinck CofE Primary School	7 min (0.3 mile)
Paddington Green	4 min (0.2 mile)
Portman Early Childhood Centre	5 min (0.2 mile)
Ark King Solomon Academy	2 min (0.1 mile)
Paddington Academy	24 min (1.2 mile)
St. Marylebone	21 min (1.1 mile)
North Westminster Community School	22 min (1.1 mile)

Source: Google Maps, 2020

6.3.4 Health

There is a tendency for people belonging to protected characteristic groups, particularly young people, older people, disabled people, and BAME people, to experience poorer health.³⁷

The health of people in Westminster is varied compared with the England average. Westminster is one of the 20% most deprived local authorities in England and about 27% (6,900) of children live in low-income families. Between 2014 and 2016 life expectancy for both men and women was better than the national average.³⁸

Life expectancy of the Westminster population can vary dramatically depending on where people live. Men living in least deprived areas live nearly 17 years longer than men living in the most deprived areas. For women, this gap is nearly 10 years.³⁹

In terms of health issues within the borough, rates of childhood obesity, incidence of tuberculosis, and sexually transmitted infections, are all significantly worse than the England average.⁴⁰

As the population continues to age, the number of people with many chronic conditions is expected to increase. For example, the number of people with diabetes in England is expected to increase in the next two decades from 3.9 million people in 2017 to 4.9 million in 2035. Obesity is a major risk factor for diabetes and a range of other diseases, including heart disease and some forms of cancer, and this number will increase further if the prevalence of obesity also increases.

According to the 2015 Joint Strategic Needs Assessment on Dementia⁴¹, diagnoses of long-term conditions associated with ageing, such as dementia and Alzheimer's, will see an increase of 56% between 2013 and 2033. Furthermore, over 2,600 people in the city will have dementia by 2030. This trend will continue beyond 2030 with over 760 new expected cases of dementia in the city each year⁴². This will have significant implications for health and social care services.

In terms of health facilities in the area there is only one GP and Health Centre in the Church Street area, the Lisson Grove Health Centre. There are four dentists: the Central London Community Healthcare, Church Street Dental Surgery, mydentist, and Inspire Dental Health and one optician: Braham Optician.

³⁷ Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: https://www.equalityhumanrights.com/sites/default/files/how_fair_is_britain_-_complete_report.pdf [accessed January 2018]

³⁸ Public Health England, (2018); *Westminster Health Profile 2018*. Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000007?search_type=list-child-areas&place_name=London [accessed April 2019].

³⁹ Joint Strategic Needs Assessment for Westminster & Kensington and Chelsea (2018); *Highlight Reports*. Available at: <https://arcg.is/0f4jDu> [accessed April 2019]

⁴⁰ Ibid 32

⁴¹ Joint Strategic Needs Assessment (2015) Dementia

⁴² Ibid.

6.3.5 Housing

Westminster's private rented sector is the largest in England, comprising 43% (45,000)⁴³ of properties. Intermediate housing comprises an estimated 1.5% of the stock in Westminster (1,600 homes) while social housing makes up 25% (27,000 homes).

There is an on-going need to increase the provision of affordable housing available to residents in Westminster. In November 2019⁴⁴ there were 7,500 households waiting for affordable housing. This includes:

- 4,500 households waiting for social housing (of which 2,700 are homeless households in temporary accommodation); and
- 3,000 households waiting for intermediate housing.

Due to the shortage of social housing in the borough, households face waiting times (over ten years) in temporary housing before a permanent property is available and up to 25 years for a larger home.

There are approximately 4,950 properties located in Church Street⁴⁵. As highlighted in Table 6-14, according to the 2021 Census, the majority of households in Church Street are social rented households (58.3%). This proportion is significantly higher than observed across both London (23.1%) and Westminster (28.3%).

Table 6-14 Tenure (%) by geographical area, 2021⁴⁶

Tenure	Church Street Ward	Westminster	London
Owned	13.7	27.4	45.2
Shared ownership	0.7	0.7	1.5
Social rented	58.3	28.3	23.1
Private rented	26.0	43.3	30.0

Source: ONS Census 2021

Table 6-15 below shows occupancy rates (based on the ONS definition - number of bedrooms occupied) derived from 2021 Census data. Church Street Ward has a lower rate of overcrowded households in comparison to Westminster and London levels.

Overcrowding is more likely to occur among some protected characteristic groups and is also likely to be more detrimental to people belonging to certain protected groups, for example, young people and disabled people.⁴⁷

Table 6-15 Household overcrowding and under-occupation⁴⁸

	Overcrowded			All households	% Overcrowded
	1 below standard	2 below standard	Total		
Church Street	774	338	1,112	4,545	21.6
Westminster	25,088	11,541	36,629	94,814	10.3
London	927,909	746,047	1,673,956	3,423,890	11.1

Source: ONS Census 2021

⁴³ Westminster Council (2015) Westminster Housing Strategy: Direction of Travel Statement (2015)

⁴⁴ Westminster Council (November 2019)

⁴⁵ Valuation Office Agency (2017)

⁴⁶ ONS (2021). TS054 – Tenure. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

⁴⁷ Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: [How fair is Britain? | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/)

⁴⁸ ONS (2021) TS052 – Occupancy rating for bedrooms. Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2070>

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-occupying if they have more bedrooms than they need.

6.3.6 Transport and connectivity

Church Street benefits from excellent public transport accessibility. Edgware Road Underground Station is in the southwest corner of the area. The station provides access to the Bakerloo Line. A separate Edgware Road Underground Station which accesses the Circle, District and Hammersmith and City Lines, is located three minutes' walk to its southeast. Marylebone Station provides access to the Bakerloo Line and National Rail services.

Most of the site has a Public Transport Accessibility Level (PTAL) rating of 6b; the highest level, emphasising the area's importance as a diverse residential, business and leisure destination for local residents.⁴⁹ However, the rating is fragmented in the north of the site, ranging from 1b (second worst) to 6a (second best).

Despite good transport accessibility and connectivity, Church Street area is bound by large infrastructure which creates clearly defined edges but also act as barriers to accessibility and movement from the neighbourhood.⁵⁰

6.3.7 Public realm and open space

The ability to access and use the public realm is important to ensuring that all members of society are able to participate in their community. However, certain PCGs such as people with a disability and BAME groups are less likely to take part in public life than other sections of the population. For disabled people, public spaces can often be inaccessible due to mobility limitations. Access to the public realm is also important to the provision (and management) of play space for children.

The Partnership Approach to Open Spaces and Biodiversity in Westminster⁵¹ identified that there were over 200 open spaces in the borough, and that public open spaces amount to approximately 822 hectares. Almost one quarter of Westminster's 8.9 square mile area is open and green space, ranging from large, multi-functional areas such as Paddington Recreation Ground to small ornamental gardens, squares and 'pocket parks'. Westminster's 'blue ribbon' waterways are also included – canals and of course the Thames. These assets are supplemented by the five Royal Parks that fall within Westminster – Royal Parks' land accounts for around 80% of the borough's total green space. Finally, there are 21 registered parks and gardens and 85 London Squares in Westminster.

The closest open spaces are Regent's Park (east of the site) and Broadley Street Gardens (within the site). There is also a private open space located within the site. Regent's Canal, to the north-west, provides a linear green route with opportunity for walking, cycling and interaction with nature, providing vital green infrastructure. Currently the Canal is mostly inaccessible directly from the Church Street area due to built development and level changes associated with the Canal. Regent's Park and Hyde Park are two major London parks within a 15–20-minute walk to Church Street, however there is not a clear or direct route to the parks and there is a lack of way-finding and signage.

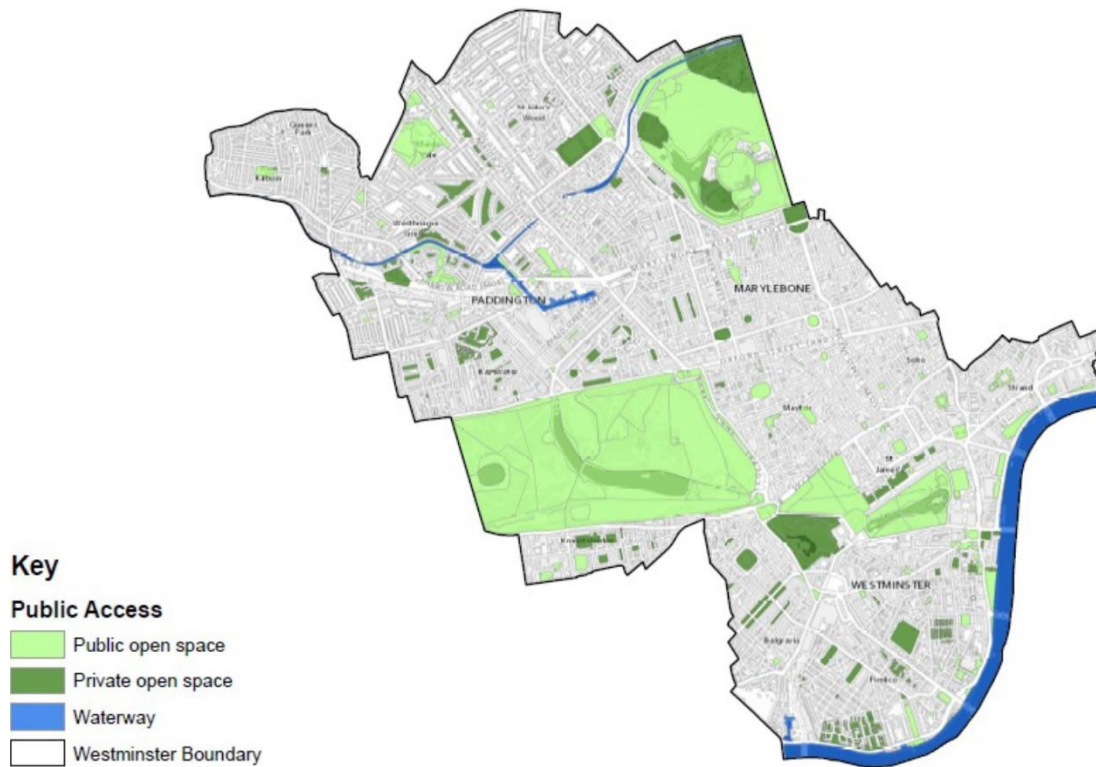
The open and green spaces are listed in the Appendix 1 of the Partnership Approach to Open Spaces and Biodiversity, reproduced below in Figure 6-3.

⁴⁹ Transport for London, (2019); Public Transport Accessibility. Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Type=PTAL&lat=51.52465&lon=-0.17053&locationId=ChIJCyq5s7AadkgR9jqLBFdtbQ&scenario=Base%20Year&input=NW8%20LN&zoomLevel=15&places=Stations%20stops%20and%20piers>, accessed April 2019

⁵⁰ City of Westminster (2017) Church Street Masterplan [online] available at: https://www.westminster.gov.uk/sites/default/files/church_street_masterplan_dec_2017.pdf accessed April 2019

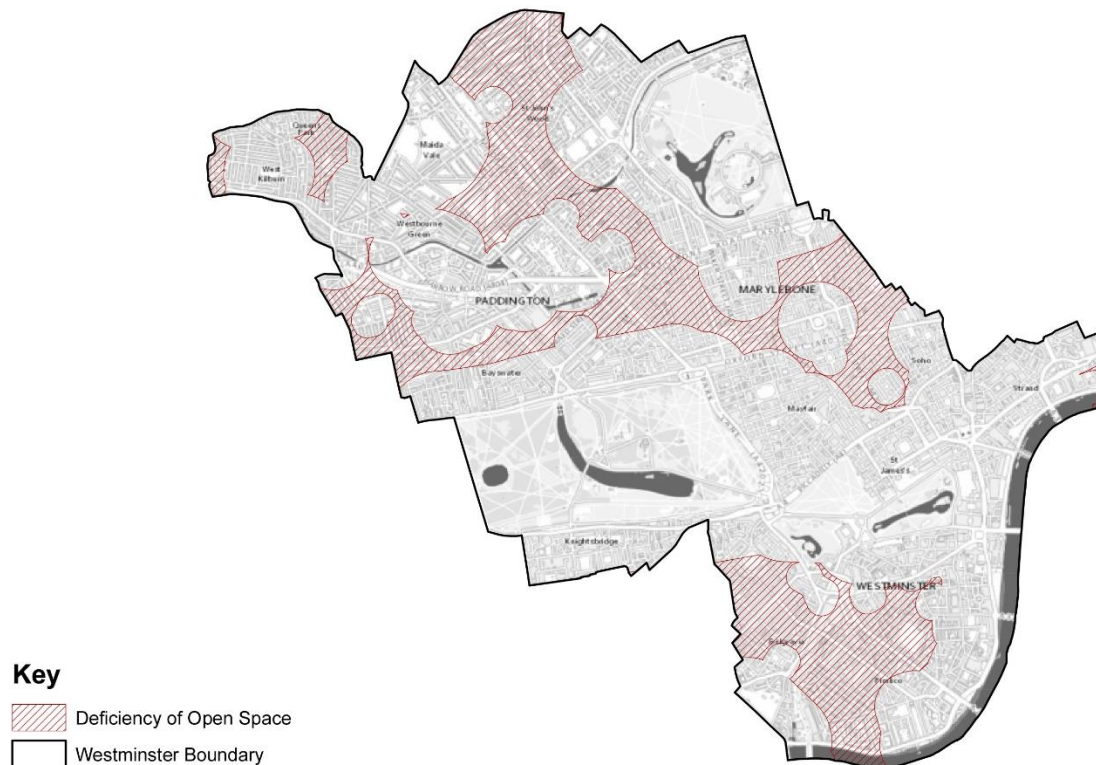
⁵¹ City of Westminster (2019) Open Space and Biodiversity Strategy [online] available at: https://www.westminster.gov.uk/sites/default/files/a_partnership_approach_to_open_spaces_and_biodiversity_in_westminster_-_march_2019.pdf

Figure 6-3 Map of open and green spaces



Despite its proximity to Regent's Park, a large swathe of the area is also classed as being deficient in access to open space, as noted in the Partnership Approach to Open Spaces and Biodiversity in Westminster and as can be seen below in Figure 6-4.

Figure 6-4 Map of open space deficiency areas



People sharing protected characteristics may be disadvantaged if they are unable to access public open space, and for certain protected groups there are considerable advantages associated with access to open space; for example, young and older people are likely to benefit from opportunities for active and passive recreation, and socialising with others.⁵²

6.3.8 Safety and security

The feeling of safety and security within a person's local area is key to ensuring their personal wellbeing. Everyone is vulnerable to feelings of being unsafe, however these may be particularly acute for people belonging to certain protected characteristic groups, including young people, older people, disabled people, women, and people belonging to a particular ethnicity, or sexual orientation.⁵³

The top three reported crimes within Church Street in April 2023 were classed as anti-social behaviour (45) followed by violence and sexual offences (36) and theft from the person (14).⁵⁴

Crime rates in Westminster's wards are influenced by the influx of visitors to the borough. According to the 2017 City Survey, 33% of residents in Church Street perceived anti-social behaviour to be a problem in their area.⁵⁵

6.3.9 Community cohesion

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

According to the City Survey 2017, 87% of the community within Church Street say that people from different backgrounds get on well. 20% of the residents spend time helping to improve the community and 26% are interested in helping more to improve community.⁵⁶

6.3.10 Covid-19 Impacts

Considering the Covid-19 pandemic, it is important to consider the disparate ways in the way in which Covid-19 affects various protected characteristic groups. According to a report by Public Health England (2020), Covid-19 is more likely to affect certain protected characteristic groups, based on factors such as race, ethnicity, age, and deprivation. These characteristics are discussed below in the context of Church Street.⁵⁷

Race and Ethnicity

Health impacts will be experienced differently by different people and communities, and there are strong links between social equity, race, and health. There is evidence that BAME communities are at greater risk of dying from Covid-19.⁵⁸ This is also true for people living in deprived areas, demonstrating the close link between social inequity and health inequalities.

Deprivation

People who live in deprived areas have higher diagnosis rates and death rates than those living in less deprived areas. As per Public Health England, COVID-19 death rates were more than twice as high in the most deprived

⁵² Equality and Human Rights Commission, (2010); *How Fair is Britain?* report. Available at: https://www.equalityhumanrights.com/sites/default/files/how_fair_is_britain_-_complete_report.pdf, accessed January 2018.

⁵³ Equality and Human Rights Commission, (2010); *How Fair is Britain?* report. Available at: <http://www.equalityhumanrights.com/publication/how-fair-britain>, accessed September 2016.

⁵⁴ Metropolitan Police (2023). Church Street. Available at: [Church Street | Your area | Metropolitan Police | Metropolitan Police](#)

⁵⁵ City of Westminster (2018), Church Street Ward Profile. Available at: <https://www.westminster.gov.uk/sites/default/files/church-street-ward-profile.pdf>, accessed April 2019.

⁵⁶ Ibid

⁵⁷ Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf

⁵⁸ See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf

areas as they were in the least poor areas, for both males and females. This is higher than the disparity in mortality rates reported previously, implying that COVID-19 death rates are more unequal. It is possible that high diagnostic rates are attributable to close contact to illnesses or a significant proportion of workers in high-risk occupations. Furthermore, people who are socially excluded, such as those who are homeless or vulnerable migrants, have generally worse health outcomes than other groups, which puts them at the extreme end of the health inequalities spectrum.

This is the result of being exposed to several overlapping risk factors, such as difficulty accessing resources, stigma, and prejudice. People who are socially excluded, for example, are not regularly recorded in computerised records, thereby making them invisible for policy and service planning purposes. Furthermore, recent research shows that socially excluded groups have high levels of morbidity and mortality compounded with multiple and complex needs including overlapping mental and physical ill-health, and substance dependency. These factors put these populations at a greater level of risk from the consequences of emergencies, such as the pandemic. Additionally, a recent study found that in a “do nothing” scenario, 34% of rough sleepers and people presently living in hostels would be infected with COVID-19, leading to over 4,000 hospital admissions⁵⁹

Community Facilities and Open Space

The Covid-19 pandemic has demonstrated the need for access to greenspace and community facilities (such as common spaces to meet and sustain social relationships) to ensure mental and physical well-being, especially for those living in homes without gardens or private greenspaces. Additionally, there is a growing body of evidence on the health benefits of access to such spaces, as it brings with it several benefits, including greater community cohesion and reduced social isolation.

Redevelopment of existing community facilities should be approached with care. It is crucial that important community facilities and services are not lost during redevelopment process since the resulting impact on the health and wellbeing local communities could be serious, especially following the end of Covid-19. Additionally, it may also be prudent to consider the importance of ease of access to open and green space during any future pandemic akin to Covid 19.

Housing

It is as important to consider the impacts of the Covid-19 pandemic on house prices and affordability. In terms of renting, especially in the Private Rented Sector (PRS), rental prices are likely to increase as a larger number of households will be unable to access home ownership, including affordable home ownership products, in the short term. The overall demand for rented housing could increase in the short term and increasing rents may impact several households over the course of the pandemic, and long after it ends. This might also have disproportionate impact on BAME groups that are more likely to rent in the social rented sector and could face increasing costs.

Additionally, it may be the case that older people are more likely to want to remain in their own homes instead of living in care homes given both the recent funding crisis in the care sector and the rise in virus related deaths in care homes.⁶⁰ Furthermore, for those that might still want to access specialist housing, the experiences of pandemic isolation could lead to a greater demand of certain attributes in the types of housing: people are likely to need spacious homes, homes located near green space, homes equipped with smart technology (for those who cannot access carers), and homes located close to community support networks in order to ensure their physical and mental well-being. These factors isolation might affect site allocation for specialist housing, and commercial housing developments in general.

Impacts on Businesses and Employment

The pandemic has affected all business and economic activity, however, it is SMEs and local businesses, including businesses owned by protected characteristic groups, such as BAME owned or female-owned businesses, that have been impacted the most.⁶¹ A 2020 study on the economic impact of COVID-19 on London’s Small and Medium-sized enterprises shows the impact of the pandemic on local employment, and sets

⁵⁹ See: COVID-19 and homelessness in England: a modelling study of the COVID-19 pandemic among people experiencing homelessness, and the impact of a residential intervention to isolate vulnerable people and care for people with symptoms. Lewer D, Braithwaite I, Bullock M, Eyre MT, Aldridge RW. s.l. : medRxiv. 2020.

⁶⁰ Available at: Public Health England (PHE). COVID-19: number of outbreaks in care homes – management information [Online]. 21 May 2020. Available from: <https://www.gov.uk/government/statistical-data-sets/covid-19-number-of-outbreaks-incare-homes-management-information>

⁶¹ Available at Bank Underground (2020) available from: <https://bankunderground.co.uk/2021/07/16/what-do-two-million-accounts-tell-us-about-the-impact-of-covid-19-on-small-businesses/>

forth a plan for recovery.⁶² One key observation from the report is that individuals from BAME communities experienced covid-19 related fatalities higher than other demographic groups, and that individuals from this equality group have also seen disproportionate job losses. Furthermore, the report notes that more jobs in deprived areas were lost than other areas, and that lower wage and lower skilled jobs experienced the greatest percentage declines. In the context of Church Street, being a neighbourhood with high levels of deprivation and high percentages of BAME groups, it is likely the economic impacts of covid-19 were experienced strongly by several community members, including local businesses.

⁶² See: <https://data.london.gov.uk/dataset/economic-impact-of-covid-19-sme>

7. Primary research - Church Street residents

7.1 Introduction

This section provides an overview of Church Street Residents using the Housing Needs Assessment (HNA) conducted by Westminster Council for 541 households located in sites A, B and C and Lillestone Street and Lisson Grove in Autumn 2018.

The HNA assessed data from the Council's Orchard system which stores data on housing and tenancy types as well as limited demographic data relating to tenants and leaseholders where available. In addition, an HNA survey was undertaken directly with households in sites A, B and C and Lisson Grove. The survey was undertaken with:

- Council tenants;
- Registered provider tenants;
- Homeless households living in temporary accommodation provided by the Council;
- Private tenants i.e. of non-resident leaseholders;
- Resident leaseholders; and
- Non-resident leaseholders.

The survey received a response from 299 households; an overall response rate of 55% (please note that this also includes 16 households located in the Lisson Grove area).

Overall, 287 responding to the HNA provided their ethnicity and the responses, showing a range of wide range of ethnic origin groups living the area, are shown in Table 7-1. The highest concentrations of ethnic groups amongst were white British (21.6%), Arab (9.1%) and African (7%).

Table 7-1 Ethnicity of residents

Ethnicity	Number of respondents
Afghanistan	2 (0.7%)
African	20 (7.0%)
Algerian	1 (0.3%)
Arab	26 (9.1%)
Armenian	1 (0.3%)
Asian	1 (0.3%)
Asian British	3 (1.0%)
Any Other Asian Background	3 (1.0%)
Any Other White Background	1 (0.3%)
Assyria	1 (0.3%)
Bangladeshi	18 (6.3%)
Bangladeshi, British Bangladeshi	1 (0.3%)
Bengali	2 (0.7%)
Black Africa	1 (0.3%)
Black and White Caribbean	1 (0.3%)
Black British	3 (1.0%)
Black English	1 (0.3%)
Brazilian	1 (0.3%)
British Asian	4 (1.0%)
British Bangladeshi	1 (0.3%)
British Egyptian	1 (0.3%)
British Indian	5 (1.7%)
British Moroccan	2 (0.7%)

Ethnicity	Number of respondents
British Syrian	1 (0.3%)
Caribbean	7 (2.4%)
Chinese	3 (1.0%)
Chinese British	1 (0.3%)
Colombian	1 (0.3%)
East African	1 (0.3%)
Eritrean	1(0.3%)
Ethiopian	1 (0.3%)
Filipino	5 (1.7%)
French	1 (0.3%)
German	1 (0.3%)
Indian	10 (3.5%)
Indian British	2 (0.7%)
Iranian	2 (0.7%)
Iranian/Kurdish	1 (0.3%)
Iraqi	7 (2.4%)
Irish	1 (0.3%)
Italian	3 (1.0%)
Korean	1 (0.3%)
Kosovan/Albanian	1 (0.3%)
Kurdish	3 (1.0%)
Kurdish White Other	1 (0.3%)
Korean	1 (0.3%)
Lebanese	1 (0.3%)
Malaysian	2 (0.7%)
Middle Eastern	1 (0.3%)
Mixed African/European	1 (0.3%)
Middle Eastern	1 (0.3%)
Moroccan	1 (0.3%)
North African	10 (3.5%)
Northern Irish	1 (0.3%)
Other Asian	1 (0.3%)
Other Middle Eastern	7 (2.4%)
Other Mixed Background	2 (0.7%)
Other White Background	1 (0.3%)
Pakistani	1 (0.3%)
Portuguese	1 (0.3%)
Russian	1 (0.3%)
Somali	2 (0.7%)
South American	1 (0.3%)
South East Asian	1 (0.3%)
Spanish	3 (1.0%)
Sri Lankan	2 (0.7%)
Turkish	1 (0.3%)
Ukrainian	1 (0.3%)
White and Asian	1 (0.3%)
White and Black African	3 (1.0%)
White and Black Caribbean	1 (0.3%)
White British	62 (21.6%)

Ethnicity	Number of respondents
White Greek	1 (0.3%)
White European	7 (2.4%)
White European (Kosovan)	1 (0.3%)
White Irish	5 (1.7%)
White Italian	1 (0.3%)
White Welsh	2 (0.7%)
White Middle East	1 (0.3%)
White Other	1 (0.3%)
White Yugoslavian	1 (0.3%)
Yugoslavian	1 (0.3%)
Total responses	287 (100%)

In total, 266 individuals provided their religious beliefs. These responses are shown in Table 7-2 and show that amongst residents 41.7% identify as Muslim, 24.1% as Christian and 14.3% identified as having no religion or belief.

Table 7-2 Religious beliefs of residents

Ethnicity	Number of respondents
Agnostic	1 (0.4%)
Any Other Belief	1 (0.4%)
Atheism	6 (2.3%)
Buddhism	3 (1.1%)
Catholic	14 (5.3%)
Christianity	64 (24.1%)
Church of England	4 (1.5%)
Greek Orthodox	1 (0.4%)
Hinduism	9 (3.2%)
Islam	111 (41.7%)
Jehovah's Witness	2 (0.8%)
Judaism	1 (0.4%)
No Religion or Belief	38 (14.3%)
Orthodox Christian	1 (0.4%)
Roman Catholic	7 (2.6%)
Sikhism	2 (0.8%)
Vaishnav	1 (0.4%)
Total responses	266 (100%)

Of these, 86 households identified how long they had lived in their property. Table 7-3 shows that the majority of households (68.6%) have lived in their property for over 5 years and 47.7% have lived there over 10 years. This indicates that many households are well established in the area.

Table 7-3 Number of years lived in property

Occupancy	Respondents
Less than five years	27 (31.4%)
Between five and ten years	18 (20.9%)
Over ten years	41 (47.7%)
Total responses	86 (100%)

7.2 Residents by tenure

The 541 properties within the HNA include a mixture of tenure types. For this report, the HNA data has been analysed to summarise the current and future housing needs of householders in the area by each of the following groups:

- Resident leaseholders (109).
- Private renters (56); and
- Social housing (Council) tenants (323).

7.3 Resident leaseholders

The HNA identified that as of October 2018 there were 210 private leasehold properties (around 39%) ranging from studios to 4-bedroom flats. Of these leasehold properties 51% are resident leaseholders or family occupied.

Of those leasehold properties 46 (42% of resident leaseholders and 8% of all residents that completed the HNA survey the following information was gained):

- When asked if the leaseholders would consider a move off the estate over 25% said that they would although the majority of these said they would also consider moving back to the estate and buying on the new development.
- No children were recorded as living in the properties from the survey responses received.
- 32% of leaseholders are aged 65 or over – all these leaseholders have owned the lease for 15 years or longer.

7.4 Private renters

Of all leasehold properties 49% are rented out to private tenants. No HNA surveys were undertaken with those renting privately although it is likely that the demographics reflect those living in the area overall.

7.5 Social housing tenants

The HNA identified 323 households as tenants either through secure tenancy agreement with the Council or through a temporary accommodation arrangement (3 households in total). Out of the 323 households, 210 completed the HNA survey. Findings of this survey with social housing tenants are summarised below.

7.5.1 Children

- Of all the tenanted households that responded to the HNA survey, 59 (28% of all respondents) stated that children lived in the property.
- 21% properties are classed as overcrowded. The majority of these properties are home to children.
- 6% of households responding to the survey were single parent households. All these households had other protected characteristics including disabilities or health issues, language barriers.
- 10 households would consider splitting households.
- Five households stated that they receive childcare and 35 (21.3%) households (out of 210 that responded) have children who attend schools nearby. These schools include:
 - Edward Wilson Primary School, Senior St, London W2 5TL;
 - Gateway Academy, 4 Capland Street, Westminster NW8 8LN;
 - Hampden Gurney, Marylebone, London W1H 5HA;
 - Harris Academy, 401 Battersea Park Rd, Battersea, London SW11 5AP;
 - King Solomon Academy, Marylebone, London NW1 6RU;
 - Kings Way College, Grays Inn Rd, London WC1X 8RA;
 - Marylebone Boys' School, Paddington, London W2 1QZ;

- St Augustine School, Oxford Road, London, NW6 5SN;
- St Edwards, Lisson Grove, London NW1 6UH;
- St Mary's, E Row, London W10 5AW;
- St Georges, Lanark Rd, Maida Vale, London W9 1RB; and
- Westminster Academy, Sir Naim Dangoor Centre, 255 Harrow Rd, London W2 5EZ.

7.5.2 Older people

- 48% of households were home to a resident aged 65 or over and 10% of households were home to a resident aged 85 or over.
- Of all respondents aged over 65, 40 stated that English was not their first language with 27 stating that they need some formal or informal translation services.
- Of all respondents aged over 65, 65% had medical issues and 21% needed to use wheelchair or walking aid at least some of the time. 31% receive informal care nearby.
- 62% of respondents aged 65 or over said that they would not consider a move off the estate.

7.5.3 Disability and medical issues

- When asked if anyone in the household had any medical issues, 112 (53%) responded 'yes'. Issues described were wide ranging and including mobility issues, back pain, heart problems, diabetes, depression and autism and many more.
- 76 households (36%) stated that at least one of the occupants of the household was disabled.
- 37 (21.8%) out of 210 that responded stated that their current homes were adapted. These adaptations included:
 - Adaptations to bathroom;
 - Walk in shower;
 - Bars for ease;
 - Hand rails;
 - Bath seat;
 - Disabled toilet;
 - Wet room; and
 - Chair in bathroom.

7.5.4 Preferences and needs regarding the Church Street Regeneration Programme

When social housing residents were asked if they would consider a move off the estate if the regeneration goes ahead, responses were received as follows:

- 43% of respondents answered said they would consider a move;
- 4% of respondents said that they were undecided;
- 30% of respondents said that they would move more than once with the support of a dedicated relocation officer; and
- 19% of respondents said that they would consider a permanent move off the estate.

Preferred areas to move to included Maida Vale, Little Venice, Marylebone, St Johns Wood, Church Street and Paddington. Two residents said they were interested in rehousing out of the borough or London.

8. Primary research - Church Street Market and Local Businesses

8.1 Introduction

Interviews took place with businesses and market stall holders located within sites A, B and C as part of a survey to find out more information about the nature of businesses, business owners and employees affected by the planned regeneration. In total 128 businesses including 83 Church Street market stalls were interviewed between the 14th and 21st May 2019.

In addition, a further 100 on-street interviews were undertaken with customers on Church Street.

This section provides an overview of the findings from both the business and customer surveys.

8.2 Nature of the businesses

The leaseholder status of the businesses surveyed is summarised in Table 8-1. This shows that the majority of respondents to the businesses survey were license holders for a market stall (65.9%). This is followed by those who were the main leaseholder for the property they were occupying.

Table 7-4 Leasehold status of business

Question	Options	Respondents
What is the leasehold status of your premises?	Freeholder	2.4%
	Main leaseholder	21.4%
	Sub-leaseholder	2.4%
	Licence-holder for a market stall	65.9%
	Do not know	7.9%
Response Rate	Answered Question	126
	Skipped Question	2

Table 8-2 summarises the length of time that businesses have operated at the current location. Over 64% of businesses have been at the location for over 6 years and 37% over 10 years which shows that most of the businesses surveyed are well established at the location.

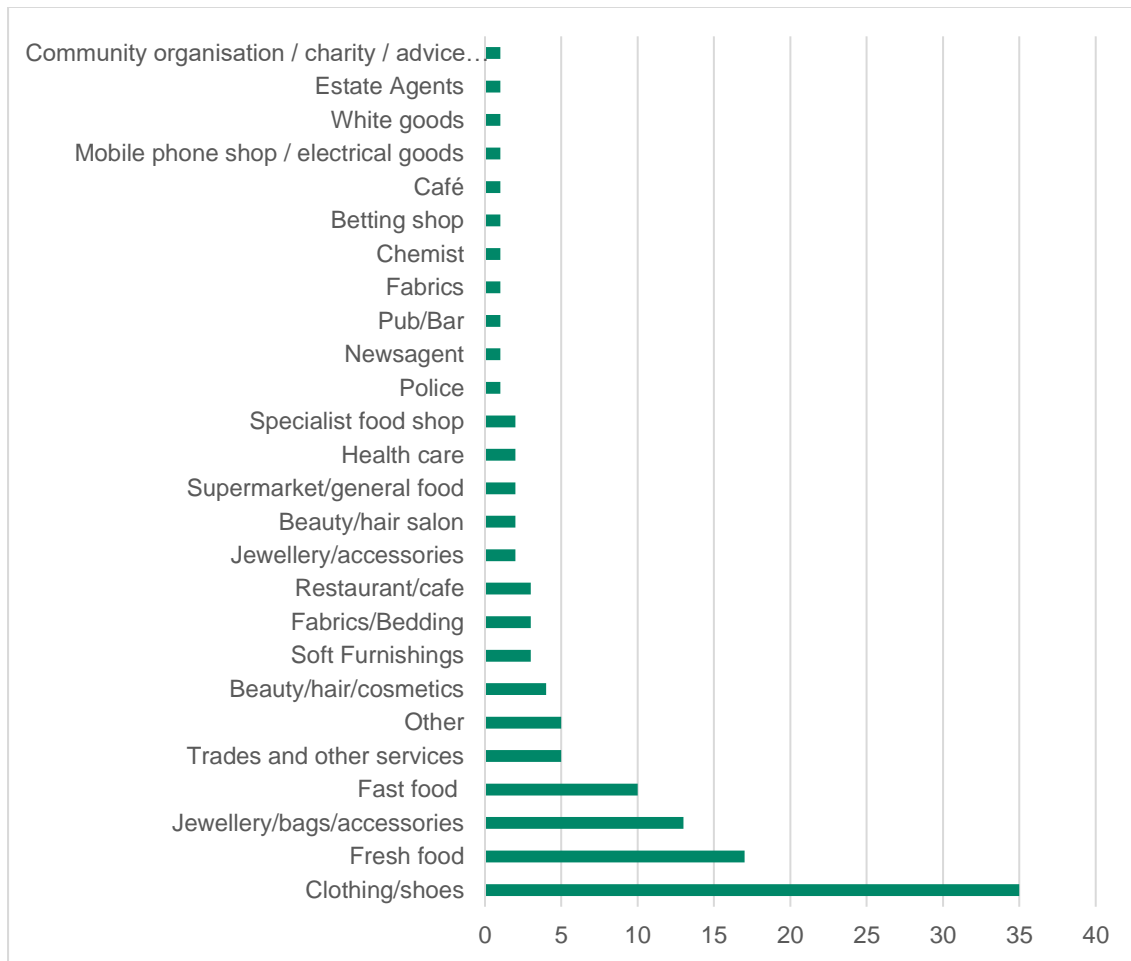
Table 7-5 Length of time in operation

Question	Options	Respondents
How long has the business/organisation operated in its current premises?	Less than 12 months	3.9%
	Between one and two years	7.1%
	Between three and five years	24.4%
	Between six and ten years	27.6%
	More than ten years	37.0%
Response Rate	Answered Question	127
	Skipped Question	1

The majority of businesses interviewed classed themselves as a market stall (67.7%), whereas 19.7% were independent shops or businesses. A further 3.9% classified themselves as a local outlet of a national chain and 2.4% classified themselves as a community organisation. The remaining 6.3% classified themselves as 'other.' Figure 8-1 provides a breakdown of the types of businesses interviewed. Clothes shops, Fresh food shops and

stalls, jewellery, bags and accessories and fast-food shops were the most popular categories. However, the businesses in the area provide a wide range of goods and services.

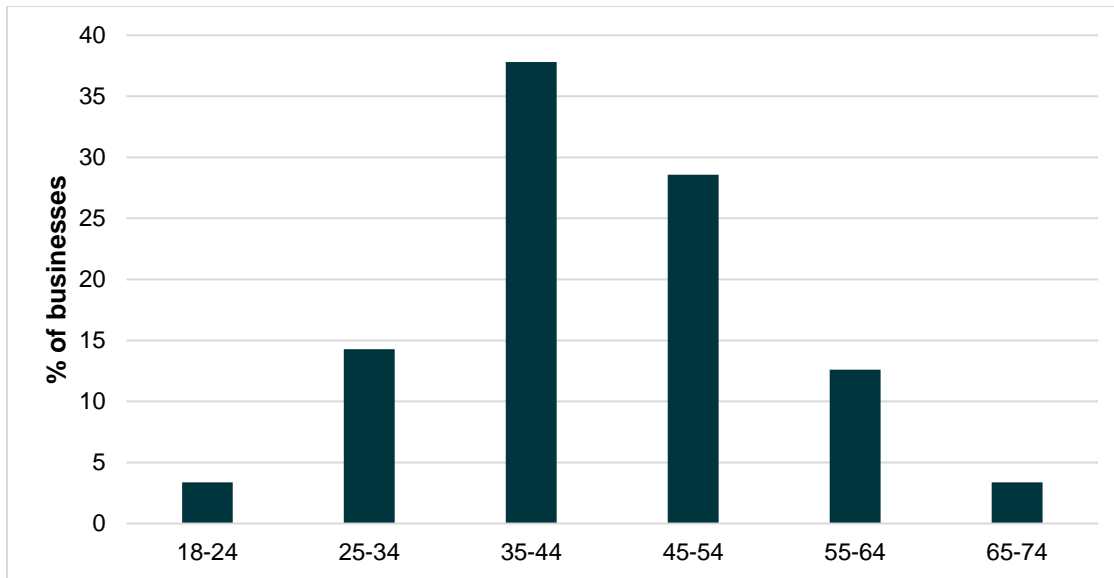
Figure 7-1 Type of existing businesses on-site



8.3 Diversity of business owners/managers

The majority of businesses interviewed were owned by males (89.8%). Figure 8-2 shows the age breakdown of owners and managers in the area indicating that only a small minority of businesses are run by those in the youngest or oldest age categories.

Figure 7-2 Age of business owners/managers



The ethnicity of business owners is shown in Table 8-3. The largest ethnic group amongst business owners and managers was Arab (22.4%). This was followed by Asian/Asian British: Pakistani (12.8%). Overall, BAME groups make up over 80% of business owners on the exiting site.

Table 7-6 Ethnic group of business owner/managers

Question	Options	Respondents
Which of the following ethnic groups do you feel you belong to?	Arab	22.4%
	Asian/Asian British: Pakistani	12.8%
	White: English/Welsh/Scottish/Northern Irish/British	12%
	Other Ethnic Group	11.2%
	Asian/Asian British: Other Asian	8.8%
	Asian/Asian British: Indian	8%
	Black/African/Caribbean/Black British: African	8%
	Asian/Asian British: Bangladeshi	5.6%
	White: Other White	4%
	Black/African/Caribbean/Black British: Other Black	2.4%
	Mixed/multiple ethnic group: White and Black Caribbean	1.6%
	Mixed/multiple ethnic group: Other Mixed	0.8%
	Black/African/Caribbean/Black British: Caribbean	0.8%
	Mixed/multiple ethnic group: White and Asian	0.8%
	Refused/prefer not to say	0.8%
Response Rate	Answered Question	125
	Skipped Question	3

The largest religious group amongst business owners and managers was Islam (69.2%), followed by Christianity (12.6%), Hinduism (5.5%) and Judaism (5.5%).

8.3.1 Employees

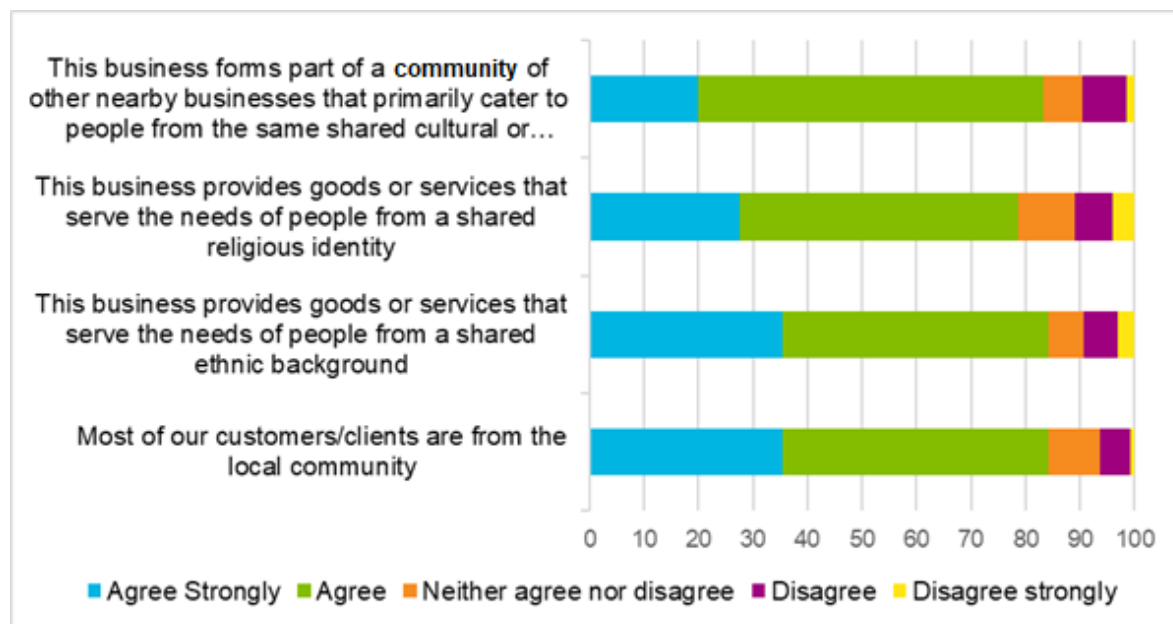
On average the businesses interviewed had two full time employees and two part-time employee which indicating the high presence of small business in the area. Approximately 276, employees worked across the businesses interviewed. When asked about the ethnic groupings of employees, respondents listed:

- Asian/Asian British - 31%;
- Black/African/Caribbean/Black British – 17%;
- Mixed/Multiple Ethnic Groups – 17%;
- Latin American – 13%;
- Arab – 9%; and
- White British/White Other – 13%.

8.3.2 Customers

Businesses were asked to confirm the extent to which they agreed with a set of statements relating to their business and its customers. Figure 8-3 demonstrates that over 70% of businesses agreed or strongly agreed with all statements. The highest level of agreement was with statements relating to customers coming from the local community and serving people from a shared ethnic background.

Figure 7-3 Shared protected characteristics of customers



8.3.3 Businesses and the Church Street regeneration programme

Businesses were asked if they had been aware of the proposals for the Church Street Regeneration Programme prior to the interview and 88% of the businesses who responded agreed that they were aware of the proposals. However, only 46.1% of businesses stated they had taken part in any consultation activities associated with the regeneration programme with the majority of these being meetings in the council office.

Businesses were also asked how supportive they were of the plans for the regeneration of Church Street:

- 58.3% of businesses were either supportive or very supportive for the regeneration.
- 23.6% of businesses were neither supportive nor unsupportive,
- 13.4% were unsupportive and
- 4.7% were very unsupportive.

Reasons for support included:

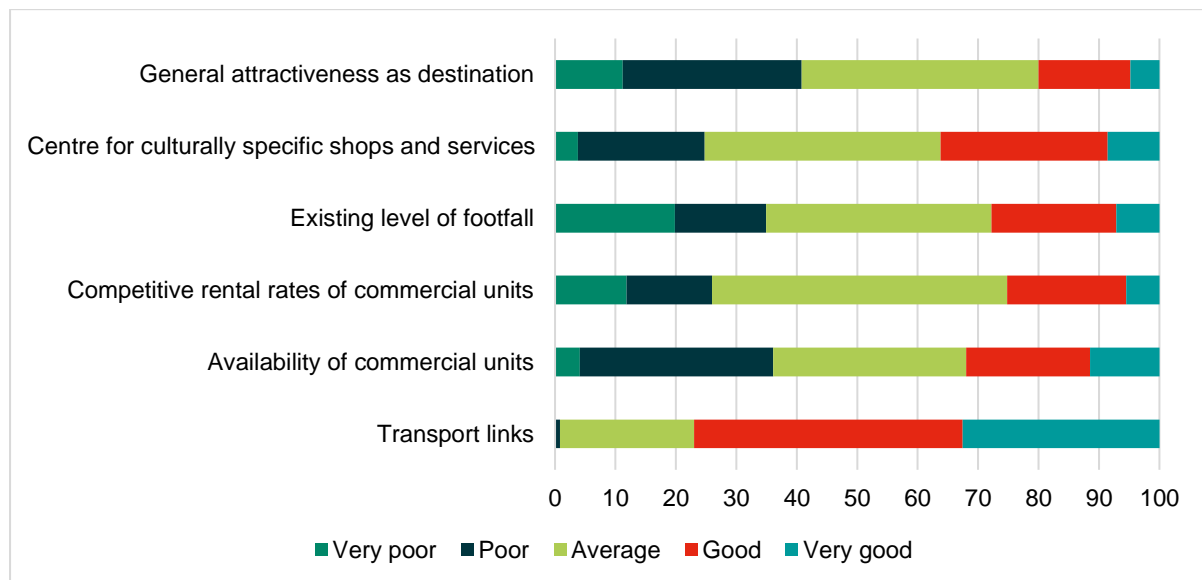
- *'It will bring more business into the area;'*
- *'We need some changes as properties are not in a good state/need new housing;'*
- *'maybe the area will get more attention and more footfall;'* and
- *'to modernise the market.'*

Reasons against the regeneration of the area included:

- *'Because if we moved from here it might be possible, I lose my customer;'* and
- *'Uncertainty where we will work during regeneration time period.'*

When asked to rate the existing site on a number of factors, transport links, culturally specific shops and services and availability of commercial units were rated highest. General attractiveness as a destination and competitive rental rates of commercial units were rated lowest (Figure 8-4).

Figure 7-4 Views on the existing site



Businesses were informed that if regeneration of the area goes ahead there will likely be a period of temporary relocation for the market. They were asked what additional measures they might feel were needed so that their business can continue to operate during both the development stage, as well as the longer-term. During the development stage, the majority of responses related to 'parking,' 'electricity' and 'public toilets'. During the long-term, responses also included 'parking,' 'electricity' and 'public toilets' as well as 'affordable rent and better facilities'.

When asked if they have any other comments regarding the proposed development and any potential impact on your business, there were some mixed responses including:

- *'I don't have any idea what's going to happen'*
- *'I hope the proposal will benefit local business and residents and no other changes we know nothing about'*
- *'I would like help with advertising and promotion of my business'*
- *'I'm worried I might to have to go and I need more information – I've already been moved out of 3 areas of London already'*
- *'I think it will be fine and good for the area'*
- *'I would like the development to be cancelled'*
- *'If they redevelop the site another location for us might be busier but don't really know'*
- *'This regeneration effect my business and I don't know what will be in the future'*

- *'We just hope something is made clear before too long as it affects our business all this uncertainty'*
- *'I feel like as all the flats are going to go and a lot of businesses will suffer as a result as it won't be so busy and it will take time to build up again'*
- *'Some people say it could be good others bad / i can only hope it will benefit my business'*
- *'The regeneration must be started quickly so that the uncertainty goes away'*
- *'If they knock down the flats it would devastate our business as that's where all our clients come from'*
- *'It's going to mean we will have to relocate and it might be hard to find reasonable rent as a business we need to keep our overheads low'*
- *'The business will grow with new facilities and regeneration'*
- *'More outside toilets needed more open space with seating'*
- *'Allocate stalls for variety purposes to make the market more attractive'*

8.4 On-street surveys

Interviews were undertaken in the Church Street area with customers visiting local business as well as those passing through the area. The aim of the survey was to establish use of local businesses by customers and their views on the regeneration. In total, 100 responses were collected between the 14th and 21st May 2019.

8.4.1 Frequency of visits to the Church Street area

Table 8-4 shows that the majority of respondents (43%) surveyed lived in the Church Street area, 28% visited every day and 19% visited every week.

Table 7-7 Frequency of visits to the Church Street area

Question	Options	Respondents
How often do you visit the area shown on the map?	I live here	43%
	Every day	28%
	Every week	19%
	Less than once a week	10%
Response Rate	Answered Question	100
	Skipped Question	0

Table 8-5 shows that the most popular mode of travel to the area was by walking (46.5%). A further 25.3% travelled by bus and 11.1% by the underground. This shows that travelling by non-motorised transport is popular and public transport is being used over travelling by car.

Table 7-8 Main mode of travel to the Church Street area

Question	Options	Respondents
How do you usually travel to the area shown on the map?	Walk	46.5%
	Cycle	3.0%
	Car	5.1%
	Underground	11.1%
	Bus	25.3%
	Taxi	9.1%
Response Rate	Answered Question	99
	Skipped Question	1

Respondents were asked to rate the area on a scale of 1 to 5 (with 1 being very poor and 5 being very good) on the factors shown in Figure 8-5. Transport was rated the highest score showing the high level of connectivity in

the area. Over 70% of respondents also rated proximity to their home as 'good' or 'very good' showing the importance of the Church Street businesses and market to local residents.

The lowest rated factor associated with the Church Street area was safety with almost 20% of respondents rating this as 'very poor' or 'poor'.

Figure 7-5 Rating of factors relating to Church Street area

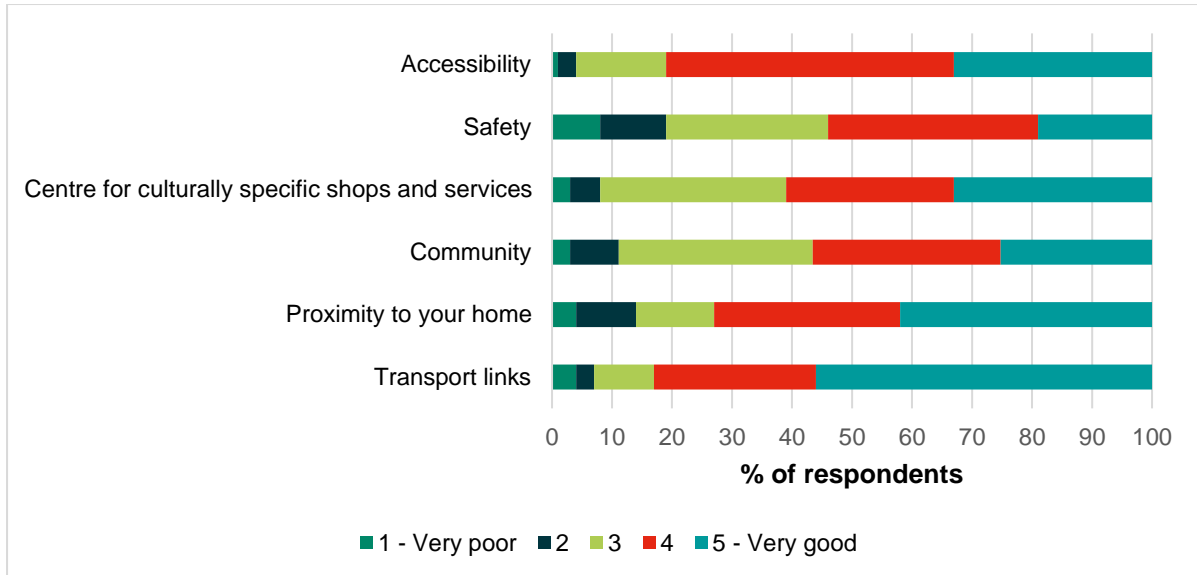


Table 7-9 Reason for visiting Church Street

Question	Options	Respondents
Did you travel to Church Street today to visit one or more specific business, shops or market stalls?	Yes, this is the main purpose of my visit to Church Street today	51%
	No, I am mainly visiting for a different purpose	49%
Response Rate	Answered Question	100
	Skipped Question	0

Of all respondents interviewed on-street, 51% said that they had specifically travelled to Church Street to visit a business within the Church Street area. Respondents were asked if there were any businesses or services that they used where there was no viable alternative nearby. Table 8-7 summarises the responses and shows that 32% of those interviewed thought there were no nearby alternatives to services they were using. Feedback on this included:

- *'The fruit and veg stalls are reasonably priced', and*
- *There was no nearby market like this and that it is unique to the area.*

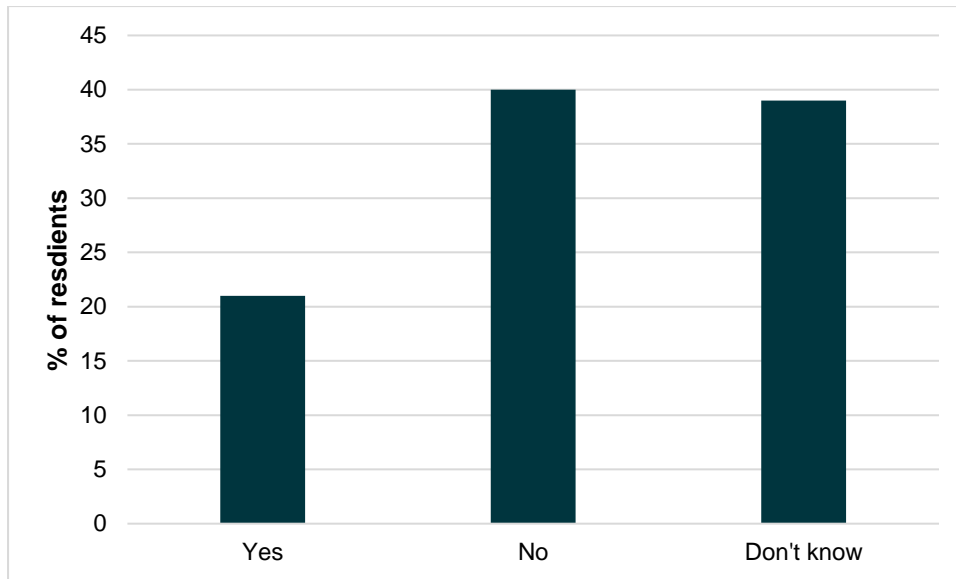
Table 7-10 Alternatives to businesses in the Church Street area

Question	Options	Respondents
Are there are any businesses or services that you use in the area shown on the map for which there is no nearby alternative?	Yes	32%
	No	47%
	Do not know	21%
Response Rate	Answered Question	99
	Skipped Question	0

Figure 8-6 shows that the majority of respondents would not be able to use services if they were relocated elsewhere in Church Street. Reasons for this include;

- *'the next library is too far away'*,
- *'it depends where the relocation is'*,
- *'it would be a shame and it will be an inconvenience'*.

Figure 7-6 Would you still be able to use the businesses or facilities you mentioned if they were relocated elsewhere?



8.4.2 Views on the Church Street regeneration programme

Of those interviewed, 51% of respondents were aware of the regeneration proposals before being interviewed. When asked for any other comments regarding the proposed regeneration and any potential impact on day-to-day activities in the area, there was a mixture of responses with more positive comments than negative comments. Positive comments included that they like the idea of modernisation, it will hopefully improve safety, it will be good for the community and if it brings in more money then it is good for the area. Some negative comments included it will disrupt the community and moving would make things harder. 21% of respondents had no comments.

There was limited variation in views on the regeneration across different genders, ethnic groups, or religious groups but overall, there were more negative views towards the proposals from women between 25 and 44.

8.4.3 Diversity of on-street survey respondents

Table 8-8 provides a breakdown of the protected characteristic data of respondents who were surveyed as part of the on-street survey.

Table 7-8 Diversity breakdown of on-street respondents

Protected Characteristic	Options	Respondents
Sex	Male	47%
	Female	52%
	Other	1%
	Total	100%
	Non-responses	0%
Age	18 - 24	19%

Protected Characteristic	Options	Respondents
	25 - 34	16%
	35 - 44	19%
	45 - 54	13%
	55 - 64	10%
	65 - 74	4%
	75+	5%
	Total	86%
	Non-responses	14%
Ethnicity	White: English/Welsh/Scottish/Northern Irish/British	33%
	White: Irish	6%
	White: Gypsy or Irish Traveller	1%
	White: Other White	13%
	Mixed/multiple ethnic group: White and Black Caribbean	5%
	Mixed/multiple ethnic group: White and Black African	4%
	Mixed/multiple ethnic group: White and Asian	1%
	Mixed/multiple ethnic group: Other Mixed	1%
	Asian/Asian British: Indian	3%
	Asian/Asian British: Bangladeshi	10%
	Black/African/Caribbean/Black British: African	5%
	Black/African/Caribbean/Black British: Caribbean	3%
	Arab	7%
	Other Ethnic Group	4%
	Total	96%
	Non-responses	4%
Religion/Belief	Christianity	30%
	Hinduism	2%
	Islam	23%
	Judaism	2%
	Buddhism	1%
	No religion	28%
	Other	6%
	Total	92%
	Non-responses	8%
Sexual Orientation	Heterosexual	94%
	Lesbian/Gay/Bisexual	3%
	Other	1%
	Total	98%
	Non-responses	2%

8.4.4 Asylum Seeker status

Of all on-street respondents, 2% identified themselves as a refugee or asylum seeker.

8.4.5 Disability

Of all respondents, 14% stated that they were disabled. Disabilities included learning difficulties, mobility issues, mental health issues, diabetes, and asthma.

9. Assessment of potential equality effects

9.1 Introduction

The assessment of equality effects considers the potential impacts on affected people sharing protected characteristics arising from the Church Street Estate Regeneration – Sites A, B and C. It considers:

- Direct and indirect impacts of the proposed development;
- Impacts during the construction and operational phases of the proposed development; and
- The adverse and beneficial impacts for local residents and businesses and the wider Church Street community.

The assessment is based on the proposed development set out in the hybrid planning application for the site. This is a high-level impact assessment based on the policies information and data sources reviewed in this report and addresses impacts relevant to the key themes identified for the Church Street Masterplan. A framework for the assessment of equality impacts is outlined in Table 9-1.

Table 9-1 EqlA assessment framework

Church Street Masterplan Theme	EqlA objectives
Homes	<ul style="list-style-type: none"> • Provide a mix of good quality, affordable and specialist housing that meets the needs of Church Street residents, including older people, people with disabilities (particularly those with accessibility issues) and families with children. • Provide a range of rehousing options to enable tenants and leaseholders to stay in the local area and in their communities. • Provide other rehousing options and support for those that do not want to remain in the housing renewal area. • Enable leaseholders to remain as home owners where possible. • Identify residents who may need support through an unsettling and difficult process – particularly those with vulnerabilities and medical issues.
Market and Economy	<ul style="list-style-type: none"> • Provide support to market stall-holders to thrive on the new development and during temporary relocation • Support a diverse and resilient economy that provides opportunities for all and promote regeneration. This could include social enterprise, voluntary and community sectors. • Provide employment opportunities, for disadvantaged and underrepresented groups. • Ensure that education and skills provision meets the needs of Church Street's existing and future labour market and improves life chances for all.
Making Connections	<ul style="list-style-type: none"> • Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to the open spaces and community facilities services. • promote alternatives to car use and prioritise active travel.
Population and Communities	<ul style="list-style-type: none"> • Support good access to existing and planned community infrastructure and facilities for new and existing residents and visitors, mindful of the potential for community needs to change over time. • Improve perceptions of safety and fear of crime to help remove barriers to activities and reduce social isolation.
Health and wellbeing	<ul style="list-style-type: none"> • Improve the physical and mental health and wellbeing of Church Street residents and reduce health inequalities across the Borough and between local communities. • Minimise loneliness, maximise independence and improve mental and physical wellbeing of older people

9.2 Homes

9.2.1 Construction phase – potential beneficial impacts

9.2.2 Permanent rehousing opportunity for tenants

The Housing Needs Assessment identified 19% of households who would welcome a permanent move from Church Street to other areas within or outside of the borough and 21.6% these households suffer from overcrowding. These households have the opportunity to move to new larger accommodation or split households if preferred. New local developments such as Lyons Place are able to provide temporary accommodation and permanent accommodation options for Church Street residents on a priority basis for residents. A permanent move to a new property is likely to benefit large households including families with children and those where more than one household are currently living within the same property.

The Council's Policy for Tenants in Housing Renewal Areas⁶³ sets out options for social housing tenants including permanent moves to new social homes in the local area, moves to another social home in Westminster or elsewhere. As of September 2023, the first, and only, refusal offer to new build housing stock has been made to tenants with approximately 85-90% of tenants having moved into new housing. Of the 47 Site A leaseholders, currently 4 have chosen the option to move back to site when it is redeveloped.

9.2.3 Construction phase - potential adverse impacts

9.2.4 Potential for compulsory acquisition of leasehold properties

Sites A, B and C include properties that are not owned by Westminster Council, with 109 leasehold properties identified through the HNA. In many cases these properties have been bought by their current leaseholders through a right to buy scheme.

The Council's Policy for Leaseholders in Renewal Areas⁶⁴ sets out a number of options for resident leaseholders to remain in, or return to, their Housing Renewal Area with different options available to suit different circumstances. Where leaseholders opt to remain in, or return to the Housing Renewal Area, reasonable efforts will be made to help them to remain homeowners. As of September 2023, four leaseholders have chosen the option to move back to the site once it is redeveloped, and the Council has made shared equity offers to these people.

Additionally, for those leaseholders who wish to move away from the area, the Council will provide help and support with the move. Resident leaseholders will be entitled to financial compensation equal to the open market value of the property as well as further compensation in the form of disturbance and homes loss payments.

Non-resident leaseholders will only have the option to sell their property at market value to the Council and receive the statutory financial compensation. They will also receive a basic loss payment, which is 7.5% of the market value of the property and disturbance payment in relation to costs incurred in acquiring a replacement property. In the case of resident leaseholders, the Council have considered the option of offering available new build stock to them on a shared equity basis, which gives them a financially achievable option to remain in the local area and remain close to their local connections.

Westminster Community Homes (WCH) act on the Council's behalf to organise and maintain engagement and communication with all renewal leaseholders. They do this by writing, calling and physically visiting the leaseholder at a time and place which meets the leaseholder's needs. During these personal sessions WCH run through all the available options leaseholders have, explain the home loss and disturbance compensation packages the leaseholders is eligible to and outline the additional support the Council can offer them.

Furthermore, the CS regeneration office has also held leaseholder engagement sessions during the evenings and on a Saturdays, to offer more support and advice to all leaseholders, in case they work or have care need

⁶³ Westminster Council (2019) Policy for Tenants in Housing Renewal Areas
https://www.westminster.gov.uk/sites/default/files/policy_for_tenants_in_housing_renewal_areas_2019_final.pdf

⁶⁴ Westminster Council (2018) Policy for Leaseholders in Housing Renewal Areas
https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

responsibilities during the day and week. The following steps have been undertaken to improve communication and engagement with different leaseholders including:

- Older leaseholders:
 - Larger font on correspondence can be provided on request with all correspondence.
 - Engagement and communication with the leaseholder's family members can be arranged with their consent.
 - Setting aside additional time for visits/interviews/viewings etc if they are elderly.
 - Transport can be arranged to viewings/events etc.
 - Encouragement to have an advocate, for instance a family member attend meeting.
- Leaseholders who do not speak English as a first language:
 - Translation services have been used and can be organised if English is not easily understood by the leaseholder.
- Disabled leaseholders:
 - Within the Leaseholder policy WCC will cover the cost of the new adaptations if already fitted in the existing property

WCH has sent introductory letters to residents living in sites B and C to inform leaseholders that they are able to make contact to discuss the planning application. PPCR, an independent residential advisory service, have also been appointed by the Council as a residential impartial support service to offer free advice to all leaseholders, secure tenants, TA tenants and private tenants. Between February 2019 and August 2023, PPCR completed 1,884 engagement interactions with local residents, through a variety of formats including door-knocking (325 interactions), drop-ins (182 interactions), phone/e-mail (1,178 interactions), workshops (30 interactions), and at WCC events (101 interactions). The positive impact of these interactions is that residents will most likely feel better informed about the potential compulsory acquisition process, and what their options are in terms of moving property.

Where possible, the Council will aim to negotiate an agreement with leaseholders to purchase leaseholder interests using the options set out in the Policy for leaseholders. However, as a last resort the Council could be required to apply for Compulsory Purchase Order (CPO) powers to acquire properties.

This could result in adverse effects for leaseholders who live in the affected interests and may be forced to move out of the area or lose full ownership of a leasehold property. This could particularly affect people with BAME status, older people, disabled people and families who may lose important social and community ties. The Council will provide additional assistance to vulnerable leaseholders and will engage with third parties including family members, social services and health practitioners to identify and address any special needs.

Should CPO powers be required then the EqIA should be updated to identify specific impacts associated that may arise with the CPO process.

9.2.5 Temporary relocation of social housing tenants

The regeneration will require 229 households in Sites A, B & C to decant to achieve vacant possession of the blocks. This will result in the temporary relocation of social housing residents during the construction phase.

The Policy for Tenants in Housing Renewal Areas sets out the process and rights for tenants required to temporary relocate. Supply of housing in the local area might be limited and therefore those with the highest needs will be prioritised for the supply that is available by the award of additional points or priority. These will be awarded where:

- An application has been made to a primary or secondary school for a qualifying member of the household, and a move away from the local area could result in them not being chosen for it. (This only applies where the current address is in the catchment area);
- A qualifying member of the household is receiving a specialist medical service and would be unable to continue to travel there due to their age, vulnerability and/or a disability;
- The tenant is in Community Supportive Housing and is particularly vulnerable due to their age or health; or

- There are other exceptional reasons.

Returning tenants, who have had to move away, will also have the first priority for new homes within the Church Street area.

According to the HNA 68.6% of households have lived in the area for 5 years or more. This could mean that some residents have established important community and social ties. Temporary relocation of residents could potentially have the following effects for groups with protected characteristics for which these ties are more important including older people, people with disabilities, BAME residents and families with children who may be more reliant on informal and formal, social and support networks in the local area.

Households that include school-aged children will be prioritised for temporary homes in the local area to enable them to continue attending their current school or to a school they have applied. This only applies to where the child's current address is within the catchment area of the school and therefore those children attending other schools may potentially have to change schools. However, the area has good transport links, which improves the chances that children will be able to continue at their current school and use existing childcare arrangements should they need to relocate outside of the immediate area. The Policy for Tenants in Housing Renewal Areas does set out timescales for relocation or identify ways in which the communities can be kept together or provided with appropriate support through the move if this is not possible.

The Relocations team has carried out housing needs assessment for every secure tenant and have identified any language issues. Every address in Site A has been visited and as of September 2023 and 140 of the 145 residents have successfully been rehoused. Additionally, the Relocations team has also arranged actual services for tenants when moving to minimise resident disruption- including support with rents, utilities, mail redirection, and disposals. They have also been working to identify specific support needs for residents including:

- For older tenants:
 - Larger font on correspondence can be provided on request.
 - Setting aside additional time for visits/interviews/viewings etc if I know they are elderly.
 - Transport can be arranged to viewings/events etc.
 - Encouragement to have an advocate, for instance a family member attend meeting.
- For those with language barriers
 - Translation services
 - Encouragement to have an advocate, for instance a family member attend meeting.
 - Work with Scheme Manager to accommodate needs of tenants who do not speak English.
- Larger households
 - Organise meetings around the tenant's schedule.
 - Consider housing options near to the children's school.
 - Offer reimbursement of new uniform if children change school.
 - Award high priority to renewal tenants, so they have first options to view larger properties.
 - In certain scenarios with large households, the option to split the household will be made available to the tenant.

Once the tenant has moved into their temporary new home, they will have the option to return to the new development once it is built. Temporary social tenants will be invited to view the new property, and should they not like it, they will have the option to remain where they are. If they do decide to move all disturbance costs (such as removals and redistribution of mail) involved in moving a second time will be covered by the council.

In order to keep track of impacts experienced by tenants as they move, a monitoring programme has been set up to record where tenants are being relocated to, however, it does not capture diversity data of household members. Furthermore, a communications officer could be appointed and be in touch with households moved to understand their experience and ensure their quality of life has not decreased, and where possible, make note of improved standard of living. In cases where tenants choose to move a second time, there should be efforts to understand why they might want to move, and whether any support can be offered to make the process more

comfortable. For many social housing tenants, moving can be expensive and at times, emotionally charged as the process can create anxiety and uncertainty, especially for those from lower income households. Furthermore, tenants might experience high costs and issues of affordability which are beyond the disturbance costs paid by the council. In such cases, the impacts of having to move could affect certain PCGs more than others, and the council should pay attention to how these households can be further supported.

9.2.6 Relocation of private tenants

The EqlA undertaken for the Policy for Tenants in Housing Renewal Areas 2019 found that the impact on private tenants is largely negative as there is no rehousing offer, although help and support will be available to those that may be homeless as a result of housing renewal. In addition, private rental accommodation in the Church Street area are lower than much of Westminster so it could be particularly hard for this group to find alternative housing in the local area or borough. However, as of September 2023, WCC have purchased 110 properties from a nearby private developer to accommodate rehousing needs, and a further 208 homes ranging from 1-4 beds have been built and made available to rehouse residents.

At least 10% of properties on the site are privately rented. Households that include people with BAME status, older people, disabled people and families may lose important social and community ties if they need to move away from the area. It is also recognised that this is a risk that already exists with shorthold private rental tenure.

The Council has already appointed an Independent Resident Advisor to provide advice and support to tenants and leaseholders. This continued support (or signposting towards existing organisations providing advocacy and advice) to help find alternative affordable accommodation would help to minimise against negative equality impacts. Furthermore, in January 2021, the Council published a five-year private rented sector strategy detailing its plans to improve housing market conditions for tenants and to ensure the sector is well managed. The strategy identifies the need to ensure properties are good quality, and that all stakeholders including tenants, landlords and letting agents are informed of their rights and responsibilities and that support can be provided where needed, including taking action when the law is broken.

PPCR, an independent residential advisory service, have also been appointed by the Council as a residential impartial support service to offer free advice to all leaseholders, secure tenants, TA tenants and private tenants. Between February 2019 and August 2023, PPCR completed 1,884 engagement interactions with local residents, through a variety of formats including door-knocking (325 interactions), drop-ins (182 interactions), phone/e-mail (1,178 interactions), workshops (30 interactions), and at WCC events (101 interactions). The positive impact of these interactions is that residents will most likely feel better informed about the relocation process and what options they have available to them in terms of moving property.

9.2.7 Operational phase - potential beneficial impacts

9.2.8 Net increase in housing provision

The regeneration includes provision for around 1,121 new homes, including replacement homes provided at social rent for existing council tenants and new homes, of which 50% will be affordable. The net increase in affordable housing will benefit people with priority for affordable housing, both social and intermediate, that are more likely to have protected characteristics (particularly for social housing).

While those likely to benefit from the increase in affordable homes are not necessarily local residents the council has committed to developing a Local Lettings Plan (LLP) for the new additional affordable housing supply. Proposed principles for regeneration areas within the LLP are set out in the Supply and Allocation of Social Housing 2018/19 Cabinet Report⁶⁵ and focus on prioritising local people. LLP will be subject to consultation.

Baseline data and information from the HNA shows that Church Street has high levels of overcrowding; it is considered that an increase in the provision of housing suitable for families would also have a positive impact for children.

Specific groups with high needs for access to housing and high representation amongst the local population include BAME groups and older people. These groups particularly stand to benefit from new housing associated

⁶⁵Westminster Council (2018) Cabinet Report: Supply and Allocation of Social Housing 2018/19
https://www.westminster.gov.uk/sites/default/files/social_housing_supply_and_allocations_2018-19.pdf

with the regeneration, except where affordability barriers could limit these opportunities. In particular, new private housing in the area may be beyond the means of many local residents.

There is also an on-going need to procure more settled accommodation for homeless households and this was cited as a priority during consultation with young people with regards to housing regeneration. There may be an opportunity for the regeneration to help address the needs of vulnerable people in the area through suitable housing and other forms of support, which may benefit people belonging to certain protected groups including young people.

The population aged 65+ is projected to increase significantly over 20 years in Church Street and in the borough. An increase in the number of elderly people will require appropriate housing that meets their needs. Housing implications include increased demand for both specialist accommodation for older people and for services and home adaptations to enable older people to remain 'at home' living independently. This will also have implications for the types of development and services that will be required to meet the needs of society, including disabled people. The Housing Needs Assessment found that 125 out of 299 interviewed households confirmed that someone living in the household had medical issues and 26 households had members using wheelchairs or walking aids at least some of the time.

The proposals include 10% (a net increase of 120) new homes to be fully wheelchair accessible. This will be of particular benefit for people with mobility issues including older people and people with disabilities.

9.2.9 Improved quality housing on the sites

Many of the responses to initial public consultation for the options for Sites A, B & C acknowledged that properties on the site were no longer 'fit for purpose' and cited specific issues around access, heating and ventilation and anti-social behaviour. Older people also specifically commented on the lack of lift access, being unable to bathe, difficulties in using their toilets and the heating systems.

The properties on site currently do not have lifts and initial consultation feedback found that residents would like new homes to be accessible to older people and people with disabilities including lift access.

In line with the feedback received from more recent consultation rounds, the Council have stated that new homes will be designed in accordance with the Nationally Prescribed Space Standards which promote dual aspect flats, good natural surveillance, adaptable for changing needs and provision of private amenity space. It is estimated that the new homes will require less energy to heat and thereby expected to reduce heating bills. This is a benefit that can be shared by groups with protected characteristics including those in lower income or single households and more vulnerable to heating charges such as older people.

As of September 2023, it has been confirmed that all of the new build properties on site will be accessible in terms of lifetime homes standards, and of the 208 homes that have been built for rehousing tenants, 24 are wheelchair adaptable and 130 of them are to lifetime home standards.

9.2.10 Operational phase - potential adverse impacts

9.2.11 Potential increase in rent for social housing tenants

In some cases, tenants may move to smaller properties as returners are offered homes based on the size needed and therefore would not receive an increase in rent. However, some tenants will potentially be subject to an increase in rent costs when located in temporary and/or permanent accommodation as well as moved to larger or newer accommodation with higher rents in the new development.

There is no information on the likely rent levels expected within the new development, although rents will also be set in line with national formula so any increases should not be significant. However, even a small increase can be significant for those on a low income and the Council need to consider current rents paid by tenants and the likely impact of an increase across different households. The impacts of increased rent may also be exacerbated by higher service charges and this is noted as a potential negative impact in the EqlA for the Council's Policy for Tenants in Housing Renewal Areas.

Groups that may be most adversely impact are those who are unemployed, low-income households, families (especially single parents) and those with additional carer roles, disabled people and older people. However, it is acknowledged that many tenants will receive some form of housing benefit that contributes to their rent and

service charge payment and as such the effects of a rent increase on these groups could be limited to those who do not receive benefits.

9.2.12 Affordable housing options for resident leaseholders

As mentioned above under the Council aim to negotiate the purchase of leaseholds from existing resident leaseholders within the current site. Leaseholds have been bought from the Council under the Right to Buy scheme and as such at discounted rates from the market value of the property. The leaseholds will be brought at market value but leaseholders may have difficulty in securing similar property in the area, in other preferred areas or in the new development at an equivalent cost. The Council's Policy for Leaseholders in Renewal Areas⁶⁶ sets out a number of options for resident leaseholders to remain in, or return to, their Housing Renewal Area with different options available to suit different circumstances. Where leaseholders opt to remain in, or return to the Housing Renewal Area, reasonable efforts will be made to help them to remain homeowners. Options include:

- Buying one of the new homes outright or through an equity loan or on a shared equity basis or shared ownership basis;
- Buying another leasehold property in the housing renewal area; or
- Becoming a social or an intermediate tenant in the housing renewal area.

Additionally, for those leaseholders who wish to move away from the area, the Council will provide help and support with the move. Residents leaseholders are also entitled to financial compensation equal to the open market value of the property as well as further compensation in the form of disturbance and homes loss payments.

This could potentially provide more adverse impacts on older people, those with low incomes as well as some non-UK born residents who may find it difficult to transfer mortgages or apply for a new mortgage for a new property. Some leaseholders may have no option but to join the private rental sector if they are unable to find an affordable equivalent home.

The EqIA for the policy also identified a potential negative impact where a leaseholder is eligible to become an intermediate tenant, rather than a social one. In this case the tenancy offered is likely to be a shorthold assured one, which offers less security than a social tenancy (and some providers only renew them in certain circumstances or offer them for a fixed term). They offer less security than a leaseholder will have now as a homeowner. Having to pay an intermediate rent may lead to some leaseholders having higher housing costs than before. This might particularly impact households with children, older people and those with disabilities. However, a tenancy is only likely to be offered in limited circumstances and where the home ownership options are not appropriate for the leaseholder and intermediate tenancies are offered subject to the being affordable on the leaseholder's income.

The Council's current mitigation plan involves offering all renewal tenants moving on a permanent basis first refusal to all available new build local stock, with the option to move permanently if that is the preferred option. While this option minimises both the inconvenience of tenants having to move more than once and also means tenants will not have to wait until the new development is built (which can take years to complete) before moving into their new permanent home, it does not presently mitigate the possible impacts experienced by those that may not accept these conditions and may have to find alternative accommodation outside the Church Street area. Tenants may refuse the options offered for a number of reasons, ranging from loss of sentimental value of their home to problems with the design and anxiety around moving, in which case the Council should engage directly with these residents and find ways to mitigate the negative impacts they will experience.

PPCR, an independent residential advisory service, have also been appointed by the Council as a residential impartial support service to offer free advice to all leaseholders, secure tenants, TA tenants and private tenants. Between February 2019 and August 2023, PPCR completed 1,884 engagement interactions with local residents, through a variety of formats including door-knocking (325 interactions), drop-ins (182 interactions), phone/e-mail (1,178 interactions), workshops (30 interactions), and at WCC events (101 interactions). The positive impact of these interactions is that residents will most likely feel better informed about what affordable housing options are available to them.

⁶⁶ Westminster Council (2018) Policy for Leaseholders in Housing Renewal Areas
https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

9.2.13 Potential adverse effects with respect to loss of light

It is possible that a number of properties in the development area could be affected by minor light loss. More information is required as to the protected characteristics of those living within the affected properties.

It is worth noting that respondents during both rounds of consultation conducted in 2021 specifically mentioned the “depressing”, “dark”, and “gloomy” environment that tall buildings obscuring light could create. Furthermore, some respondents in the June-July consultation round also noted that despite the Council’s adjusted plans, a large number of buildings could create a very high-density neighbourhood which could have health and wellbeing impacts for those residents that are affected by anxiety or depression, and that it would be preferable to have open and well-lit spaces.

In June 2023, the Right of Light Impact on Neighbouring Properties Report was completed. The report highlighted unavoidable right of light impacts on neighbouring properties due to the scale of the scheme. Of the 100 properties assessed for potential rights of light (RtL) impacts, 10 properties experience minimal losses and 33 properties experience actionable losses of light as a result of implementing the regeneration scheme proposals.

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.

All parties who suffer an expected RtL injury will be notified and engaged with. Property owners will be entitled to compensation for any reduction in the value of their property caused by the development. It is acknowledged where occupiers are tenants, they may not be the beneficiary of the compensation. All affected parties included in the CPO, including RtL parties, will be notified that the CPO has been submitted and notified of the process for making an objection / representation. If a council tenant experiences an interference with their natural light which has a significant impact on their use and enjoyment of their accommodation due to a disability/condition or their specific use of a property, they will be able to approach the Council’s housing team for a review of their housing needs.

9.3 Market and economy

9.3.1 Construction phase – potential beneficial impacts

9.3.2 Creation of new construction-related employment opportunities

The regeneration brings with it the opportunity for new employment, including 3,322 gross temporary construction jobs (equivalent to 332 permanent construction jobs).⁶⁷

The area has high levels of unemployment and low levels of educational attainment and as such there is potential for those seeking work to benefit from this employment opportunity. The groups who benefit from this new employment may vary considerably depending on the type of business and associated training. Equality effects may arise where employment or training is not available to groups with protected characteristics, for example where procurement policies make it harder for some groups to access the opportunities.

The localised Westminster Employment Service (WES) continues to provide an employment coaching service for the local community. The service works with local partners (Job Centre/developers etc.) to ensure existing employees and local people can benefit from job opportunities arising through the regeneration programme. The Church Street Responsible Procurement Plan has been drawn up and will be the conduit to ensuring that the contractors adhere to the council’s employment policies and that local residents are given priority over construction jobs and training.

During the period from 2018/19 to date there have been a total of 55 local (Westminster) job starts for the Church Street sites, but no local apprenticeship starts. However, it is likely that these figures will increase significantly once construction starts on Sites A, B, and C. The breakdown of local employment generated to date, by scheme and year, is as follows:

Scheme:

⁶⁷ Socioeconomic analysis of Church St for all Masterplan (2017)

- West End Gate / Berkeley Homes: 3
- Luton Street / Bouygues/: 38
- Parson's North/ Osborne Construction: 3
- Dudley House / Willmott Dixon: 13

Year:

- 2018/19 (13)
- 2019/20 (3)
- 2020/21 (11)
- 2021/22 (21)
- 2022/23 (7)

9.3.3 Construction phase – potential adverse impacts

9.3.4 Temporary relocation of Church Street Market infrastructure

The regeneration provides the opportunity to improve both the market offer and the facilities offered to existing and future traders. This includes around 220 stalls, 150 van parking spaces and 3,600m² of storage and facilities. However, market stall-holders will experience temporary relocation to a new site or in the wider immediate area during the construction phase. Equality effects may be experienced where the pattern of affected business owners or employees affects a single race or share other protected characteristics.

While the Council will retain market stalls where possible, it is anticipated that temporary relocations may occur in situations where either:

- The trader requests a move
- Large machinery must be brought to site via CS
- Noise and dust from especially heavy works might prove difficult for traders to endure

As of September 2023, following completion of negotiations with market traders regarding relocation options, the decision has been made for the basement car park at Site B to be used as interim storage space whilst Site A is being redeveloped. An architect has been commissioned to review proposed plans in relation to this move.

Since the Council employs a Section 61 policy which does not allow for noisy works on a Saturday, disruption to Saturday traders in this area will be reduced. Additionally, public realm works will be phased in small increments to minimise impact on individual traders and make for faster completion. Due to lack of alternative pitches it may be necessary to suspend trading from affected pitches.

Overall, disruption to market traders is being minimised by continuing market trading as a whole in a new temporary location. The Council is currently consulting with market traders on the new public realm plans and how the impacts of both the Public Realm and Site A works might affect them. The Council notes that to date, engagement feedback from traders has been very positive with only a couple of concerns about the suspension of trading.

Furthermore, it is anticipated that the impacts of the works will only effect small groups of traders at any one time. The council will also minimise suspensions by delivering public realm improvements in shorter, faster increments.

Going forward, the council must ensure the relevant needs of traders and customers continue to be considered in order to continue operating successfully. Any additional financial burdens should also be considered, for example where potential costs of moving location could adversely impact market traders and where existing customers might need to pay extra travel costs in order to keep on using the market. The development of a market relocation strategy could help to resolve some of the above issues and minimise adverse effects.

Furthermore, in cases where relocation may not occur, the Council should consider potential health and wellbeing impacts from construction works on both stall-holders and customers.

The EIA undertaken for this scheme found that areas most likely to be impacted by noise and vibration levels are Boscobel Street, Penfold Street, Church Street, Salisbury Street, Broadley Street and Edgware Road. This means stall-holders and customers will be impacted by high noise and vibration, as well as air pollution during the construction phase of the scheme.

9.3.5 Permanent or temporary relocation of businesses

The regeneration could result in the closure or temporary relocation of around 27 commercial leasehold interests in business properties. The proposed regeneration scheme includes provision for shop units. However, there will be a requirement for a temporary relocation during development of the site.

There will be a shortfall of units overall, meaning that not all businesses will be able to relocate within the new development. Primary research found that over 84% of affected businesses were managed by a BAME freeholder or leaseholder. This may result in the closure of a number of BAME-owned businesses, where they are unwilling or unable to relocate the business successfully, with some associated loss of employment, including amongst BAME employees. This is likely to be particularly important for any family-run businesses, where more than one member of the family works for the business.

Equality effects can be experienced where the pattern of affected business owners or employees affects a single ethnic group, or other patterns in terms of protected characteristics, including effects of changes to clustering of businesses offering services to a common customer set. Currently on-site, 22.4% of business owners identify themselves as Arab. However, these businesses are also likely to benefit from increased customers to the area should they relocate back on site in the new retail space.

The Church Street regeneration team aim to assist current businesses to remain in the area or within Westminster if relocation is not possible. The localised WES service continues to provide an employment coaching service for the local community and works with local partners (Job Centre/developers etc.) to ensure existing employees and local people can benefit from job opportunities arising through the regeneration programme. Additionally, a curation strategy for Church Street is being developed as part of the regeneration programme which will set out the strategy to be used when letting the new commercial units within the development. The Council also made a commitment to reprovide some tenancies on site to existing businesses, where possible. A local fabric makers shop, for instance, will be reprovided their tenancy on site as per WCC.

The Church Street Responsible Procurement Plan is being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities. This will allow WCC to invite or accept business applications for commercial units. It is recommended that the strategy should include measures to prioritise those businesses on the existing site and mitigation measures such as marketing and financial support for businesses who will not be able to return to the site.

The purchase of leaseholds or freeholds, appropriate compensation for costs associated with relocation and disruption in line with guidance, and support with identification of suitable alternative accommodation (including for those businesses who would no longer be able to relocate as a result of the Site A design update) are considered appropriate measures to assist with mitigation against negative impacts for affected BAME business owners (particularly Arab) on the site. However, it is important to ensure continued effective collaboration between all interested parties, taking consideration of the differing levels of support needed by individual business owners.

As of September 2023, the borough wide property search for affected businesses is ongoing – those being actively engaged are those who have surrendered their lease. Some businesses have already been relocated, for example the Church Street Pharmacy, which has been moved across the road and therefore remains usable by local residents, including those with particular needs such as disabled, older and elderly people, and those with medical conditions. WCC are also currently holding back commercial assets for consideration by businesses on Site A, the businesses will be offered one month to express an interest before the properties are taken off the market.

9.3.6 Permanent or temporary loss of employment

Employees and self-employed workers at affected businesses may experience temporary or permanent loss of income and/or employment until relocated and/or where the employer closes/downsizes/relocates elsewhere.

Equality effects may be experienced where the pattern of effected employees affects a protected characteristic (e.g. race) disproportionately or have other protected characteristics which make them more sensitive than others to the effects of the regeneration. The potential negative impacts for affected employees can be mitigated against by providing support and advice through initiatives such as an Employment, Skills and Education Strategy for the scheme.

In addition, any employment opportunities created through the regeneration should be accessible to all and promoted through a variety of channels to attract a diverse workforce. The localised Westminster Employment Service continues to provide an employment coaching service for the local community and works with local partners (Job Centre/developers etc.) to ensure existing employees and local people can benefit from job opportunities arising through the regeneration programme.

The Church Street Responsible Procurement Plan is also being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities.

9.3.7 Operational phase – potential beneficial impacts

9.3.8 Provision of new retail space and shopping facilities

The regeneration proposes new shopping facilities including a new supermarket on Church Street and the redeveloped Church Street Market infrastructure. Since Sites A, B and C could provide up to 3,187m² retail space, this space will likely benefit existing business, new businesses and the local and wider community as a result of enhanced access to new shopping and other facilities. The extent to which these benefits are shared between those with protected characteristics and others will depend on the type of goods and services offered. For instance, the new shopping and other facilities may be of a different mix than currently provided meaning that access to culturally specific or affordable goods and services, associated sense of belonging and cultural and community connections may be more difficult or easier for groups with protected characteristics.

The Council is currently running monthly property searches for Site A businesses requesting assistance with relocating locally and across the wider borough. The idea of subdividing the proposed commercial space on Site A into smaller units is currently being considered, such that it could be offered to smaller businesses and local start-ups for socially minded projects and enterprises, while Sites B and C could provide appropriately sized retail space to ensure a viable mix of commercial tenants.

As part of the Curation Report, a Social Value Framework was developed which was intended to be used to inform decision making as to which tenants may be invited back to the new development. However, given the significant reduction in commercial floorspace the decision has been made not to offer commercial occupiers a right to return. However, they can apply for a unit in the new development once completed.

9.3.9 Provision of new enterprise space in the area

Approximately 1,270sqm of space allocated for enterprise including start-ups and pop-up businesses that have been removed from Site A original plans due to financial viability. However, the Council has also identified that additional space for enterprise is being allocated across the ward. This includes 10,000sqm of enterprise space at Lisson Grove within the Lisson Arches Development which will be available as part of the wider regeneration plans for the area.⁶⁸ As of September 2023, one business from Site A and one from Site B have expressed interest in business support offered in relation to the Church Street Triangle Project.

Furthermore, the business support programme has helped many individuals in the local area access support to help develop their business ideas. Venture 382 (a coworking/office space occupying first floor space on the corner of Edgware Rd and Church St), that has been vacant since May 2020 is now occupied by a meanwhile operator who has created 8 new creative studios and introduced a locally owned women's project teaching accredited courses in fashion and textiles.

⁶⁸ Note that this refers to the wider regeneration plans, and not to space allocated for Sites A, B and C specifically. Sites A, B and C could provide up to 3,187 sqm of Class E floorspace that could deliver office, commercial or retail space.

This is likely to have benefits to business owners including female and BAME business owners and as well young people.

9.3.10 Creation of new retail-related employment opportunities

According to the socioeconomic analysis of the Church Street masterplan, approximately 841 full time employees (FTEs) would be employed in retail units delivered under the Masterplan proposals.

The groups who benefit from this new employment may vary considerably depending on the type of business and associated training. Equality effects may arise where employment or training is not available to groups with protected characteristics, for example if jobs require high skill/education levels which make it harder for some groups to access the opportunities.

The area has high levels of unemployment and low levels of educational attainment. This includes those from BAME groups (Asian/ Black African/Arab and Latin American) who are currently overrepresented on the site in terms of employees.

Presently, the localised Westminster Employment Service (WES) provides an employment coaching service for the local community. The service works with local partners (Job Centre/developers and employers) to provide job opportunities and training for local young people. Similarly, the CS Neighbourhood Keeper Programme also plays an active role and supports local people into local employment, entrepreneurship and training through local projects and capacity building training.

An Employment, Education and Skills strategy should be developed to help local people into employment. This service should be used to ensure that opportunities for retail employment associated with new business to the area are prioritised for those currently working and living in the area.

During the period from 2018/19 to date there have been a total of 55 local (Westminster) job starts for the Church Street sites, but no local apprenticeship starts. However, it is likely that these figures will increase significantly once construction starts on Sites A, B, and C, and also once the project has been completed and new retail outlets have opened which will provide further employment opportunities to the local area. The breakdown of local employment generated to date, by scheme and year, is as follows:

Scheme:

- West End Gate / Berkeley Homes: 3
- Luton Street / Bouygues/: 38
- Parson's North/ Osborne Construction: 3
- Dudley House / Willmott Dixon: 13

Year:

- 2018/19 (13)
- 2019/20 (3)
- 2020/21 (11)
- 2021/22 (21)
- 2022/23 (7)

9.3.11 Regeneration of Church Street Market Infrastructure

Feedback from the business survey and public consultation found that there was strong support for improving the market facilities. The regeneration provides the opportunity to make comprehensive improvements to the market for existing and future traders. This includes changes to design, layout, appearance, storage, parking, provision of water, electricity and trader welfare facilities including toilets. This includes around 220 stalls, 150 van parking spaces, up to 4900m² storage and facilities. The regeneration of the market provides an opportunity to create an inclusive environment to meet the need of market stall holders and their customers including those with protected characteristics.

The revised detailed design for Site A includes toilet facilities, 4 loading and unloading spaces, and between 24-32 trader storage spaces. According to the Environmental Statement produced for the proposed scheme, the revised detailed design for Site A includes toilet facilities and will offer 5% (of the number of units) disabled parking provision for residents as well as 5% standard residential car parking spaces. According to the statement, at Site A, this will be 22 residential disabled parking spaces and 21 standard residential car parking spaces. The residential car parking spaces are to be provided within the basement of Site A and will be accessible via two car lifts situated on Penfold Street. These facilities will be accessed from Church Street as opposed from Broadley Street as originally proposed, making it more accessible to traders.

Respondents in the 2021 consultation sessions remarked on the need for cleaner toilets and parking spaces as important factors for the proposed development.

Although parking has been reduced at this site it is recommended that the Council seek to maintain overall parking and storage provision at the target levels of 55 van parking spaces and 55 storage spaces across sites A, B and C. Allocation of parking and spaces for traders has yet to be determined and should be included as part of a future strategy for the new market. Prioritisation should take it to account a variety of factors and cost of parking and storage hire should be assessed to ensure fairness and affordability to all market traders.

On-going engagement with market stall holders has been undertaken by the CS Retail, Markets and Business Team. It is recommended that a dedicated 'Market facilitator' is appointed from the team for continued engagement to ensure that the appropriate facilities for traders are provided.

9.3.12 Operational phase – potential adverse impacts

9.3.13 Loss of shops and businesses providing current mix of culturally specific services and goods

The loss of existing shops, market stalls and business premises providing the current mix of goods, services and facilities at the site will also affect customers/users of these services. The on-street survey found that 51% of respondents were visiting the area for a specific shop or service.

Equality effects may be experienced where there are patterns in terms of affected customers and their having protected characteristics. The regeneration will bring a different mix of goods, services and facilities at the site, with the potential for a mix of positive and negative effects for groups, possibly patterned in relation to protected characteristics. The existing site currently provides a cluster of businesses and organisations that provide goods and services to the Arabic and Muslim community which include, specialist food shops, restaurants, supermarkets and clothing. The effects on these ethnic and religious groups may include changes to access to culturally-specific goods and services, associated sense of belonging and cultural connections. The loss of these facilities could have an adverse impact on certain groups with protected characteristics in cases where the service is not relocated nearby or where there is no nearby alternative.

However, effective engagement with the local community should assist in identifying the needs and requirements of residents. The new retail provision is likely to result in increased number of customers who want to shop in the area and therefore benefiting existing businesses and providing better facilities for customers.

An Independent Business Advisor has been appointed to provide support and advice to local businesses and this advice could extend to marketing and advertising advice to businesses to ensure existing and new customers are made aware of relocations of businesses or of alternative businesses offering similar services or products. In addition, it is recommended that further consultation should be conducted with affected groups and a survey of alternative options within the surrounding Church Street area should be undertaken.

The Cultural Infrastructure Plan work has been commissioned to identify and map existing cultural assets, identify any gaps and risks to culture as a result of the development proposals. This Cultural Infrastructure Strategy for Sites A, B and C was completed in October 2021 and has been used internally by the Council to inform decision making to maximise the use of infrastructure and continue to engage communities throughout the regeneration process.

The Council will conduct combined Regeneration and Place shaping workshops to establish potential impact of design proposal and establish a set of strategic design principals that respect the cultural wealth potential of the ward. The Council continues to run monthly property searches for Site A businesses requesting assistance with

relocating locally and commercial units on Church St are also being kept from going to market to provide options for affected businesses.

9.3.14 Loss of shops and businesses providing affordable and accessible goods and services for existing local community

The market and surrounding businesses currently provide affordable and accessible goods and services to those living in the immediate area. Local shops and markets offer staples such as fresh fruit and vegetables, meat and fish as well as affordable clothing and accessories. Other businesses provide affordable and/or local services such as hairdressers, cafes and pharmacies.

The loss of these goods and services may have an adverse effect on those with low incomes, children, young people, older people, disabled people, families including single parent families and those from BAME groups.

The temporary relocation of the market is planned to be within close vicinity to the existing site which should minimise the impact on some of the above groups. However, there may still be issues for older people and people with disabilities who may have difficulties accessing the temporary market location. The Council should develop and implement appropriate support measures for these residents during the market relocation period, for example, through dedicated transport services and/or home delivery services.

An Independent Business Advisor has been appointed to provide support and advice to local businesses and this advice could extend to marketing and advertising advice to businesses to ensure existing and new customers are made aware of relocations. Furthermore, a monthly newsletter is being sent to approximately 6000 local residents informing them of the relocations of Church Street businesses.

To potentially help counteract the impact of loss of business, digital skills and training offers have been made to market traders and businesses.

9.3.15 Potential for increasing rents or 'gentrification' of the area

The new development will provide brand new fit for purpose commercial units which in combination with the enhanced public realm and access improvements will likely result in an increase in commercial rents in the area. The mix of type and usage of shops, businesses and facilities on offer, as well as public space will differ from what currently exists. This may create a change in the types of businesses moving into the area and result in the potential for other businesses to relocate permanently elsewhere.

Aside from BAME business owners this may also affect BAME people who currently work or shop in businesses on the existing site may be forced to leave the area due to high rents or experience a loss of community cohesion, cultural connections and social inclusion where the cluster of services they use is dispersed or lost.

The Church Street Regeneration Programme has contracted business support providers to assist businesses adapt to changes brought by the regeneration process. This will assist in mitigating against some of the adverse impacts for businesses. BAME jobseekers will be able to share in direct and indirect newly created employment opportunities but should be supported to ensure that they are aware of job opportunities in the area.

The Independent Business Advisor appointed by the Council to provide support and advice to local businesses could provide marketing and advertising advice to businesses to ensure existing and new customers are made aware of relocations of businesses or of alternative businesses offering similar services or products. However, businesses that serve the local community should be supported by the Council to continue operating in the area during construction and operation phases where possible.

As of September 2023, a Curation Report has also been completed and will be used to inform WCC decision making – the Report includes all three sites and the future aspirations for development in the area – in particular the commercial layout, public space and what matters for Church Street moving forward.

9.4 Making connections

9.4.1 Construction phase – potential adverse impacts

9.4.2 Safety, security and accessibility during construction

The proposed development is large scale with the construction phase estimated to last around 7 years. During this time some tenants will be living in the area whilst the demolition and construction of other residential buildings takes place.

The area has high levels of crime deprivation and feedback from public consultation and other engagement activities has identified fear of crime in the area as an issue. There is a need to balance safety and security with accessibility needs during construction. It is important to ensure that the direct and indirect risks of physical danger associated with construction are minimised. This includes avoiding the creation of secluded or isolated areas through construction hoardings.

Safety and security risks could result in adverse effects for those who are more vulnerable to safety and security issues including children, women (including pregnant women), older people, people with disabilities, young people, ethnic minority groups and people from the LGBT community.

Footpath diversions could have an adverse impact on those with mobility issues, in particular older people, disabled people, pregnant women and people with pushchairs.

A construction management plan should be followed and best practice Code of Construction should be followed taking into account the needs of those with protected characteristics. Key walking routes and crossing points in the area should be maintained or appropriately diverted where possible and CCTV or staffed security provided where natural surveillance has been limited.

Awareness and education as to the dangers of playing on construction sites should be provided in local schools and community centres to discourage children from entering construction areas.

As of September 2023, it has been confirmed that a demolition management plan is to be developed imminently ahead of works starting. The plan will abide to the code of construction and contain necessary chapters relating to noise and vibration, and air quality. The decommissioning management plan will be consulted on with the local community, so they have the opportunity to raise concerns. There will also be a dedicated Resident Liaison Officer from WCC as well as one from the contractor who can be contacted directly during demolition and construction phases if there are any resident issues.

9.4.3 Operational phase – potential beneficial impacts

9.4.4 Improvements for walking and cycling

The regeneration will provide improvements to the pedestrian experience by introducing new routes and improving existing routes and spaces in terms of better-quality road and pavement surfaces, wider and clearly defined footways, less clutter, better lighting and signage, street furniture and clear priority given to pedestrian in the design of the new development. The improved environment, lighting, signage and permeability will encourage walking, access to secure bike storage will encourage cycling and access to car clubs will discourage car ownership. Cycle storage provision has been established for Site A, with 850 spaces being provided for residents – 827 long stay spaces, and 23 short stay. This provision is in line with London Plan 2021 minimum cycle parking standards, as well as the London Cycling Design Standards.

This will have benefits that can be shared by all groups with protected characteristics through an improved environment, better air quality, increased safety and more natural surveillance resulting in improved security.

However, consultation held in June-July 2021 found that several respondents were concerned that increased cycling could be dangerous for older and disabled people living in the area within shared pedestrian/cycle paths and crossing facilities. The Council should consider enforcing times during which e-scooters and bikes can be ridden through the market, for instance during trading hours and also consider sectioning off areas of public open space where bicycles (or e-scooters) are not permitted so that older people and those who are more vulnerable can enjoy open space safely.

9.4.5 Increased parking/ better management of parking

The regeneration will result in improved and better managed parking for residents and market traders. This will provide benefits for those residents who have mobility impairments and rely on private vehicles for some of their journeys. Furthermore, trader parking on Site A has been reallocated as loading/unloading for storage unit users to increase storage provision on site, which will benefit stall-holders.

It is worth noting that the Council has determined that any loss of parking in the surrounding area will not be able to be recouped anywhere else. In order to mitigate against these impacts, Public Realm work will consider retention of current permit parking bays.

9.5 Population & Community/Health & Wellbeing

9.5.1 Construction phase – potential beneficial impacts

9.5.2 Community engagement during regeneration

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.

Church Street is an area of entrenched deprivation and comprises LSOAs that are among the top 10-20% most deprived areas nationally, creating a complex and nuanced range of community needs. The extent to which benefits of the regeneration are shared amongst all members of the community, including protected characteristics (e.g. BAME businesses), will depend in part on engagement efforts to include their views in the planning process.

Throughout the regeneration process continuous and effective engagement and consultation will need to be undertaken with affected parties. Equality effects may be experienced during engagement activities. For example, young people, BAME people and those from the LGBTQ+ community can face barriers to taking part in engagement processes effectively and therefore be underrepresented in such activities. Furthermore, there is a high percentage of children living in the area and a significant number of impacts affecting this group. The need to engage with children with regards to the regeneration plans is important.

In terms of youth engagement specifically, a strategy is currently being drafted, and will engage youth specifically with the regeneration consultation process over a series of workshops and other events. The implementation of the Youth Engagement Strategy has begun through youth engagement webinars and focus groups. The Young Westminster Foundation and Marylebone Bangladesh Society engaged to facilitate the CS Youth Voice to ensure participation of young people in consultation and engagement opportunities across the programme. Additionally, the Youth Voice has undertaken its first youth walk to understand the lived experience of the area for young people which will feed into the regeneration plans and help young people understand more about the onsite and planned projects.

A broad community engagement strategy should also be developed incorporating all of the groups mentioned above. This should include a baseline study used for undertaking regular diversity monitoring to assess the impact of the development on groups with protected characteristics, and so that any key groups are not missed during the engagement process. This will also allow the Council to engage with any key groups that might have issues in the future.

9.5.3 Construction phase – potential adverse impacts

9.5.4 Uncertainty and anxiety for existing residents

Engagement with local people has highlighted many anxieties and concerns with regards to the regeneration including uncertainty over plans and relocation. The HNA highlighted a number of residents with mental health and depression issues that could make them more vulnerable to changes in circumstances and the uncertainty about their future living arrangements. The HNA data shows a large number of residents born outside of the UK many of whom do not have English as their first language. Language barriers can add to difficulty with engagement and add to anxieties of residents who are uncertain about plans.

The EqIA for the Policy for Tenants identified potential negative impacts around lack of information on timing and detail for tenants (around disturbance payments for example). This might particularly impact on vulnerable tenants.

The Council's Relocation team currently offer comprehensive support to tenants before, during and following a move and provide one-to-one engagement. Translation services are also provided where necessary to help people that are not comfortable using English and would prefer another language choice. This provides a dedicated officer for each household, which is on hand to continue offering support to all tenants with any housing issues, their moving options, their bidding process, their offers, their viewings, their moves. All removals and transportation are also organised by the team.

Furthermore, in order to help Church Street residents with any anxiety about the regeneration works, the Council has established the Church Street Regeneration office (99 Church Street) which is open every weekday, and staffed with at least one manager, in order to offer support and assistance.

9.5.5 Environmental impacts of construction works on health and well-being of residents

The construction works associated with the regeneration plan are likely to result in environmental impacts such as noise, vibration and dust from demolition and construction activities. According to the EIA for the scheme, existing residential properties adjacent to Plots A, B and C, along Boscobel Street, Penfold Street, Church Street, Salisbury Street, Broadley Street and Edgware Road are likely to be affected by dust, noise and vibration levels during the construction phase of this project. Furthermore, educational/school sites around the site area, specifically Portman Nursery School, Imps Pre-School and King Solomon Academy, will also face adverse impacts from noise and vibration levels.

Some residents would be more sensitive to the effects of these construction impacts than others. For example, those who spend more time at home would be subjected to longer periods of adverse noise impacts. These residents are likely to include older people, some people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children. Furthermore, if works begin towards the end of the Covid-19 pandemic, residents quarantining or self-isolating might be affected by noise and dust, which may aggravate individuals who are sick or suffering from the impacts of the coronavirus.

Some groups with protected characteristics also have differential sensitivity to noise. For example, children are susceptible to increased noise levels, particularly with regards to cognitive impairment.⁶⁹ Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise. Children may also be more sensitive to health effects arising from poor air quality and dust concentrations, as well adults with limiting illnesses such as chronic lung or heart conditions^{70 71}. People with dementia also have an increased sensitivity to both noise and light.⁷²

Many of the local schools identified as sensitive receptors offer special education services, specifically King Solomon Academy, and students at these schools with special education needs (SEN) might be impacted by demolition and construction works. The presence of infrastructure and visual barriers in the landscape can also create 'isolation effects'. Construction sites can be visually unappealing or hinder access to green space and this could potentially result in differential impacts on children with SEN, including those with autism.

A Construction and Environmental Management Plan (CEMP) will be implemented throughout the construction phase of the Scheme. However, in order to understand the specific issues faced by local residents, active engagement with local residents with health issues should be carried out. A Health Impact Assessment is currently being prepared to understand the major health impacts of the scheme.

⁶⁹ World Health Organisation Children and Noise <https://www.who.int/ceh/capacity/noise.pdf>

⁷⁰ Defra (2013), Short-term effects of air pollution on health. Available online at: <https://uk-air.defra.gov.uk/air-pollution/effects?view=short-term>.

⁷¹ WHO (2006), What are the effects of air pollution on children's health and development? Available online at: <http://www.euro.who.int/en/dataand-evidence/evidence-informed-policy-making/publications/hen-summaries-of-network-members-reports/what-are-the-effects-of-air-pollution-on-childrens-health-and-development>.

⁷² Social Care Institute for Excellence – Dementia Friendly Environments <https://www.scie.org.uk/dementia/supporting-people-with-dementia/dementia-friendly-environments/noise.asp>

9.5.6 Loss of informal community hubs

Many local businesses currently act as informal community hubs providing meeting places and places of social connection for older people, people with disabilities or limited mobility. These businesses provide a continuity for local people and a familiar link to the area, plus they are affordable for people on low incomes. For example, the Church St cafe is used by diverse, older people, people with learning difficulties and other disabilities on a regular basis. Many customers with these protected characteristics have provided feedback, as part of the engagement process, that they feel comfortable and welcome at the cafe and use it on a regular basis.

The loss of these businesses could potentially have an adverse impact on these groups with regards to their social interaction and wellbeing.

As part of the Church Street masterplan, a new community hub on Church Street will provide more formal community facilities⁷³. In addition, the proposed Triangle development on Church Street will also offer flexible enterprise, arts and community space. However, it is noted that these facilities are outside of sites A, B and C. Furthermore, recent consultation feedback regarding the importance of community space, particularly in relation to the library has been acknowledge (as is discussed further below). Plans have been drawn up to ensure the Library retains a Church Street presence and these designs will be included in the second stage of the consultation, where community feedback on current proposals will be considered. The Church Street team are also working with library staff to ascertain the best ways forward to limit the disturbance of the space and ensure the new space offered enables them to continue offering their popular services.

Despite the benefits created by these new formal community spaces, it is worth noting that they may not be able to accommodate the facilities provided by existing informal community hubs and cannot replace the social and cultural value of informal community spaces. Therefore, businesses providing informal community spaces for older people and people with limited mobility issues should be supported by the Council to stay in the area where possible, especially those with established relationships with local people. The Council should identify ways in which to support the continued operation of informal spaces of specific community importance as part of a business model for social value. This should include anchoring points that link the past to present in the Church Street area.

9.5.7 Operational phase – potential beneficial impacts

9.5.8 New Library on Church Street

As part of the design update for Site A, the Church Street Library is to be relocated from its current location at Site B to Site A. Feedback from the public, stakeholders and Councillors were in favour of keeping the library on Church Street and as such the new location provides a suitable nearby alternative location to its existing location. Although there is a reduction in floorspace when compared to the existing library, the new design will allow for a more efficient, accessible and flexible use of space, therefore allowing all existing services within the library to operate from the new location. In addition, the new library will also have outdoor space within the 'library garden' replacing the existing outdoor space at the current location.

The new health and wellbeing hub on Lisson Grove will also include space for a library and as such the regeneration plans will increase library services in the area overall. The services to be provided as part of the original proposed community hub would be incorporated into the new library or health and wellbeing hub.

Design plans for Site A have ensured that the Library retains a Church Street presence. First stage consultation showed that while most responses appeared satisfied with location choice, there were concerns about the size. These designs have also been included in the second stage of the consultation, where the feedback on current proposals for the community space, location and size will be considered by the staff. Design amendments as of November 2022 have resulted in an increase in the size of the library to 605 sqm. It is also worth noting that that the new library will be built before Site B is demolished so that there is no interruption in service provision.

The needs of current library users and service providers should be considered through active engagement with relevant groups to ensure that access for those with protected characteristics are improved where possible, and that the new location and site does not act as a barrier to participating in library activities.

⁷³ Note this hub is part of the wider development and not a direct part of the offerings of Sites A, B and C.

9.5.9 New open/public spaces

Open spaces and public realm offer opportunities for active and passive recreation, places to meet, and can help to improve health, wellbeing, and community cohesion. Safe and accessible spaces should cater to the needs of all people, and provide places where people of different ages, sexes, ethnicities, and abilities can all enjoy together.

The Covid-19 pandemic has revealed the need for public or shared spaces, such as spaces for social interaction and open green spaces, especially in those areas that are densely populated and where households may not have their own backyards or gardens.

Several vulnerable groups, including older people and those from low-income communities, may rely on various public and open spaces to be able to have social interactions, exercise or enjoy solitude. The ability to engage in such activities can have positive impacts of people's health and wellbeing, and thus, the lack of access to these facilities during the construction and operational phase both will strongly impact local communities.

The Council aims to increase publicly accessible open space within Church Street ward by 40%. This includes the provision of New Street Gardens between Church Street and Broadley Street as part of the Site A design update which will have allocated space for local play. The improved open space is likely to bring improvements in feelings of safety, actual safety and security, inclusive access and access to open space. Well-designed streets can also help to promote walking and healthier active transport modes and improve air quality. Disabled and elderly people are likely to particularly benefit from inclusive access improvements, enabling them to share the benefits (such as physical and mental health benefits) of the overall regeneration. Other groups may also particularly benefit from access, safety and security improvements, in relation to needs /priorities associated with their protected characteristics.

9.6 Summary of potential impacts

Table 9-2 provides a summary of the potential construction and operational impacts of the Church Street regeneration. This provides an assessment of groups with protected characteristics who are likely to be disproportionately or differentially affected by each of the impacts.

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. High level recommendations are provided for further consideration.

It is envisaged that this table can be updated with more detailed mitigation measures when developed and used to monitor equality effects as plans for the regeneration progress. It also provides mitigations which can reduce adverse impacts, and which in some instances, will provide beneficial impacts.

Table 9-2 Summary of potential equality impacts of proposed Church Street regeneration

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)		
	Age			Sex	Ethnicity -BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership						
	Children	Young People	Older People														
Homes – Construction Impacts																	
Beneficial	Permanent rehousing opportunity for tenants (including to new high quality and larger homes)	✓												A permanent move to a new property is likely to benefit large households including families with children and those where more than one household are currently living within the same property.	<p>Planned mitigation: The Council's Policy for Tenants in Housing Renewal Areas sets out options for tenants to remain or return to the housing renewal area to move to a new home outside of the area or become a homeowner.</p> <p>Relocation strategy will prioritise those groups who are keen to move on a permanent basis.</p>	<p>Renewal tenants moving on a permanent basis are offered first refusal to all available new build local stock, with the option to move permanently if that is the preferred option.</p> <p>Church Street renewal tenants also received the highest number of bidding points, so should they view properties on CBL which they are interested in, they are more likely to be able to successfully bid and view these properties.</p> <p>If tenants are currently overcrowded, they will be rehoused to accommodation which meets their assessed housing need.</p>	<p>First, and only, refusal offer of new build stock has been made to tenants. Tenants have been able to view different size and types of houses. Approximately 85-90% of tenants have gone into new buildings, those who have moved to old council stock have done so out of preference. Just over 50% of council tenants have the right to return, of the 47 leaseholders 4 have chosen the option to move back to the site when it is redeveloped.</p> <p>No guarantee that overcrowding will be resolved in the new builds as it is dependent on supply and uptake. Furthermore, the Council cannot guarantee people's household growth in the interim period.</p>
	Adverse	Potential for compulsory acquisition of leasehold properties	x		x		x		x						<p>Leaseholders with protected characteristics that influence their ability or desire to move out of the area. This includes those ethnic minority groups, people with disabilities, older people and families who may have formed formal and informal social and community ties and support.</p>	<p>Further recommendation: The Council's Policy for Leaseholders in Housing Renewal Areas sets out options for resident leaseholders to buy new homes in the renewal area. Financial compensation for resident and non-resident leaseholders is also set out within the Policy.</p> <p>Develop engagement strategy for engaging with groups affected by the regeneration process:</p> <p>Early engagement with leaseholders to minimise need for CPO</p> <p>Appropriate level of support to navigate through relocation process for leaseholders especially elderly as those with English as a second language</p>	<p>Westminster Community Homes (WCH) act on the Council's behalf to organise and maintain engagement and communication with all renewal leaseholders. They do this by writing, calling and physically visiting the leaseholder at a time and place which meets the leaseholder's needs.</p> <p>In the case of resident leaseholders, the Council have looked into the option of offering available new build stock to them on a shared equity basis, which gives them a financially achievable option to remain in the local area and remain close to their local connections.</p> <p>The CS regeneration office has also held Leaseholder engagement sessions during the evenings and on a Saturdays, to offer more support and advice to all leaseholders, in case they work or have</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)			
	Age			Sex	Ethnicity - BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership							
	Children	Young People	Older People															
																	care need responsibilities during the day and week. Communication and engagement measures have been adopted for leaseholders with various protected characteristics. PPCR, an independent residential advisory service, have been appointed by the Council as a residential impartial support to off free advice to all leaseholders, secure tenants, TA tenants and private tenants.	their sessions and encourage take up of their service. The Council have made shared equity offers to the four leaseholders who want to move back to Church Street. Between February 2020 to July 2021 PPCR carried out over 200 doorknock sessions, held over 30 drop-ins and dealt with over 170 queries. Face-to-Face drop-ins for Site A, B and C residents happen on the second and fourth Thursdays of each month. PPCR ensured the workshop contents were accessible to residents for whom English was not a first language, by arranging for interpreters to attend all workshops. PPCR have carried out 1,884 engagement interactions with local residents between February 2019 – August 2023. These have been split over the following methods: <ul style="list-style-type: none"> - Door knocking, 325 interactions. - Drop-ins, 182 interactions. - Pop-ups, 42 interactions. - Phone / email, 1,178 interactions. - 1-to-1 meetings, 24 interactions. - Workshops, 30 interactions. - WCC events, 101 interactions.
Temporary relocation of social housing tenants	x		x		x		x						Tenants with protected characteristics that influence their ability or desire to move out of the area. This includes those ethnic minority groups, people with disabilities, older people and families who may have formed formal and informal social and community ties and support.	Planned mitigation: A Policy for Tenants in Housing Renewal Areas has been prepared setting out processes for temporary relocation of social housing tenants. An Independent Resident Advisor has been appointed by the Council to support residents.	The Relocations team has carried out housing needs assessment for every secure tenant The Relocations team arrange actual services for tenants when moving to minimise resident disruption- including rents, housing benefit, utilities, mail redirection, and disposals.	Following the HNA, WCC's policy was amended to prioritise renewal tenants such that they can choose where they want to move. There is a monitoring programme recording where tenants have moved to.		

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)	
	Age			Sex	Ethnicity - BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership					
	Children	Young People	Older People													
												Those who would find it more difficult to move because of mobility issues or family size.	<p>Further recommendation:</p> <p>Early engagement with individual social housing tenants.</p> <p>Develop engagement strategy for engaging with groups affected by the regeneration process.</p> <p>Set up monitoring programme to record where tenants are being relocated. To include diversity monitoring.</p>	Once the tenant has moved into their temporary new home, they will have the option to return to the new development once it is built. With disturbance costs (such as removals and redistribution of mail) involved in moving a second time will be covered by the council.		
Loss of private tenancy housing with no guarantee of re-provision on site within new private housing.	x			x								A range of different ethnicity households living in private rental housing. Children in affected households.	<p>Planned mitigation: An Independent Resident Advisor has been appointed by the Council to support residents.</p> <p>Further recommendation: Develop engagement strategy for engaging with groups affected by the regeneration process. Set up monitoring programme to record where tenants are being relocated. To include diversity monitoring.</p>	<p>The Council has published a five-year private rented sector strategy detailing its plans to improve housing market conditions for tenants and to ensure the sector is well managed</p> <p>WCC's team on homelessness prevention is currently being considered as an option to help tenants search for alternative housing.</p> <p>The Council is also considering support from PPCR, an independent residential advisory service, to support private tenants on Site A.</p>	<p>In order to facilitate rehousing of Site A, WCC purchased 110 properties from a private developer to accommodate rehousing needs.</p> <p>Currently, 208 homes ranging from 1-4 beds have been built and made available to rehouse residents.</p> <p>Face-to-Face drop-ins for Site A, B and C residents happen on the second and fourth Thursdays of each month.</p> <p>PPCR have carried out 1,884 engagement interactions with local residents between February 2019 – August 2023. These have been split over the following methods:</p> <ul style="list-style-type: none"> - Door knocking, 325 interactions. - Drop-ins, 182 interactions. - Pop-ups, 42 interactions. - Phone / email, 1,178 interactions. - 1-to-1 meetings, 24 interactions. - Workshops, 30 interactions. - WCC events, 101 interactions. 	
Homes – Operational Impacts																
Beneficial	Net increase in overall housing provision including family, social, wheelchair accessible, affordable and high-quality housing	✓	✓	✓	✓		✓					All groups but especially families with children, young people, older people, people with disabilities and homeless people. Those from low-income	Planned mitigation: Local Letting Plan to be developed including principle for regeneration areas focusing on prioritising new affordable homes for local people.		The Local Letting Plan will not be developed until approximately 6-months before project completion. However, there will be no specific detail on affordable	

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)
	Age			Sex	Ethnicity - BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership				
	Children	Young People	Older People												
												households from which people from ethnic minorities, older people or people with a disability are over-represented.	Outline business case to be drawn up to include budget for buy back of Westminster Council homes for existing tenants. Further recommendation: Meet 35% affordable housing provision targets and mix of social housing, family housing and wheelchair accessible housing. Identify opportunities for homeless people to be accommodated in the new development.		homes and will not include any targets in this regard. However, the Council aim is for 50% of the homes to be affordable. The outline business case for Site A has been completed and the budget for buy backs was set in May 2020.
Improved quality housing on the sites with the development of operational net zero, high quality new housing	✓	✓	✓		✓		✓					All groups but especially families with children, older people, people with disabilities and homeless people. Those from low-income households from which people from ethnic minorities, older people or people with a disability are over-represented.	Planned mitigation: Homes will be designed in accordance with the Nationally Prescribed Space Standards.	The new housing will be Homes designed in accordance with Nationally Prescribed Space Standards. The reprovion units are all designed to fit the Housing Need Assessment requirements. The design development has also taken place in close consultation with the community and the Housing Department.	All of the new build properties will be accessible in terms of lifetime homes standards. Of the 208 homes that have been built for rehousing tenants, 24 are wheelchair adaptable. 130 of them are to lifetime home standards which allows for adaptations to occur where required such as the installation of wet rooms.
Adverse	Potential increase in rent for social housing tenants	x	x	x	x		x					Those from low-income households from which people from ethnic minorities, older people, younger people or people with a disability are over-represented. Also, those with families including single parent households from which female single parents are also over-represented.	Planned mitigation: The Council's Policy for Tenants in Housing Renewal Areas set out options for tenants. Rents will also be set in line with national formula.	The reprovion units will be let at current rates, for returning tenants where applicable. The net new social rent housing will be let in line with national formula for social rent.	No further update.
	Affordability issues for leaseholders			x		x						Older people, those with low incomes as well as some non-UK born residents may find it difficult to transfer mortgages or apply for a new mortgage. Some leaseholders may have no option but to join the private rental sector where they are unable to find an affordable equivalent home.	Planned mitigation: The Council's Policy for Leaseholders in Housing Renewal Area sets out options for resident leaseholders to buy new homes in the renewal area. Financial compensation for resident leaseholders is also set out within the Policy.	WCH Officer looking after leaseholds are in frequent contact with all remaining leaseholders and are available to provide advice and run through all available options if there are any affordability issues. The Council have appointed independent residential advisors, PPCR, to offer free and impartial advice to all Church Street leaseholders, including advice covering affordability concerns. Council offers equity loan products to residential leaseholders, seeking local new	Between February 2020 to July 2021 PPCR carried out over 200 doorknock sessions, held over 30 drop-ins and dealt with over 170 queries. Overall, PPCR have carried out 1,884 engagement interactions with local residents between February 2019 – August 2023. These have been split over the following methods: - Door knocking, 325 interactions. - Drop-ins, 182 interactions. - Pop-ups, 42 interactions. - Phone / email, 1,178 interactions.

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)		
	Age			Sex	Ethnicity - BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership						
	Children	Young People	Older People														
																	<ul style="list-style-type: none"> - 1-to-1 meetings, 24 interactions. - Workshops, 30 interactions. - WCC events, 101 interactions. <p>Face-to-Face drop-ins for Site A, B and C residents happen on the second and fourth Thursdays of each month.</p> <p>PPCR help with targeted 1-1 support for tenants and leaseholders with regular dialogue with communications and engagement team, the relocations team and Ian Sellens Leasehold Negotiator. They provide impartial, independent advice for those residents on the process, their tenure circumstances and understanding their rights during the regeneration.</p>
Potential adverse effects with respect to loss of light												Groups with protected characteristics living within these properties especially those who may have a differential effect (currently unknown).	Recommendation: Further check the extent and nature of the rights affected and attempt to negotiate a private agreement or determine whether the scheme can be altered to avoid interfering with the affected property's RoL.	Given the dense urban fabric in central London, transgressions from the BRE recommendations are inevitable, if the site is to be developed in a meaningful way. Further work being done to minimise the harm and looking at opportunities to mitigate the impact.	The Right of Light Impact on Neighbouring Properties Report was completed in June 2023. The report highlighted the inevitable RoL impacts on neighbouring properties due to the scale of the scheme, there will be engagement between the council and those residents/businesses impacted and those with any light injury. The timeframe for engagement is once the light has been impacted which means after construction is complete.		
Market and Economy – Construction Impacts																	
Beneficial	Creation of new construction-related employment opportunities		✓									The socio-economics report indicates there would be a creation of 252 net jobs per annum, both within and outside of Greater London. This would especially benefit young people, especially those from low-income and BAME backgrounds.	<p>Planned mitigation: Employment, Education and Skills strategy programme has been set up to provide support and advice for jobseekers in the area.</p> <p>Further recommendations: A local employment and procurement policy should be produced to include a requirement for contractors to adhere to national or local schemes to promote employment amongst under-represented equality groups, e.g. Disability Confident Employer. People currently living and working in the area should be given priority over construction jobs and training.</p>	<p>The localised WES service provides an employment coaching service for the local community. The service works with local partners (Job Centre/developers etc.) to ensure existing employees and local people can benefit from job opportunities arising through the regeneration programme.</p> <p>The Church Street Responsible Procurement Plan has been drawn up and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that local</p>	<p>The WES continues to provide a service at Church Street under the same remit.</p> <p>Since 2018/19, local (Westminster) job /apprenticeship starts for the Church Street sites is as follows:</p> <p>Local Employment (Westminster): 55 (total) Apprenticeships (Westminster): 0 (total)</p> <p>Breakdown by scheme:</p> <p>West End Gate / Berkeley Homes: 3 Luton Street / Bouygues/: 38 Parson's North/ Osborne Construction: 3 Dudley House / Willmott Dixon: 13</p>		

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)
	Age			Sex	Ethnicity - BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership				
	Children	Young People	Older People												
													Targeted recruitment initiative should be set up to advance equality of opportunity for young BAME people living in the area.	residents are given priority over construction jobs and training.	Breakdown by Year: 2018/19 (13) 2019/20 (3) 2020/21 (11) 2021/22 (21) 2022/23 (7)
Adverse	Temporary relocation of Church Street Market Infrastructure		x		x								<p>Market traders; especially those who are low earning and those that depend on customers from shared cultural identity. Customers including local residents and others on low incomes including older people who rely on the market for affordable goods.</p> <p>Planned mitigation: An Impacts and risk assessment report has been developed to assess the options available to WCC in dealing with potential impacts of the development on the market traders.</p> <p>Site A - Where possible Saturday traders should be retained at current pitch locations while weekday traders can be relocated to other parts of the existing market.</p> <p>Public realm works – As these works will be more of a disruption to the market and businesses than Site A works.</p> <p>These works to be phased in small increments to minimise impact on individual traders and make for faster completion. Due to lack of alternative pitches it may be necessary to suspend trading from affected pitches.</p> <p>Church Street Retail, Business and Market Team will provide support and advice to market-stall holders.</p> <p>Further recommendations: Focused engagement with market-stall holders.</p> <p>Signage for temporary moves to minimise of loss of business for traders if relocation is required</p>	<p>Currently consulting with market traders on the new public realm plans and the impacts that this and Site A works might have on them. To date the feedback has been very positive with just one or two concerns about suspension of trading.</p> <p>The proportion of traders selling culturally specific products only is very low and not something that cannot be found elsewhere in the vicinity.</p> <p>The impacts of the works should only effect small groups of traders at any one time. We will reduce suspensions by delivering public realm improvements in shorter, faster increments.</p>	<p>WCC have recently completed negotiations with market traders for relocation options.</p> <p>Following negotiations, the decision has been made that the basement car park at Site B will be used for interim storage space whilst Site A is being redeveloped. Architects have now been instructed to begin looking at the proposed plans in relation to this.</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)
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	Children	Young People	Older People												
Temporary or permanent loss of employment following closure or relocation of affected businesses					x							BAME employees of affected businesses; particularly Asian/ Black African/Arab and Latin American employees who are over represented on the site	<p>Planned mitigation: Employment, Skills and Education strategy has been developed to provide support and advice for jobseekers in the area.</p> <p>Further recommendations: Targeted employment services or service initiatives should provide support to existing employees including job opportunities arising through the regeneration programme.</p>	<p>The localised WES service continues to provide an employment coaching service for the local community. The service works with local partners (Job Centre/developers etc.) to ensure existing employees and local people can benefit from job opportunities arising through the regeneration programme.</p> <p>The Church Street Responsible Procurement Plan is being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities.</p> <p>Complete surveys with all businesses to assess level of job losses for local people.</p>	<p>The WES continues to provide a service at Church Street under the same remit.</p>
Business closure/non-viability of business following temporary relocation and net reduction in number of retail units across the area as part of the Site A design update					x							BAME owned businesses; particularly those from the Arabic and Asian communities who are both over-represented on the site.	<p>Planned mitigation: Church Street Business Programme has been set up to provide support and advice to businesses.</p> <p>The Church Street regeneration team aim to assist current businesses to remain in the area or within Westminster if relocation is not possible. A curation strategy for Church Street is being developed as part of the regeneration programme which will set out the strategy to be used when letting the new commercial units within the development. A Social Value Framework will be developed as part of the curation strategy with which potential tenants of the new units can be measured against. This will allow WCC to invite or accept business applications for commercial units.</p> <p>Further recommendations: Ensure viable mix of retail space to allow some existing businesses to return to the site and provide businesses with alternative locations for relocation. Engagement with local businesses should be undertaken to</p>	<p>The Council will re-provide targeted business support to reduce the likelihood of this impact.</p> <p>The Council is providing a local and borough wide property search service for affected businesses. This includes both WCC owned commercial stock and properties on the open market.</p> <p>Commercial considerations, as outlined on the forthcoming Church St Curation Report, will need to be observed for Site B & C design reviews.</p>	<p>The borough wide property search for affected businesses is ongoing, those currently actively engaged are those who have surrendered their lease. Some businesses, for example the Pharmacy, have been moved to a new unit that is within the Church Street redevelopment area.</p> <p>WCC are holding back commercial assets for consideration by businesses on Site A. They will be offered one month to express an interest before the properties are taken to market.</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)
	Age			Sex	Ethnicity - BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership				
	Children	Young People	Older People												
													determine future requirements and needs and to understand impacts of relocation.		
Market and Economy – Operational Impacts															
Beneficial	Provision of new retail space and shopping facilities	✓		✓	✓								<p>All groups should be able to share the benefits of the provision of new retail space including those currently own businesses and work in the area.</p> <p>Planned mitigation: Church Street Business Programme has been set up to provide support and advice to businesses. This includes new start-ups.</p> <p>The Church Street regeneration team aim to assist current businesses to remain in the area or within Westminster if relocation is not possible. A curation strategy for Church Street is being developed as part of the regeneration programme which will set out the strategy to be used when letting the new commercial units within the development. A Social Value Framework will be developed as part of the curation strategy with which potential tenants of the new units can be measured against. This will allow WCC to invite or accept business applications for commercial units.</p> <p>This will allow the WCC to invite or accept businesses applications for commercial units.</p> <p>Further recommendations: Ensure viable mix of retail space to potentially allow existing businesses to return to the site.</p> <p>The Curation strategy should set out plans to ensure a diverse mix of businesses in the new development.</p>	<p>The Council is currently running monthly property searches for Site A businesses requesting assistance with relocating locally and across the wider borough.</p> <p>The Council will consider further subdividing the proposed commercial space on Site A into smaller units to offer to smaller businesses and local start-ups, and socially minded projects and enterprises. Sites B and C will then provide appropriately sized retail space to ensure a viable mix of commercial tenants.</p>	<p>Engagement is ongoing and at various stages with Site A business owners.</p> <p>Subdividing the commercial spaces is an option still being considered although it has been acknowledged that there are potential access and amenity issues.</p> <p>The Social Value Framework was developed by consultants as part of the Curation Report. It was intended to be used to inform decision making as to which tenants may be invited back to the new development. However, given the significant reduction in commercial floorspace the decision has been made not to offer commercial occupiers a right to return. However, they are able to apply for a unit in the new development once completed.</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)	
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	Children	Young People	Older People													
Provision of new Enterprise space at Lisson Arches development and upgrade of underused public space through the Church Street Triangle Project		✓		✓	✓	✓							BAME business owners, young people and women should be able to benefit from low rent, start-up and pop-up enterprise space across being created across the ward including 10,000 sqm of space at the Lisson Arches development. The Triangle Project will refurbish vacant buildings and upgrade underutilised public space to create a new heart for the neighbourhood that will be enjoyed by residents for many years to come.	<p>Planned mitigation: Church Street Business Programme has been set up to provide support and advice to businesses. This includes new start-ups.</p> <p>Engagement with local businesses and key stakeholders to address local need and provision</p>	<p>The business support programme has helped many individuals in the local area access support to help develop their business ideas.</p> <p>Venture 382 (a coworking/office space occupying first floor space on the corner of Edgware Rd and Church St), has been vacant since May 2020. This is now occupied by a meanwhile operator who has created 8 new creative studios and introduced a locally owned women's project teaching accredited courses in fashion and textiles. Demand has been high with 200 applications for these 8 studios.</p> <p>This provision will act as a feeder space for Lisson Arches Workspace and the Triangle Project.</p>	<p>Business support programme has not yet come to fruition following construction delays. However, the Church Street Triangle Project is soon to be completed and business support will be offered in relation to this. The Church Street Triangle operators have started to consult with key stakeholders in the local area, and have received interest from one business at Site A and one at Site B.</p>
New employment opportunities at new businesses on-site.		✓			✓								<p>The socio-economics report states that the proposed scheme will generate 355 jobs per annum (278 within Greater London, and 77 outside of Greater London), This will benefit all groups. Especially young people, and BAME groups.</p>	<p>Planned mitigation: WCC should provide support and advice for jobseekers in the area</p> <p>Further Recommendations: WCC to work with existing and new employers in the area to provide training and job opportunities for young people affected by the regeneration.</p> <p>There is also potential for a targeted recruitment initiative to be set up to advance equality of opportunity for young BAME people living in the area.</p>	<p>The localised WES service continues to provide an employment coaching service for the local community. The service works with local partners (Job Centre/developers and employers) to provide job opportunities and training for local young people.</p> <p>The CS Neighbourhood Keeper Programme supports local people into local employment, entrepreneurship and training through local projects and capacity building training.</p> <p>The Church Street Responsible Procurement Plan is being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities.</p>	<p>The WES continues to provide a service at Church Street under the same remit.</p> <p>The Church Street Neighbourhood Keeper Programme was ended in March 2023.</p> <p>Since 2018/19, local (Westminster) job /apprenticeship starts for the Church Street sites is as follows:</p> <p>Local Employment (Westminster): 55 (total) Apprenticeships (Westminster): 0 (total)</p> <p>Breakdown by scheme:</p> <p>West End Gate / Berkeley Homes: 3 Luton Street / Bouygues/: 38 Parson's North/ Osborne Construction: 3 Dudley House / Willmott Dixon: 13</p> <p>Breakdown by Year:</p> <p>2018/19 (13) 2019/20 (3)</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)	
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	Children	Young People	Older People													
																2020/21 (11) 2021/22 (21) 2022/23 (7)
Improvement of the facilities and infrastructure for Church Street Market			✓		✓	✓							Benefits should be accessible to all groups but especially those more likely to be from local income households/businesses and those who would benefit from accessibility improvements and increased facilities.	Recommendations: Continued effective engagement with the local community and traders to ensure that appropriate facilities are provided on site. Potentially through the creation of a dedicated Market Facilitator role within the Retail, Markets and Business Team. Although parking has been reduced at Site A it is recommended that the Council seek to maintain overall parking and storage provision at the target levels across sites A, B and C. Prioritisation and allocation of parking and spaces for traders should be included as part of a future strategy for the new market. The cost of parking and storage hire should be assessed to ensure fairness and affordability to all market traders.	This should allow for an increase in the number of storage units which should reduce the need for on-street parking.	The initial plans were communicated to the market traders. The redevelopment of the Site B car park tackles the issue of lack of storage and on-street parking directly.
Adverse	Permanent loss of shops and businesses providing current mix of culturally specific services and goods				x	x							BAME community living in close proximity to the site especially those from Arabic and Asian communities and Muslims.	Planned mitigation: Independent Business Advisor has been appointed to provide support and advice. Further Recommendations: Further consultation should be conducted with affected groups and a survey of alternative options to enable businesses with shared culturally specific goods and services to relocate together. Marketing and advertising advice to business so to ensure existing and new customers are made aware of relocations of businesses.	The Council are running monthly property searches for Site A businesses requesting assistance with relocating locally. Details and dates of consultation and engagement with the businesses and market traders is as follows: <ul style="list-style-type: none">- Business Forum, Sites ABC Consultation, 23rd March 2021- Market Traders, Sites ABC Consultation, 24th March 2021- Markey and Business, Pre-Planning Stage 2 Consultation, 4 sessions during July 2021- Market Traders, Relocation Pamphlet Distribution, 12th February 2022 Commercial units on Church St are also being kept from going to market to provide options for effected businesses.	Engagement is ongoing and at various stages with Site A business owners.

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)
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	Children	Young People	Older People												
Loss of shops and businesses providing affordable and accessible goods and services for existing local community	x	x	x		x		x						<p>The loss of these services could have an adverse effect on those with low incomes, children, young people, older people, disabled people, families including single parent families and those from BAME groups. These groups may have a stronger dependency on businesses providing local and affordable goods and services.</p> <p>Planned mitigation: The temporary relocation of the market is planned to be within close vicinity to the existing site which should minimise the impact on these groups. An Independent Business Advisor has been appointed to provide support and advice to local businesses.</p> <p>The Church Street regeneration team aim to assist current businesses to remain in the area or within Westminster if relocation is not possible. A curation strategy for Church Street is being developed as part of the regeneration programme which will set out the strategy to be used when letting the new commercial units within the development. A Social Value Framework will be developed as part of the curation strategy with which current and potential tenants of the new units can be measured against. This will allow WCC to invite or accept business applications for commercial units.</p> <p>Further recommendations: Business advice could extend to marketing and advertising advice to businesses to ensure existing and new customers are made aware of relocations.</p> <p>The Council should develop and implement appropriate support measures for these residents during the market relocation period, for example, through dedicated transport services and/or home delivery services.</p>	<p>The market will remain on Church St throughout the development process and will not be relocated elsewhere.</p> <p>Suspension of pitches will only happen on a Saturday as part of the public realm works.</p> <p>The Council are currently running monthly property searches for Site A businesses requesting assistance with relocating locally.</p> <p>Commercial units on Church St are also being kept from going to market to provide options for the relocation of existing businesses.</p> <p>In addition to the above mitigation measures that have been introduced, the council is currently considering promoting the relocation of businesses via their newsletter and social media channels to develop the digital skills of local businesses and traders so they too can promote to directly to their customer base.</p>	<p>A monthly newsletter is being sent to approximately 6000 local residents informing them of the relocations of Church Street businesses.</p> <p>Digital skills and training offers have been made to market traders and businesses. However, uptake has been limited.</p>
Potential for an increase in commercial rents and 'gentrification' of the area			x		x								<p>BAME business owners and BAME people and older people who currently work or shop in businesses on the existing.</p> <p>Further Recommendations Guarantees on commercial rents and market stall rates and leases through market trader agreement.</p>	<p>The Curation Report is being developed.</p>	<p>The Curation Report has been completed and will be used to inform WCC decision making (but will not be made public). It looks at all three sites and the future aspirations for development in the area – in particular the commercial layout, public</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)	
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	Children	Young People	Older People													
																space and what matters for Church Street moving forward.
Making Connections – Construction Impacts																
Adverse	Safety and accessibility issues during construction	x	x	x				x	x	x	x		Groups who are more vulnerable to poor security including young people, older people, disabled people, ethnic minority groups, transgender and non-heterosexual people. Safety issues are more prevalent amongst those for who mobility is an issue including older people, disabled people, pregnant women and children.	Recommendations: The construction management plan and Code of Construction should be prepared and followed taking into account the needs of those with protected characteristics. Key walking routes and crossing points in the area should be maintained or appropriately diverted where possible with appropriate security provided where natural surveillance has been limited. Awareness and education as to the dangers of playing on construction sites should be provided in local schools and community centres to discourage children from entering construction areas.	The project is not yet at a stage where a construction management plan has been prepared. A detailed construction management plan in will be prepared in conjunction with a developer partner. This will take in to account the recommended mitigations and strive to reduce the impact of construction as far as possible.	The project is still not at the stage where a construction management plan is required, however, the demolition management plan is to be developed imminently ahead of works starting. Both plans will stick to the code of construction and contain necessary chapters relating to, for example, noise and vibration and air quality issues. The decommissioning management plan will be consulted on with the local community so they have the opportunity to raise concerns. There will also be a dedicated Resident Liaison Officer from WCC as well as the contractor who can be contacted directly if residents have issues.
	Making Connections – Operational Impacts															
Beneficial	Improvements for walking and cycling around the site with the addition of a new pedestrian focused, playable street.	✓	✓	✓				✓					All groups but especially those with mobility issues such as older people and people with disabilities. Also, for people on lower incomes and without access to car such as younger people.	Recommendations: Effective engagement with local community and traders to ensure that appropriate infrastructure to support walking and cycling journeys is available on site. Inclusive design standards should be developed and followed for public realm improvements	The development is being designed to the latest, highest standards, all public realm areas are accessible with the use of steps avoided wherever possible and if it cannot be avoided access ramps provided. Currently access to the market storage areas is provided directly off Church street, this will be accessible only to traders. Cycling and walking will be encouraged with a generous provision of cycle storage for residents and a new pedestrianised street within Site A.	No update on design changes as things have not progressed since Planning Consent. Cycle storage provision has been established for Site A, with 827 long stay spaces and 23 short stay spaces. These provisions are in line with the London Plan 2021 and London Cycling Design Standards.
	Improved parking management and facilities			✓				✓					All groups but especially those with mobility issues who may be more reliant on private vehicle use such as older people and people with disabilities	Recommendations: Effective engagement with local community, traders and businesses to ensure that appropriate parking facilities are provided on site.	Trader parking on Site A has been reallocated as loading/unloading for storage unit users to increase storage provision on site. Conversations with Parking suggest that any loss of parking in the surrounding area	At Site A, 22 car parking spaces are to be provided. It remains unlikely that parking losses in the surrounding area will be able to get recouped elsewhere.

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	Children	Young People	Older People												
														will not be able to be recouped anywhere else. Public Realm work to consider retention of current PbP bays but this conflicts with WCC/Masterplan aspirations for less vehicles on the road.	
Population & Communities / Health & Wellbeing – Construction Impacts															
Beneficial	Effective and detailed consultation and community engagement with affected groups to contribute to sharing benefits of the regeneration	✓	✓		✓			✓	✓			All groups including those with protected characteristics who are traditionally underrepresented in terms of engagement. This can include children, young people and BAME groups as well those from the LGBT community.	<p>Planned mitigation: Consultation to date has been comprehensive and well documented.</p> <p>Further recommendations: Develop engagement strategy for engaging with groups affected by the regeneration process taking into account diversity.</p> <p>Diversity monitoring should be taken for all engagement activities with businesses, employees, residents and visitors.</p>	<p>The Council will deliver and implement the Church St Youth Engagement Strategy This strategy is being compiled, aimed at engaging youth specifically with the regeneration consultation process over a series of workshops and other events.</p> <p>During pre-planning consultation in 2021, in partnership with the Young Westminster Foundation and the Marylebone Bangladesh Society, WCC established Church Street Youth Voice; a forum made up of around 20 local young people aged 12-24. Its long-term vision is to create a sounding board for both design development and social regeneration initiatives across the Church Street programme. Church Street Youth Voice held a session on 15th March 2021 with WCC, and also did activity visits to local places such as Lord's Cricket Ground and held a local police engagement session.</p> <p>On 15th July 2021, WCC held a regeneration walkabout with 16 members of the Church Street Youth voice. The objective of the walkabout was to continue to engage young people with the regeneration and to allow them to leave feedback during the consultation.</p> <p>Implementation of the Youth Engagement Strategy has begun through youth engagement webinars and focus groups. The Young Westminster Foundation and Marylebone Bangladesh Society engaged to facilitate the CS Youth Voice to ensure</p>	No further update.

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation (June 2020)	Status of Planned and Recommended Mitigation (January 2023)	Status of Planned and Recommended Mitigation (September 2023)		
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	Children	Young People	Older People														
																participation of young people in consultation and engagement opportunities across the programme. The Youth Voice has undertaken its first youth walk to understand the lived experience of the area for young people which will feed into the regeneration plans and help young people understand more about the onsite and planned projects.	
Adverse	Uncertainty and anxiety for existing residents			x		x		x					Older people, people with medical issues affecting mental health or who might require more support and assistance with the move, people with language barriers who may find it more difficult to understand the details of the development.	<p>Planned Mitigation: Relocation team offer comprehensive support to tenants before, during and following a move.</p> <p>Council will provide additional assistance to vulnerable residents and engage with third parties including family members, social services and health practitioners to identify and address any special needs (policy for leaseholders and tenants)</p> <p>Translation services are provided where necessary to help people for whom English is not their first language.</p> <p>Further recommendations: Potential for befriending/support service to provide support to older people during and after moving, to help establish new relationships and help to find their feet in a new environment.</p>	<p>Relocations team, with a dedicated officers for households are on hand to continue offering support to all tenants with any housing issues, their moving options, their bidding process, their offers, their viewings, their moves. All removals and transportation is organised by the team.</p> <p>Regeneration office (99 Church Street) is now open every weekday, staffed with at least one manager, to offer full support and assistance to residents.</p> <p>Staff can also redirect any housing concerns to the Housing Service or put the resident in touch with the relocation team/ PPCR (independent residential advisory service) TA team or WCH to assist them.</p>	Five WCC officers from the relocations team have been available to support all tenanted residents during rehousing, as well as one WCC officer supporting the leaseholders. At Site A, currently 140 of 145 have been rehoused.	
	Loss of informal community hubs			x				x					The loss of local businesses such as cafes could potentially have an adverse impact on older people and people with limited mobility who use these as places for social interaction and connection.	<p>Planned mitigation: A new library on Church Street will provide formal community facilities and services. The new health and wellbeing hub on Lisson Grove also will provide additional community facilities and library services.</p> <p>Further recommendations: The Council should identify ways in which to support the continued operation of businesses and informal spaces of specific community importance as part of a model for social value. This particularly applies to businesses that have established</p>	<p>Plans have been drawn up to ensure the Library retains a Church Street presence.</p> <p>The Church Street team are working with library staff to ascertain the best ways forward to limit the disturbance of the space and ensure the new space offered enables them to continue offering their popular services.</p> <p>The Council has also commissioned a Cultural Infrastructure Plan work to identify and map existing cultural assets, identify</p>	The Residents Ballot took place between 28 th November – 19 th December 2022, in which eligible residents received the 'Landlord Offer' document to inform their vote and which outlined the rehousing offer and the proposed benefits of the scheme. Details on Library design improvements were included and consulted on with Library staff and Friends of the Church Street Library – the primary change which was supported by stakeholders was to change the size of the library and associated outdoor space.	

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	Children	Young People	Older People													
													relationships with local people with protected characteristics. The new health and wellbeing hub and library should be accessible to all.	any gaps and risks to culture as a result of the development proposals. The Council will also conduct Combined Regeneration and Placeshaping workshops to establish potential impact of design proposal and establish a set of strategic design principals that respect the cultural wealth potential of the ward.	The Council's Cultural Infrastructure Strategy for Sites A, B and C was completed in October 2021 and helps to inform decision making to maximise use of infrastructure and continue to engage communities.	
Environmental impacts of construction works on health and well-being of residents			x				x						All groups, especially older people, disabled people, people with long-term limiting illnesses and pregnant women or those caring for small children would be affected.	A construction management plan and a code of construction will be implemented taking into account the needs of those with protected characteristics.	The project is still not at the stage where a construction management plan is required, however, the demolition management plan is to be developed imminently ahead of works starting. Both plans will adhere to the code of construction and contain necessary chapters relating to, for example, noise and vibration and air quality issues. The decommissioning management plan will be consulted on with the local community so they have the opportunity to raise concerns. There will also be a dedicated Resident Liaison Officer from WCC as well as the contractor who can be contacted directly if residents have issues.	
Population & Communities / Health & Wellbeing – Operational Impacts																
Beneficial	Increase in high quality public open space	✓	✓	✓			✓						Disabled people, older people, women and other groups in terms of accessibility, health, wellbeing and safety benefits.	Recommendations: Ensure that public realm plans are accessible to the wider community and that effective engagement is undertaken to identify needs. Inclusive design standards (including inclusive play) should be developed and followed for public realm improvements	The development is being designed to the latest, highest standards, all public realm areas are accessible with the use of steps avoided wherever possible and if it cannot be avoided access ramps provided. There is public space provided in the form of New Street Gardens, a pedestrianised street through the middle of Site A. This provides a variety of play space and amenity space adopting inclusive design standards.	Designs have not progressed further. However, the latest public realm standards pertaining to factors such as inclusivity will be followed. The Church Street Triangle development included dedicated public realm improvements that facilitated local residents being able to informally congregate in and socialise.

10. Recommendations and conclusions

10.1 Recommendations

The key issues identified through this EqIA of the Church Street Estate Regeneration – Sites A, B and C for different groups with protected characteristics are summarised alongside provisional high-level recommendations in Table 9-2.

This identifies priority groups for which there are differential or disproportionate impacts as a result of the regeneration including older people, younger people, children, BAME people and people with disabilities. Furthermore, there are groups affected by the regeneration proposals with multiple protected characteristics for which the cumulative impacts of the regeneration proposal could have an exacerbated effect. The following paragraphs describe these priority groups and provide suggested recommendations and actions for enhancing the benefits of the regeneration and minimising adverse effects.

10.1.1 Priority groups

10.1.2 Older residents

Population figures from the Office for National Statistics show that 12.5% of people living in the Church Street ward are aged 65 or over, higher than the borough and London rate. Population projections estimate that this will increase by 70% by 2040. Church Street is also in the top 5% most deprived areas nationally for income affecting older people. The Housing Needs Assessment shows that almost half of all tenanted households are home to a resident aged 65 or over and 10% are home to a resident aged 85 or over. In addition, 32% of leaseholders are aged 65 or over all of whom leaseholders have owned the lease for 15 years or longer. The issues affecting older people are varied and include:

- Anxiety and concerns over uncertainty and less willingness to move from the estate;
- A reliance on informal and formal social, care and health support networks in the area;
- Low income;
- Medical issues and disabilities; and
- Language barriers.

Older people (including pensioners and elderly) are more likely to require one to one support to help them through the process. Those older people who are leaseholders may have concerns about their ability to buy in the local area and those who are social housing tenants will need to be supported prior, during and after the move. Both the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas set out options for remaining or returning to the area as well as moving out of the area. They also state that the Council will provide additional assistance to vulnerable residents and will engage with third parties including family members, social services and health practitioners to identify and address any special needs.

The relocation team at Westminster Council already provide one to one engagement at all stage of the relocation process and has carried out housing needs assessment for every secure tenant and have identified any language issues. Furthermore, every address in Site A has been visited and to date, 140 of the 145 tenants have successfully moved. Additionally, the Relocations team has also arranged actual services for tenants when moving to minimise resident disruption- including support with rents, utilities, mail redirection, and disposals. They have also been working to identify specific support needs for residents including

Data from the HNA survey shows that the majority of older people have lived in the Church Street area for a long period of time and manage to get out of their homes because they are familiar with their current environment. A new environment could seriously challenge this without adequate support. Vulnerable older people who are moved to temporary or permanent new locations will need to be supported to find routes to local services and replacement services (e.g. medicine deliveries) in their new location, especially those with limited mobility. Furthermore, during the relocation of the market to its new temporary location some older people may need support in accessing the goods and services the market provides. The Council should continue to identify ways

in which to support the continued operation of businesses and informal spaces of specific community importance for older people as part of a model for social value.

Older people visiting the area during the construction phase will need supporting through this time in terms of diversions, access to goods and facilities and safety and security. Clear information in different languages and through one-to-one engagement would help to convey important messages about safety.

A walking audit could be taken by the Council with local residents to understand travel patterns and important routes and destinations so that diversions can be planned accordingly.

Households with children

The area has a high rate of 0–15-year-olds compared with this is set to increase over the next 20 years whereas the rates for Westminster and London are set to decline. The area has high levels of child poverty and is located within the top 10% most deprived areas in terms of income affecting children. The impacts of this deprivation could increase when combined with other factors such as language barriers, single parent households, lack of informal and formal support networks and poor living conditions.

The relocation of families should focus on keeping children close to their schools or care networks where possible. Losing informal, free and reliable care networks can result a particularly adverse impact on low-income households especially single parent households who have no alternative option. If this is not possible, then families should be provided with assistance and support in their new accommodation to settle in to the area and find alternative care assistance whilst also avoiding disruption to education for children. Families are currently living in overcrowded accommodation in Church Street and as such priority is being given to ensuring these families are provided with more suitable accommodation where possible.

10.1.3 Young people

The area currently has high unemployment levels and income deprivation as well as high levels of anti-social behaviour and crime deprivation all of which have a high adverse impact on young people living in the area. In addition, employment figures show a disparity in employment rates for young people across different ethnic groups, with those from BAME groups experiencing lower rates of employment.

The regeneration of Church Street will provide employment opportunities both during construction and through increased retail jobs. These opportunities offer potential for young people to become employed locally and benefit from the scheme.

The localised Westminster Employment Service (WES) provides an employment coaching service for the local community. The service works with local partners (Job Centre/developers and employers) to provide job opportunities and training for local young people. Similarly, the CS Neighbourhood Keeper Programme also plays an active role and supports local people into local employment, entrepreneurship and training through local projects and capacity building training.

There is also an opportunity to work with new businesses coming into the area to establish training schemes and employment commitments for local people. Positive action should be taken to advance equality of opportunity by targeting young people from BAME groups through specific recruitment drives and initiatives.

In terms of youth engagement specifically, a strategy is currently being drafted, and will engage youth specifically with the regeneration consultation process over a series of workshops and other events. The implementation of the Youth Engagement Strategy has begun through youth engagement webinars and focus groups. The Young Westminster Foundation and Marylebone Bangladesh Society engaged to facilitate the CS Youth Voice to ensure participation of young people in consultation and engagement opportunities across the programme. Additionally, the Youth Voice has undertaken its first youth walk to understand the lived experience of the area for young people which will feed into the regeneration plans and help young people understand more about the onsite and planned projects.

An Employment, Skills and Education Strategy could be developed setting out targets and monitoring plans to demonstrate how the scheme will realise benefits for employment in the area and how different stakeholders (including private organisations commissioned to work on the regeneration) will contribute and be held to account. This can be open to all people living within the Church Street area.

10.1.4 Church Street Market Stall holders and customers

The temporary relocation and regeneration of the Church Street can provide a combination of beneficial and adverse effects for market stall holders and customers. The adverse impacts are likely to have a greater effect on market stall holders with low income and customers who rely on the market for affordable food and other goods.

A market relocation strategy can help to identify suitable and sufficient mechanisms of support to ensure that the transition from the current premises to the new temporary location is successful for the Church Street Market stallholders and customers. This should consider accessibility, costs, impact of disruption other barriers on the ability to trade and shop at the market.

10.1.5 BAME business owners and employees

The Council should also continue to identify what additional or differing forms of support should be offered to businesses or employees affected by the regeneration proposals. The business engagement officer should continue to signpost market traders as well as all existing and affected business owners and employees to relevant business support and/or training providers to increase their capabilities to effectively respond to the changes brought upon them by the regeneration of the area.

The Church Street Business Support and Programme has been set by the Council to engage with businesses and assist them through the regeneration process which will assist in mitigating against some of the adverse impacts for businesses. The Church Street regeneration team is currently developing a curation strategy for Church Street which will set out the strategy to be used by WCC Corporate Property team when letting the new commercial units within the development. The Strategy will also include a Social Value Framework with which current and potential tenants of the new units can be measured against. This will allow the Council to invite or accept business applications for commercial units. However, the strategy should clearly set out its prioritisation policy with provision for businesses currently located at the existing site. The strategy should also seek to provide information on alternative locations or signpost to relevant information for businesses who cannot relocate on Church Street.

BAME jobseekers will be able to share in direct and indirect newly created employment opportunities but should be supported to ensure that they are aware of job opportunities in the area. A local employment and procurement policy alongside an Employment, Skills and Education Strategy (see above) would help to ensure that recruitment involving contractors during the construction stage and businesses at the operation stage is inclusive and that opportunities are available to all groups with protected characteristics.

Marketing support and advice provided by the Council can help businesses to inform customers of any relocation of the Church Street market infrastructure and other affected businesses. This should also help to reduce negative effects on the community due to the loss of shops and businesses providing culturally specific goods and services.

Effective consultation and engagement with affected businesses is important for community cohesion, as well as ensuring that important cultural and social links within the area are not lost and that all groups with protected characteristics can benefit from the regeneration. Further consultation should be conducted with affected groups and a survey of alternative options for businesses within the surrounding Church Street area should be undertaken.

A clear and on-going business engagement strategy should be developed to take into account the diversity of the area and monitoring of equality effects should be undertaken on a regular basis.

10.1.6 Procurement of developer

Church Street regeneration programme will require the procurement of a developer to deliver the regeneration. 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 the delivery of regeneration) to another entity (for example a developer), the Council cannot absolve itself from its responsibility to fulfil the PSED.

The Council should ensure that compliance with PSED is factored in throughout the procurement process, and is considered in future procurements, including procurements of delivery partners.

Guidance on embedding the PSED into the procurement process from the Equality and Human Rights Commission⁷⁴ states will be that the Council will be able to factor in a potential development partner'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 a developer submitting 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.

10.2 Conclusions and next steps

The regeneration of Church Street will contribute to the improvements and regeneration of the area through a net increase in housing, new employment opportunities associated with the construction and the completed development, new leisure, and shopping facilities as well as the additional expenditure in the area. This EqIA assessment has identified potential beneficial equality effects of the proposed development as follows:

- A net increase of 629 residential properties on-site.⁷⁵ This includes social housing, family housing, wheelchair accessible housing and affordable housing. The net increase in housing should benefit people with priority for affordable housing, both social and intermediate, who are more likely to have protected characteristics (particularly for social housing). It should be noted that affordability barriers may make it harder for certain groups, including low-income BAME households, children living in low income and overcrowded households and (mainly female-headed) single parent households, from sharing in this benefit. The Council should aim to meet affordable housing, social housing, and shared ownership targets of the development;
- Additional expenditure in the area through an increase in customers attracted by an improved market, retail provision, accessibility, and public realm;
- Employment creation in construction, as well as retail and service jobs on the completed site. Businesses workspace in the Lisson Grove Arches development will create further employment and business opportunities;
- A new location for Church Street library within Site A with an improved, flexible, and more efficient use of space to deliver services for the local community; and
- An increase in open public space, play space and community facilities providing benefits in terms of safety, accessibility, and connectivity. People sharing equality protected characteristics are likely to be able to share in these benefits.

However, the assessment also shows that there are potential adverse effects including:

- Temporary or permanent relocation of existing social housing residents;
- Loss of private rental accommodation on-site affecting BAME tenants in particular;
- Temporary relocation of the Church Street Market Infrastructure;
- Loss of informal and formal community facilities and support networks;
- Loss of BAME owned businesses on-site, affecting a particularly significant proportion of Arabic businesses;
- A loss of shops and services providing the current mix of culturally specific services and goods as well as potential loss of businesses providing affordable and accessible goods and services;
- Temporary or permanent loss of employment following closure or relocation of affected businesses, particularly amongst BAME employees;
- Anxiety and stress caused by uncertainty around development plans and relocation.

The planned mitigation set out in Table 9-2 and the further recommendations set out for priority groups aim to strengthen, secure or enhance positive beneficial impacts and to mitigate for potential adverse equality impacts associated with the regeneration of Church Street. By following these recommendations and continuing to develop and implement appropriate mitigation measures, strategies and policies going forward, the Council will be paying due regard to the PSED.

⁷⁴ 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

⁷⁵ Based on existing properties on site being 492 and the planning application proposals delivering up to 1121 properties, the proposed scheme would deliver a net increase of 629 residential homes.

It is important that the Council continues to pay due regard to the PSED when contracting out the delivery of the regeneration to a developer. Therefore, the Council should ensure that the importance of the PSED and the need to follow and enhance the recommendations set out in the EqIA are embedded within the procurement process. The appointed developer should demonstrate how they will incorporate the EqIA into the delivery of the regeneration and provide commitments to mitigation and enhancing benefits through the Section 106 agreement and other funding mechanisms.

This EqIA should be considered as a live document, and should be updated, refreshed and the actions within it monitored on a regular basis at further milestones. This should include a monitoring update on the status of identified potential impacts and associated mitigation. Whilst the EqIA identifies short-term and medium-term impacts of the regeneration proposals it will also be important to capture any additional impacts including any identified long-term impacts as the programme progresses. EqIA updates should be undertaken (but not limited to) the following milestones:

- Following the appointment of a developer - to provide more detail around mitigation measures and assign responsibilities. This is to include mitigation measures into Section 106 and other funding mechanisms;
- Once the planning application has been approved and prior to the application for CPO powers from Secretary of State should this be required;
- Prior to construction - to include mitigation for construction impacts following more detailed design and monitoring of impacts of relocation.
- During construction - to respond to newly identified impacts resulting from construction works; and
- After completion of the project to monitor long-term impacts.

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