

FINAL REPORT

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Church Street Regeneration Programme – Sites A, B & C

Initial Equality Impact Assessment – Site A Design Update

Westminster City Council

June 2020

Quality information

Prepared by	Checked by	Verified by	Approved by
Laura Walker Equalities Specialist Tamsin Stevens Graduate Consultant Guillaume Rey Graduate Consultant	Mary Zsamboky Technical Director	Mary Zsamboky Technical Director	Steve Smith Technical Director

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Distribution List

# Hard Copies	PDF Required	Association / Company Name

Prepared for:

Westminster City Council
64 Victoria Street
London
SW1E 6QP

Prepared by:

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

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List of acronyms used in the text:

BAME	Black, Asian and minority ethnic
EIA	Equality Impact Assessment
IMD	Index of Multiple Deprivation
HNA	Housing Needs Assessment
PSED	Public Sector Equality Duty

1. Introduction

1.1 Purpose

This Equality Impact Assessment (EIA) report provides an update to the initial EIA undertaken of the Church Street regeneration programme by AECOM in November 2019.

AECOM has been commissioned by Westminster City Council ('the Council') to provide an update of the EIA based on changes to the regeneration plans arising from the design update of Site A in March/April 2020. The objectives of this EIA are therefore to:

- Identify any potential new negative equality effects that might arise from the design update;
- Analyse whether the design update would alter the outcomes of the previous assessment; negative equality effects would give rise to unlawful discrimination for any identified group;
- Validate committed mitigation measures and identify any further measures required to mitigate or avoid any further negative equality effects; and
- Identify potential positive equality effects that have arisen due to the design update, including opportunities to enhance equality of opportunity.

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

An EIA 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 EIA is to consider how the regeneration of Church Street would contribute to the realisation of equality effects on businesses, residents and the community affected.

This EIA will support the Council to fulfil its equality duties in relation to the PSED in developing the regeneration programme. It provides a consideration of potential direct and indirect equality impacts (both adverse and beneficial) associated with the construction and operational phases of the regeneration process. The approach draws on evidence from secondary data sources, the Housing Needs Assessment for Church Street and primary research undertaken for the purpose of this EIA in May 2019. The Council has been keen to produce an initial EIA at the early 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.

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:

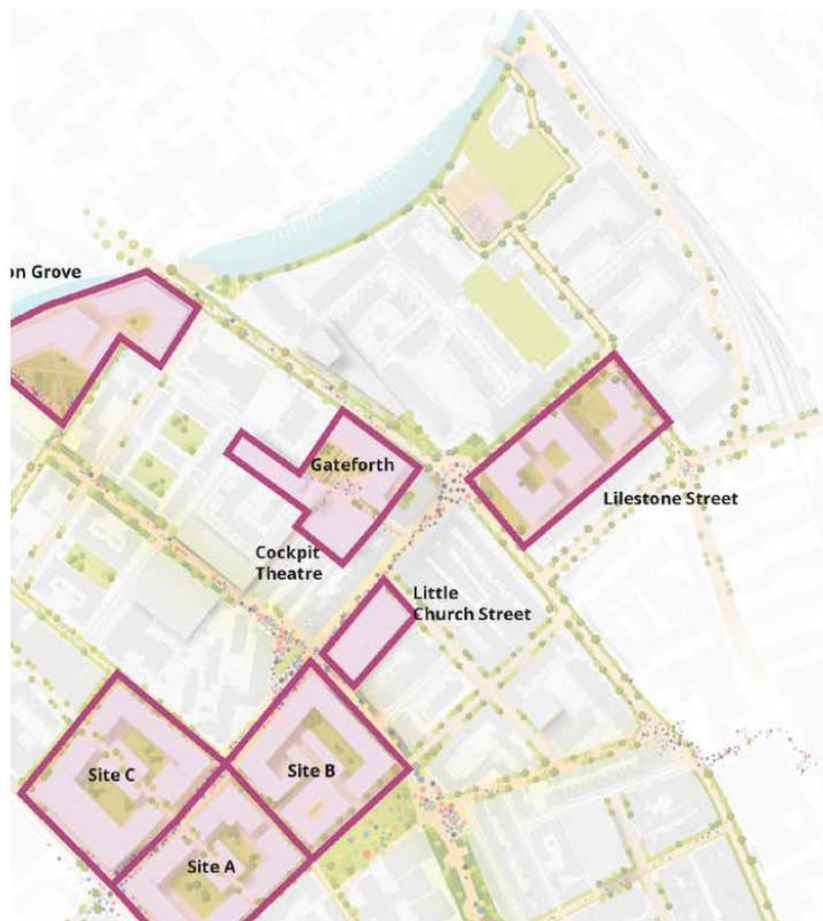
- Around 1,750 new homes of all types, including more affordable homes for local people
- A 40% increase in publicly accessible open space
- An improved street market with van parking spaces and storage facilities
- Affordable and flexible workspace and business support facilities
- A new cultural quarter centred around the antiques market and Cockpit Theatre
- 7,000m² retail space provision

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.

- 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

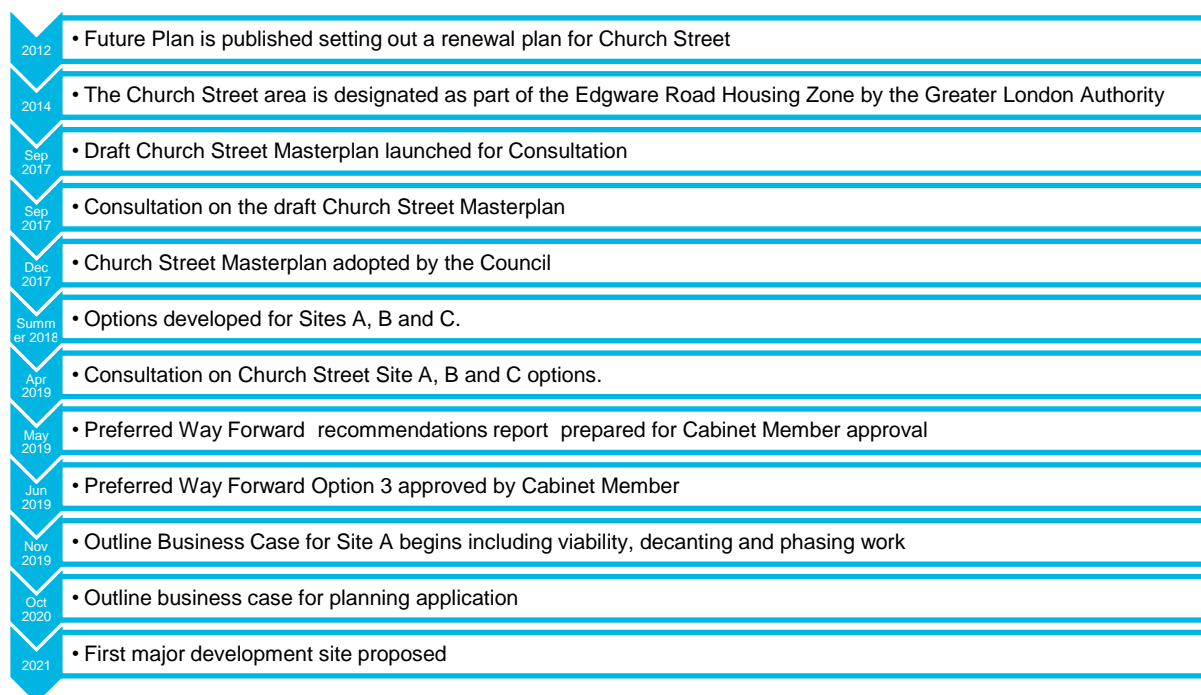


In summer 2018, the Council's Development Team engaged a consultant to develop a range of options for the three largest development sites within the Masterplan, Sites A, B & C and Church Street market. Four options for these sites and the Market were developed ranging from maintenance to full regeneration. 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.

It is envisaged that the regeneration of the Church Street area will take place over the next 15-20 years with the first major site due to start towards the end of 2021. Figure 1-2 summarises the key events to date in the regeneration of the Church Street area.

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



The initial EIA provides an assessment of the potential direct and indirect equality impacts of the Council's Preferred Way Forward on businesses, residents and the local community for Sites A, B and C..

1.3 Site A design update

The initial EIA report was finalised 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 has progressed, consultants were commissioned to undertake a design update in April 2020. This has consequently resulted in changes to the design and land use allocations from the original plans for Site A. As such, the Council considered it appropriate to review the initial EIA to ensure it was updated and relevant prior to the development of the overall outline business case for the planning application stage.

The design update of site A resulted in the following changes from the original plans and as such will be considered as part of the EIA update. These include:

- A small 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 playspace (New Street Gardens and Library Gardens).

This updated version of the initial EIA report assesses the potential impact of these changes as part of the overall assessment, revising or adding to the original assessment as appropriate.

This version of the report does not include an update of any other recent activities or initiatives taking place within the Church Street area that could potentially have an impact on or support residents, businesses and visitors as a result of the regeneration plans. This information will be collated and reported on within the EIA of the outline business case for the planning application.

1.4 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 EIA;
- **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 regeneration of the Church Street area site. 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 area regeneration.

It also considers the potential equality effects of the regeneration 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 EIA takes a 'worst case scenario'.

2.2 Approach overview

The approach for undertaking this EIA 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 EIAs.

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 and crime and safety;
- Review of national and local datasets to develop an equalities baseline profile of groups with protected characteristics within and surrounding the regeneration area including Census 2011; and
- Review of the consultation activities undertaken to date in relation to the Church Street regeneration undertaken by the Council to identify any issues of relevance to this EIA.

2.4 Primary research

2.4.1 Church Street Housing Needs Assessment

A Housing Needs Assessment survey was undertaken with households in Sites A, B, C and Lisson Grove. The survey included:

- 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 main issues for residents with regards to those with protected characteristics.

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.

² Market Research Society (September 2014) MRS Code of Conduct available at https://www.mrs.org.uk/standards/code_of_conduct (Last checked November 2019)

³ Data Protection Act 2018 available at <https://www.gov.uk/data-protection> (last checked November 2019)

Table 2-1 Survey details and response rates

Type of Survey	Description of survey activities	Response rates
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>	In total 75 business interviews were conducted with occupiers.
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>	In total 100 members of the general public were interviewed on Church Street.

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 his or her 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 EIA, 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 EIA 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 worse 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 process 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 EIA.

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 taken into account. 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 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 (February 2019)

The National Planning Policy Framework (NPPF)⁵ was adopted in July 2018 and updated with minor revisions in February 2019. 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

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

⁵ Department for Communities and Local Government, (2019); National Planning Policy Framework available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

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.

3.3 Regional Policy

3.3.1 London Plan

The London Plan⁶ was adopted with amendments in March 2016. 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 2.9 Inner London Strategic planning requires that boroughs and other stakeholders should work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting there;
- Policy 3.1 'Ensuring Equal Life Chances for All' requires that development proposals should protect and enhance facilities that meet the needs of particular groups and communities. The plan does not support proposals involving loss of these facilities without adequate justification or provision for replacement;
- Policy 3.2 'Improving Health and Addressing Health Inequalities' is also relevant, requiring due regard to be had to the impact of development proposals on health inequalities in London;
- Policies 3.17 - 3.19 concerning the provision of social infrastructure, including health and social care, education, sports and recreation facilities, are all relevant to equal opportunities;
- Housing policies 3.3 - 3.16 concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities;
- Policy 4.12 Improving Opportunities for all requires that strategic development proposals should support local employment, skills development and training opportunities. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, with Londoners from Black, Asian and Minority Ethnic (BAME) groups more than twice as likely to be unemployed as those from White groups; and
- Policy 7.1 Lifetime Neighbourhoods policy for development which enables people to live healthy active lives, and maximises opportunity for community diversity and inclusion, and the design of places that meet the needs of the community at all stages of people's lives.

3.3.2 Draft London Plan

The new Draft London Plan⁷ was published for public consultation in September 2017. This set out targets for affordable housing on new developments under draft policy H5 as follows:

- The strategic target is for 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include:

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

⁷ Greater London Authority (2018) The Draft London Plan <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>

- requiring residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications)
- using grant to increase affordable housing delivery beyond the level that would otherwise be provided
- Affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
- Public sector land delivering at least 50 per cent affordable housing across its portfolio
- Strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio.
- Affordable housing should be provided on-site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-site or as cash in lieu contribution in exceptional circumstances.

Policy E11 stated that development proposals should seek to support 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.

Policy GG1 seeks to build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

- Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city.
- Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.
- Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.
- Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.
- Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
- Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation

3.3.3 Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2018)

The Mayor's Equality, Diversity and Inclusion Strategy⁸ (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:

⁸ GLA (2018); Mayor's Equality, Diversity and Inclusion Strategy <https://www.london.gov.uk/what-we-do/communities/mayors-strategy-equality-diversity-inclusion>

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

3.3.4 Homes for London: the London Housing strategy

The London Housing Strategy was formally adopted in October 2014. The Strategy identifies its emphasis as 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 to 42,000 new homes per annum, of which 17,000 should be affordable (including 5,000 for long-term market rent). The Strategy has a particular focus on low and middle income working households, whilst also addressing the needs of vulnerable and older households.

3.3.5 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 City Plan 2019 – 2040 Regulation 19 Publication Draft (June 2019)

Westminster's City Plan⁹ is the key policy document for determining planning applications in Westminster and contains the most up-to-date policies. Following the formal consultation (known as the 'Regulation 19' stage) on Monday 28 October 2019, the latest version of the draft City Plan and all accompanying evidence papers were published for considered by Full Council on Wednesday 13 November 2019. Subject to consideration and approval of the draft City Plan by Cabinet and Full Council, the City Plan and accompanying papers will be submitted to the Secretary of State for examination.

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 “ensure those from disadvantaged backgrounds benefit from the opportunities [job growth] 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.
- **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 and the renewal of the Ebury Bridge Estate.
- **Policy 9 Affordable housing** requires that the affordable housing provision will be between 'intermediate' affordable housing for rent and sale (60%) and social and affordable rent (40%). The Council will maximise the provision of additional affordable housing in designated housing renewal areas.
- **Policy 11 Housing for specific needs** sets out that residential development will provide a housing mix to secure mixed and inclusive communities and contribute towards meeting Westminster's housing needs for different groups.
- **Policy 15.9 -11 Markets** proposes that new and enhanced existing markets will be supported in town centres.
- **Policy 18 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.

⁹ Westminster Council (2019) City Plan 2019 – 2040 Regulation 19 Publication Draft
<https://www.westminster.gov.uk/cityplan2040>

3.4.2 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 Lilestone 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.

3.4.3 Westminster Housing Renewal Strategy (2010)

In 2010 the Council published a Housing Renewal Strategy¹⁰ 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.

3.4.4 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.

¹⁰ Westminster Council (2010) Westminster Housing Renewal Strategy
http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf

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

The Council's Policy for Tenants in Housing Renewal Areas¹¹ 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.

Tenants that don't 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 housing¹²" 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

¹¹ 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

¹² 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.

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 EIA. An easy to read summary leaflet version of the policy will also be produced.

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

The Council's Policy for Leaseholders in Housing Renewal Areas¹³ 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
- 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 EIA. An easy to read summary leaflet of the policy has also been produced¹⁴.

3.4.7 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 strategy¹⁵, which is a three-year framework to take forward the priorities identified during the consultation.

3.4.8 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

¹³ 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

¹⁴ Westminster Council (2018) Leaseholders: Your options Summary of the Policy for Leaseholders in Housing Renewal Areas 2018 https://www.westminster.gov.uk/sites/default/files/final_-_wcc_leaseholders_rehousing_leaflet_017.pdf

¹⁵ Westminster Council (2018) A strategy for Westminster City Council's markets 2019-2022 <https://www.westminster.gov.uk/market-strategy>

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.

3.4.9 Westminster's equality objectives 2016 – 2020

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 objectives¹⁶ are to:

- Minimise loneliness, maximise independence and improve mental and physical wellbeing of older people;
- Better understand the needs of our diverse communities to improve our approach to tackling discrimination;
- Communities lead healthy lifestyles through increased participation in sport and physical activity;
- Promote equality of opportunity across the city by tackling barriers to employment;
- Create an environment where all children have an equal opportunity to succeed in life; and
- Improve the diversity of our workforce.

¹⁶ Westminster City Council [2016] 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.

The site 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.

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, 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 Preferred Way Forward – Sites A, B and C

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. 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. 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
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).

The following paragraphs provide some high-level information on the planned development. It should be noted that these figures are based on a best estimate at present and will be updated and confirmed when the design has been refined.

4.4 Site A design update

In April 2020 a design update was completed for Site A. Changes to the design include a net increase of 5 residential dwellings from the original plans and a reduction in retail and enterprise space. The updated design also includes changes to landscape and public open space with a net increase of approximately 385sqm of public open space resulting from the creation of New Street Gardens. This area will also incorporate inclusive and local playspace.

The plans also provide details on market trader facilities on the site including toilets, seven van parking spaces and 14 storage spaces. This replaces the 23 van parking spaces initially outlined on the original plans for Site A.

The proposed enterprise space and enterprise courtyard in Site A has been removed and will be replaced by residential dwellings, a new library (relocated from Site B), library gardens and a ground level courtyard for residents.

Figure 4-1 below shows the original proposed ground floor plans for Site A alongside the April 2020 design update.

Figure 4-1 Site A ground floor layout: original proposal and April 2020 design update



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 scheme proposes a total of 1080 residential dwellings with a diversity of tenure mix equating to a net increase of approximately 588 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.

Table 4-2 provides a breakdown of current provision against new provision for Sites A, B and C and the overall net change for different housing types.

Table 4-2 Summary of indicative changes to housing provision for Sites A, B and C

Housing Type	Current provision	New Provision	Net change
All	492	1080	588
Affordable	230	533	+302
Social	265	333	+68
Family (3+bedrooms)	153	424	+271
Wheelchair accessible housing	0 (fully accessible)	108	+108

4.6 Retail and commercial provision

The Church Street Market 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, 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.

4.7 Community and landscape

The Church Street library will be relocated from its existing location in Site B to a new location on Church Street in Site A. The library will also provide flexible space accommodating existing services provided at the current site.

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 playspace 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.

5. Consultation

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

5.1 Public Consultation on Sites A, B & C options

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 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.

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.

A website providing consultation information and an opportunity to provide feedback was also available. 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.

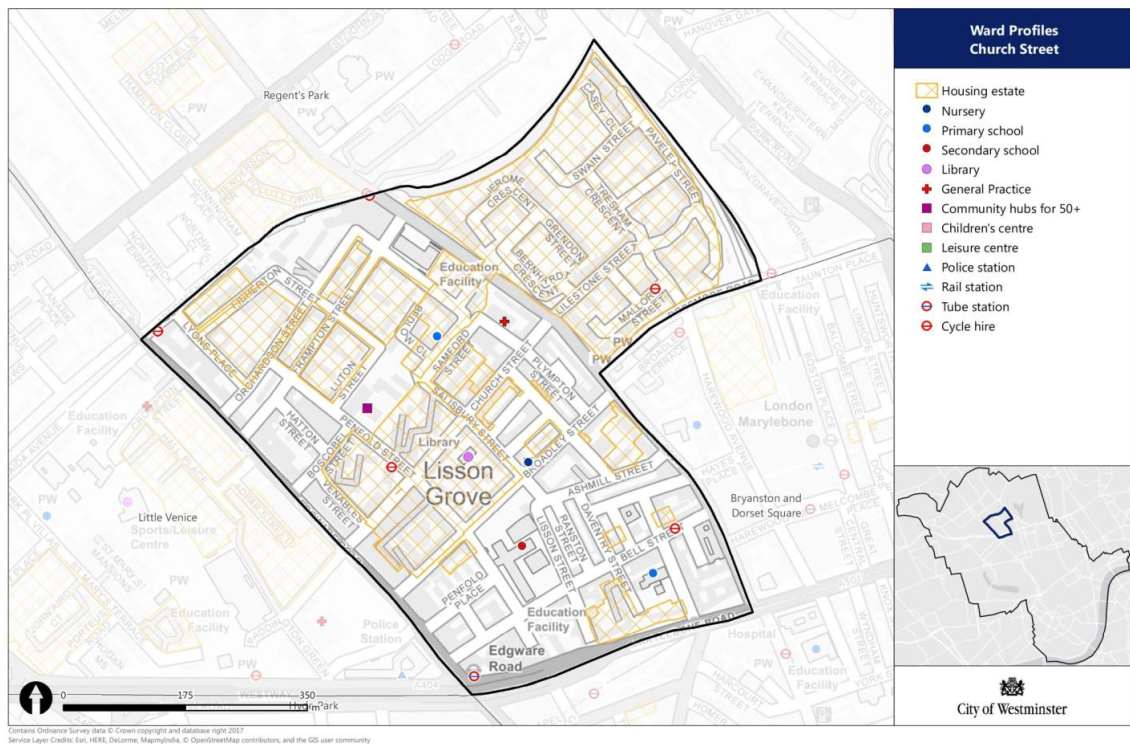
6. Equalities Baseline

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 2011 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 the most recent data available, Church Street Ward is home to 12,913 people. As shown in Table 6-1, the population of Church Street almost doubled between 2001 and 2017, increasing at a significantly higher rate between in comparison to Westminster and London growth rates.

Table 6-1 Population growth 2001 - 2017¹⁷

Year/Population	Church Street	Westminster	London
2001	6,490	181,286	7,172,036
2011	11,760	219,396	8,173,941
2017	12,913	244,796	9,176,530
% Change	+98%	+35%	+28%

Source: ONS 2001 and 2011 Census and Mid-year population estimates, 2017

¹⁷ ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

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 a high proportion of children and older people. The proportion of residents aged 0 – 15 years old across the Church Street ward (22.4%) is higher than for Westminster (16.7%) and London (20.5%) and the proportion of residents over the age of 65 is also the highest (13.18%) among all the different geographical areas.

Table 6-2 Age breakdown by different geographical areas

Age (years)	Church Street	Westminster	London
0-15	22.4%	16.7%	20.5%
16-64	64.4%	71.0%	67.7%
65 and over	13.2%	12.3%	11.8%

Source: ONS Mid-year population estimates, 2017

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 time 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.¹⁸

6.2.3 Disability

The proportion of residents at ward level in the 2011 Census who reported that their day-to-day activities were limited a lot (15.5%) was higher than the Westminster average of 7.9% and the London average of 8.0%. The proportion of residents with day-to-day activities limited a little is also higher (12.9%) than across the borough (8.0%) and London (8.8%). Correspondingly, the proportion of residents who reported that their day-to-day activities were not limited is lower than that reported for London.

Table 6-3 Limiting long-term illness or disability by different geographical areas

Level of disability	Church Street	Westminster	London
Day-to-day activities limited a lot	15.5%	7.9%	8.1%
Day-to-day activities limited a little	12.9%	8.0%	8.8%
Day-to-day activities not limited	71.6%	84.0%	83.2%

Source: ONS, DC3602EW - Long-term health problem or disability by NS-SeC by sex by age¹⁹

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.

¹⁸ 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.

¹⁹ ONS, (2011); DC3602EW - Long-term health problem or disability by NS-SeC by sex by age, available at: [https://www.nomisweb.co.uk/query/construct/summary.asp?reset=yes&mode=construct&dataset=676&version=0&anal=1&initiel=">](https://www.nomisweb.co.uk/query/construct/summary.asp?reset=yes&mode=construct&dataset=676&version=0&anal=1&initiel=) accessed April 2019

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

There are no official statistics relating to gender reassignment and the UK Census currently only collects data relating to sex (gender assigned at birth). The Office for National Statistics (ONS) has identified a need for information about gender identity for policy development and service planning with these requirements strengthened by the need for information on those with the protected characteristic of gender reassignment as set out in the Equality Act 2010. Work is currently being undertaken to identify the ways of capturing this information within the 2021 Census.

A 2012 UK survey of transgender people showed that respondents avoided some activities due to a fear of being harassed or identified as transgender. Many said they avoided public toilets and gyms, and around a quarter said they avoided clothing shops, leisure facilities, clubs or social groups, public transport, restaurants or bars. Those with 'clear and constant gender identities' as men avoided many more situations than those with 'clear and constant identities' as women. This was particularly the case with public toilets, with 77% of transgender men avoiding them.²⁰

6.2.5 Marriage and civil partnership

In Westminster, 44.8% of the population who are over the age of 16 are married or in a registered same-sex civil partnership comparable to 46.8% nationally. The 2011 census also indicates that there were 1539 people in registered civil partnerships in Westminster – which accounted for 6% of all people living in same-sex couples in London, and 2% of all people living in same-sex couples in England.

6.2.6 Pregnancy and maternity

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 quality²¹, 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.

Census 2011 data showed that one in eight households (12.5%) within Church Street Ward were lone-parent households with dependent children. Of these households, 94% were female lone parent households with 67% of these not in employment.

6.2.7 Race

Table 6-4 shows that although the largest ethnic group in the area, the proportion of White British residents at the ward level (22.2%) is considerably lower than both Westminster borough (35.3%) and London (44.9%) rates. The proportion of 'Other' white residents (14.2%) is also lower than in the borough (24.1%), but higher than London (12.7%).

The proportion of Black African residents in the ward is significantly higher than in Westminster (4.2%) but only slightly higher than the London average (7.0%).

Church Street also has a significantly large proportion of Bangladeshi residents (11.05%) compared with all other areas (e.g. 2.7% across London and 2.3% in the neighbouring ward of Little Venice).

²⁰ EHRC (2015) Is Britain Fairer?: Key Facts and Findings on Transgender People [online] available at: <https://www.equalityhumanrights.com/sites/default/files/key_facts_and_findings-transgender_0.pdf> [accessed 22/02/19]

²¹ <https://www.nhs.uk/news/pregnancy-and-child/air-pollution-associated-with-low-birthweight/>

There is also a large presence of Arab residents (13.7%) compared with the average for London (1.3%). The neighbouring areas and the borough (7.2%) also present higher levels of Arab residents than observed across London. This indicates 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.

Table 6-4 Ethnic groups by different geographical areas

Ethnic group		Church Street	Westminster	London
White	British	22.2%	35.3%	44.9%
	Irish	1.9%	2.3%	2.2%
	Gypsy or Traveller	0.02%	0.03%	0.1%
	Other	14.2%	24.1%	12.7%
Mixed/ Multiple Ethnic Groups	White/ Black Caribbean	1.3%	0.9%	1.5%
	White and Black African	1.4%	0.9%	0.8%
	White and Asian	1.6%	1.6%	1.2%
	Other	1.8%	1.8%	1.5%
Asian/ Asian British	Indian	2.1%	3.3%	6.6%
	Pakistani	1.4%	1.1%	2.7%
	Bangladeshi	11.1%	2.9%	2.7%
	Chinese	2.4%	2.7%	1.5%
	Other	5.2%	4.6%	4.9%
Black/ African/ Caribbean/ Black British	African	8.5%	4.2%	7.0%
	Caribbean	2.6%	2.0%	4.2%
	Other Black	2.5%	1.3%	2.1%
Other Ethnic Group	Arab	13.7%	7.2%	1.3%
	Other	6.1%	3.9%	2.1%

Source: ONS DC2101EW - Ethnic group by sex by age²²

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%).

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 6-5 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.

²² ONS, (2011); DC2101EW - Ethnic group by sex by age, available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?reset=yes&mode=construct&dataset=651&version=0&anal=1&initse1=> accessed April 2019

Table 6-5 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 (42%) is significantly higher than across all geographies (only 12.4% across London), while all other religions are less represented. The proportion of atheist residents (11.0%) is about half of what is observed in the other areas.

Table 6-6 Religion or belief by different geographical areas

Religion	Church Street	Westminster	London
Christian	35.5%	44.6%	48.4%
Buddhist	1.4%	1.5%	1.0%
Hindu	0.9%	1.9%	5.0%
Jewish	0.5%	3.3%	1.8%
Muslim	42.0%	18.3%	12.4%
Sikh	0.2%	0.2%	1.5%
Other religion	0.6%	0.6%	0.6%
No religion	11.0%	20.3%	20.7%
Religion not stated	7.9%	9.4%	8.5%

Source: ONS, KS209EW - Religion²³

6.2.9 Sex

Church Street has a slightly higher proportion of female residents (50.4%) compared to males (49.6%). A similar trend is observed nationally (Census 2011).

6.2.10 Sexual orientation

In 2017, there were an estimated 1.1 million people aged 16 years and over identifying as lesbian, gay or bisexual (LGB) out of a UK population aged 16 years and over of 52.8 million. This reflects approximately 2.0% of the UK population identifying as (LGB) in 2017, a 0.5% increase from 2012 figures²⁴.

London as a region has the largest proportion of adults identifying as Lesbian, Gay, or Bisexual (LGB), at 2.6% (with other regions in the UK ranging from 1.0% in the East Midlands to 1.8% in the South East). Estimates relating to numbers of people identifying with a specific sexual orientation are not available at borough level or below, due to the small sample size of this dataset.

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 Street²⁵ 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
- 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.

²³ ONS, (2011); KS209EW - Religion, available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?reset=yes&mode=construct&dataset=616&version=0&anal=1&initset=> accessed April 2019

²⁴ ONS: Sexual orientation, UK: 2017 Available at:

https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2017?utm_source=govdelivery&utm_medium=email#main-points

²⁵ For the purpose of this report deprivation in Church Street will refer to the Lower Super Output Area (LSOA) named Westminster 009K

6.3.2 Employment

According to 2011 census data, 54.8% (4,625) of Church Street residents are economically active, 7.9% are unemployed and 9.4% are retired. Levels of unemployment in Church Street are slightly greater than in Westminster (4.5%) and England (4.4%).

Table 6-7 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 neighbouring wards, the borough and London.

Table 6-7 Employee jobs by broad sector group across different geographical areas

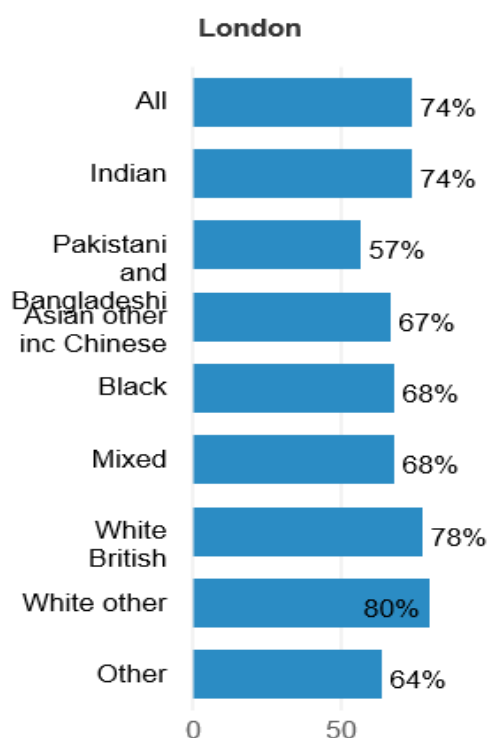
Occupation	Church Street	Westminster	London
Managers, directors, senior officials	10%	20%	12%
Professional occupations	17%	27%	22%
Associate professional & technical occupations	15%	23%	16%
Administrative & secretarial occupations	10%	9%	12%
Skilled trades occupations	9%	4%	8%
Caring, leisure & other service occupations	9%	5%	8%
Sales & customer service occupations	11%	5%	7%
Process plant / machine operatives	5%	2%	5%
Elementary occupations	14%	6%	10%

Source: ONS, KS608UK – Occupation

Figure 6-2 shows the percentage of people aged 16-64 years in employment within each ethnic group for London in 2017²⁶. 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.

²⁶ 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 6-8) at ward level for Church Street shows a higher percentage of residents with no qualifications (28.1%) relative to London as an average (17.6%) and Westminster (12.8%).

Correspondingly, the proportion of residents with level 4 qualifications and above in Church Street is lower than the London average of 37.7% and Westminster of 50.3%.

Table 6-8 Educational attainment by different geographical areas

Educational attainment	Church Street	Westminster	London
No qualifications	28.1%	12.8%	17.6%
Level 1 qualifications	10.2%	6.6%	10.7%
Level 2 qualifications	10.4%	7.8%	11.9%
Apprenticeship	1.1%	0.8%	1.6%
Level 3 qualifications	9.1%	9.2%	10.5%
Level 4 qualifications and above	26.4%	50.3%	37.7%
Other qualifications	14.8%	12.6%	10.0%

Source: ONS, LC5102EW - Highest level of qualification by age

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, Quinton Kynaston, Paddington Academy, St. Marylebone and North Westminster Community School.

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.²⁷

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.²⁸

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.²⁹

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.³⁰

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 Dementia³¹, 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 year³². 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.

6.3.5 Housing

Westminster's private rented sector is the largest in England, comprising 43% (45,000)³³ 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 2019³⁴ 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.

²⁷ 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]

²⁸ 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].

²⁹ Joint Strategic Needs Assessment for Westminster & Kensington and Chelsea (2018); *Highlight Reports*. Available at: <https://arcg.is/0f4jDu> [accessed April 2019]

³⁰ Ibid 32

³¹ Joint Strategic Needs Assessment (2015) Dementia

³² Ibid.

³³ Westminster Council (2015) Westminster Housing Strategy: Direction of Travel Statement (2015)

³⁴ Westminster Council (November 2019)

There are approximately 4,950 properties located in Church Street³⁵. The majority of households in Church Street are in the social housing sector (56%). This proportion is significantly higher than observed across both London (24%) and the borough (25%).³⁶

Census (2011) data indicates that only 17% of Church Street households own their home, significantly lower than the London average (48%). The median price paid for a property in Church Street is £500,000.³⁷

Table 6-9 below shows occupancy rates (based on the ONS definition - number of bedrooms occupied) derived from 2011 Census data. Within Westminster Borough 10.9% of households are considered overcrowded, although this is slightly lower than the London average of 11.3%. By contrast, Church Street shows much higher levels of overcrowding (21.2%).

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.³⁸

Table 6-9 Household overcrowding and under-occupation³⁹

	Overcrowded			All households	% overcrowded
	1 below standard	2+ below standard	Total		
Church Street	808	191	999	4,719	21.2%
Westminster	9,709	1,804	11,513	105,772	10.9%
London	301,325	69,206	370,531	3,266,173	11.3%

6.3.6 Transport and connectivity

Church Street benefits from excellent public transport accessibility. Edgware Road Underground Station is located 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 also 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.⁴⁰ 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.⁴¹

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

³⁵ Valuation Office Agency (2017)

³⁶ ONS, KS402EW - Tenure

³⁷ ONS, (2017)

³⁸ 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.

³⁹ 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.

⁴⁰ 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=ChIJCyq5s7AadkgR9jqLBFfdtbQ&scenario=Base%20Year&input=NW8%20LN&zoomLevel=15&places=Stations%20stops%20and%20piers>, accessed April 2019

⁴¹ 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

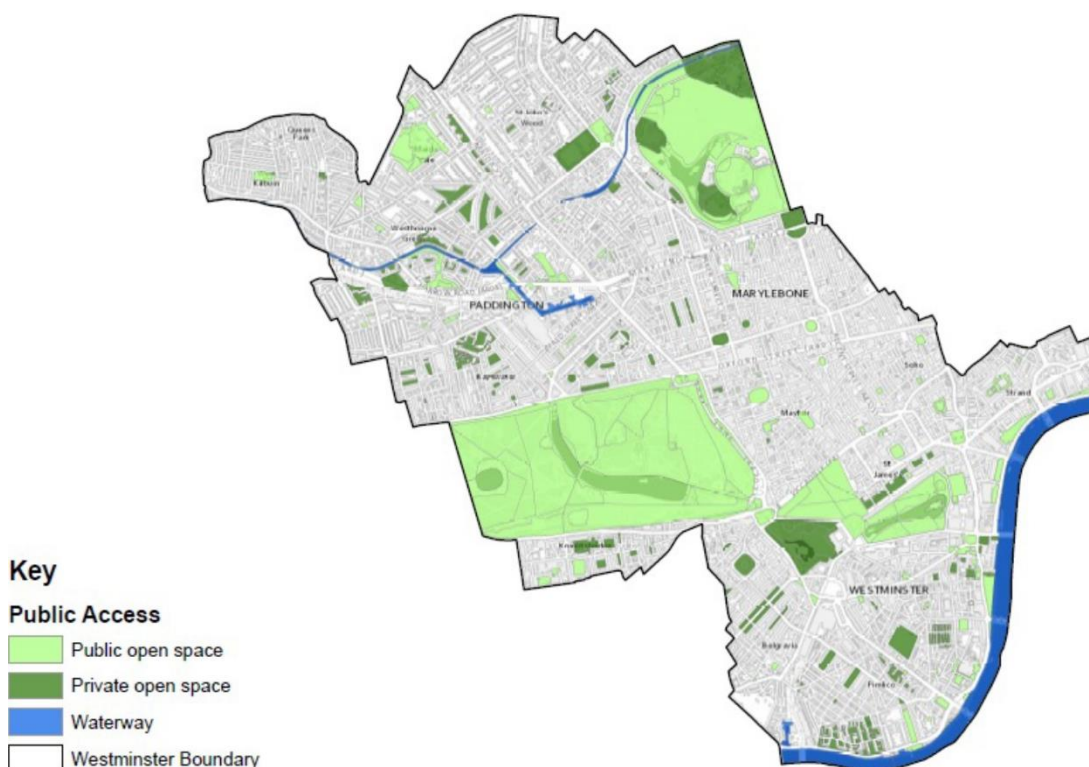
people, public spaces can often be inaccessible due to mobility limitations. Access to the public realm is also important to the provision (and management) of play space for children.

The Partnership Approach to Open Spaces and Biodiversity in Westminster⁴² 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.

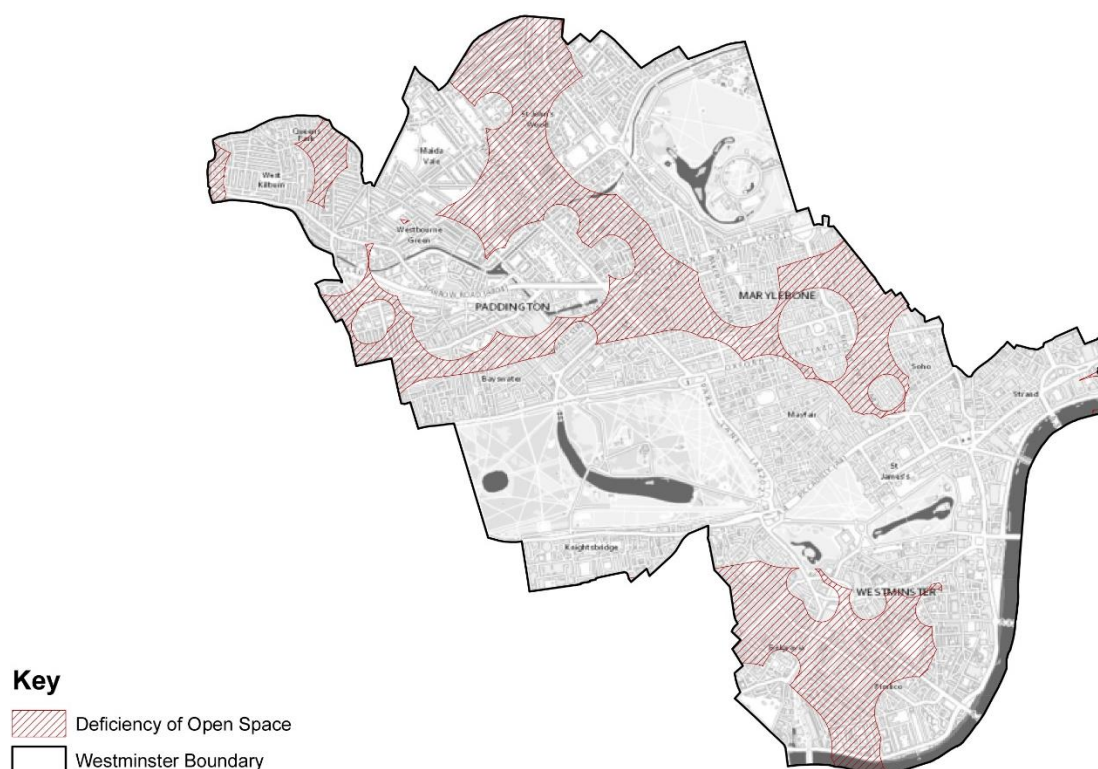
Figure 6-3 Map of open and green spaces



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.

⁴² 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 6-4 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.⁴³

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.⁴⁴

The top three reported crimes within Church Street in February 2019 were classed as miscellaneous theft (12) followed by harassment (11), and vandalism (9.21%). Church Street has a rate of 27 crimes per 1000 residents, as opposed to 28 across the borough and 8 across London.⁴⁵

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.⁴⁶

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

⁴³ 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.

⁴⁴ Equality and Human Rights Commission, (2010); *How Fair is Britain?* report. Available at: <http://www.equalityhumanrights.com/publication/how-fair-britain>, accessed September 2016.

⁴⁵ Metropolitan Police Crime Statistics. Available at: <https://www.met.police.uk/a/your-area/met/westminster/church-street/?tab=Overview>, accessed April 2019.

⁴⁶ 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.

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.⁴⁷

⁴⁷ Ibid

7. Primary research - Church Street residents

7.1 Introduction

This section provides an overview of Church Street Residents using the Housing Needs Assessment (HNA) carried out 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%)
British Syrian	1 (0.3%)

Ethnicity	Number of respondents
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%)
White Greek	1 (0.3%)
White European	7 (2.4%)

Ethnicity	Number of respondents
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 the purpose of 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 of 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.

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 of 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;
- Marelybone 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.

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.

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.

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 8-12. 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 8-12 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%
	Don't know	7.9%
Response Rate	Answered Question	126
	Skipped Question	2

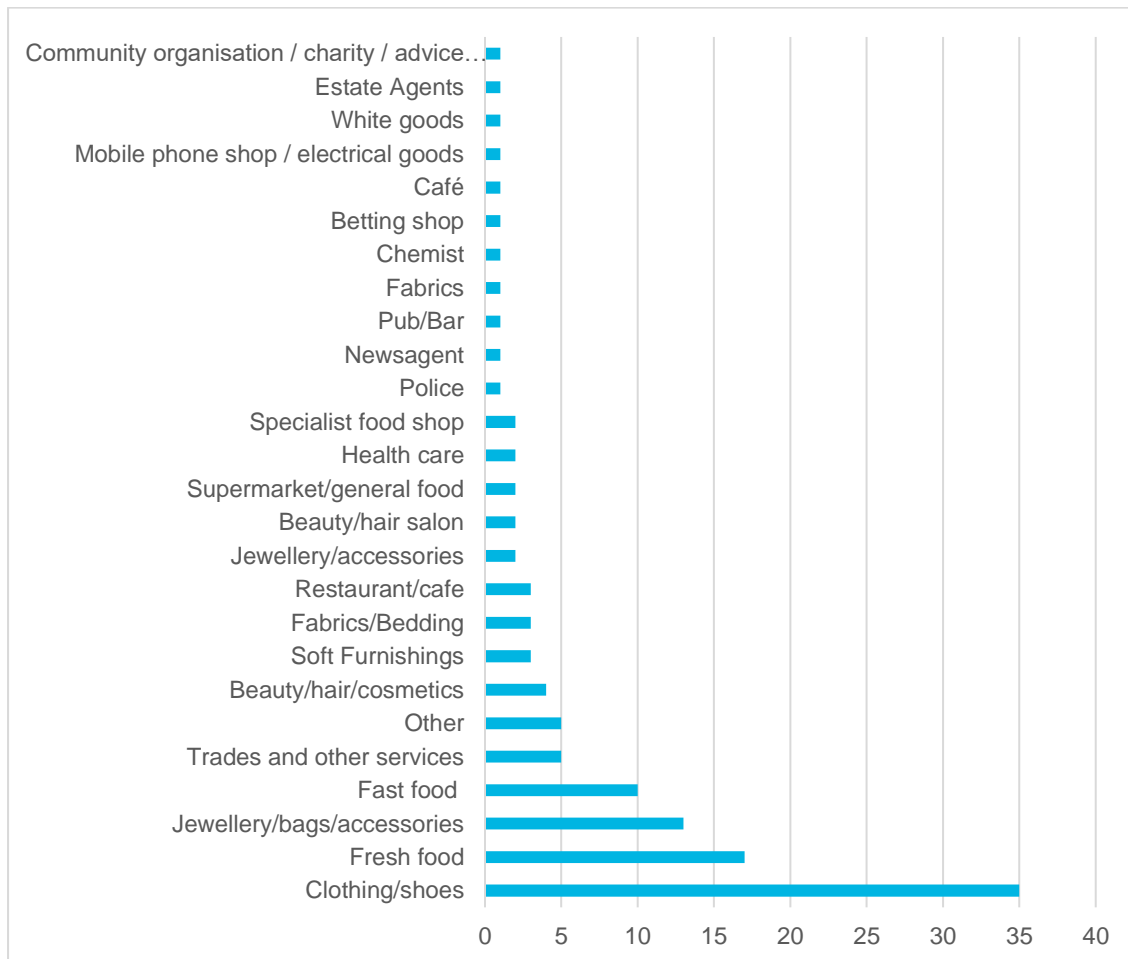
Table 8-13 summarises the length of time that businesses have operated at the current location. Over 64% of businesses have been at the location for over 6 years and 37% over 10 years which shows that most of the businesses surveyed are well established at the location.

Table 8-13 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.

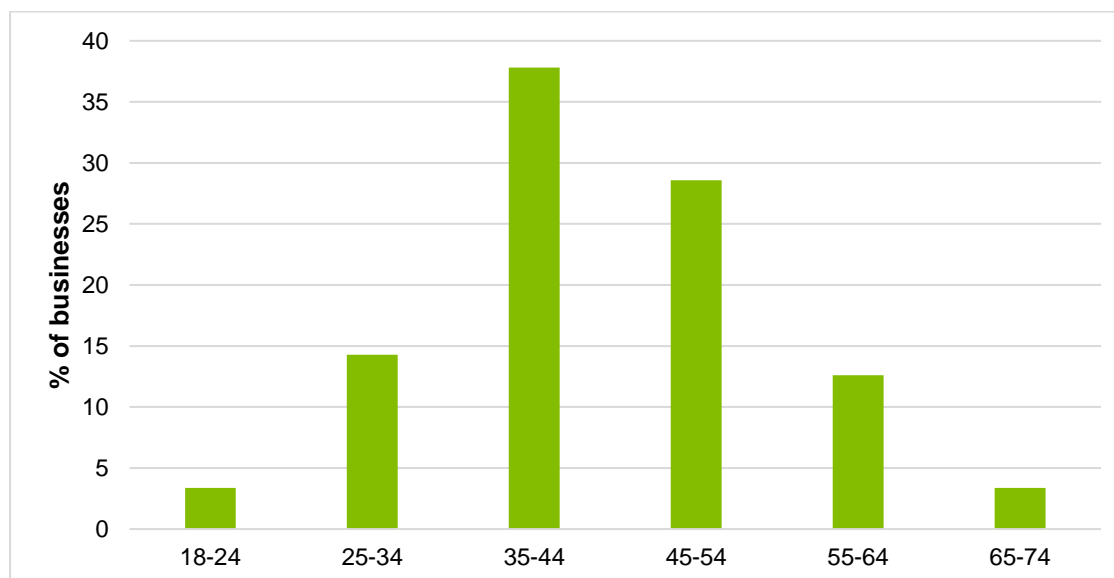
Figure 8-1 Type of existing businesses on-site



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 8-2 Age of business owners/managers



The ethnicity of business owners is shown in Table 8-14. 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 8-14 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

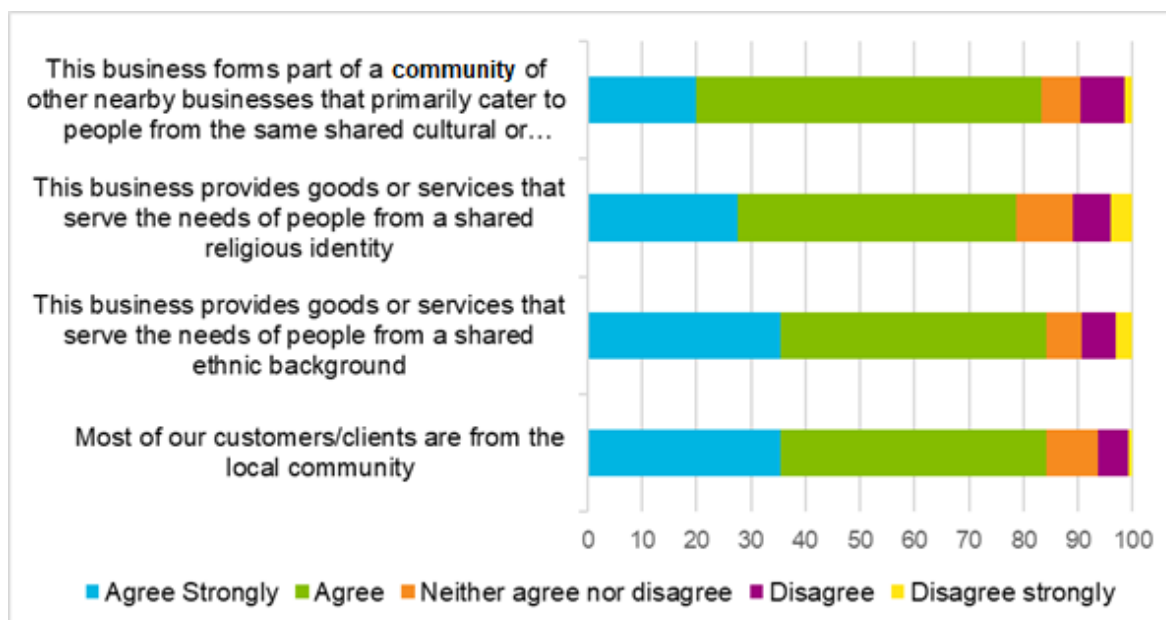
worked across the businesses interviewed. When asked about the ethnic groupings of employees, respondents listed:

- 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 8-15 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 8-15 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:

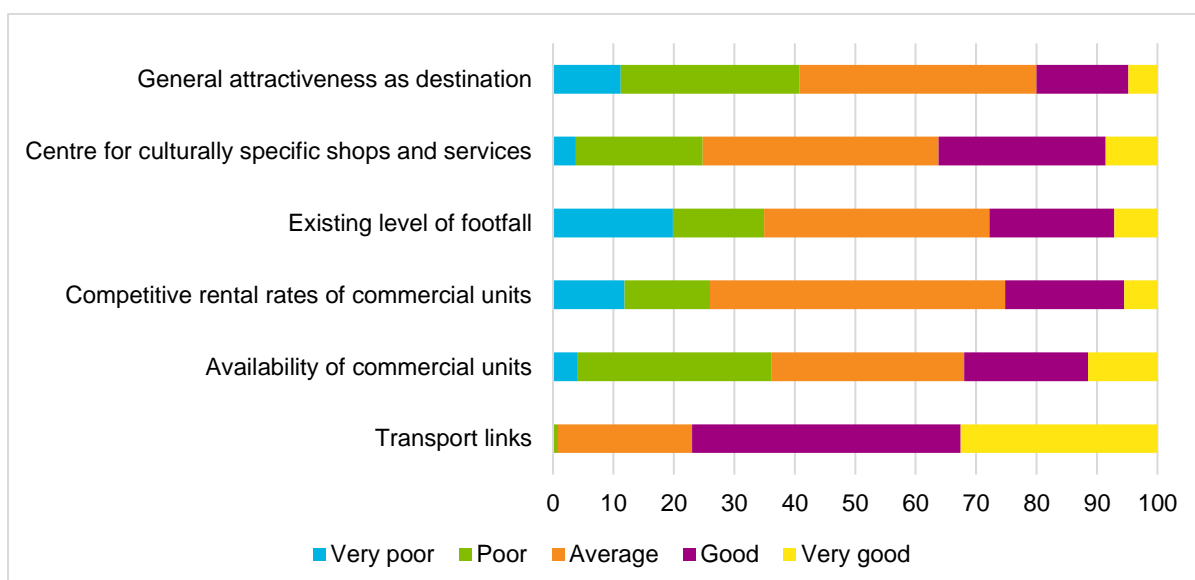
- *'It will bring more business into the area';*
- *'We need some changes as properties are not in a good state/need new housing';*
- *'maybe the area will get more attention and more footfall'; and*
- *'to modernise the market'.*

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 8-16).

Figure 8-16 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 going to happen'*
- *'I hope the proposal will benefit local business and residents and not 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 8-15 shows that the majority of respondents (43%) surveyed lived in the Church Street area, 28% visited every day and 19% visited every week.

Table 8-15 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 8-16 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 8-16 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 8-17. 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 8-17 Rating of factors relating to Church Street area

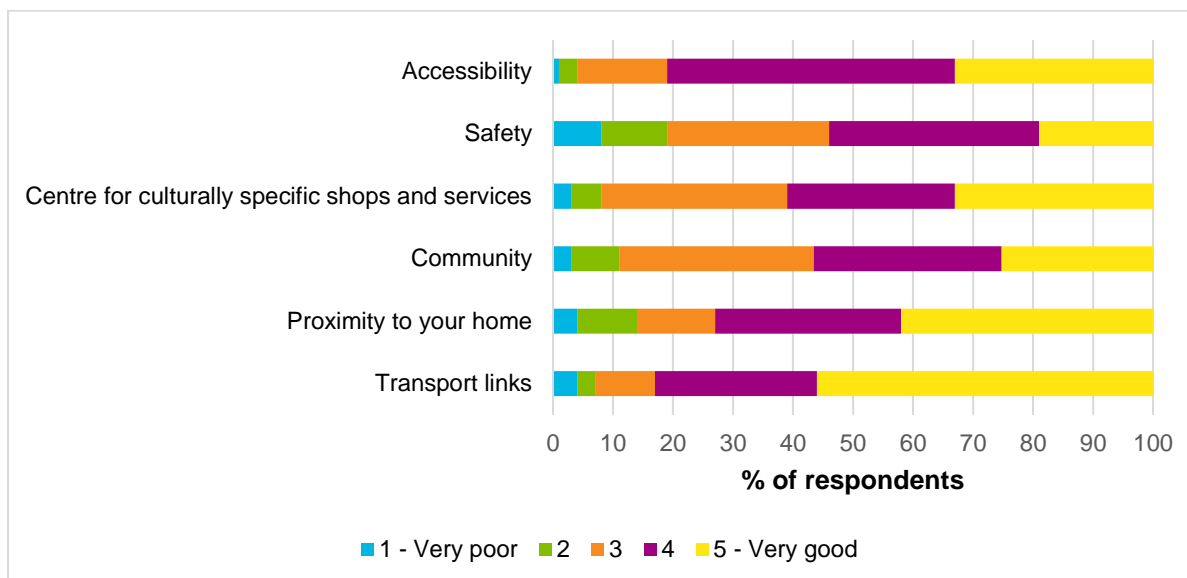


Table 8-17 Reason for visiting Church Street

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 8-18 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.*

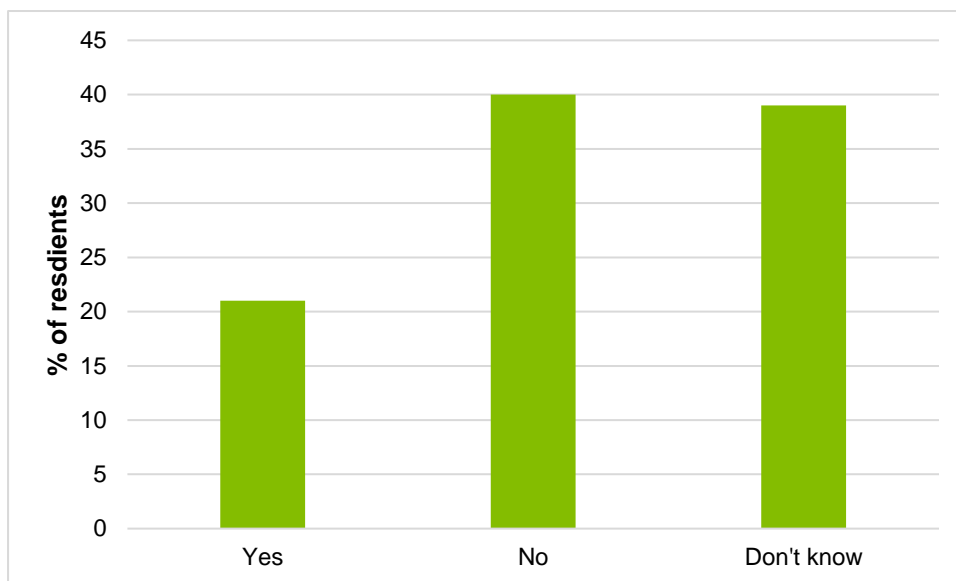
Table 8-18 Alternatives to businesses in the Church Street area

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%
	Don't know	21%
Response Rate	Answered Question	99
	Skipped Question	0

Figure 8-18 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 8-18 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's 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 8-19 provides a breakdown of the protected characteristic data of respondents who were surveyed as part of the on-street survey.

Table 8-19 Diversity breakdown of on-street respondents

Protected Characteristic	Options	Respondents
Sex	Male	47%
	Female	52%
	Other	1%
	Total	100%

Protected Characteristic	Options	Respondents
	Non-responses	0%
Age	18 - 24	19%
	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 potential regeneration of the Church Street. It considers:

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

The assessment is based on the Preferred Way Forward for Sites A, B and C Programme as approved in June 2019. It also assesses the impacts of the Site A design update completed in April 2020 where a change from the original design is likely to have an impact on the overall findings of the initial EIA or where a new potential effect has been identified. A summary of the Site A design update changes and a qualitative assessment of their impact on the EIA is included (see Appendix A).

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 EIA assessment framework

Church Street Masterplan Theme	EIA objectives
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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 public realm, including key services. • Creating streets that are legible, safe and enjoyable for pedestrians and cyclists.
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.

	<ul style="list-style-type: none"> • 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

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. Over 30% these households suffer from overcrowding and 46% are home to children. 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 Areas⁴⁸ 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.

9.2.2 Construction phase - potential adverse impacts

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 Areas⁴⁹ 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. Additionally, for those leaseholders who wish to move away from the area, the Council will provide help and support with the move. Residents 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.

The Council will seek 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

⁴⁸ 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

⁴⁹ 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

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 EIA should be updated to identify specific impacts associated that may arise with the CPO process.

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 70% 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. Therefore, it is recommended that early engagement with individual social housing tenants takes place to reduce anxiety and uncertainty around moving. This should take place as part of an engagement strategy for engaging with groups affected by the regeneration process.

In addition, a monitoring programme should be set up to record where tenants are being relocated to and should capture diversity data of household members.

Relocation of private tenants

The EIA 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.

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.

9.2.3 Operational phase - potential beneficial impacts

Net increase in housing provision

The regeneration includes provision for around 1,080 new homes, including replacement homes provided at social rent for existing council tenants and new homes, of which 35% 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 Report⁵⁰ 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 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 108) 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.

⁵⁰Westminster 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

Improved quality housing on the sites

Many of the responses to the 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 the consultation feedback found that residents would like new homes to be accessible to older people and people with disabilities including lift access.

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's 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.

9.2.4 Operational phase - potential adverse impacts

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 EIA 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.

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 difficult 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 Areas ⁵¹ 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.

⁵¹ 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

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 EIA 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 home owner. 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.

Properties affected by loss of light

There are 35 properties in the area that have been identified as experiencing injurious loss of light as a result of the regeneration proposals for sites A, B and C. The principal properties to be affected are:

- 356-392 (even) and 406-418 (even) Edgware Road (adjoining sites A and C respectively),
- 20-30 Salisbury St (north east of Plot B), and
- 103-113/115-127 (odd) Broadley St (south east of site A).

A small number of other properties in the area would also experience minor light loss. More information is required as to the protected characteristics of those living within the affected properties.

9.3 Market and economy

9.3.1 Construction phase – potential beneficial impacts

Creation of new construction-related employment opportunities

The regeneration brings with it the opportunity for new employment, including 3,500 construction-related jobs. 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 Church Street for All Employment Service has been set up to help local people into employment. This service should be used to ensure that opportunities for construction employment associated with the proposed regeneration is prioritised for those currently working and living in the area.

9.3.2 Construction phase – potential adverse impacts

Temporary relocation of Church Street Market

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.

Disruption to market traders is being minimised by continuing market trading as a whole in a new temporary location. However, consideration will need to be given to ensure that the new temporary site is as well connected and accessible as Church Street and provides the relevant needs of traders and customers in order to continue operating successfully. Any additional financial burdens should also be taken into account, 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.

Permanent or temporary relocation of businesses

The regeneration could result in the closure or temporary relocation of around 70 freehold or 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.

The revised plans for Site A show a further reduction in the amount of retail floorspace available, amounting to a reduction in the number of retail units from 19 to 3 at this site. This will result in 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. 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. 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.

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 affected 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 the Church Street for All Employment Service and similar

initiatives such as a Skills, Employment 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.

9.3.3 Operational phase – potential beneficial impacts

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. The provision of 7,000m² retail 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. As mentioned above, the Church Street regeneration team is currently developing a curation strategy for Church Street which will set out the strategy to be used for letting the new commercial units within the development.

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

Creation of new retail-related employment opportunities

The regeneration is estimated to create around 525 new retail jobs. 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. As mentioned above, the Church Street for All Employment Service has been set up 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. This includes those from BAME groups (Asian/ Black African/Arab and Latin American) who are currently overrepresented on the site in terms of employees.

Regeneration of Church Street Market

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, 3,600m² 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, seven ground floor van parking spaces and 16 market storage spaces. These facilities will be accessed from Church Street as opposed from Broadley Street as originally proposed, making it more accessible to traders. 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.

9.3.4 Operational phase – potential adverse impacts

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.

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.

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. Church Street for All has been set up to provide advice and support jobseekers on 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.

9.4 Making connections

9.4.1 Construction phase – potential adverse impacts

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 manned 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.

9.4.2 Operational phase – potential beneficial impacts

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.

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.

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.

Market traders will be able to use the improved parking for better access to the market.

9.5 Population & Community/Health & Wellbeing

9.5.1 Construction phase – potential beneficial impacts

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 among the top 10% most deprived wards 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 and further consideration should be given as to the best approach to for engagement.

A community engagement strategy should 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.

9.5.2 Construction phase – potential adverse impacts

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 EIA 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 provided where necessary to help people for whom English is not their first language.

There is also potential for a befriending/support service to provide support to older residents during and after moving, to help establish new relationships and help to find their feet in a new environment.

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 facilities. In addition, the proposed Triangle development on Church Street will offer flexible enterprise, arts and community space. However, these new formal community spaces may not be able to accommodate the facilities provided by existing informal community hubs. 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.

9.5.3 Operational phase – potential beneficial impacts

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.

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.

Increase in public open space

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 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.

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	
	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	✓											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>
	Adverse	Potential for compulsory acquisition of leasehold properties	x		x		x		x					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.
Temporary relocation of social housing tenants		x		x		x		x					<p>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.</p> <p>Those who would find it more difficult to move because of mobility issues or family size.</p>	<p>Planned mitigation: A Policy for Tenants in Housing Renewal Areas has been prepared setting out processes for temporary relocation of social housing tenants.</p> <p>An Independent Resident Advisor has been appointed by the Council to support residents.</p> <p>Further recommendation:</p> <ul style="list-style-type: none"> • Early engagement with individual social housing tenants. • 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.

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation	
	Age			Sex	Ethnicity -BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership			
	Children	Young People	Older People											
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>
Homes – Operational Impacts														
Beneficial	Net increase in overall housing provision including family, social, wheelchair accessible and affordable housing	✓	✓	✓		✓		✓					All groups but especially families with children, young people, 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.	<p>Planned mitigation: Local Letting Plan to be developed including principle for regeneration areas focusing on prioritising new affordable homes for local people.</p> <p>Outline business case to be drawn up to include budget for buy back of Westminster Council homes for existing tenants.</p> <p>Further recommendation: Meet 35% affordable housing provision targets and mix of social housing, family housing and wheelchair accessible housing.</p> <p>Identify opportunities for homeless people to be accommodated in the new development.</p>
	Improved quality housing on the sites	✓	✓	✓		✓		✓					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.	<p>Planned mitigation: Homes will be designed in accordance with the Nationally Prescribed Space Standards.</p>
Adverse	Potential increase in rent for social housing tenants	x	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.	<p>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.</p>
	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.	<p>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.</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation
	Age			Sex	Ethnicity -BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership		
	Children	Young People	Older People										
Potential adverse effects on properties 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.
Market and Economy – Construction Impacts													
Beneficial	Creation of new construction-related employment opportunities		✓										<p>Planned mitigation: Church Street for All 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>Targeted recruitment initiative to be set up by Church Street for All to advance equality of opportunity for young BAME people living in the area.</p>
	Adverse	Temporary relocation of Church Street Market			x		x						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.
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	Planned mitigation: Church Street for All programme has been set up to provide support and advice for jobseekers in the area.

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation
	Age			Sex	Ethnicity -BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership		
	Children	Young People	Older People										
													<p>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>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 allow existing businesses to return to the site.</p> <p>The Curation strategy should set out plans for prioritisation of relocation for existing businesses and to ensure a diverse mix of businesses in the new development.</p>
Provision of new Enterprise space at Lisson Arches development		✓		✓	✓	✓							<p>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.</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>
New employment opportunities at new businesses on-site.		✓			✓								<p>Young people, BAME groups, people with disabilities.</p> <p>Planned mitigation: Church Street for All programme has been set up to provide support and advice for jobseekers in the area</p> <p>Further Recommendations: Church Street for All 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>Targeted recruitment initiative to be set up by Church Street for All to advance equality of opportunity for young BAME people living in the area.</p>
Regeneration of Church Street Market			✓		✓	✓							<p>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.</p> <p>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</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation
	Age			Sex	Ethnicity -BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership		
	Children	Young People	Older People										
													<p>Market Facilitator role within the Retail, Markets and Business Team.</p> <p>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.</p> <p>Intelligence gathering exercise on lessons learned from the Seven Sisters market relocation.</p>
Adverse	Permanent loss of shops and businesses providing current mix of culturally specific services and goods					x	x						<p>BAME community living in close proximity to the site especially those from Arabic and Asian communities and Muslims.</p> <p>Planned mitigation: Independent Business Advisor has been appointed to provide support and advice.</p> <p>Further Recommendations: Further consultation should be conducted with affected groups and a survey of alternative options to enable businesses with shared cultural specific goods and services to relocate together.</p> <p>Marketing and advertising advice to business so to ensure existing and new customers are made aware of relocations of businesses.</p>
	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</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation	
	Age			Sex	Ethnicity -BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership			
	Children	Young People	Older People											
													units can be measured against. This will allow WCC to invite or accept business applications for commercial units. Further recommendations: Business advice could extend to marketing and advertising advice to businesses to ensure existing and new customers are made aware of relocations. 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.	
Potential for an increase in commercial rents and 'gentrification' of the area			x		x								BAME business owners and BAME people and older people who currently work or shop in businesses on the existing. Further Recommendations Guarantees on commercial rents and market stall rates and leases through market trader agreement.	
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.
Making Connections – Operational Impacts														
Beneficial	Improvements for walking and cycling	✓	✓	✓				✓					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	

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation
	Age			Sex	Ethnicity -BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership		
	Children	Young People	Older People										
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.
Population & Communities / Health & Wellbeing – Construction Impacts													
Beneficial	Effective 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>
	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.
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</p>

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation
	Age			Sex	Ethnicity -BAME groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage/ Civil Partnership		
	Children	Young People	Older People										
													businesses that have established relationships with local people with protected characteristics. The new health and wellbeing hub and library should be accessible to all.
Population & Communities / Health & Wellbeing – Operational Impacts													
Beneficial	New library and library gardens located on Church Street (Site A design update) (Additional library services to be incorporated into the new health and wellbeing hub on Lisson Grove)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		The new library site has potential to provide more flexible and efficient space providing support, training and education facilities for all groups with protected characteristics. Recommendations: Potential barriers to accessing the new site should be considered further. On-going engagement with library users, local residents and service providers at the library should continue to contribute to the development of an accessible and inclusive design.
	Increase in 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

10. Recommendations and conclusions

10.1 Recommendations

The key issues identified through this initial EIA of the Church Street regeneration proposals 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

Older residents

Population figures from the Office for National Statistics show that 13.2% of people living in the Church Street 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. However, additional measures may help to make the reduce anxiety with regards to moving. For example, where people are unable to be moved with their friends or neighbours they could be matched with a 'buddy' at their new accommodation to make the transition easier.

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 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.

An Independent Resident Advisor has been appointed to provide advice and support to residents and continued engagement with residents to understand their needs should minimise negative impacts during temporary or permanent relocation. This service should be available to provide advice to people in their homes if possible to assist those who have limited mobility.

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 should be given to ensuring these families are provided with more suitable accommodation where possible.

A community engagement strategy must include a clear approach for effective engagement with children and young people living in the area.

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.

Church Street for All programme provides advice and support for local people including information job opportunities. The Council and Church Street for All could help to ensure that opportunities for young people in the area are enhanced by requiring that organisations procured in the design, development and construction of the scheme commit to providing work placements, apprenticeships or permanent work opportunities to those living within the Church Street area as part of their contract. 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 led by Church Street for All.

A Skills, Employment 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.

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.

The Wards Corner regeneration⁵² in Haringey aims to regenerate the Seven Sisters market. In order to pay due regard to the PSED and minimise adverse impacts to market stall holders and customers, Haringey Council agreed a series of commitments part of section 106 with the private developer that a Market Facilitator was in place promote the interests of non-English speaking traders in the temporary market and the new market as well as providing appropriate business support and advice to all traders and people working at the market. They also assisted Traders in continuing to trade from the Temporary Market as well as advertising and promoting the temporary market and new market area to customers. A similar initiative could help to support Church Street market traders and contribute to a smooth transition to the temporary market and back to the new market. The Council should consider gathering intelligence as to any lessons learned from the Seven Sisters market relocation and consider how this might be factored into the current plans for the relocation of the Church Street market.

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 aware of job opportunities in the area. Church Street for All has been set up to provide advice and support jobseekers on the area. A local employment and procurement policy alongside a Skills, Employment 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 and other affected businesses. This should also help to

⁵² <https://www.tottenham.london/WC>

reduce negative effects on the community due 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 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.

10.1.2 Procurement of developer

The 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, for example;

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

The Council should also take into account the PSED when nominating representatives to the Board of any incorporated vehicle involved in the delivery of the Church Street regeneration project (e.g. a joint venture vehicle). This means that the Board members should be knowledgeable of the issues identified in the EIA and understand the aims of PSED. This will be of particular relevance in relation to any community interest company (CIC) that is to hold community assets and interface directly with the community.

Guidance on embedding the PSED into the procurement process from the Equality and Human Rights Commission⁵³ 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 EIA assessment has identified potential beneficial equality effects of the proposed development as follows:

- A net increase of 735 residential properties on-site. 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-

⁵³ 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

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;
- 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;
- Right to light implications for housing on neighbouring streets; and
- Anxiety and stress caused by uncertainty around development plans and relocation.

The provisional recommendations 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 developing a set of clear mitigation measures as part of the Outline Business case and associated strategies and policies going forward, the Council will be paying due regard to the PSED.

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 EIA are embedded within the procurement process. The appointed developer should demonstrate how they will incorporate the EIA into the delivery of the regeneration and provide commitments to mitigation and enhancing benefits through the Section 106 agreement and other funding mechanisms.

This EIA should be considered as a live document, and should be updated, refreshed and the actions within it monitored on a regular basis at key milestones in the project. This should include a monitoring update on the status of identified potential impacts and associated mitigation. EIA updates should be undertaken (but not limited to) the following milestones:

- Following design updates where changes to the design have the potential to affect the EIA outcomes;
- Outline Business Case – to include more detailed information with regards to the planned development at the planning application stage;
- 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;

- As part of the planning application;
- Once the planning application has been approved and prior to the application for CPO powers from Secretary of State should this be required; and

Prior to construction - to include mitigation for construction impacts following more detailed design and monitoring of impacts of relocation.

Appendix A – Site A Design Update EIA Appraisal

Masterplan Theme	Site A design update outcomes	Update to EIA required?
Homes	<p>The number of dwellings has increased overall by 6 in Site A with the change in numbers by type as follows:</p> <ul style="list-style-type: none"> - Social reprovision: = no change - Social new intermediate: +13 - Social new rent: -15 - Private: +8 	<p>No – the overall increase in the number of dwellings is low and the overall percentage breakdown for types of dwelling does not change significantly. Allocation of tenure types and social and affordable housing is within housing provision targets and recommended split.</p>
Market and Economy	<p>The Market - The design update provides space for new market facilities including toilets, van parking and storage on the ground floor with access directly from Church Street (as opposed to Broadley Street as originally proposed). This is a reduction of van parking spaces from the original design but the addition of storage spaces and toilet facilities in lieu of this.</p> <p>Retail space - Loss of retail space due to market access and increased residential properties. Current small units to be replaced by larger units. There are currently 19 units in site A and provision for 3 units in the Site A design update.</p> <p>Enterprise Space – the design update includes the removal of the enterprise space in Site A. This was originally designed for start-up or pop-up businesses, to be let for reduced rent. However, viability studies showed the location of this site for this purpose to be difficult.</p>	<p>Yes - feedback from market traders showed a concern about lack of facilities and a desire for more facilities in the new development. There are implications with regards to the allocation of parking spaces and storage and how these will be allocated and prioritised and if the overall number of spaces will be affected across the area.</p> <p>Yes – to highlight under ‘permanent or temporary loss of business’ that there will be insufficient units to accommodate all existing businesses back on to the site. The Corporate property 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 units within the development.</p> <p>Yes – to highlight the loss of enterprise space but the provision of space elsewhere in the area supporting small businesses (potentially those owned by groups with protected characteristics). On review, 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 will be available as part of the wider regeneration plans for the area.</p>
Making Connections	<p>Landscape and transport measures on Church Street - Design update plans show number of possibilities around potential for parklets/additional seating along Church Street as well as TRO to reduce vehicle access and potential to adjust pitch locations to increase space for social events and play opportunities</p>	<p>No – although these measures are being looked at they are not part of the detailed design currently and as such will not be assessed as part of the EIA.</p>
Population and Communities / Health and Wellbeing	<p>Church Street Library - The new site for the library will be in Site A (relocated from the existing site in Site B). The new health and wellbeing hub on Lisson will also incorporate library services as well so there will be additional library facilities across the regeneration area.</p> <p>There will be a reduction in floorspace for the new Church Street library when compared to the existing site. However, the site will allow a</p>	<p>Yes – Stakeholder, councillor and public feedback from consultation expressed a preference for the library to remain on Church Street and not be moved out of the area into the new health and wellbeing hub. This shows that community engagement is being effective. However, engagement must be ongoing to ensure that the new facilities are fully inclusive and accessible and</p>

more efficient and flexible use of space and such all services currently using the library (e.g. Citizens Advice Bureau) should be able to continue in the new library. The additional library at the health and wellbeing hub will also add to available space for services.

Open space at the existing library is used for outdoor activities and growing plants. There is provision in the new site for the same amount of outdoor library space within the 'library garden'.

Public Open Space - The design update includes the removal of Enterprise Yard (1090 sqm) and the addition of New Street Gardens (1465 sqm) and library gardens (220 sqm). This provides a net increase in open public space within Site A and across the regeneration area. New Street Gardens will be accessible to local residents and the public and contain local and inclusive playspace for 5-11 year olds. This will also include an overall increase in provision for local play for 5 - 11 year olds in the area.

meet the needs the need of current users and service providers.

Yes – as this will have beneficial effects on all groups with protected characteristics in terms access to local outdoor space. Particular benefits for children with an increase of playspace.

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