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# 1. Introduction

## 1.1 Purpose

AECOM has been commissioned by Westminster City Council ('the Council') to provide an Equality Impact Assessment (EqIA) on the use of the Council's compulsory purchase powers to enable the delivery of Site A of the proposed Church Street Estate Regeneration Scheme.

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 Compulsory Purchase Order (CPO) does not lead to unlawful discrimination (direct and indirect), and that it advances equality of opportunity and fosters good relations between those with a protected characteristic<sup>1</sup> and all others.

An EqIA is often used by public sector organisations to demonstrate how this duty has been discharged. It is a systematic assessment of the potential or actual effects of plans, policies, or proposals on groups with protected characteristics. The purpose of this EqIA is to consider how the CPO could contribute to equality impacts on businesses and residents affected.

The Council is currently aiming to acquire current interests in Site A through agreement. However, it is anticipated that the Council will need to use CPO powers to acquire any outstanding interests. This EqIA will support the Council to fulfil its equality duties in relation to the PSED as well as addressing the Council's equalities objectives in using its CPO powers. It provides a consideration of potential direct equality impacts (both negative and positive) associated with the CPO process on affected businesses and residents.

It is the Council's policy that EqIAs are undertaken at the earliest stages of project, and updated as the project develops. As such, a wider regeneration scheme EqIA (referred to throughout this document as 'regeneration scheme EqIA') was initially produced by AECOM in November 2019. Following on from this, the report was updated at the following milestones:

- June 2020 - to reflect changes to the regeneration plans arising from the design update of Site A in March/April 2020;
- October 2021 – for the purposes of the planning application; and
- January 2023 – updates to planning application incorporating amendments to the design of Site A between August and November 2022.

Whilst this CPO EqIA report has been produced as a separate document to the regeneration scheme EqIA, it draws on the same evidence collated including both secondary data sources as well as primary research undertaken between February and April 2018 and subsequent primary research carried out in November 2021. It also refers to the actions and recommendations within the regeneration scheme EqIA which demonstrate how the Council has considered its duties to date with regards to the PSED in relation to the affected interests and wider community.

## 1.2 Context

The draft Church Street Masterplan was launched in September 2017 and, following an intensive consultation, the final draft was agreed by Cabinet in December 2017.

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

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

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, which was subject to further consultation with residents, businesses and market traders living and working in Sites A, B & C, the Church Street market infrastructure.

The Council submitted a hybrid planning application comprising a part detailed application covering Site A and a part outline application for the balance of the site comprising the two further phases (Site B and Site C) in November 2021. Since the submission of the planning application, a series of amendments were made to the scheme and submitted in January and February 2023.

Each phase of the development is expected to take between three to five years to complete, however there will be overlap between each phase. With this in mind the total length of the programme is currently estimated to be around thirteen years to deliver the development from commencement on site. Works are currently programmed to begin on Site A in 2023.

## 1.3 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 of the CPO;
- **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 including details of Site A affected interests;
- **Section 5: Consultation and engagement** – a summary of consultation and engagement undertaken to date on the proposed regeneration;
- **Section 6: Equalities baseline** – using secondary data sources such as Census 2021 data to form an understanding of the community residing and working within the area, and a summary of primary research undertaken for the project wide EqIA;
- **Section 7: Assessment of potential equality impacts** – an assessment of indirect and direct impacts and equality effects of Site A CPO; and
- **Section 8: 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 assessing the equality impacts of the CPO of Site A interests to support the delivery of the Church Street Regeneration Scheme (the 'regeneration scheme'). The assessment considers how the CPO could directly impact (both positively and negatively) commercial and residential leaseholders and occupiers who share protected characteristics within the footprint of the proposed development.

It also considers the potential equality impacts of the CPO 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.

It also considers the indirect impacts that would be realised as a result of the CPO leading to the successful delivery of the regeneration scheme. This applies to both construction and operational impacts associated with the development.

In considering the direct impacts of the CPO, this EqIA takes a 'worst case scenario' approach, considering the most severe possible outcome that can reasonably be predicted to occur in a given situation.

### 2.2 Approach overview

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

1. Desk-based review - including relevant national, regional and local policies and legislation, planning application documents, documents associated with the CPO and secondary and primary datasets relating to groups with protected characteristics;
2. Assessment of potential impacts - informed by a consideration of the policy context, consultation responses, equalities baseline data, primary research survey findings; and
3. Recommendations and conclusions.

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

### 2.3 Desk-based review

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

- Review of all relevant and recent documentation regarding the proposed regeneration under key equality themes of housing, business and employment, public realm, transport and accessibility, crime and safety;
- Review of national and local datasets to develop an equalities baseline profile of groups with protected characteristics within and surrounding the regeneration area;



- Review of the primary research undertaken for the project wide EqIA to identify responses associated with the affected interests in Site A.
- Review of recent impact assessments produced, notably the socioeconomic analysis of Church Street Masterplan (2017) and Environmental Impact Assessment (EIA) (2021) and Health Impact Assessment (2021); and
- Review of the consultation activities undertaken to date in relation to the proposals undertaken by the Council to identify any issues of relevance to this EqIA.

## 2.4 Primary research

For the purpose of the regeneration scheme EqIA, AECOM have undertaken a series of primary research activities. These include a Housing Needs Assessment (HNA), business and market trader surveys and on-street customer surveys. Table 2-1 summarises the approach for each different activity and the response rate achieved.

**Table 2-1 Summary of primary research**

<b>Type of primary research</b>	<b>Description of research activities</b>	<b>Response rates</b>
<b>Housing Needs Assessment</b>	<p>A Housing Needs Assessment survey was undertaken by the Council with households in Sites A, B &amp; C in Autumn 2018.</p> <p>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. The result of this analysis can be found in Section 6 of this report.</p>	<p>In total 299 households responded to the survey (55% response rate).</p> <p>The survey was undertaken with: council tenants, registered provider tenants, homeless households living in temporary accommodation, private tenants, resident leaseholders and non-resident leaseholders.</p>
<b>EqIA business and market trader survey</b>	<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 team of trained market research interviewers 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 14<sup>th</sup> May and 21<sup>st</sup> May. The survey was either completed or an appointment to conduct the survey at a later</p>	<p>In total 128 business interviews were conducted with occupiers.</p>

date was made to maximise participation in the survey.

<b>EqIA On-street surveys</b>	An on-street survey was prepared for customers of Church Street businesses and the market. Respondents were stopped and asked to participate in the survey on-street by the survey team. 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.	In total 100 members of the general public were interviewed on Church Street.
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Once the surveys were completed all datasets were checked, cleaned and coded in the case of open-ended responses. Analysis was undertaken identifying any significant differences in responses by different groups with protected characteristics. A summary of the survey findings 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 CPO could contribute to the realisation of the equality impacts for affected groups 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 impacts. A disproportionate equality impact may arise when the 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 EqlA, 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 impact 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 EqlA will consider impacts on groups of people rather than on individuals.

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

- People who share a protected characteristic form a disproportionately large number of those adversely affected by the regeneration;
- Amongst the population affected by the regeneration, people who share protected characteristics are particularly vulnerable or sensitive to a possible impact in relation to their possessing a specific protected characteristic;
- The regeneration may either make worsen or improve existing disadvantage (e.g. housing deprivation or economic disadvantage) affecting people who share a protected characteristic;
- People with shared protected characteristics amongst the affected population may not have an equal share in the benefits realised as a result of the regeneration. This can be either due to direct or indirect discrimination or where the groups experience particular barriers to realising such benefits, unless suitable mitigations are proposed to overcome those barriers; and
- The regeneration may worsen existing community cohesion amongst the affected local population or exacerbate conflicts with community cohesion policy objectives.

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

## 2.6 Conclusions

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

## 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 process<sup>2</sup> 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).

Through the CPO process the acquiring authority should demonstrate that it has considered alternatives to the scheme underlying the CPO, and whether the public benefits of the scheme could be delivered without interfering with the private rights of existing owners and occupiers, or via a method where the impact would not be so detrimental.

## 3.2 National Policy

### 3.2.1 National Planning Policy Framework (July 2021)<sup>3</sup>

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

While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:

- The economic role contributes to building “a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure”;
- The social role supports strong, vibrant and healthy communities by “providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being”; and
- The environmental role contributes to protecting and enhancing the “natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

<sup>2</sup> Ministry of Housing, Communities & Local Government (2018). Guidance on Compulsory purchase process and the Cridel Down Rules. Available at: [Compulsory purchase process and the Cridel Down Rules - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/714447/Compulsory_purchase_process_and_the_Cridel_Down_Rules_-_GOV.UK_(www.gov.uk).pdf)

<sup>3</sup> Department for Communities and Local Government (2021). National Planning Policy Framework. Available at: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/96131/National_Planning_Policy_Framework.pdf)

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

- Local strategies to improve health, social and cultural wellbeing for all;
- The delivery of sufficient community and cultural facilities and services to meet local needs;
- The requirement to plan for the needs of different groups within communities.

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

## 3.3 Regional Policy

### 3.3.1 London Plan (2021)<sup>4</sup>

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

- **Policy GG1: Building Strong and Inclusive Communities** which builds on the idea that “good growth is inclusive growth” and requires that planning and development involves community and stakeholder engagement, provides access to good quality community spaces, and supports the creation of a London for all Londoners, where all people including protected characteristic groups (PCGs) are able to move around and enjoy the city’s opportunities with ease, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation;
- **Policy SD 10: Strategic and Local Regeneration** which requires development and regeneration opportunities address inequality and deprivation across London, by allocating Strategic Areas of Regeneration and Local Areas of Regeneration. The policy also highlights the need to work collaboratively with local stakeholders and understand local community’s needs so that regeneration can address the local area’s most urgent issues;
- Policies **HC1 and HC3**, which highlight heritage conservation and the importance of strategic and local views;
- Policies **S1 to S7** concerning the provision of social infrastructure, including health and social care, education, sports and recreation facilities, are all relevant to equal opportunities;
- Housing policies **H1 – H16** concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities;
- Design policies **D6, D7 and D7**, which relate to accessible design and tall buildings, which are especially relevant here;
- Employment policy **E11: Skills and Opportunities** for all requires that strategic development proposals should support local employment, skills development,

<sup>4</sup> Greater London Authority (2016). London Plan. Available at: [Page not found | London City Hall](#)

apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, and that low pay and gender and ethnicity pay gaps are critical issues; and

- Employment policy **E9: Retail, Markets and Hot Food Takeaways**, which highlight the importance of a diverse and competitive retail sector, stating specifically the crucial role played by street markets in creating and sustaining London's vibrant character, while also serving the shopping and leisure needs of specific ethnic groups.

### 3.3.2 Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2018)<sup>5</sup>

The Mayor's Equality, Diversity and Inclusion Strategy (EDIS) was published in May 2018. The strategy sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality, as well as the challenges and disadvantage facing London can be a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential. The strategy sets out 33 equality, diversity and inclusion objectives which include working with councils and other partners to:

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

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<sup>5</sup> Greater London Authority (2018). Mayor's Equality, Diversity and Inclusion Strategy. Available at: [The Mayor's strategy for equality, diversity and inclusion | London City Hall](#)



### 3.3.3 London Housing strategy (2018)<sup>6</sup>

The London Housing Strategy was formally adopted in May 2018. The Strategy identifies its emphasis to deliver significant new housing across all tenures to address demand and support London's continued economic growth. Its long-term ambition is to increase supply of homes, while also addressing issues such as affordable housing needs, quality of housing and types of tenures offered. The Strategy has a particular focus on low- and middle-income working households, whilst also addressing the needs of vulnerable and older households. Key messages from the Strategy include:

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

### 3.3.4 Better homes for local people - The Mayor's Good Practice Guide to Estate Regeneration (February 2018)<sup>7</sup>

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.

<sup>6</sup> Greater London Authority (2018). London Housing Strategy. Available at: [London Housing Strategy](#)

<sup>7</sup> Greater London Authority (2018). Better homes for local people: The Mayor's good practice guide to estate regeneration. Available at: [Microsoft Word - Better Homes for Local People - The Mayor's Good Practice Guide to Estate Regeneration.docx \(london.gov.uk\)](#)

Households who are currently overcrowded should be offered homes large enough for their needs. Households who under-occupy their current homes should not automatically qualify for a new home with the same number of bedrooms. For example, landlords may choose to limit the number of bedrooms offered to under-occupiers to a maximum of one greater than their need.

- awarded high priority in the local allocations policy should they need to move into a new home temporarily as a result of estate regeneration. Any offer of alternative accommodation should be reasonable, in that it meets the needs of the household in terms of the number of bedrooms and any special requirements (such as wheelchair accessibility or adaptations).
- offered the maximum home loss compensation permitted by legislation by landlords if they meet the statutory criteria and are displaced from their homes due to estate regeneration.
- awarded 'disturbance costs' of moving home by the landlord. This means paying the reasonable costs of moving, such as removal costs, telephone and utility connection and installation costs, and the provision of new carpets and curtains. Tenants who must move more than once should receive home loss payments for each move.

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

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

3. **A fair deal for leaseholders and freeholders** - Leaseholders and freeholders affected by estate regeneration should be treated fairly and fully compensated if their homes are to be demolished. Where it is necessary to acquire homes owned by leaseholders and freeholders, landlords should:

- always seek to do so by negotiation in the first instance to help avoid a compulsory purchase process, which creates uncertainty for the household and can lead to significant delays.
- offer market value (plus home loss payments where appropriate) in the first instance. Where compulsory purchase is required, the rights of resident and non-resident leaseholders and freeholders are set out in legislation. The purchase should be based on a value of the home undertaken by an independent valuer, paid for by the landlord if requested by the leaseholder or freeholder. The valuation must reflect the value of the property before the impact of any regeneration or proposed regeneration is taken into account.
- consider enabling resident leaseholders and freeholders to combine market value and home loss payments towards the purchase price for a new home.

- consider paying for other costs that might be borne by resident leaseholders and freeholders, such as the cost of moving home or setting up new utility connections.

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

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

## 3.4 Local policy

### 3.4.1 Private Rented Sector Strategy 2021-2025 (January 2021)<sup>8</sup>

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

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

### 3.4.2 City Plan 2019 – 2040<sup>9</sup>

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

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

- Objective 1 of the City Plan is to “increase the stock of high-quality housing and provide variety in terms of size, type and tenure to meet need and promote mixed and inclusive communities, with a clear focus on affordability and family homes.”
- Objective 2 of the City Plan is to “ensure those from disadvantaged backgrounds benefit from the opportunities [job growth] presents.”

<sup>8</sup> City of Westminster (2021). Private Rented Sector Strategy. Available at: [Private Rented Sector-ActionPlan 2021-25](#)

<sup>9</sup> Westminster Council (2019). City Plan 2019 – 2040 Regulation 19 Publication Draft. Available at: [City Plan 2019 - 2040: previous stages | Westminster City Council](#)

- **Objective 8** of the City Plan is to “promote quality in the design of buildings and public spaces ensuring that Westminster is attractive and welcoming.
- **Policy 1 Westminster’s spatial strategy** sets out the ambition 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 Infrastructure and the renewal of the Ebury Bridge Estate. The policy also states there will be at least 350 new jobs, and new community facilities, including new health and wellbeing facilities.
- **Policy 7 Managing development for Westminster’s people** requires development be ‘neighbourly’: considering daylight, sense of enclosure and privacy, protecting and enhancing the local natural and historic environment, not overburdening local infrastructure, contributing to greening, improving sustainable infrastructure and making appropriate waste management arrangements.
- **Policy 9 Affordable housing** requires that the affordable housing provision will be between ‘intermediate’ affordable housing for rent and sale (60%) and social or affordable London rent (40%). The Council will maximise the provision of additional affordable housing in designated housing renewal areas.
- **Policy 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. This policy includes provisions for family sized homes, specialist housing, older people’s housing, purpose-built student accommodation, and provisions for gypsies and travellers.
- **Policy 12 Housing quality** proposes that all new homes be designed to a standard that ensures the safety, health and well-being of its occupants.
- **Policy 14 Town centres, high streets and the CAZ** sets out that the intensification of town centres, high streets and the CAZ will be supported in principle. This policy provides a section on markets, which states that “suitably located, well designed and managed markets” are key aspects of the culture and diversity of the city, and specifically mentions Church Street as a key council-run market within Westminster. The policy also states that existing markets will be enhanced through partnerships with traders, residents and businesses, in line with the council’s Market strategy.
- **Policy 43 Public realm** sets out that development should create “a well-designed, clutter free public realm” and high-quality soft landscaping should be integrated as part of the streetscape design. Furthermore, pressures on space in Westminster mean the council has emphasised that inclusivity and accessibility are priorities for public realm development and maintenance, with an emphasis placed on disabled people, children and those with dementia and mobility requirements.
- **Policy 17 Community infrastructure and facilities** states that community facilities and floorspace will be protected and that major development will contribute to employment, education and skills initiatives.

### 3.4.3 Church Street Masterplan City of Westminster (December 2017)<sup>10</sup>

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.

### 3.4.4 Westminster Housing Renewal Strategy (2010)<sup>11</sup>

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

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

### 3.4.5 Housing Strategy: Direction of Travel Statement (2015)<sup>12</sup>

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,

<sup>10</sup> City of Westminster (2017). Church Street Masterplan. Available at: [Church Street](#)

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

<sup>12</sup> City of Westminster (2015). Westminster Housing Strategy – Direction of Travel Statement. Available at: [Decision - Westminster Housing Strategy - Direction of Travel Statement | Westminster City Council](#)

intermediate housing, disposal of affordable properties, reviewing CityWest home, the private rented sector and energy efficient homes.

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

### 3.4.6 Policy for Tenants in Housing Renewal Areas (August 2019)<sup>13</sup>

The Council's Policy for Tenants in Housing Renewal Areas 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 housing"<sup>14</sup> 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.

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<sup>13</sup> Westminster Council (2019) Policy for Tenants in Housing Renewal Areas. Available at: [policy for tenants in housing renewal areas 2019 final.pdf \(westminster.gov.uk\)](https://www.westminster.gov.uk/policy-for-tenants-in-housing-renewal-areas-2019-final.pdf)

<sup>14</sup> 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.

- Stage 2: The Assessment – at this stage a detailed assessment is undertaken of the size and type of new home needed.
- Stage 3: Rehousing begins – at this stage the option chosen is confirmed in writing and generally cannot be changed. Rehousing will then start.

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

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

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

### 3.4.7 Policy for Leaseholders in Housing Renewal Areas (August 2019)<sup>15</sup>

The Council's Policy for Leaseholders in Housing Renewal Areas 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

<sup>15</sup> Westminster Council (2018) Policy for Leaseholders in Housing Renewal Areas. Available at: [Decision - Policy for Leaseholders in Housing Renewal Areas | Westminster City Council](#)

leaseholders are also entitled to a disturbance payment in relation to costs incurred in acquiring a replacement property, within one year.

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

### 3.4.8 A strategy for Westminster City Council's markets 2019-2022<sup>16</sup>

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

### 3.4.9 Westminster's equality objectives<sup>17</sup>

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 objectives are:

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

### 3.4.10 Our Strategy for a Fairer Westminster 2022-26<sup>18</sup>

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

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

#### Fairer Housing:

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

<sup>16</sup> Westminster Council (2018). A strategy for Westminster City Council's markets 2019-2022. Available at: [4.1. Market Strategy Final Doc.pdf \(westminster.gov.uk\)](#)

<sup>17</sup> Westminster City Council (2022). Equality objectives [online]. Available at: [Equality duties | Westminster City Council](#)

<sup>18</sup> City of Westminster (2022). Fairer Westminster strategy. Available at: <https://www.westminster.gov.uk/our-new-strategy-build-fairer-westminster>



- Our tenants and lessees are consistently satisfied with our housing services, and the improved condition and energy efficiency of our housing stock.

**Fairer Communities:**

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

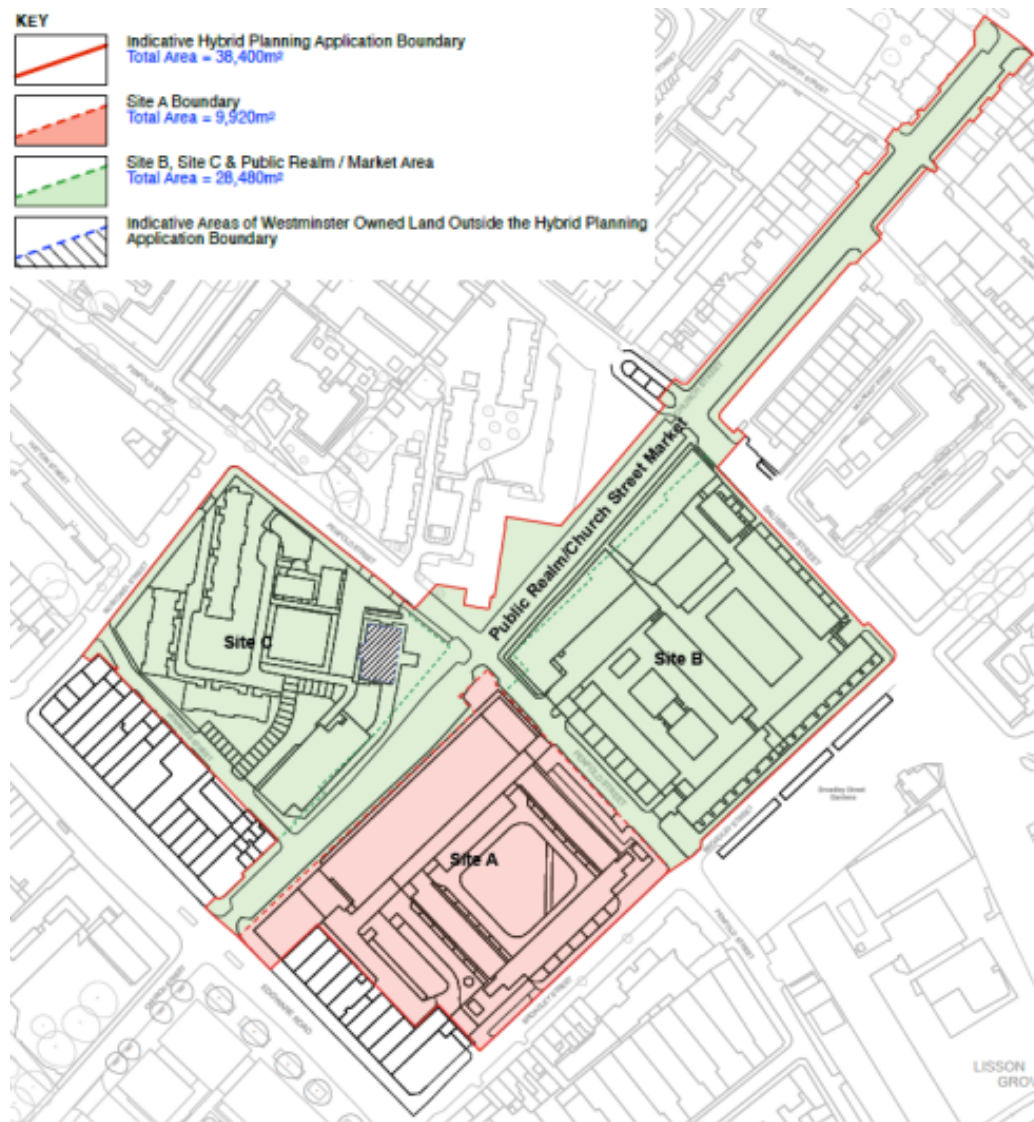
# 4. Summary of planned regeneration

## 4.1 The current site

Site A, shown in Figure 4-1 below, is located within the Church Street ward and is approximately 9,920 sqm in size. The site area is bound by Church Street to the north, Edgware Road and Penfold Street to the east and Broadley Street to the south.

The site is close to major public transport hubs (Marylebone, Edgware Road and Paddington stations) and to many city centre amenities such as London’s West End. This development also falls within the Church Street/Edgware Road Housing Renewal Area.

**Figure 4-1: Site Location Plan**



Source: WCC, 2021

Site A is predominantly composed of residential properties, with the exception of 15 commercial units. Of these commercial interests, 13 remain in use, 14 are leaseholders, 10 are independently owned businesses and 10 are BAME owned businesses covering a range of services including: a public house, pharmacy, convenience store, value retailers, betting

shop and homeware/carpets/fabric retailers. The CPO Scheme does not allow for these existing business occupiers to relocate within the new proposed development.

The 145 residences within the Site A boundary are composed of Blackwater House, Cray House, Ingrebourne House, Pool House and Lambourne House. This post-war housing was built in the 1970’s with relatively uniform architecture ranging from 3 to 5 storeys. Cray House, Pool House and Ingrebourne House enclose a large communal garden for existing residents. Within these four residential blocks, 98 units are provided for social rent and 47 are provided as market housing, with the range of unit mixes shown in table 4-1 below.

**Table 4-1 Site A unit mix**

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

Blackwater House offers both residential and commercial interests. The upper three floors are occupied residences, while the ground floor composes 2,927 sqm of commercial units. The Westminster Regeneration Base is also located within Blackwater House as a drop-in hub for both businesses and residents to remain informed as to the proposed regeneration of the site and wider Estate.

The properties on Edgware Road are outside the Site A boundary, except for the corner property (382-386 Edgware Road and 125-127 Church Street) which sits on the south side of Church Street at the junction with Edgware Road. Site A also encompasses parts of the public footpath, wall boundary, subsoil and airspace situated on Church Street.

As of June 2023, the 98 social tenants have all been rehoused via the choice based lettings list<sup>19</sup>. All of these residents were re-housed within Westminster with none choosing to relocate outside the Borough. All social tenants have been provided the opportunity to return to the Site A development. While 48 households express a desire to return, 50 wish to remain within their new homes. Upon return, all social residents will be afforded flats of adequate size for their needs on the same/similar rent and the same security of tenure.

Site A also contains 47 privately owned properties, of which seven leaseholders remain on site. Four of the seven leaseholds are under offer to the Council, while two are undergoing active negotiations.

## 4.2 Hybrid planning application (2021)<sup>20</sup>

In 2021, the Council submitted a Hybrid Planning Application comprising a detailed planning application for Site A and a Phased Outline planning application for Sites B and C and the Church Street Market infrastructure. The detailed planning application seeks full planning permission for the redevelopment of Site A comprising:

- The proposed demolition of all buildings on Site A;

<sup>19</sup> Choice Based Lettings is a local authority managed system for applying for a general needs home. Residents affected by any renewal scheme are prioritised on the lettings list.

<sup>20</sup> Westminster Borough Council (2021). Planning – Planning Application Documents (21/08160/COOUT). Available at: [21/08160/COOUT | Hybrid planning application consisting of: An application for full planning permission for SITE A; and An application for outline permission for SITES B, C and Church Street Market](#)

- The erection of two buildings, ranging up to 14 storeys, that could deliver up to:
  - 428 Residential Units (Use Class C3) or 37,114 sqm (GIA) of Residential Floorspace and ancillary residential facilities;
  - 605 sqm (GIA) of Community Floorspace (Use Class F1 and F2);
  - 341 sqm (GIA) of Commercial Floorspace (Use Class E).
  - 1,124 sqm (GIA) of Market Storage Floorspace (Use Class B8); and
  - 2,603 sqm plant space (GIA) and 896 sqm (GIA) parking.
- Alterations to the existing access road;
- Streets, open spaces, landscaping, and public realm;
- Car, motorcycle and bicycle parking spaces, and servicing spaces;
- Market infrastructure and ancillary facilities; and
- Other works incidental to the proposed development.

### 4.2.1 Residential

The proposed development of Site A will comprise of two new urban blocks, referred to as A1 and A2, delivering 428 residential units ranging from 8-11 storeys.

Block A1 will be a perimeter block development around a central garden located adjacent to Penfold Street, Broadley Street and Church Street. The building will stand at 10-storeys at the southern corner and reach 15-storeys at the eastern corner. Block A1 will also provide a basement level for accessible car parking and cycle storage.

While block A2 will be an L-shaped development surrounding a podium level garden located adjacent to Church Street, Edgware Road and Broadley Street. The building will range from 8-storeys on the Edgware Road/Church Street corner and increase to 12-storeys where the building interfaces the new pedestrianised road 'New Street Gardens'. Block A2 will provide parking and market storage from traders at the ground floor level.

Table 4-2 below displays the accommodation schedule and housing mix for Site A.

**Table 4-2 Accommodation Schedule and Housing Mix for Site A**

Unit Type	Market Sale		Social reprovision		New social		New intermediate		Total	
	Units	%	Units	%	Units	%	Units	%	Units	%
<b>1 bed</b>	119	55%	60	62%	15	21%	28	67%	222	52%
<b>2 bed</b>	77	36%	22	22%	26	35%	12	29%	137	32%
<b>3 bed</b>	19	9%	8	8%	32	44%	2	4%	61	14%

<b>4 bed</b>	0	0%	6	6%	0	0%	0	0%	6	2%
<b>5 bed</b>	0	0%	2	2%	0	0%	0	0%	2	0%
<b>Total</b>	<b>215</b>	<b>100%</b>	<b>98</b>	<b>100%</b>	<b>73</b>	<b>100%</b>	<b>42</b>	<b>100%</b>	<b>428</b>	<b>100%</b>

The new residences have been designed to be tenure-blind in terms of location, facility and appearance to promote social cohesion between residents. They have also been arranged in clusters to deliver 91% dual-aspect flats and the relationship to open space.

Each flat will be provided with private amenity space in accordance with the London Housing Design Guide with sizes of 6sqm for 1-bed flats, 7sqm for 2-bed flats and 8sqm for 3-bed flats.

### 4.2.2 Retail and commercial

Site A will deliver 341sqm GIA of Class E floorspace and 1,124sqm of market storage facilities for market traders (Class B8).

Retail floorspace will occupy the ground floor of block A2 facing onto Church Street. Two further corner retail units will be provided in the base of the block, one with frontages onto Edgware Road and Church Street and another interfacing with Church Street and New Street Gardens.

### 4.2.3 Community and landscape

The proposed development will provide a new Church Street Library, in replacement of the existing library located in Site B. The library space will be delivered over one floor with a hierarchy of spaces including a children’s library, adult’s library, learning rooms, community space, and ancillary staff facilities. The library will provide IT equipment including printers and computers, as well as meeting rooms and quiet zones for private study. Community activities planned for the space include Yoga/Pilates, skills classes and workshops, book clubs and school outreach events. A public managed library garden will also be accessible to the rear and visible from the library entrance on Church Street.

Site A is designed to deliver a total of 2,478sqm of new public open space, which is approximately 26% of the Site A total area. This public open space will be provided via a new pedestrianised street ‘New Street Gardens’ running between Church Street and Broadley Street and 1,774 sqm of play space areas for children with inclusive design in both ability and age range. While private outdoor space for each block will be provided through central communal gardens to be located on the ground floor of block A1 while block A2 will have a podium garden above market infrastructure on the first floor.

The proposed development will be car-free with the exception of 22 (5%) accessible parking spaces provided within the basement of Site A. These will be accessible via car lifts on Penfold Street and provide 100% EV charging points. A total of 827 long-stay and 23 short-stay residential cycle spaces will also be available as a mix of Sheffield stands, double stacker stands, accessible spaces and cycle lockers on the basement and ground floor of Site A. Non-residential cycle parking will be provided along Church Street and in the library.

### 4.2.4 Commercial Relocation Strategy

WCC is developing a more formal Relocation Strategy to record and finalise WCC’s approach to acquiring commercial interests comprising Site A. While the CPO Scheme has the potential to deliver significant benefits, WCC recognise the proposal will require the displacement of business interests.

WCC intend to acquire properties through agreement where possible. In order to provide advice and support occupiers in reaching an agreement, the Relocation Strategy aims to:

- assist in identifying relocation options in a way that best meets their needs and minimises disruption to trading;
- retain the Businesses within the borough and, if possible, within proximity to the Order Land and the community that they serve (if this is their preference); and
- prepare for change; be this in terms of relocation i.e. communicating the move to their client base, develop methods to stay in contact with their client base, market to new client base. Or, in dealing with extinguishment and planning for what may come next i.e. retirement, new business elsewhere etc.

Following discussions with businesses to understand particular circumstances surrounding floorspace, rent and location, WCC's regeneration team has identified parameters to search for relocation options. Monthly searches are conducted via online portals and will be distributed to commercial interests upon suitability. CPO tenants will also be given priority over WCC assets within the Church Street area.

The Council have appointed Savills to advise on the compensation payments available to leasehold interests upon acquisition of the commercial units.

## 5. Consultation and engagement

This section presents a summary of consultation and engagement activities by the Council in relation to the proposed development, focusing on findings relevant to Site A. Further detail regarding the approach and findings of consultation for Sites B and C are available in the wider project EqIA report.

### 5.1 Options Consultation 2019

An 8-week consultation period ran from 7 March – 30 April 2019 informing stakeholders of the four following development options for Church Street: maintenance; refurbishment; partial redevelopment and partial refurbishment; and comprehensive redevelopment. Findings from the consultation responses revealed strong support for the regeneration of Church Street and displayed a slightly higher preference for Option 3.

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.

### 5.2 Best Value, Deliver Options Consultation (2020)

To ensure 'best value', in January-February 2020 the Council consulted residents on three strategies for delivering the regeneration of Site A: (a) a developer-led strategy; (b) a partnership strategy; and (c) a direct delivery strategy. While there was no clear preference, more support for the direct delivery approach was indicated and an expectation that the Council ensure any agreement holds the developer accountable.

### 5.3 Site A Design Update (2020)

In May 2020, the Council undertook a round of consultation following significant design updates to Site A in response to feedback from the options consultation.

Key design changes included the following:

- Increased provision of open space;
- New Street Garden to run between the two residential blocks offering increased green space, improved accessibility and more daylight onto Church Street; and
- Re-provision of Church Street Library within Site A and an associated library garden.

This consultation was targeted at residents living or working within and in close proximity to Site A. A newsletter was distributed across Church Street Ward and stakeholder meetings and a webinar were held to engage with local residents and businesses. A film outlining the design changes was also made available on the Church Street website.

A total of 37 people provided feedback on the design updates for Site A, the majority of which were supportive. In particular, stakeholders expressed support for the new location of the library. The original proposal re-provided the library facility in Site B which presented community concerns that a temporary library would be required. The public realm design changes were also seen as improvements by stakeholders.

### 5.4 Pre-application consultation

Following this, pre-planning consultation was undertaken in two stages between March and June-July 2021.

The first stage of consultation highlighted the following main issues relevant to Site A:

- Most respondents stated ‘generous outdoor spaces including balconies’ was an important aspect of development along with dual aspect windows to maximise light and air;
- Concern as to the size of the new library and a request for more detail on the size and proposed uses;
- Concern regarding the proposed building heights and the impact on daylight reaching Church Street; and
- Most respondents answered play spaces, outdoor fitness spaces and seating areas were key features they would like to see.

The stage two consultation presented back to the community how the design team responded to comments from stage one, including adaptations to design. Those relevant to Site A include:

- To minimise overshadowing, buildings have been stepped back along the facades and corner buildings have been designed so lower storeys face Church Street;
- Sunlight studies demonstrated that adapted building designs will allow more sunlight on Church Street following the creation of New Street Gardens;
- The new library is proposed to comprise 355 sqm of internal space and 192 sqm of garden area. Following further engagement, the design was updated to provide a further 495 sqm of mezzanine area;
- Confirmation that each flat will provide private amenity space in the form of a balcony or terrace area, and the number of dual aspect units was increased; and
- To ease safety concerns, increased overlooking of external spaces provides natural surveillance, all areas will be lit at night and hard landscaping designed to reduce opportunities for anti-social behaviour.

On 24<sup>th</sup> August 2021 a virtual design workshop was held via Zoom with members of the library management team where three main design options were presented. The following feedback was received:

- The location of the children’s library should consider noise levels;
- Seating overlooking the garden should be provided and the garden should be visible from the street to ensure people access the facility;
- A public/community supported café is welcomed and could employ local residents who are less likely to employ local residents; and
- The community space should provide a store and be split in two to allow for future flexibility of space.

A second design workshop was undertaken on 22<sup>nd</sup> September on the library premises attended by key library staff and members of the ‘Friends of Church Street Library’ stakeholder group.

Following this second workshop, a revised design has been developed and reissued to the stakeholder group.

## 5.5 Residents Ballot

Between November 19<sup>th</sup> – December 21<sup>st</sup> 2022, the Council held a Residents Ballot for residents to vote in support of the Church Street regeneration proposals. The ‘Landlord offer’<sup>21</sup> was published alongside the ballot detailing the Council’s commitments to tenants

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<sup>21</sup> Westminster County Council (2022). Church Street Sites A, B and C Landlord Offer. Available at: [ChurchStreetSitesABC\\_LandlordOffer.pdf](#)



and leaseholders and the vision for the regeneration of Sites A, B and C to enable residents to make an informed decision.

Residents were able to respond to the ballot via post, online portal, telephone or ballot box. The ballot received a response from 56% of residents, 73.1% of which voted 'yes'.

## **5.6 Engagement with existing Site A businesses and residents**

Since 2016, the Council has provided a dedicated regeneration office within a vacant commercial unit on Church Street. The aim of which was to nurture long term relationships with residents, businesses and market traders affected by the regeneration scheme and offers a local resource for information.

### **5.6.1 Businesses**

The Church Street Regeneration Team has consulted with businesses throughout the design process for the regeneration of Site A. Business Forums were held between July 2018 – March 2020 to continually engage with local businesses on the commercial strategy, how businesses will be supported and businesses/market traders' ideas for regeneration.

In 2018, the Council appointed the charity Tree Shepherd to develop a business model to manage the viable relocation of businesses. During a Business Forum on 19<sup>th</sup> February 2018, Tree Shepherd offered free business training workshops, one-to-one confidential advice, support with local opportunities and measures of resilience for local trade networks.

In terms of acquisition, the Council has written to all affected businesses regarding the proposals for Site A and the support available for relocation. Following this, the Church Street Regeneration Team have held one-to-one meetings with existing commercial occupiers to understand their particular circumstances and identify requirements for relocation including rent, floorspace, location and planning use class. While WCC recognise there is a shortage of immediately available and suitable alternative sites, the Regeneration Team are undertaking monthly searches via online platforms using the identified parameters and offering to the most suitable commercial interests.

### **5.6.2 Residents**

The Council and its agent Westminster Community Homes have been attempting to acquire leaseholds through private treaty negotiations since 2014. All resident leaseholders have been offered a new home on the estate, of which only four have expressed an interest in returning. Objections received from leaseholders felt that they would be unable to afford a similar property within the area through compensation. There are currently two remaining leaseholders in Site A undergoing active negotiations.

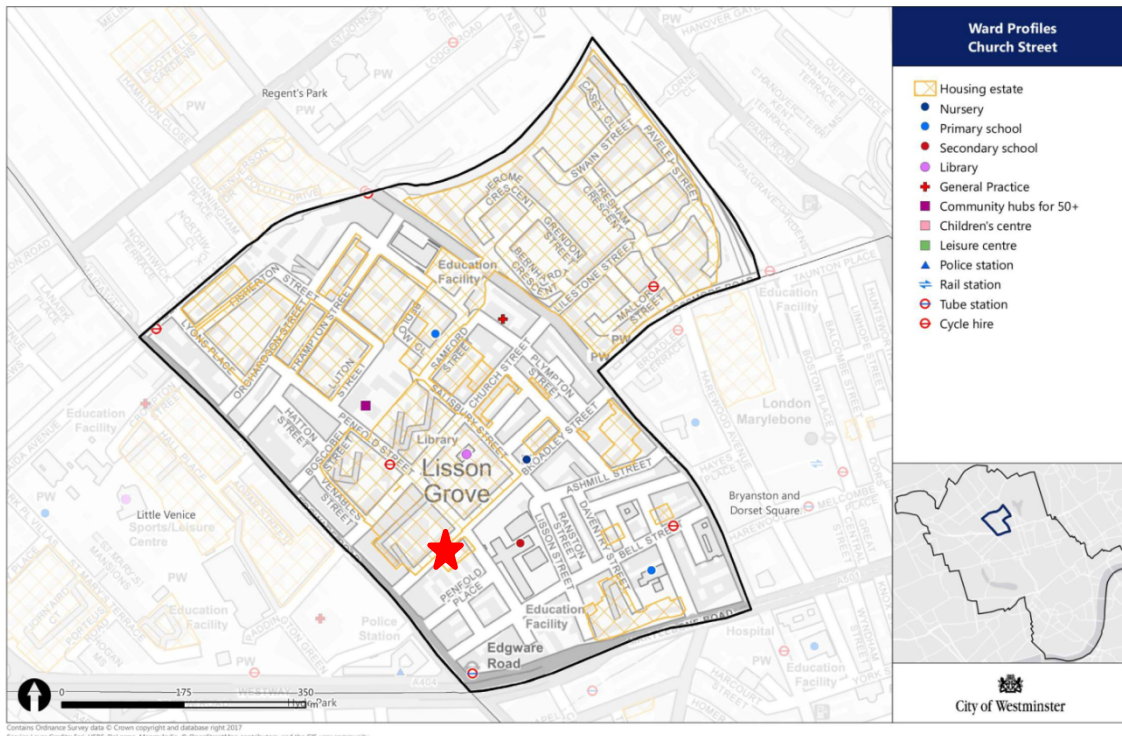
The Council have ensured that local residents are provided opportunities to raise concerns and seek clarifications through a dedicated phone number, email address and website, in addition to monthly newsletters and weekly drop-in sessions. The Regeneration Base on Church Street is also a space for residents to interact with members of the regeneration team Monday-Friday 9am-5pm.

# 6. Equalities Baseline

## 6.1 Introduction

The section outlines the equalities baseline relevant to the regeneration scheme area. This includes analysis of Census 2021 data and other datasets from the Office for National Statistics (ONS). Where possible, the most recent data is presented at five geographic levels relevant to the study area. These are, in increasing size, Westminster Lower Super Output Area (LSOA Westminster 009K – E01033605, and LSOA Westminster 009J – E01033604), the Church Street Ward (E05013794), Westminster Borough, and London. Westminster 009K and 009J have been included for context as Site A sits within both of them.

**Figure 6-1 Church Street Ward, Site A marked by the red star**



## 6.2 Protected characteristics

### 6.2.1 Population

Between 2001 and 2021, all geographical areas have experienced population growth, except for Westminster LSOA 009J which has experienced a 22.7% decline. Westminster LSOA 009K recorded a marginal rate of increase at 0.4%, Church Street experienced the greatest proportion of 79.8%, Westminster by 12.7% and London 20.2%. However, in the last ten years between 2011 and 2021, only London has experienced population growth (by 7.7%). In the same period, Westminster 009K has seen a 19.8% decrease, Church Street a 0.8% decrease, and Westminster a 6.9% decrease.

**Table 6-1 Population growth by geographies, 2001 - 2017<sup>22</sup>**

Year	Westminster 009J	Westminster 009K	Church Street	Westminster	London
2001	1,527	1,634	6,490	181,286	7,172,036
2011	1,236	2,046	11,760	219,396	8,173,941
2021	1,181	1,640	11,670	204,236	8,799,728
% Change	-22.7	+0.4	+79.8	+12.7	+20.2

## 6.2.2 Age

Table 6-2 reveals the age breakdown across the five geographies. The data shows that Westminster 009K has the highest proportion of children (22.1%) and elderly residents (13.7%).

**Table 6-2 Age breakdown (%) by different geographical areas<sup>23</sup>**

Age (years)	Westminster 009J	Westminster 009K	Church Street	Westminster	London
0-15	14.8	22.1	16.9	13.2	19.2
16-64	73.1	64.2	70.6	74.8	68.8
65 and over	12.1	13.7	12.5	12.1	11.9

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% in Westminster 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% by 2040 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% for over-65s and 94% over-85s.<sup>24</sup>

Children and older people may be more vulnerable to CPO as residents due to the potential loss of local informal and formal care networks. Young and elderly people also have an increased risk of health issues or sensitivities associated with the environmental impacts during site construction. For example, evidence shows that traffic-related noise causes increased health risks for older people<sup>25</sup> and lowers health-related quality of life in children<sup>26</sup>. Both groups are also more vulnerable to the effects of poor air quality compared to the overall population. Elderly people are also more vulnerable to the environmental, safety and accessibility impacts of construction activities associated with construction projects.

<sup>22</sup> ONS: Census 2001: Usual resident population (KS001); Census 2011: Population Density 2011 (QS102UK); Census 2021: Number of usual residents in households and communal establishments (TS001). All available at:

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

<sup>23</sup> ONS (2020) Census Output Area population estimates – London, England (supporting information). Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/censusoutputareaestimatesinthelondonregionofengland>; ONS (2021) Census 2021: TS007 Age by single year. Available at:

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

<sup>24</sup> 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](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.

<sup>25</sup> Halonen, J. et al (2015). Road Traffic noise is associated with increased cardiovascular morbidity and mortality in London. *European Heart Journal*. 36(39), 2653-2661

<sup>26</sup> Hjortebjerg, D. et al (2016). Exposure to road traffic noise and behavioural problems in 7-year-old children: a cohort study. *Environmental health perspectives*, 124(2), 228-234.

## 6.2.3 Disability

Table 6-3 highlights the breakdown of people with disabilities in the relevant geographies. Church Street ward has the highest proportion of residents whose day-to-day activities are limited a lot (11.6%) followed by Westminster 009K (10.9%) and Westminster 009J (10.5%). These proportions are significantly higher compared to Westminster and London.

Westminster 009K and Church Street also have high proportions of residents whose day-to-day activities are limited a little, at 11.4% and 9.6% respectively. While Westminster 009J, Westminster and London all have similar proportions of residents whose day-to-day activities are limited a little, ranging between 7.3 and 7.5%.

**Table 6-3 Limiting long-term illness or disability (%) by different geographical areas<sup>27</sup>**

Level of disability	Westminster 009J	Westminster 009K	Church Street	Westminster	London
Day-to-day activities limited a lot	10.5	10.9	11.6	6.5	5.7
Day-to-day activities limited a little	7.4	11.4	9.6	7.3	7.5
No long term physical or mental health condition	79.1	74.4	75.3	81.5	81.5

According to the Department for Work and Pensions (2018) Church Street has almost five times the proportion of Disability Living Allowance Claimants (1.19%) than Westminster (0.26%).<sup>28</sup>

Disabled people, including those with weak respiratory systems, or people who suffer from other health problems associated with weaker lungs, may be disproportionately impacted by emissions and dust, both traffic-related and as a result of construction of the infrastructure.<sup>29</sup> Additionally, in cases where disability causes people’s daily activities to be significantly limited, construction can impose further limitations in terms of disruption of accessibility.

## 6.2.4 Gender reassignment

Until the 2021 Census, there were no official statistics relating to gender reassignment and the UK Census only collected data relating to sex (gender assigned at birth). The 2021 Census included the optional question “Is the gender you identify with the same as your sex registered at birth?”, for which findings are presented at the Borough and London geographies in Table 6-4.

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

<sup>27</sup> ONS (2021). Census 2021: TS038: Disability. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/dataset/ts038)

<sup>28</sup> City of Westminster (2018). Church Street Ward Profile 2018. Available online at: [Church-street-ward-profile](#)

<sup>29</sup> Font, A. et al (2014). Degradation in urban air quality from construction activity and increased traffic arising from a road widening scheme. *Science of the Total Environment*, 497, 123-132.

**Table 6-4 Gender identity (%) in Westminster and London, 2021<sup>30</sup>**

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

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

### 6.2.5 Marriage and civil partnership

Across the four Westminster geographies the majority of residents aged 16 and over have never been married, the highest proportion being in Westminster 009K at 57.4%. Contrastingly, across London less than half of residents aged 16 and over have never married and the highest proportion of residents married to someone of the opposite sex (39.3%), followed by Westminster at 31.1%. Westminster and Westminster 009J have the highest proportion of residents married to someone of the same sex at 0.6% each. Westminster 009J also has the highest proportions of separated (4.0%) and divorced (9.7%) residents. While Westminster 009K has the highest proportion of widowed residents (6.6%), sitting significantly higher than Westminster 009J (2.8%).

**Table 6-5 Legal partnership status (%) by geographical area, 2021<sup>31</sup>**

Legal partnership status	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
Never married	53.1	57.4	54.7	54.4	46.2
Married: opposite sex	29.3	25.5	28.4	31.1	39.3
Married: same-sex	0.6	0.2	0.3	0.6	0.4
In a registered civil partnership: opposite sex	0.2	0.0	0.1	0.1	0.1
In a registered civil partnership: same-sex	0.3	0.0	0.1	0.4	0.2
Separated	4.0	2.9	3.5	2.4	2.3
Divorced	9.7	7.4	7.8	7.6	7.3
Widowed	2.8	6.6	5.1	3.4	4.2

<sup>30</sup> ONS (2021). Gender identity (detailed) (TS070). Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

<sup>31</sup> ONS (2021) Census 2021: TS002 – Legal partnership status. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

## 6.2.6 Pregnancy and maternity

Table 6-6 provides a breakdown of the different household compositions and the proportions of different household types with dependent children. Westminster 009J (9.4%), 009K (10.3%) and Church Street (10.2%) all have a higher proportion of lone parent family households with dependent children compared to married or civil partnership households with dependent children.

Westminster 009K and Church Street also have high proportions of other household types with dependent children, at 5.4% and 6.1% respectively. London has the next highest proportion in this category, at 4.7%.

**Table 6-6 Household composition and lone-parent households (%) by geographical area, 2021<sup>32</sup>**

Household composition	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
<b>Single family household</b>	45.0	44.9	47.7	45.6	58.0
Single family household: Married or civil partnership couple: Dependent children	8.7	10.2	9.4	9.9	15.8
Single family household: Cohabiting couple family: With dependent children	3.3	1.3	2.2	1.3	3.0
Single family household: Lone parent family: With dependent children	9.4	10.3	10.2	5.3	7.8
<b>Other household types</b>	13.8	15.0	15.4	11.7	12.7
Other household types: With dependent children	1.7	5.4	6.1	2.5	4.7

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

## 6.2.7 Race

Table 6-7 shows the percentage breakdown of ethnic groups by geographical area. The proportion of White British residents is lowest in the project area LSOAs and Church Street, ranging between 16.9 and 19.9%, compared to 28% in Westminster and 36.8% in London. There are high proportions of Other White residents across all geographies, being highest in Westminster (24.6%) and lowest in Church Street (14.2%).

Westminster 009K (7.1%) and Church Street (16.4%) have high proportions of Bangladeshi residents compared to Westminster and London (both 3.7%). All of the geographies have similar significant proportions of African residents, ranging between 7.0% in Westminster 009J and 8.8% in Church Street. The Westminster geographies all have high proportions of Arab and Other residents; Westminster 009J (24.8% Arab residents and 10.8% Other),

<sup>32</sup> ONS (2021). TS003 – Household composition. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

Westminster 009K (22.1% Arab residents and 8.9% Other), Church Street (15.6% Arab residents and 8.4% Other) and Westminster (7.6% Arab residents and 5.9% Other) compared to London (1.6% Arab residents and 4.7% Other).

**Table 6-7 Ethnic groups (%) by different geographical areas<sup>33</sup>**

Ethnic group		Westminster 009J	Westminster 009K	Church Street	Westminster	London
<b>White</b>	British	16.9	19.9	17.2	28.0	36.8
	Irish	0.8	0.8	1.1	1.8	1.8
	Gypsy or Traveller	0.2	0.0	0.0	0.0	0.1
	Roma	2.0	0.3	0.5	0.7	0.4
	Other	18.7	15.4	14.2	24.6	14.7
<b>Mixed/ Multiple Ethnic Groups</b>	White and Black Caribbean	0.8	1.2	1.0	1.0	1.5
	White and Black African	1.1	1.5	1.2	1.0	0.9
	White and Asian	1.2	0.9	0.9	1.8	1.4
	Other	2.9	1.8	2.2	2.7	1.9
<b>Asian/ Asian British</b>	Indian	1.6	1.8	1.8	3.9	7.5
	Pakistani	2.4	0.9	1.3	1.2	3.3
	Bangladeshi	1.8	7.1	16.4	3.7	3.7
	Chinese	2.0	0.7	2.1	3.2	1.7
	Other	5.5	6.1	4.3	4.7	4.6
<b>Black/ African/ Caribbean/ Black British</b>	African	7.0	7.6	8.8	8.1	7.9
	Caribbean	2.8	2.6	2.3	2.1	3.9
	Other Black	0.3	0.4	0.8	0.8	1.7
<b>Other Ethnic Group</b>	Arab	24.8	22.1	15.6	7.6	1.6
	Other	10.4	8.9	8.4	5.9	4.7

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%).<sup>34</sup>

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

<sup>33</sup> ONS (2021). Census 2021: TS021 – Ethnic group. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

<sup>34</sup> City of Westminster (2018) Church Street Ward Profile 2018. Available to download online.

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.

**Table 6-8 Ethnic group projections - Westminster<sup>35</sup>**

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

People from certain ethnic minority groups are more likely to be unemployed, underpaid, or economically inactive.<sup>36</sup> Employment opportunities created by the redevelopment of Site A and the wider Church Street Estate have the potential to mitigate these issues.

<sup>35</sup> London Datastore (2020). Ethnic group projections (2016-based central trend). Available at: [Ethnic group population projections - London Datastore](#)

<sup>36</sup> Devine-Francis, B. Unemployment by ethnic background. (2022) Available at: [Unemployment by ethnic background - House of Commons Library \(parliament.uk\)](#)



## 6.2.8 Religion or belief

Table 6-9 highlights the breakdown of religious groups by geographical area. The LSOA and ward geographies have higher proportions of Muslim residents, at 41.0% in Westminster 009J, 45.4% in Westminster 009K, and 48.6% in Church Street, compared to 20.0% in Westminster and 15.0% in London. Correspondingly, the project area geographies have lower proportions of residents belonging to the other religious groups, or not following a religion, compared to Westminster and London.

**Table 6-9 Religion or belief (%) by different geographical areas<sup>37</sup>**

Religion	Westminster 009J	Westminster 009K	Church Street	Westminster	London
Christian	26.3	30.0	26.6	37.3	40.7
Buddhist	1.5	0.7	0.8	1.3	0.9
Hindu	0.3	1.0	0.8	2.2	5.1
Jewish	0.1	0.5	0.5	2.8	1.7
Muslim	41.0	45.4	48.6	20.0	15.0
Sikh	0.0	0.2	0.1	0.3	1.6
Other religion	0.5	0.6	0.5	0.9	1.0
No religion	22.1	14.3	14.9	25.9	27.1
Religion not stated	8.1	7.1	7.1	9.4	7.0

## 6.2.9 Sex

Table 6-10 highlights that the Church Street Ward has the highest proportion of female residents at 52.2%, contrastingly Westminster 009J has a low proportion of female residents at 47.0%, this is the only geographical area where females don't make up more than half of the population.

**Table 6-10 Proportion (%) of residents by sex and geographical area, 2021<sup>38</sup>**

Sex	Westminster 009J	Westminster 009K	Church Street	Westminster	London
Female	47.0	51.5	52.2	51.6	51.5
Male	53.0	48.5	47.8	48.4	48.5

## 6.2.10 Sexual orientation

Table 6-11 shows the proportion of adults by their identified sexual orientation for London and Westminster Borough. Westminster Borough has a higher proportion of adults identifying as Gay or Lesbian (3.5%) compared to London (2.2%). London has marginally higher proportion of adults identifying as Pansexual (0.4%) and Queer (0.1%), than Westminster Borough (0.3% and 0.0% respectively).

<sup>37</sup> ONS (2021). Census 2021: TS030 – Religion. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

<sup>38</sup> ONS (2021). Census 2021: TS008 – Sex. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

**Table 6-11 Sexual orientation (%) in Westminster and London, 2021<sup>39</sup>**

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

People who identify as LGBTQ+ are at greater risk of being victims of hate crime<sup>40</sup>. Increased footfall and natural surveillance as a result of Site A redevelopment will potentially reduce incidences of hate crime and boost the confidence of LGBTQ+ people.

### 6.3 Socio-economic profile

The socio-economic profile of the area considers several factors including levels of deprivation, employment, education, health, housing, transport and connectivity; access to services and facilities; public realm and open space; safety, security and well-being; and community cohesion. These factors are pertinent to those with protected characteristics and inequality and as such provide additional baseline information relevant to the assessment of equality effects

#### 6.3.1 Deprivation

According to the English Indices of Deprivation 2019 (IoD2019), Church Street<sup>41</sup> 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

<sup>39</sup> ONS (2021). Sexual orientation (detailed) (TS079). Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

<sup>40</sup> True Vision (2022). Sexual Orientation Hate Crime. Available at: [Sexual Orientation & Transgender Hate Crime - True Vision \(report-it.org.uk\)](https://report-it.org.uk)

<sup>41</sup> For the purpose of this report deprivation in Church Street will refer to the Lower Super Output Area (LSOA) named Westminster 009K

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

### 6.3.2 Employment

The regeneration scheme is located within the top 10% most deprived neighbourhoods nationally in terms of employment deprivation, employment deprivation measures the proportion of the working age population involuntarily excluded from the labour market.<sup>42</sup>

Table 6-12 below indicates both economic activity and inactivity levels of the population at the relevant geographies. The project area LSOAs have the highest proportions of residents who are economically active but unemployed, at 5.3% in Westminster 009J and 5.9% in Westminster 009K. Furthermore, Church Street ward (50.3%) and the LSOAs (43.6% in 009J and 48.5% in 009K) have significantly higher proportions of economically inactive residents than Westminster (37.9%) and London (33.8%).

**Table 6-12 Economic activity status (%) by geographical area, 2021<sup>43</sup>**

Economic activity status	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
<b>Economically active: in employment</b>	47.4	41.5	40.9	55.6	59.4
<b>Economically active: unemployed</b>	5.3	5.9	5.2	4.0	4.1
<b>Economically inactive</b>	43.6	48.5	50.3	37.9	33.8

**Table 6-13 Employee jobs by broad sector group (%) by geographical area<sup>44</sup>**

Occupation	Westminster 009J	Westminster 009K	Church Street	Westminster	London
<b>Managers, directors, senior officials</b>	12.6	14.6	12.1	22.5	14.6
<b>Professional occupations</b>	22.3	20.0	20.1	30.6	25.8
<b>Associate professional &amp; technical occupations</b>	10.7	14.3	13.6	17.3	15.3
<b>Administrative &amp; secretarial occupations</b>	6.8	8.2	8.8	6.6	8.5
<b>Skilled trades occupations</b>	10.3	5.0	6.9	3.4	7.5
<b>Caring, leisure &amp; other service occupations</b>	8.9	10.0	10.2	6.1	7.7
<b>Sales &amp; customer service occupations</b>	9.7	11.1	11.2	5.1	6.3

<sup>42</sup> Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 009K LSOA. Employment Deprivation Domain. Available at: [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019)

<sup>43</sup> ONS (2021). TS066 – Economic activity status. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

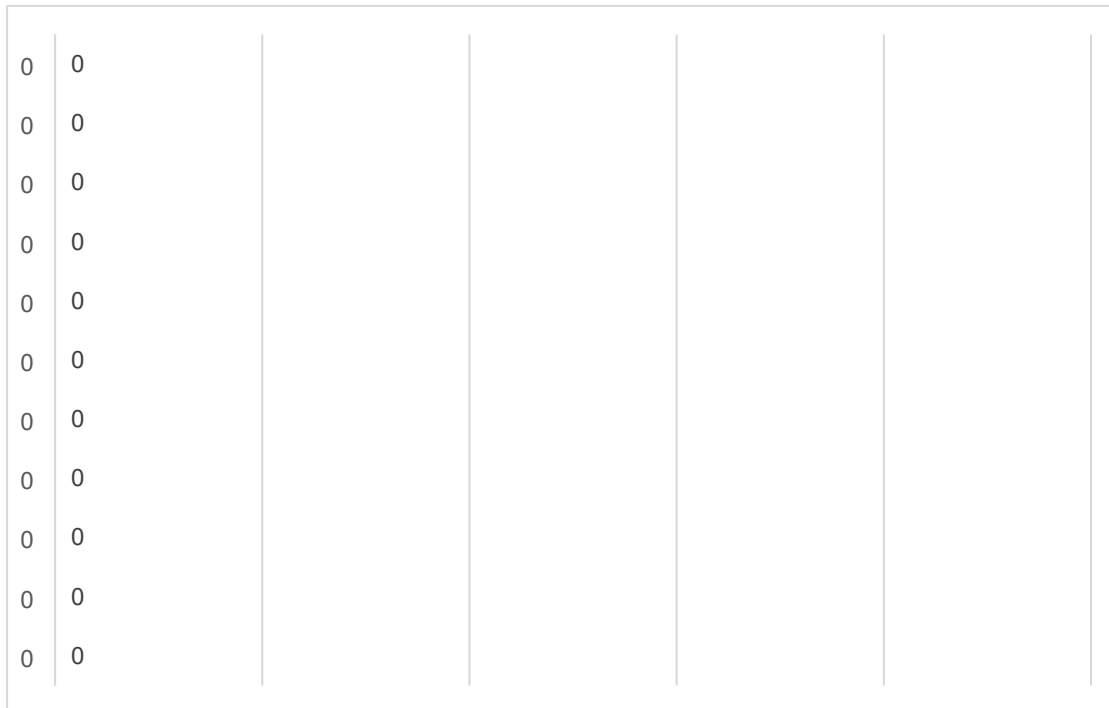
<sup>44</sup> ONS (2021). TS063 – Occupation. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

<b>Process plant / machine operatives</b>	4.8	5.7	5.7	2.7	5.0
<b>Elementary occupations</b>	14.0	11.1	11.5	5.7	9.2

Table 6-13 presents a detailed breakdown of employment sectors within the geographical areas for 2021. At all geographies, more people work in professional occupations than any other occupation sector – the range being between 30.6% in Westminster, and 20.0% in Westminster 009K. Westminster 009J has a high proportion of residents working in elementary occupations, at 14.0%, and Westminster 009K has a high proportion working in Manager, director, or senior official occupations, at 14.6%.

Figure 6-2 shows the percentage of people aged 16-64 years in employment within each ethnic group for London in 2021. This shows a lower rate of employment for BAME groups (except Indian), especially amongst Pakistani and Bangladeshi groups (58%). Furthermore, employment rates for people aged 16-25 are lower than the overall population and the disparity between ethnic groups is even greater.

**Figure 6-2 Percentage of people aged 16 to 64 years in employment within each ethnic group, 2021<sup>45</sup>**



Source: Annual Population Survey (2021)

### 6.3.3 Education

The regeneration scheme is located within one of the 50% most deprived neighbourhoods nationally in the education, skills and training domain, this domain measures the lack of attainment and skills in the local population.

Table 6-14 highlights the different levels of educational attainment by the relevant geographical areas. The project area geographies in Westminster have significantly higher proportions of residents with No Qualifications – 22.8% in Westminster 009J, 24.4% in Westminster 009K, and 25.2% in Church Street Ward, compared to 12.9% in Westminster

<sup>45</sup> Gov.uk (2022). Employment: main facts and figures. Available at: [Employment - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://www.gov.uk/ethnicity-facts-figures)

and 16.2% in London. 50% of residents in Westminster 009J have a Level 3 or 4 qualification compared to 50.9% in Westminster 009K and 51.3% in Church Street – Westminster and London have significantly higher proportions of residents with Level 3 or 4 qualifications.

**Table 6-14 Educational attainment by different geographical areas<sup>46</sup>**

Educational attainment	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
No qualifications	22.8	24.4	25.2	12.9	16.2
Level 1 qualifications	10.6	8.7	8.1	4.9	7.7
Level 2 qualifications	9.2	10.7	9.4	6.9	10.0
Apprenticeship	3.2	3.0	2.7	2.1	3.2
Level 3 qualifications	9.3	12.8	14.3	12.4	13.2
Level 4 qualifications and above	40.7	38.1	37.0	57.7	46.7
Other qualifications	4.1	2.3	3.3	3.2	3.1

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

**Table 6-15 Estimated Walking Distance (miles)**

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

Source: Google Maps, 2020

### 6.3.4 Health

There is a tendency for people belonging to protected characteristic groups, particularly young people, older people, disabled people, and BAME people, to experience poorer health.<sup>47</sup>

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.<sup>48</sup>

<sup>46</sup> ONS (2021). TS067 – Highest level of qualification. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

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

<sup>48</sup> Public Health England (2018). *Westminster Health Profile 2018*. Available at: [Local Authority Health Profiles - Area search results - OHID \(phe.org.uk\)](https://phe.org.uk)

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.<sup>49</sup>

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.<sup>50</sup>

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 Dementia<sup>51</sup>, 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 year. 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 one optician: Braham Optician and the Pharma Medic pharmacy on Church Street.

### 6.3.5 Housing

Westminster's private rented sector is the largest in England, comprising 43% (45,000)<sup>52</sup> 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 2019 there were 7,500 households waiting for affordable housing.<sup>53</sup> This includes:

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

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

There are approximately 4,950 properties located in Church Street.<sup>54</sup> According to the 2021 Census, the majority of households at the LSOA and ward level are rented. Church Street has the largest percentage of social rented households (58.3%) followed by Westminster

<sup>49</sup> Joint Strategic Needs Assessment for Westminster & Kensington and Chelsea (2018); *Highlight Reports*. Available at: [Local Authority Health Profiles - Area search results - OHID \(phe.org.uk\)](#)

<sup>50</sup> Public Health England (2018). *Westminster Health Profile 2018*. Available at: [Local Authority Health Profiles - Area search results - OHID \(phe.org.uk\)](#)

<sup>51</sup> Joint Strategic Needs Assessment (2015). Dementia. Available at: [Dementia | Joint Strategic Needs Assessment \(jsna.info\)](#)

<sup>52</sup> City of Westminster (2015). Westminster Housing Strategy – Direction of Travel Statement. Available at: [Decision - Westminster Housing Strategy - Direction of Travel Statement | Westminster City Council](#)

<sup>53</sup> Information provided by Westminster Council.

<sup>54</sup> Valuation Office Agency (2017). Available at: **Error! Hyperlink reference not valid.**

009K (52.4%). These proportions are significantly higher than observed across both London (23.1%) and the borough (28.3%).

Consequently, the percentage of households who own their home are significantly lower across the LSOA and ward geographies compared to Westminster (27.4%) and London (45.2%). The median price paid for a property in Church Street was £464,500 in 2017, which is less than the media price in Westminster by 56%.<sup>55</sup>

**Table 6-16 Tenure (%) by geographical area, 2021<sup>56</sup>**

Tenure	Westminster 009J	Westminster 009K	Church Street Ward	Westminster	London
<b>Owned</b>	6.4	19.2	13.7	27.4	45.2
<b>Shared ownership</b>	0.4	1.9	0.7	0.7	1.5
<b>Social rented</b>	32.6	52.4	58.3	28.3	23.1
<b>Private rented</b>	60.2	25.2	26.0	43.3	30.0

Table 6-17 below shows occupancy rates (based on the ONS definition - number of bedrooms occupied) derived from 2021 Census data. London has the highest proportion of overcrowded households at 48.9%, followed by Westminster 38.6%, and Church Street Ward 24.5%.

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.<sup>57</sup>

**Table 6-17 Household overcrowding and under-occupation<sup>58</sup>**

	Overcrowded			All households	% Overcrowded
	1 below standard	2+ below standard	Total		
<b>Church Street</b>	774	338	1,112	4,545	24.5
<b>Westminster</b>	25,088	11,541	36,629	94,814	38.6
<b>London</b>	927,909	746,047	1,673,956	3,423,890	48.9

### 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

<sup>55</sup> City of Westminster (2018). Church Street Ward Profile. Available to download online.

<sup>56</sup> ONS (2021). TS054 – Tenure. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk)

<sup>57</sup> Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: [How fair is Britain? | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com)

<sup>58</sup> This analysis uses the 'bedroom standard' measure of overcrowding, which determines how many bedrooms households need based on the ages, genders and relationships of members. Households are overcrowded if they have fewer bedrooms than they need. They are under-occupying if they have more bedrooms than they need.



destination for local residents.<sup>59</sup> 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.<sup>60</sup>

### 6.3.7 Public realm and open space

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

The Partnership Approach to Open Spaces and Biodiversity in Westminster<sup>61</sup> 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.

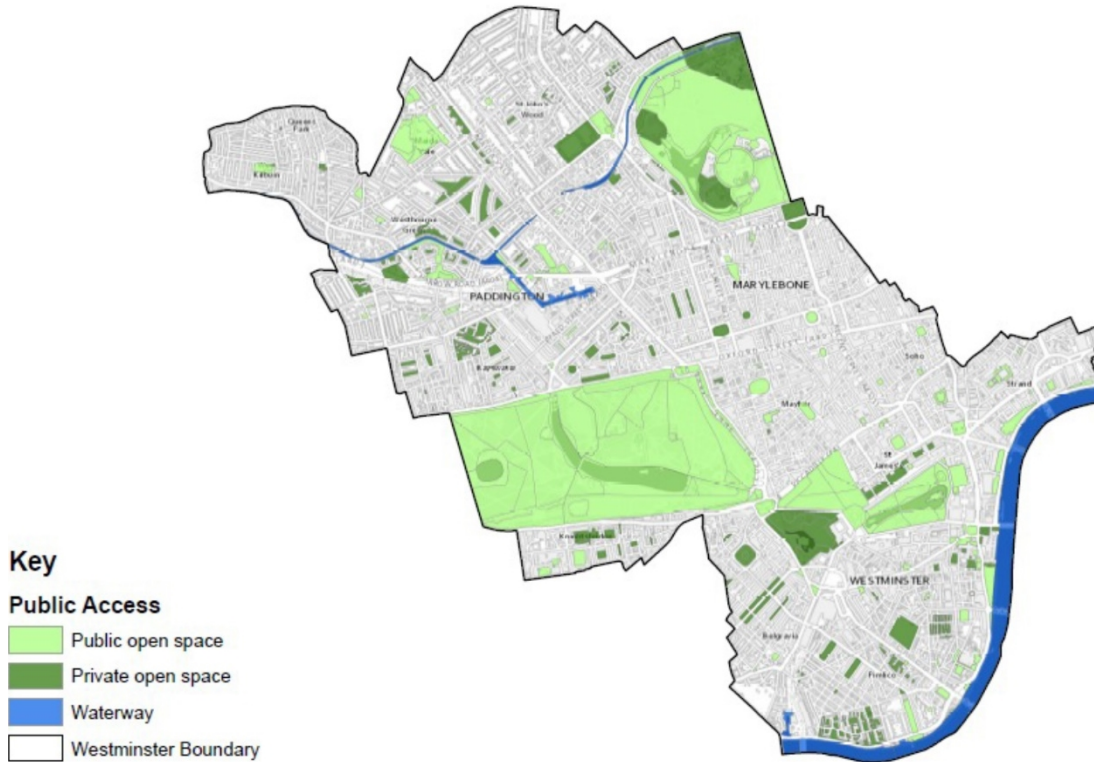
The open and green spaces are listed in the Appendix 1 of the Partnership Approach to Open Spaces and Biodiversity, reproduced below in Figure 6-3.

<sup>59</sup> Transport for London (2019). Public Transport Accessibility. Available at: [WebCAT planning tool - Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk)

<sup>60</sup> City of Westminster (2017). Church Street Masterplan. Available at: [westminster.gov.uk/sites/default/files/church\\_street\\_masterplan\\_dec\\_2017.pdf](https://www.westminster.gov.uk/sites/default/files/church_street_masterplan_dec_2017.pdf)

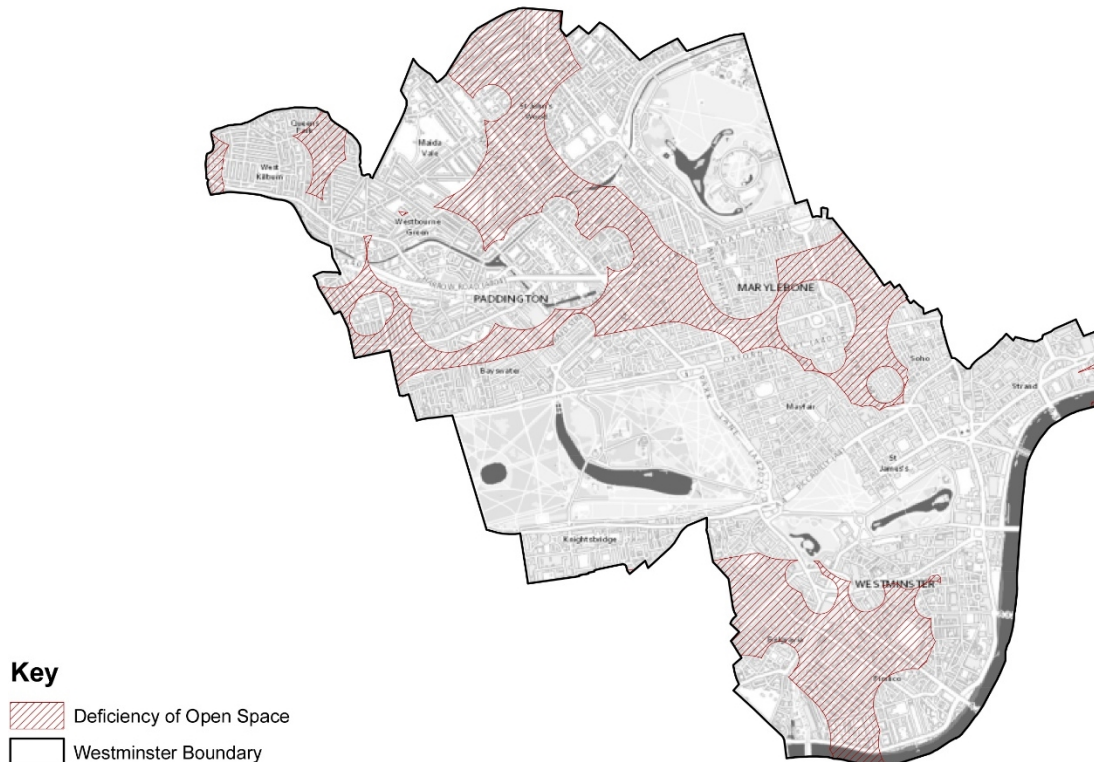
<sup>61</sup> City of Westminster (2019). Open Space and Biodiversity Strategy. Available at: [a\\_partnership\\_approach\\_to\\_open\\_spaces\\_and\\_biodiversity\\_in\\_westminster\\_-\\_march\\_2019.pdf](https://www.westminster.gov.uk/sites/default/files/open_space_and_biodiversity_strategy_march_2019.pdf)

**Figure 6-3 Map of open and green spaces**



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

**Figure 6-4 Map of open space deficiency areas**



People sharing protected characteristics may be disadvantaged if they are unable to access public open space, and for certain protected groups there are considerable advantages associated with access to open space; for example, young and older people are likely to benefit from opportunities for active and passive recreation, and socialising with others.<sup>62</sup>

### 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.<sup>63</sup>

The top three reported crimes within Church Street in April 2023 were classed as anti-social behaviour (45) followed by violence and sexual offences (36) and theft from the person (14).<sup>64</sup>

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.<sup>65</sup>

### 6.3.9 Community cohesion

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

According to the City Survey 2017, 87% of the community within Church Street say that people from different backgrounds get on well. 20% of the residents spend time helping to improve the community and 26% are interested in helping more to improve community.<sup>66</sup>

## 6.4 Primary research

Primary research has been undertaken as part of the wider Church Street Regeneration project, including a Housing Needs Assessment (HNA) with residents as well as business and market trader interviews and on-street customer surveys undertaken as part of the regeneration scheme EqIA. The following sections provide a summary of evidence collected from this research.

While these findings represent the wider regeneration scheme area, the high-levels trends can be indicative of the demographics and businesses within Site A. A detailed analysis of primary research findings is provided within the regeneration scheme EqIA.

<sup>62</sup> Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: [How fair is Britain? | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

<sup>63</sup> Equality and Human Rights Commission, (2010); *How Fair is Britain?* Report. Available at: [How fair is Britain? | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

<sup>64</sup> Metropolitan Police (2023). Church Street. Available at: [Church Street | Your area | Metropolitan Police | Metropolitan Police](#)

<sup>65</sup> City of Westminster (2018). Church Street Ward Profile. Available to download online.

<sup>66</sup> City of Westminster (2018). Church Street Ward Profile. Available to download online.

## 6.4.1 Housing Needs Assessment

This section provides a summary of Church Street Residents using the Housing Needs Assessment (HNA) carried out by Westminster Council in Autumn 2018 as follows:

- A wide range of ethnic groups are represented. The highest concentrations of ethnic groups amongst were white British (21.6%), Arab (9.1%) and African (7%);
- Amongst residents 41.7% identify as Muslim, 24.1% as Christian and 14.3% identified as having no religion or belief;
- Many households were well established in the area, with the majority of households (68.6%) have lived in their property for over 5 years and 47.7% have lived there over 10 years;
- Nearly 50% of households were home to a resident aged 65 or over, 65% of which had medical issues, 21% needed to use wheelchair or walking aid at least some of the time and 62% said that they would not consider a move off the estate;
- Just over 50% of households had a member with a medical issue, 36% of which has a disability;
- The majority of residents were social housing tenants. Of these tenanted households, 28% contained children, 21% were considered overcrowded and 6% were single-parent households;
- 43% of social housing residents said they would consider moving off the estate if regeneration goes ahead, with preferred areas including Maida Vale, Little Venice, Marylebone, St Johns Wood, Church Street and Paddington.
- Around 40% of all properties were private leasehold properties, of which 51% were resident leaseholders or family occupied and 49% were rented out to private tenants; and
- Just over 30% of leaseholders were aged 65 or over and had owned the lease for 15+ years.

## 6.4.2 Business interviews

This section provides a summary of interviews that took place with businesses and market stall holders in May 2019:

- The majority of businesses interviewed were owned by males (89.8%);
- The largest ethnic group amongst business owners and managers was Arab followed by Asian/Asian British: Pakistani. Overall, BAME groups make up over 80% of business owners on the existing site;
- The majority (66%) were license holders for a market stall followed by those who are the main leaseholder of the property they were occupying (21%);
- Most businesses were well established at the location, with over 60% of businesses have been at the location for over 6 years and almost 40% over 10 years;
- 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%);
- There was a high presence of small businesses in the area, with businesses having two full time and two part time employees on average with the majority being Asian/Asian British (31%);
- The highest level of agreement from business owners was to statements that customers come from the local community and their business serves people from a shared ethnic background;
- Almost 60% of businesses were supportive/very supportive of the regeneration plans for Church Street due to economic uplift and increased footfall; and
- While ~5% were very unsupportive due to fear of losing customer base and uncertainty of work during construction periods and beyond.

## 6.5 On-street surveys

The following section summarises interviews that were undertaken in the Church Street area in May 2019, with customers visiting local business as well as those passing through the area:

- The majority of respondents (43%) lived in the Church Street area, 28% visited every day and 19% visited every week;
- Active and public transport is popular, with the most frequent mode of travel to the area being walking (46.5%), while a quarter travelled by bus and around 10% took the underground;
- Over 70% rated proximity of Church Street businesses and market as 'good' or 'very good', indicating the importance of the regeneration site to local residents;
- Over 50% visit Church Street to visit one or more specific businesses, shops or market stalls;
- Over 30% of interviewees felt there were no nearby alternatives to services they were using, with the market being unique to the area;
- Positive comments regarding regeneration of Church Street included welcoming the idea of modernisation to improve safety, community cohesion and economic uplift. While some negative comments included disruption to the community and difficult accessing relocated services; and
- 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.

# 7. Assessment of potential equality effects

## 7.1 Introduction

The assessment considers the potential impacts on affected people sharing protected characteristics arising from the potential exercise of CPO powers associated with Site A of the Church Street Estate Regeneration project. It considers the direct impacts of the CPO for interested parties of affected residential and commercial properties on the site.

It also considers how the exercise of CPO powers would likely contribute to the realisation of equality effects arising from the wider planned development for groups with protected characteristics in the area. For the purpose of this EqIA the wider planned development refers to the Church Street Regeneration project as a whole (planned activities covering sites A, B and C). However, where appropriate the assessment focuses on specific detailed proposals within Site A.

## 7.2 Homes

### 7.2.1 Direct impacts of the CPO

#### *Loss of homes for resident leaseholders*

The CPO associated with Site A could result in the loss of homes for existing resident leaseholders living within properties currently on the site. Whilst the Council has successfully negotiated with the majority of leaseholders to acquire residential leaseholds prior to the development, as of June 2023, there are still seven residential leaseholders remaining within Site A.

The Council has confirmed that four of the seven leaseholds are under offer to the Council and aims to negotiate the purchase of the remaining leaseholds from existing leaseholders. However, compulsory purchase powers may be required to acquire the remaining leaseholds should these negotiations be unsuccessful.

It is understood that 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. Whilst the leaseholds will be brought at market value, leaseholders may have difficulty in securing a similar property in the area, in other preferred areas or in the new development at an equivalent cost. This could result in adverse effects for leaseholders who live in the affected interests and may force them to move out of the area or lose full ownership of a leasehold property.

Specific details about the protected characteristics of these resident leaseholders are unknown. However, groups that could be particularly sensitive to the impact of the CPO include people from ethnic minority groups, older people, disabled people and families who may lose important social and community ties. Further adverse impacts may be experienced by 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 Council's Policy for Leaseholders in Renewal Areas<sup>67</sup> 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 are 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.

All resident leaseholders have been offered a new home within the regeneration scheme, of which only four have expressed an interest in returning. Engagement with leaseholders has resulted in objections to the sales of leaseholds and as it was felt that they would be unable to afford a similar property within the area.

For leaseholders who wish to move away from the area, the Council provides help and support with the move. Resident leaseholders are 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 (those not currently living within the properties on Site A) 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 EqIA for the Policy for Leaseholders in Renewal Areas identified a potential negative impact where a leaseholder is eligible to become an intermediate tenant, rather than a social one. In this case, the tenancy offered is likely to be a shorthold assured one which offers less security than a social tenancy (and some providers only renew them in certain circumstances or offer them for a fixed term). They offer less security than a leaseholder will have now as a homeowner. Having to pay an intermediate rent may also lead to some leaseholders having higher housing costs than before. This might particularly impact households with children, older people and those with disabilities. However, a tenancy is only likely to be offered in limited circumstances and where the home ownership options are not appropriate for the leaseholder and intermediate tenancies are offered subject to the being affordable on the leaseholder's income.

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

Westminster Community Homes (WCH) have initially acted on the Council's behalf to organise and maintain engagement and communication with all renewal leaseholders. This has been done by writing, calling and physically visiting leaseholders at a time and place which meets the leaseholder's needs. During these personal sessions WCH run through all

<sup>67</sup> Westminster Council (2018) Policy for Leaseholders in Housing Renewal Areas. Available at: [Decision - Policy for Leaseholders in Housing Renewal Areas | Westminster City Council](#)

the available options leaseholders have, explain the home loss and disturbance compensation packages the leaseholders is eligible to and outline the additional support the Council can offer them.

Furthermore, the Church Street regeneration office has also held leaseholder engagement sessions during weekday evenings and on Saturdays, to offer more support and advice to all leaseholders in case they work or have care responsibilities during the day and week. The following steps have been undertaken to improve communication and engagement with different leaseholders including:

**Older leaseholders:**

- Larger font on correspondence provided on request;
- Engagement and communication with the leaseholder's family members arranged with their consent;
- Setting aside additional time for visits/interviews/viewings etc for elderly leaseholders;
- Arranging transport to viewings/events etc; and
- Encouraging leaseholders to have an advocate, for instance a family member attend meetings.

**Leaseholders who do not speak English as a first language:**

- Translation services have been arranged where English is not easily understood by the leaseholder.

**Disabled leaseholders:**

- Within the Leaseholder policy the Council will cover the cost of the new adaptations if already fitted in the existing property

Public Participation, Consultation and Research (PPCR) and an independent residential advisory service were also appointed by the Council as a residential impartial support to offer free advice to all leaseholders, secure tenants, Tenants' Association tenants and private tenants.

The Council has also provided additional assistance to vulnerable leaseholders and engagement with third parties including family members, social services and health practitioners to identify and address any special needs.

## **Loss of homes for private tenants**

The CPO associated with Site A could result in the loss of homes and rel of private rental tenants. The EqIA 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, availability of private rental accommodation in the Church Street area is lower than much of Westminster so it could be particularly hard for this group to find alternative housing in the local area or borough.

Whilst there are no confirmed details about private rent tenants remaining on the site, households that include private tenants with BAME status, older people, disabled people and families that may lose important social and community ties if they need to move away from the area could be particularly vulnerable to adverse impacts. However, 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 has helped to minimise against negative equality impacts. In January 2021, the Council published a five-year private rented sector strategy detailing its plans to improve



housing market conditions for tenants and to ensure the sector is well managed. The strategy identifies the need to ensure properties are good quality, and that all stakeholders including tenants, landlords and lettings agents are informed of their rights and responsibilities and that support can be provided where needed, including taking action when the law is broken.

## 7.2.2 Indirect impacts of regeneration realised by CPO

### *Net increase in housing provision on Site A*

The approval of the CPO for Site A would enable new housing to be developed on the site as part of the regeneration schemes. This would result in an increase from 145 to 428 residential properties (a net increase of 283 homes) on site A.

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

While those likely to benefit from the increase in affordable homes are not necessarily local residents, the council has committed to developing a Local Lettings Plan (LLP) for the new additional affordable housing supply. Proposed principles for regeneration areas within the LLP are set out in the Supply and Allocation of Social Housing 2018/19 Cabinet Report<sup>68</sup> and focus on prioritising local people. LLP will be subject to consultation.

Baseline data and information from the Housing Needs Assessment 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 households with children and multi-generational families.

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 the new housing, 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 the next 20 years in Church Street and Westminster 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 proposals include 10% of 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 and an improvement on current housing on site which do not have lift facilities.

<sup>68</sup> Westminster Council (2018). Cabinet Report: Supply and Allocation of Social Housing 2018/19. Available at: [social\\_housing\\_supply\\_and\\_allocations\\_2018-19.pdf](https://www.westminster.gov.uk/media/2018/12/social_housing_supply_and_allocations_2018-19.pdf) ([westminster.gov.uk](https://www.westminster.gov.uk))

## ***Improved quality housing on Site A***

Many of the responses to initial public consultation regarding 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 currently within Site A do not have lifts and initial consultation feedback found that residents would like new homes to be accessible to older people and people with disabilities, including lift access.

In line with the feedback received from more recent consultation, the Council have stated that new homes will be designed in accordance with the Nationally Prescribed Space Standards which promotes 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.

## ***Potential adverse effects with respect to loss of light***

A Rights of Light report has been prepared by GIA on behalf of the Council. This assesses the impact on neighbouring properties as a result of the Church Street Masterplan.

Of the 100 properties assessed for potential rights of light (RtL) impacts, 10 properties experience minimal losses and 33 properties experience actionable losses of light as a result of implementing the regeneration scheme proposals.

For properties, particularly residential properties, which do experience a loss of light, equality effects may arise for residents who share protected characteristics. This may arise where a resident is more sensitive than other people, due to a protected characteristic, for example a disability.

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

## **7.3 Market and economy**

### **7.3.1 Direct impacts of the CPO**

#### ***Business closure/non-viability of business following permanent loss of units***

Where possible the Council is negotiating with existing property owners to acquire commercial freeholds and leaseholds prior to the development. However, there are seven remaining interests on site where an agreement has not been made with leasehold interests. The use of compulsory purchase powers could result in the closure or relocation of these businesses. Whilst the proposed regeneration scheme includes provision for shop units, the CPO Scheme does not allow for existing business occupiers to relocate on the site.

Primary research undertaken for sites A, B and C 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 the clustering of businesses offering services to a common customer set.

The Church Street regeneration team has assisted current businesses in the area since 2016. Located on Church Street the Regeneration Base has:

- Served as a single point of contact for enquiries;
- Coordinated and delivered consultations and engagement sessions and workshops;
- Disseminated feedback, updates and information;
- Managed relationships with internal and external parties;
- Understood the needs and wants of the occupiers; and
- Created a Business Forum to centralise discourse providing an open forum for all.

A more formal Commercial Relocation Strategy is being developed to support existing occupiers find alternative accommodation so that they can maintain continuity of trade. Whilst the Strategy cannot guarantee a successful relocation, a concerted effort is being made by the Council to give businesses an opportunity to relocate through the identification of potentially suitable and available premises within the Borough. The aim of the Strategy is to;

- Assist in identifying relocation options in a way that best meets their needs and minimises disruption to trading; and
- Retain the Businesses within the borough and, if possible, within proximity to Church Street and the community that they serve (if this is their preference).

The Church Street regeneration team has gained an understanding of individual floor space requirements, rent, location and planning use class requirements. Initial discussions with occupiers have outlined a preference to remain within Westminster. Based on the specific preference (i.e. to remain on Church Street, close to Church Street, an area like Church Street within Westminster or just anywhere within Westminster), the team compiled data on suitable and available commercial units within Westminster's boundary. Searches are conducted monthly via online portals such as Rightmove, Zoopla and Loop.net by the Regeneration Team and, once assessed, suitable premises have been distributed to all leaseholders remaining on the site with priority given to those leases protected under the Landlord and Tenant Act 1954.

Since February 2020 the Council has engaged with Pharm Medica, being a key community resource that occupies a double unit on Site A. Given the service that the Business provides to the local community and the health and well-being benefits it offers, the Council was keen to retain the pharmacy in proximity to Church Street and facilitated an introduction with Berkley Homes, the developer of the neighbouring West End Gate development. An agreement has been reached for Pharm Medica to move into a unit within that development in Autumn 2023.

Additionally, a curation strategy for Church Street is being developed as part of the regeneration programme which will set out the strategy to be used when letting the new commercial units within the development. 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 through the Commercial Relocation Strategy are considered appropriate measures to assist with mitigation against negative impacts for affected business owners 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.

Some businesses may not be eligible under the CPO compensation code and are therefore vulnerable to closure/non-viability but will still be provided support to identify potential relocation opportunities under the Commercial Relocation Strategy.

There is an assumption that if all requirements are not fulfilled, there could be some adverse equality effects on businesses and employees on the site. It is recommended that the Council monitor engagement with affected parties, ensure compensation payments to those who are entitled to receive them are paid expeditiously, and that where viable, the Council supports relocation by making compensation payments in advance of the possession date to allow businesses to pay deposits on alternative premises.

### ***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 initiatives such as an Employment, Skills and Education Strategy for the scheme.

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

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

### ***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 prepared for the wider project EqIA found that 51% of respondents were visiting the Church Street 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.

The Church Street regeneration team have provided on-site support to local business and an Independent Business Advisor was appointed to provide support and advice to local businesses. This has resulted in the successful relocation of Pharma Medica, to a nearby unit. A more formal Commercial relocation strategy is being developed to support other businesses to maintain operations and therefore limit the impact on customers.

The Cultural Infrastructure Plan work has been commissioned to identify and map existing cultural assets, identify any gaps and risks to culture as a result of the development proposals. The Council will conduct combined Regeneration and Place-shaping workshops to establish potential impacts of the design proposal and establish a set of strategic design principals that respect the cultural wealth potential of the ward. The Council is also presently running monthly property searches for Site A businesses requesting assistance with relocating locally and commercial units on Church Street are also being kept from going to market to provide options for affected businesses.

### ***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.

Further, a commercial relocation strategy and market relocation strategy are being developed by the Council in support the relocation of businesses within the wider immediate area and to ensure that the market can continue to operate whilst the regeneration of the surrounding areas take place.

## 7.3.2 Indirect impacts of the regeneration scheme realised by the CPO

### *Creation of new employment opportunities*

The Church Street regeneration project brings with it the opportunity for new employment, including temporary construction jobs and new retail jobs on site.

The area has high levels of unemployment and low levels of educational attainment. This includes those from BAME groups (Asian/ Black African/Arab and Latin American) who are currently overrepresented on the site in terms of employees. 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 localised Westminster Employment Service provides an employment coaching service for the local community. The service works with local partners (Job Centre/developers and employers) to provide job opportunities and training for local young people. Similarly, the CS Neighbourhood Keeper Programme also plays an active role and supports local people into employment, entrepreneurship and training through local projects and capacity building training. The Church Street Responsible Procurement Plan has been drawn up and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that local residents are given priority over construction jobs and training.

### *Temporary disruption/relocation of Church Street Market*

The overall regeneration scheme 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 3,600m<sup>2</sup> of storage and facilities.

However, market stall holders may experience temporary relocation to a new site in the wider immediate area during the construction phase. Equality effects may be experienced where the pattern of affected business owners or employees affects a single race or share other protected characteristics.

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

- The construction site boundary encroaches on to the current location of the market;
- The trader requests a move;
- Large machinery must be brought to site via Church Street; or
- Noise and dust from especially heavy works might prove difficult for traders to endure.

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

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

Overall, disruption to market traders is being minimised by continuing market trading as a whole in a new temporary location. The Council is currently consulting with market traders

on the new public realm plans and how the impacts of both the Public Realm and Site A works might affect them. The Council notes that to date, engagement feedback from traders has been very positive with only a couple of concerns about the suspension of trading.

Going forward, the council must ensure the relevant needs of traders and customers continue to be considered in order to continue operating successfully. Any additional financial burdens should also be considered, for example where potential costs of moving location could adversely impact market traders and where existing customers might need to pay extra travel costs in order to keep on using the market. In cases where relocation may not occur, the Council should consider potential health and wellbeing impacts from construction works on both stall holders and customers.

A Temporary Market Relocation Strategy has also been developed by the Council in an attempt to ensure that the market can continue to operate whilst the regeneration of the surrounding areas take place. The Council has pledged that the market will continue to operate throughout the works and be retained in one location. The commitment to residents has been made that this source of affordable food and clothing will not be adversely affected.

### ***Regeneration of Church Street Market Infrastructure***

Feedback from the business survey and public consultation found that there was strong support for improving the market facilities. The regeneration provides the opportunity to make comprehensive improvements to the market for existing and future traders. This includes changes to design, layout, appearance, storage, parking, provision of water, electricity and trader welfare facilities including toilets. This includes around 220 stalls, 150 van parking spaces, up to 4900m<sup>2</sup> storage and facilities. The regeneration of the market provides an opportunity to create an inclusive environment to meet the needs of market stall holders and their customers, including those with protected characteristics.

The revised detailed design for Site A includes toilet facilities, 4 loading and unloading spaces and between 24-32 trader storage spaces. According to the Environmental Statement produced for the proposed scheme, the revised detailed design for Site A includes toilet facilities and will offer 5% (of the number of units) disabled parking provision for residents as well as 5% standard residential car parking spaces. According to the statement, at Site A, this will be 22 residential disabled parking spaces and 21 standard residential car parking spaces. The residential car parking spaces are to be provided within the basement of Site A and will be accessible via two car lifts situated on Penfold Street. These facilities will be accessed from Church Street as opposed from Broadley Street as originally proposed, making it more accessible to traders. Respondents in the 2021 consultation sessions remarked on the need for cleaner toilets and parking spaces as important factors for the proposed development.

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

## **Potential for increasing rents or ‘gentrification’ of the area**

The regeneration scheme 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 adaptation 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 and should be supported to ensure that they are aware of job opportunities in the area.

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

## **7.4 Making connections**

### **7.4.1 Indirect impacts of the regeneration scheme realised by CPO**

#### **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.

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.

For example, footpath diversions could have an adverse impact on those with mobility issues, in particular older people, disabled people, pregnant women and people with pushchairs. Key walking routes and crossing points in the area should therefore 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 also be provided in local schools and community centres to discourage children from entering construction areas.

### ***Improvements for walking and cycling***

The regeneration scheme 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.

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

### ***Increased parking/ better management of parking***

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

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

## **7.5 Population & Community/Health & Wellbeing**

### **7.5.1 Direct impacts of the CPO**

#### ***Loss of informal community hub (Church Street Café)***

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 Street cafe is used by 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 this business 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<sup>69</sup>. In addition, the proposed Triangle development on Church Street will also offer flexible enterprise, arts and community space. However, it is noted that these facilities are outside the scope of sites A, B and C. Furthermore, recent consultation feedback regarding the importance of community space, particularly in relation to the library has been acknowledge (as is discussed further below). Plans have been drawn up to ensure the Library retains a Church Street presence and these designs will be included in the second stage of the consultation where community feedback on current proposals will be considered. The Church Street team are also working with library staff to ascertain the best ways forward to limit the disturbance of the space and ensure the new space offered enables them to continue offering their popular services.

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

### ***Uncertainty and anxiety for existing residents***

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

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

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

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

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<sup>69</sup> Note this hub is part of the wider development and not a direct part of the offerings of Sites A, B and C.

## 7.5.2 Indirect impacts of the Church Street Estate Regeneration Project realised by CPO

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

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

### *Environmental impacts of construction work on health and well-being of residents in the wider area*

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

Some residents could be more sensitive to the effects of these construction impacts than others. For example, those who spend more time at home would be subjected to longer

periods of adverse noise impacts. These residents are likely to include older people, some people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children. Some groups with protected characteristics also have differential sensitivity to noise. For example, children are susceptible to increased noise levels, particularly with regards to cognitive impairment.<sup>70</sup> Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise. Children may also be more sensitive to health effects arising from poor air quality and dust concentrations, as well adults with limiting illnesses such as chronic lung or heart conditions<sup>71 72</sup>. People with dementia also have an increased sensitivity to both noise and light.<sup>73</sup>

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

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

### ***New Library on Church Street***

The Church Street Library is to be relocated from its current location at Site B to Site A. The new library will be built before the existing library on Site B is demolished so that there is no interruption in service provision.

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 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.

### ***New open/public spaces***

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

<sup>70</sup> WHO (2006). What are the effects of air pollution on children's health and development? Available at: [WHO/Europe | Home](#)

<sup>71</sup> Defra (2013). Short-term effects of air pollution on health. Available at: [Short-term effects of air pollution on health - Defra, UK](#)

<sup>72</sup> WHO (2006). What are the effects of air pollution on children's health and development? Available at: [WHO/Europe | Home](#)

<sup>73</sup> Social Care Institute for Excellence (2023). Dementia Friendly Environments. Available at: [Noise levels - Dementia-friendly environments - SCIE](#)

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

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

The Council aims to increase publicly accessible open space within the Church Street ward by 40%. This includes the provision of New Street Gardens between Church Street and Broadley Street on Site A 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.

## 7.6 Summary of potential impacts

Table 7-1 provides a summary of direct and indirect effects of the CPO. This describes each potential impact alongside the potentially effected groups with protected characteristics. Details of embedded mitigation are provided that support the enhancement of positive effects and minimising of negative effects as well as further recommendations.

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

**Table 7-1 Summary of potential direct and indirect impacts of CPO**

Impact	Affected Protected Characteristic Groups											Overview of potential effects	Planned and further recommended mitigation	
	Age			Sex	Race	Religion/ belief	Disability	Gender reassignment	Sexual Orientation	Pregnancy/ Maternity	Low income households			
	Children	Young People	Older People											
<b>Homes – Direct Impacts</b>														
Loss of homes for residential leaseholder	x		x		x		x					x	<p>Leaseholders with protected characteristics that influence their ability or desire to move out of the area. This includes those ethnic minority groups, people with disabilities, older people and families who may have formed formal and informal social and community ties and support.</p> <p>Further adverse impacts may be experienced by 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.</p>	<ul style="list-style-type: none"> <li>Westminster Community Homes (WCH) act of the Council's behalf to organise and maintain engagement and communication with all renewal leaseholders. They do this by writing, calling and physically visiting the leaseholder at a time and place which meets the leaseholder's needs.</li> <li>The Council's Policy for Leaseholders in Housing Renewal Areas sets out options for resident leaseholders to buy new homes in the renewal area. Financial compensation for resident and non-resident leaseholders is also set out within the Policy.</li> <li>Support to navigate through relocation process for leaseholders especially elderly as those with English as a second language.</li> <li>In the case of resident leaseholders, the Council have looked into the option of offering available new build stock to them on a shared equity basis, which gives them a financially achievable option to remain in the local area and remain close to their local connections.</li> <li>The CS regeneration office has also held Leaseholder engagement sessions to offer more support and advice to all leaseholders, in case they work or have care need responsibilities during the day and week.</li> </ul>

																				<ul style="list-style-type: none"> <li>Communication and engagement measures have been adapted for leaseholders with various protected characteristics.</li> <li><b>Recommended further actions:</b> continue engagement to negotiate agreement and avoid need for CPO</li> </ul>
	Potential loss of homes for private tenants	x				x							x	<p>A range of different ethnicity households living in private rental housing.</p> <p>Children in affected households.</p>	<ul style="list-style-type: none"> <li>An Independent Resident Advisor has been appointed by the Council to support residents including private tenants.</li> <li>The Council has published a five-year private rented sector strategy detailing its plans to improve housing market conditions for tenants and to ensure the sector is well managed</li> <li>WCC's team on homelessness prevention is currently being considered as an option to help potential tenants search for alternative housing.</li> </ul>					
<b>Homes – Indirect Impacts</b>																				
	Net increase in overall housing provision including family, social, wheelchair accessible, affordable and high quality housing	✓	✓	✓		✓		✓					✓	<p>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>	<ul style="list-style-type: none"> <li>Local Letting Plan to be developed including principle for regeneration areas focusing on prioritising new affordable homes for local people.</li> <li><b>Further recommendation:</b> Meet 35% affordable housing provision targets and mix of social housing, family housing and wheelchair accessible housing.</li> <li><b>Further recommendation:</b> Identify opportunities for homeless people to be accommodated in the new development.</li> </ul>					
	Improved quality housing on Site A	✓	✓	✓		✓		✓						<p>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>	<ul style="list-style-type: none"> <li>Homes will be designed in accordance with the Nationally Prescribed Space Standards.</li> <li>The new housing will be Homes will be designed in accordance with Nationally Prescribed Space Standards. The re-provision units are all designed to fit the Housing Need Assessment requirements. The design development has also taken place in close consultation with the community and the Housing Department.</li> </ul>					
	Potential adverse effects with respect to loss of light							x						<p>Groups with protected characteristics living within affected properties especially those who may have a sensitivity to light as a result of a disability.</p>	<ul style="list-style-type: none"> <li>A Right of Light Assessment has been undertaken.</li> <li>All parties who suffer an expected RtL injury will be notified and engaged with.</li> </ul>					

															<ul style="list-style-type: none"><li>• Property owners will be entitled to compensation for any reduction in the value of their property caused by the development.</li><li>• <b>Further recommendation:</b> If a council tenant experiences an interference with their natural light which has a significant impact on their use and enjoyment of their accommodation due to a disability/condition or their specific use of a property, they will be able to approach the Council's housing team for a review of their housing needs.</li></ul>
Market and Economy – Direct Impacts of CPO															
	Business closure/non-viability of business following temporary relocation and net reduction in number of retail units across the area as part of the Site A design update					x								BAME owned businesses; particularly those from the Arabic and Asian communities who are both over-represented on the site.	<ul style="list-style-type: none"><li>• Church Street Business Programme has been set up to provide support and advice to businesses.</li><li>• The Church Street regeneration team aim to assist current businesses to remain in the area or within Westminster if relocation is not possible.</li><li>• A more formal Commercial Relocation Strategy is being developed</li><li>• <b>Further recommendation:</b> Explore the early release of compensation payments. These payments are typically only paid after vacant possession is provided and therefore employing a policy to make payments to those eligible in advance of needing to vacate could be used to support a successful relocation i.e., to pay deposits, fund relocation expenses, etc;</li><li>• <b>Further recommendation:</b> Monitor further aspects associated with actions included in the Commercial Relocation Strategy. For example, time taken to issue compensation payments and time spent on active engagement from the Council; and</li><li>• <b>Further recommendation:</b> Monitor the progress of the CPO with regards to business occupiers where possible. This would help to determine the success of policies and other measures with regards to relocation.</li></ul>



<p>Temporary or permanent loss of employment following closure or relocation of affected businesses</p>					x						x	<p>BAME employees of affected businesses; particularly Asian/ Black African/Arab and Latin American employees who are over represented on the site</p>	<ul style="list-style-type: none"> <li>The localised WES service continues to provide an employment coaching service for the local community. The service works with local partners (Job Centre/developers etc.) to ensure existing employees and local people can benefit from job opportunities arising through the regeneration programme.</li> <li>The Church Street Responsible Procurement Plan is being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities.</li> </ul> <p><b>Further recommendation:</b> Monitoring with businesses to assess level of job losses for local people.</p>
<p>Permanent loss of shops and businesses providing current mix of culturally specific services and goods</p>					x	x						<p>BAME community living in close proximity to the site especially those from Arabic and Asian communities and Muslims.</p>	<ul style="list-style-type: none"> <li>Independent Business Advisor has been appointed to provide support and advice.</li> <li>The Council are running monthly property searches for Site A businesses requesting assistance with relocating locally.</li> <li>Commercial units on Church St are also being kept from going to market to provide options for effected businesses.</li> </ul> <p><b>Further Recommendation:</b> Marketing and advertising advice to business so to ensure existing and new customers are made aware of relocations of businesses.</p>
<p>Loss of shops, market stalls and businesses providing affordable and accessible goods and services for existing local community</p>	x	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>	<ul style="list-style-type: none"> <li>The market will remain on Church St throughout the development process and will not be relocated elsewhere.</li> <li>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. A Temporary Market Relocation Strategy has been developed to support this</li> <li>An Independent Business Advisor has been appointed to provide support and advice to local businesses.</li> <li>Suspension of pitches will only happen on a Saturday as part of the public realm works.</li> <li>The Council are currently running monthly property searches for Site A businesses requesting assistance with relocating locally.</li> </ul>
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Market and Economy – Indirect Impacts of CPO													
	Creation of new employment opportunities		✓			✓					✓	Jobs generated through construction activities and through new retail offer on site may benefit young people, and BAME groups who are over-represented in local unemployment figures	<ul style="list-style-type: none"> <li>The localised WES service continues to provide an employment coaching service for the local community. The service works with local partners (Job Centre/developers and employers) to provide job opportunities and training for local young people.</li> <li>The CS Neighbourhood Keeper Programme supports local people into local employment, entrepreneurship and training through local projects and capacity building training.</li> <li>The Church Street Responsible Procurement Plan is being compiled and will be the conduit to ensuring that the contractors adhere to the council's employment policies and that residents and businesses are given priority over jobs and training opportunities.</li> </ul>
	Temporary relocation/disruption of Church Street Market			x		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.	<ul style="list-style-type: none"> <li>The market will remain on Church St throughout the development process and will not be relocated elsewhere.</li> <li>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. A Temporary Market Relocation Strategy has been developed to support this</li> <li>Suspension of pitches will only happen on a Saturday as part of the public realm works.</li> </ul>

	Improvement of the facilities and infrastructure for Church Street Market			✓		✓	✓							Benefits should be accessible to all groups but especially those more likely to be from local income households/businesses and those who would benefit from accessibility improvements and increased facilities.	<ul style="list-style-type: none"> <li>• <b>Further recommendation:</b> Continued effective engagement with the local community and traders to ensure that appropriate facilities are provided on site. Potentially through the creation of a dedicated Market Facilitator role within the Retail, Markets and Business Team.</li> <li>• <b>Further recommendation:</b> Although parking has been reduced at Site A it is recommended that the Council seek to maintain overall parking and storage provision at the target levels across sites A, B and C. Prioritisation and allocation of parking and spaces for traders should be included as part of a future strategy for the new market. The cost of parking and storage hire should be assessed to ensure fairness and affordability to all market traders. This should allow for an increase in the number of storage units which should reduce the need for on-street parking.</li> </ul>
	Potential for an increase in commercial rents and 'gentrification' of the area			x		x							x	BAME business owners and BAME people and older people who currently work or shop in businesses on the existing.	<p><b>Further Recommendation:</b> Guarantees on commercial rents and market stall rates and leases through market trader agreement.</p> <p>A Curation Report is being developed to manage the lease of commercial units on site</p>
<b>Making Connections – Indirect Impacts of CPO</b>															
<b>Beneficial</b>	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.	<p>A detailed construction management plan will be prepared in conjunction with a developer partner. This will take in to account the recommended mitigations and strive to reduce the impact of construction as far as possible.</p> <p><b>Further recommendation:</b> 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.</p>

																			<p><b>Further recommendation</b> 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.</p>
	Improvements for walking and cycling around the site with the addition of a new pedestrian focused, playable street.	✓	✓	✓				✓											<p>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.</p> <p>The development is being designed to the latest, highest standards, all public realm areas are accessible with the use of steps avoided wherever possible and if it cannot be avoided access ramps provided. Currently access to the market storage areas is provided directly off Church street, this will be accessible only to traders. Cycling and walking will be encouraged with a generous provision of cycle storage for residents and a new pedestrianised street within Site A.</p> <p><b>Further Recommendation:</b> Inclusive design standards should be developed and followed for public realm improvements.</p>
	Improved parking management and facilities			✓				✓											<p>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</p> <ul style="list-style-type: none"> <li>• Trader parking on Site A has been reallocated as loading/unloading for storage unit users to increase storage provision on site.</li> <li>• Conversations with Parking suggest that any loss of parking in the surrounding area will not be able to be recouped anywhere else.</li> <li>• Public Realm work to consider retention of current PbP bays but this conflicts with WCC/Masterplan aspirations for less vehicles on the road.</li> </ul>
<b>Population &amp; Communities / Health &amp; Wellbeing – Direct Impacts of CPO</b>																			

	Loss of informal community hubs			x				x				x	<p>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>	<p>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><b>Further recommendations:</b> The Council should identify ways in which to support the continued operation of businesses and informal spaces of specific community importance as part of a model for social value. This particularly applies to businesses that have established relationships with local people with protected characteristics.</p> <p>The new health and wellbeing hub and library should be accessible to all.</p> <p>The Council will also conduct Combined Regeneration and Placeshaping workshops to establish potential impact of design proposal and establish a set of strategic design principals that respect the cultural wealth potential of the ward.</p>
	Uncertainty and anxiety for existing residents			x		x		x					<p>Older people, people with medical issues affecting mental health or who might require more support and assistance with the move, people with language barriers who may find it more difficult to understand the details of the development.</p>	<ul style="list-style-type: none"> <li>• Relocations team, with a dedicated officer for each household, are on hand to continue offering support to all tenants with any housing issues, their moving options, their bidding process, their offers, their viewings, their moves. All removals and transportation is organised by the team.</li> <li>• Relocation team offer comprehensive support to tenants before, during and following a move.</li> <li>• Council provide additional assistance to vulnerable residents and engage with third parties including family members, social services and health practitioners to identify and address any special needs (policy for leaseholders and tenants)</li> <li>• Translation services are provided where necessary to help people for whom English is not their first language.</li> <li>• Regeneration office (99 Church Street) is open every weekday, staffed with at least one manager, to offer full support and assistance to residents.</li> </ul>

																	<ul style="list-style-type: none"> <li>• Staff can also redirect any housing concerns to the Housing Service or put the resident in touch with the relocation team/ PPCR (independent residential advisory service) TA team or WCH to assist them.</li> </ul>
<b>Population &amp; Communities / Health &amp; Wellbeing – Indirect Impacts of CPO</b>																	
	Effective and detailed consultation and community engagement with affected groups to contribute to sharing benefits of the regeneration	✓	✓			✓			✓	✓							<p>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> <ul style="list-style-type: none"> <li>• Consultation and engagement activities to date have been comprehensive and well documented.</li> <li>• The Council will deliver and implement the Church St Youth Engagement Strategy This strategy is being compiled, aimed at engaging youth specifically with the regeneration consultation process over a series of workshops and other events.</li> <li>• Implementation of the Youth Engagement Strategy has begun through youth engagement webinars and focus groups. The Young Westminster Foundation and Marylebone Bangladesh Society engaged to facilitate the CS Youth Voice to ensure participation of young people in consultation and engagement opportunities across the programme.</li> </ul> <p><b>Further recommendation:</b> Undertake diversity monitoring on activities with businesses, employees, residents and visitors.</p> <p>people understand more about the onsite and planned projects.</p>
	Environmental impacts of construction works on health and well-being of residents			x					x								

	New Library on Church Street	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	All groups may benefit from brand new library services.	<ul style="list-style-type: none"> <li>Plans have been drawn up to ensure the Library retains a Church Street presence. These designs will be included in the second stage of the consultation, where again staff will listen to the feedback on current proposals for the community space, location and size.</li> <li>The Church Street team are working with library staff to ascertain the best ways forward to limit the disturbance of the space and ensure the new space offered enables them to continue offering their popular services.</li> <li>The Council has also commissioned a Cultural Infrastructure Plan work to identify and map existing cultural assets, identify any gaps and risks to culture as a result of the development proposals.</li> </ul>
	New open/public spaces	✓	✓	✓				✓					Disabled people, older people, women and other groups in terms of accessibility, health, wellbeing and safety benefits.	<p>The development is being designed to the latest, highest standards, all public realm areas are accessible with the use of steps avoided wherever possible and if it cannot be avoided access ramps provided. There is public space provided in the form of New Street Gardens, a pedestrianised street through the middle of Site A. This provides a variety of play space and amenity space adopting inclusive design standards.</p> <p><b>Further recommendation:</b> Inclusive design standards (including inclusive play) should be developed and followed for public realm improvements</p>

# 8. Conclusions

## 8.1 Conclusions

The exercise of compulsory purchase powers will enable interests in Site A to be brought under the Council's control, enabling regeneration which will contribute to the improvements in the area through a net increase in housing, new employment opportunities associated with the construction and the completed development, a new library and improvements to the public realm as well as the benefits of the overall wider regeneration of the Church Street Estate. The CPO will help move the project forward towards realising the identified positive equality effects arising from the planned development, including:

- A net increase of 283 residential properties (629 residential properties as part of the regeneration scheme).<sup>74</sup> This includes social housing, family housing, wheelchair accessible housing and affordable housing. The net increase in housing should benefit people with priority for affordable housing, both social and intermediate, who are more likely to have protected characteristics (particularly for social housing). It should be noted that affordability barriers may make it harder for certain groups, including low-income BAME households, children living in low income and overcrowded households and (mainly female-headed) single parent households, from sharing in this benefit. The Council should aim to meet affordable housing, social housing and shared ownership targets of the development;
- Employment creation in construction, as well as retail and service jobs on the completed site;
- 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.

The assessment of impacts shows that there are some direct potential negative effects associated with the CPO.

- Loss of homes for affected residential leaseholders on Site A. Groups that could be particularly sensitive to the impact of the CPO include people from ethnic minority groups, older people, disabled people and families who may lose important social and community ties. Further 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. The Council has provided support to residents in finding alternative accommodation that best meets their needs including returning to the new development. It is also recognised that the CPO will result in an overall net increase in residential properties which will benefit the wider community including those with protected characteristics.
- Potential closure of BAME owned businesses where businesses are not eligible for compensation. It is considered that the successful relocation of existing businesses will also depend, in part, on the flexibility of individual businesses, some of which are specific in terms of where they consider an appropriate location for their business to operate successfully.
- Temporary or permanent loss of employment following closure or relocation of affected businesses, particularly amongst BAME employees;

<sup>74</sup> Based on existing properties on site being 492 and the planning application proposals delivering up to 1121 properties, the proposed scheme would deliver a net increase of 629 residential homes.



- A loss of shops and services providing current mix of culturally specific services and goods as well as potential loss of cultural and social connections. However, there is also the potential for positive effects as a result of the opportunity for new accommodation with improved facilities;
- The loss of Church Street Café which provides an informal community hub for local residents; and
- Anxiety and stress caused by uncertainty around development plans and relocation.

Further indirect negative impacts of the CPO could occur as a result of enabling the regeneration scheme. These include:

- Safety, security and accessibility issues for residents of the local area as a result of construction activity;
- Health and wellbeing impacts of construction related activities including increased noise levels and a reduction in air quality;
- Potential for 'gentrification effects' to result in higher rent levels; and
- Right to light injuries will occur in identified properties neighbouring the development site. Property owners will be entitled to compensation. However, it is acknowledged where occupiers are tenants, they may not be the beneficiary of the compensation and that some tenants have protected characteristics that could make them more vulnerable to negative effects. This extent of this impact will be reviewed as more direct engagement takes place.

Action undertaken to date and planned mitigation set out in Table 7-1 aim to strengthen, secure or enhance positive beneficial impacts and to mitigate for potential adverse equality impacts associated with the CPO of Site A.

## 8.2 Further recommendations

In order to further minimise negative effects and enhance positive effects identified, the Council should seek to:

- Explore the early release of compensation payments. These payments are typically only paid after vacant possession is provided and therefore employing a policy to make payments to those eligible in advance of needing to vacate could be used to support a successful relocation i.e., to pay deposits, fund relocation expenses, etc;
- Develop an inclusive design framework for the public space design in order to ensure potential barriers that may prevent disabled people and older people from utilising the new public space have been considered;
- Monitor further aspects associated with actions included in the Commercial Relocation Strategy. For example, time taken to issue compensation payments and time spent on active engagement from the Council; and
- Monitor the progress of the CPO with regards to relocation of private residential tenants and business occupiers where possible. This would help to determine the success of policies and other measures with regards to relocation of private tenants and help to develop best practice with regards to future developments.

## 8.3 Next steps

The Church Street regeneration scheme will require the procurement of a developer to deliver the regeneration scheme. The PSED will apply to the procurement process because it is a non-delegable duty and procurement is a "function" of the Council. Therefore, in circumstances where the Council chooses to "contract out" part or all of a function (for

example the delivery of regeneration) to another entity (for example a developer), the Council cannot absolve itself from its responsibility to fulfil the PSED.

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

Guidance on embedding the PSED into the procurement process from the Equality and Human Rights Commission<sup>75</sup> 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.

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

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

This EqIA should be considered as a live document, and should be updated, refreshed and the actions within it monitored on a regular basis at further milestones. This should include a monitoring update on the status of identified potential impacts and associated mitigation. Whilst the EqIA identifies short-term and medium-term impacts of the regeneration proposals it will also be important to capture any additional impacts including any identified long-term impacts as the programme progresses.

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<sup>75</sup> Equality and Human Rights Commission (2013). Buying Better Outcomes: Mainstreaming equality considerations in procurement - A guide for public authorities in England. Available at:

[https://www.equalityhumanrights.com/sites/default/files/buying\\_better\\_outcomes\\_final.pdf](https://www.equalityhumanrights.com/sites/default/files/buying_better_outcomes_final.pdf)

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