



City of Westminster

Committee Agenda

Title: **Climate Action, Housing and Regeneration Policy and Scrutiny Committee**

Meeting Date: **Wednesday 8th February, 2023**

Time: **6.30 pm**

Venue: **Rooms 18.01 & 18.03, 18th Floor, 64 Victoria Street, London, SW1E 6QP**

Members: **Councillors:**

Gillian Arrindell	Patricia McAllister (Chair)
Robert Eagleton	Alan Mendoza
David Harvey	Cara Sanquest
Elizabeth Hitchcock	



Members of the public are welcome to attend the meeting and listen to the discussion Part 1 of the Agenda

Admission to the public gallery is by ticket, issued from the ground floor reception. If you have a disability and require any special assistance please contact the Committee Officer (details listed below) in advance of the meeting.

If you require any further information, please contact the Committee Officer, Clare O'Keefe, Lead Policy and Scrutiny Advisor.

**Email: cokeefe@westminster.gov.uk
Corporate Website: www.westminster.gov.uk**

Note for Members: Members are reminded that Officer contacts are shown at the end of each report and Members are welcome to raise questions in advance of the meeting. With regard to item 2, guidance on declarations of interests is included in the Code of Governance; if Members and Officers have any particular questions they should contact the Head of Committee and Governance Services in advance of the meeting please.

AGENDA

PART 1 (IN PUBLIC)

1. MEMBERSHIP

To note any changes to the membership.

2. DECLARATIONS OF INTEREST

To receive declarations by Members and Officers of the existence and nature of any pecuniary interests or any other significant interest in matters on this agenda.

3. MINUTES

The minutes of the Climate Action, Housing and Regeneration Policy and Scrutiny Committee meeting on 7 December 2022 will be reviewed at the Committee's next meeting on 2 March 2023.

4. DECISION OF EBURY ESTATE RENEWAL: DELIVERY STRATEGY AND VIABILITY POSITION

To review the Cabinet Member Decision on 'Ebury Estate Renewal: Delivery Strategy and Viability Position' after the decision was called in by three Members of the Climate Action, Housing and Regeneration Policy and Scrutiny Committee.

5. ANY OTHER BUSINESS

To review any other business which the Chair considers urgent.

(Pages 3 - 144)

Stuart Love
Chief Executive
31 January 2023



Climate Action, Housing and Regeneration Policy and Scrutiny Committee

Date:	8 February 2023
Classification:	General Release
Title:	Call-in of Cabinet Member Decision entitled 'Ebury Estate Renewal: Delivery Strategy and Viability Position'
Report of:	Debbie Jackson, Executive Director for Growth, Planning and Housing
Cabinet Member Portfolio	Climate Action, Housing and Regeneration Policy and Scrutiny Committee
Wards Involved:	Knightsbridge and Belgravia
Policy Context:	Truly Affordable Housing Strategy
Report Author and Contact Details:	James Green jgreen@westminster.gov.uk

1. Executive Summary

- 1.1. This report informs the Committee of the call-in of the decision made by the Cabinet Member for Climate Action, Regeneration and Renters and the Cabinet Member for Finance and Council Reform to approve the revised regeneration scheme at Ebury Bridge Estate.
- 1.2. The decision report was approved by the Cabinet Members on 16 January 2023 with the call-in period due to expire at 5pm on 23 January 2023. On 23 January 2023 Cllrs Harvey, Mendoza and Hitchcock indicated that they wished to call the decision in. These three Councillors are all Members of the Climate Action, Housing Regeneration and Renters Policy and Scrutiny Committee and thus the call-in is legitimate and shall be heard by that Committee¹.
- 1.3. The Chief Executive as Proper Officer was notified on the same day. The Chief Executive has activated the call-in and summonsed a meeting of the Climate Action, Housing Regeneration and Renters Policy and Scrutiny

¹ No Members of the Finance, Planning and Economic Development Policy and Scrutiny Committee (which also received this decision report as the Cabinet Member for Finance and Council Reform also approved key elements of this decision report) called this decision in and therefore that Committee has no role in the call-in.

Committee for 8 February 2023 in consultation with the Chair of that Committee, Cllr McAllister.

1.4. Call-in provisions exist to enable Members to temporarily halt the implementation of a decision when they believe that decision needs to be revisited. Members are not required to give reasons for call-in but are requested to do so. Generally, call-ins may be activated for three reasons: Members:

- believe the decision may be contrary to the normal requirements for decision-making;
- believe the decision may be contrary to the Council's agreed policy framework and/or budget;
- need further information from the decision-taker to explain why the decision was taken.

1.5. In requesting that this decision was called in, Members activating the call-in provided the following reasons:

- ***“Homes for Intermediate rent – It will be a crushing disappointment to the people who work in Westminster, and thus make it what it is, that their life options will be limited by the huge reduction in intermediate rental homes from 126 to 21. This means that 105 local people and families who had hoped to live in Pimlico so that they could work locally will no longer have a chance. Out of a total of 781 homes, fewer than three in every hundred, will go to people who serve this City and might qualify for intermediate affordable homes. Surely, with Mayoral funding it would be possible to build more social homes without making it even more difficult for the teacher, the office worker, vet assistant, council worker, nurse, or skilled SME worker to live in Westminster so sustaining an inclusive community?”***
- ***Segregation of tenures – We thought that people coming together to live next door to each other on the Ebury estate will be able to do just that. But instead, a decision has been made to separate social, intermediate and market homes. To paraphrase Aneurin Bevan, where the council is building homes, the home owner, the private renter, and the social housing tenant should all live in the same street for social cohesion.”***

1.6. The Committee may choose to refer the matter back to the decision maker(s) with reasons for their reconsideration. This would require the decision maker(s) to reconsider and, within 10 working days, or as soon as possible thereafter, either amend the decision or not before adopting a final decision – this would require a further written report. If the Committee chooses not to refer the matter back to the decision maker(s), the decision shall take effect on the rising of the Committee.

2. Key Matters for the Committee's Consideration

2.1. It is recommended that the Committee reviews the decision outlined in this paper and agrees one of the following options:

- a) To note the decision made by the Cabinet Member for Climate Action Regeneration and Renters and the Cabinet Member for Finance and Council Reform but take no further action.
- b) To refer the matter back to the Cabinet Member for Climate Action Regeneration and Renters and the Cabinet Member for Finance and Council Reform, with specific matters for their reconsideration.

3. Original decision

- 3.1. Westminster City Council is committed to increasing the numbers of truly affordable council homes at our major regeneration schemes. The delivery of 171 new council homes for social rent at Ebury Bridge in Knightsbridge and Belgravia demonstrates how the Council will use public land to provide affordable housing to those families and individuals who need it the most.
- 3.2. This original decision report sets out changes to the tenure mix and distribution of the scheme, a recommendation to submit a Section 73 Planning Application to address these changes and legal obligations, the termination of the Agreement for Lease with Westminster Housing Investments Limited in relation to the intermediate homes, the intention to hold a resident ballot and delegate authority to the Executive Director to approve any further changes to bring these matters into effect.
- 3.3. The decision follows the launch of the Council's Truly Affordable Housing Strategy in-line with the commitments made by the new administration. A cross-council plan to deliver more truly affordable homes has been implemented which means that wherever the Council is undertaking housing development schemes the emphasis will be on delivering new social rent homes to tackle the waiting list of over 4,000 families and individuals in need of a home in Westminster that meets their needs.
- 3.4. The wholesale regeneration of the Ebury Bridge Estate provides an opportunity for the Council to significantly increase the number of new Council homes for social rent and bring about the long-term physical, economic and social sustainability of the neighbourhood. The Ebury Estate Renewal – Delivery Strategy & Viability Position decision report proposes recommendations to implement these changes to the scheme.
- 3.5. In July 2020 the scheme received approval for a hybrid planning application from the Local Planning Authority. The consented scheme for the Ebury Bridge Estate outlined the provision of 781 homes with over 50% affordable homes split between a mix of social rent and intermediate tenures. The latest decision report sets out a revised tenure mix for the scheme with an emphasis on social rent homes and an updated tenure distribution to deliver an increase in truly affordable housing.
- 3.6. The Council has outlined its intention to seek external funding in order to deliver the new tenure mix at the Ebury Bridge Estate. The Ebury Bridge Estate project presents an opportunity to bid for £40m of Greater London Authority (GLA) funding for affordable homes. To receive GLA funding, estate regeneration projects that involve the demolition of any social homes and the construction of 150 or more homes (of any tenure) must be supported by residents in a ballot.

- 3.7. A key area of consideration for the scheme is the ongoing affordability for returning residents (in terms of service charges, energy bills and rents). Over the past year the Ebury Bridge Estate regeneration team has worked with residents to identify ways of mitigating the cost-of-living increases. This has included working on tenure distribution options, the specification of estate management services and the 'Landlord Offer' to returning residents and those who will move into the new neighbourhood.
- 3.8. This work has informed the recommendations in the decision report and the updated viability position which has set revised financial parameters for the project.
- 3.9. The Cabinet Member for Climate Action, Regeneration and Renters and the Cabinet Member for Finance and Council Reform were recommended to:
- Approve the revised tenure mix and distribution for the scheme as set out in section 3 of this report;
 - Approve in principle the submission of a Section 73 Application in respect of the updated tenure mix and distribution and the Council entering into the related planning obligation as required;
 - Approve the termination of the Agreement for Lease as the letting of intermediate rent and intermediate ownership units within Phase 1 do not form part of the revised tenure mix;
 - Note the intention to hold an independent resident ballot in line with the GLA's Affordable Housing Capital Funding Guide (section 8.6); and
 - Delegate authority to the Executive Director of Growth Planning & Housing to approve any necessary steps and to approve deeds or documents to put these matters into effect.

	Consented Scheme	Proposed Scheme
Hab Rooms	53%	57%
Unit Number	47%	50%
Hab Rooms (uplift)	51%	56%
Aff homes	365	391

- 3.10. The changes proposed in the Cabinet Member paper present a 56% uplift on affordable housing across the new neighbourhood. This is calculated using the GLA's criteria which is based on any increase in habitable rooms across the new affordable home provision.
- 3.11. This represents a 5% improvement upon the consented scheme (which proposed a 51% uplift (based on affordable habitable rooms). See table above;
- 3.12. The proposed tenure changes increase the number of social homes, reduces the number of intermediate homes and reduces the overall number of market

sale homes to be delivered across the scheme. All intermediate rent and discounted market rent tenure has been replaced by social rent. 21 intermediate ownership properties (for returning leaseholders) remain.

Changes in affordable tenure

3.13. The revised tenure mix also allows a redistribution of family sized homes for social rent units. By converting larger (2bed+) intermediate rent into social rent homes, the Council can provide more of the types of homes needed by families on the waiting list. The proposed changes to the affordable tenures in the scheme are set out below;

Entire Scheme	Total		Variance
	Base Case	Now	
Social Rent (affordable)	41	172	+131
Social Rent Replacement (affordable)	198	198	0
Intermediate Affordable Rent (affordable)	86	0	-86
Intermediate Ownership (affordable)	21	21	0
Discounted Market Rent (affordable)	19	0	-19
Market Rent (Market)	178	178	0
Market Sale (Market)	238	212	-26
Total	781	781	0

3.14. The proposals convert the 86 intermediate rent homes and the 19 discounted market rent homes (from the consented scheme) to social rent homes. The proposals also reduce the number of market sale homes by 26 which are also converted to social rent homes. The 21 intermediate ownership homes are retained for returning leaseholders.

3.15. Of the intermediate rent and discounted market rent homes that have been converted, the unit mix breakdown is as follows;

- 86 Intermediate rent homes (38 x 1-bedroom homes & 45 x 2-bedroom homes, 3 x 3-bedroom homes)
- 19 Discounted Market rent (7 x 2-bedroom homes & 12 x 3-bedroom homes)

3.16. The changes to the scheme propose:

- An increase of 47 new 1-bedroom 2-person social rent units
- An increase of 74 new 2-bedroom new social rent units.
- An increase of 11 new 3-bedroom properties (the consented scheme provided 25 new 3-bedroom homes with the changes increasing that figure to 36).

3.17. Below is the full breakdown of property types and movements as provided at Appendix A of the Cabinet Member report.

Entire Scheme	1b1p		1b2p		2 bed		3 bed		4 bed		5 bed		Total	
	Base Case	Now	Base Case	Now	Base Case	Now	Base Case	Now	Base Case	Now	Base Case	Now	Base Case	Now
Social Rent (affordable)	0	0	0	47	6	80	25	36	7	7	3	2	41	172
Social Rent Replacement (affordable)	0	0	50	50	86	83	54	59	8	5	0	1	198	198
Intermediate Affordable Rent (affordable)	0	0	38	0	45	0	3	0	0	0	0	0	86	0
Intermediate Ownership (affordable)	0	0	5	6	12	11	4	3	0	1	0	0	21	21
Discounted Market Rent (affordable)	0	0	0	0	7	0	12	0	0	0	0	0	19	0
Market Rent (Market)	46	46	82	82	50	50	0	0	0	0	0	0	178	178
Market Sale (Market)	18	18	85	75	103	85	32	32	0	2	0	0	238	212
Total	64	64	260	260	309	309	130	130	15	15	3	3	781	781

4. Rationale for the Amendments

Social Housing Need in Westminster

- 4.1. Like most London boroughs, Westminster has an acute shortage of genuinely affordable housing. According to the Local Government Association (“LGA”) there are up 250,000 Londoners on affordable housing waiting lists across the capital. The Council had previously committed to delivering 1850 affordable homes by 2023 (as stated in the City Plan consultation ahead of its adoption in 2021). Homelessness is also a significant issue in Westminster as evidenced by the number of households waiting for a secure home that meets their needs. Furthermore, in 2020/21, there were 2,162 rough sleepers reported in Westminster, making it the London borough with the highest number of rough sleepers in that year.
- 4.2. As of the financial year 2022/23, Westminster had 4,031 households on the housing waiting list with the average waiting time for a two-bedroom social rent property ten years and for a three-bedroom social rent property 16 years. The wait time for a four-bedroom social rent home in Westminster is 34 years.
- 4.3. Across the housing register (waiting list) there are:
 - **98** people waiting for a Studio in Community Supported Housing (Sheltered Housing)
 - **63** people waiting for a 1-bedroom property in Community Supported Housing (Sheltered Housing)
 - **428** people waiting for a Studio in General Needs Social Housing
 - **275** people waiting for a 1-bedroom property in General Needs Social Housing
 - **1521** people waiting for a 2-bedroom property in General Needs Social Housing
 - **1260** people waiting for a 3-bedroom property in General Needs Social Housing
 - **386** people waiting for a 4+bedroom property in General Needs Social Housing
- 4.4. The full breakdown is found in the table below;

Housing Demand 2022/23	Community Supportive Housing (Sheltered)		General Needs					Total	
	Studio	1-Bed	Studio	1-Bed	2-Bed	3-Bed	4+ Bed	All	%
Existing WCC Tenants	16	42	42	225	395	387	109	1216	30%
Homeless Households		1	165	14	1079	830	251	2340	58%
Housing Register	82	20	221	36	47	43	26	475	12%
Total	98	63	428	275	1521	1260	386	4031	

Future affordable tenure adjustments at the Ebury Bridge Estate

- 4.5. 50 existing secure tenants require a 1-bedroom home when they return to the redeveloped Ebury Bridge Estate. This is in part due to the households decanted from Edgson House which was predominantly bedsits. The additional 47 1-bedroom units could potentially be offered locally (via a local lettings plan) and then to the general needs housing waiting list.
- 4.6. Although there is existing demand for 1-bedroom homes on the social housing register (275 applicants) there is scope to adjust and rebalance the bedroom sizes of homes in Phase 2 & 3 of the scheme to reflect the greater demand for larger sized homes. The conversion of the smaller units would however see an overall reduction in the number of homes and have an impact on the amount of eligible grant funding from the GLA. It is proposed that the team continues to assess the needs of both returning Ebury Bridge Estate households and housing demand over the coming years.

Intermediate (Affordable) Housing in Westminster

- 4.7. Intermediate housing is a form of affordable housing generally seen as accommodation for people whose needs aren't met by the market (due to its price or instability) and are not eligible for social housing. It is also defined in terms of products, with the Mayor supporting;
- London Living Rent (LLR), where funded by the GLA, it is a 'rent to buy' time limited product.
 - London shared ownership. For GLA funded schemes a 10% share can be purchased (25% was the previous minimum share).
 - Shared Equity. In Westminster this is targeted towards returning resident leaseholders in regeneration areas.
- 4.8. Two per cent of the total stock in Westminster is estimated to be intermediate housing, with the main providers Peabody, Octavia, Dolphin Living, Westminster Community Homes and Westminster Builds. From 2017/2018 – 2021/2022, there were a total of 582 intermediate rent homes delivered by Westminster and our partners.

New Intermediate Rent Homes

- 4.9. In addition to the 582 intermediate homes already built in the City (by Westminster and our partners) another 561 are currently scheduled to be

completed by 2035. These are being delivered at sites across Westminster, including but not exclusively at Churchill Gardens (Darwin and Balmoral), Chelsea Barracks, Church Street, and Luxborough Street. 150 of these new intermediate homes are also scheduled to complete by 2024.

- 4.10. Of the 561 new intermediate homes to be delivered in the stated period there will be 9 x studios, 339 x 1-bedroom homes, 168 x 2-bedroom homes, 23 x 3-bedroom homes, 1 x 4-bedroom homes and 21 homes for the bedroom size to be confirmed.

Demand for Intermediate Rent Homes

- 4.11. Intermediate rent homes continue to be a key part of Westminster’s affordable delivery programme. There are currently 2,517 applicants who met the eligibility criteria and are registered for intermediate housing in Westminster. Registered applicants have the opportunity to apply for new or void homes as they become available although they are not proactively approached about these properties. 64% of all applicants currently live in the private rented sector and move regularly (both to other areas of the City or to other London Boroughs), making maintenance of the Register challenging. This is due in part to fluctuating demand, people not updating their preferences, and/or people remaining on the list (but not wanting intermediate housing anymore). Work is underway to improve awareness and understanding of the Intermediate Housing Register through an improved communications programme.
- 4.12. Although not a statutory housing service, the demand for intermediate rental homes in Westminster is set out below;

Table 1: Applicants by bed size needed

	Eligible	
Bed Size	No.	%
1bed	2061	82%
2bed	306	12%
3bed	129	5.0%
4bed	21	<1%
Total	2,517	

- 4.13. The largest demand for intermediate rent homes is for 1-bedroom properties (82% of eligible applicants). This reduces to 12% for 2-bedroom properties and 5% for 3-bedroom intermediate rent properties.

Applicants for intermediate rent properties

- 4.14. The table below shows the priority categories for intermediate rent properties in Westminster alongside the percentage of current registrations on the Register for each category and the percentage of applicants placed from each category during the first ten years of the scheme (formerly Home Ownership Westminster, now renamed Homes for Westminster).

	Priority	% Registered	Successful applicants (first 10 years of HOW)
P1*	Social tenants, MOD personnel, Sons and Daughters of overcrowded council tenants, existing intermediate tenants that are overcrowded	5.6%	9.56%
P2	Social Housing Register Applicants	0.1%	0.67%
P3**	Living and working in Westminster	24.6%	1.51%
P4	Living but not working in Westminster	22.5%	64.60%
P5	Working but not living in Westminster	46.9%	23.65%
P6***	Not living or working in Westminster	0.3%	0%

*The majority of lets are to current intermediate tenants not social residents.

** Introduced in 2018.

***Only after if after 3 months of marketing, homes remain unallocated to other groups.

4.15. Of the 2,500 applicants on the current intermediate Register, their key features are:

- 70% are eligible for a one-bedroom and 30% two-bedrooms or larger²
- 64% live in the private rented sector (PRS) and are often transient meaning keeping the list up to date is a challenge;
- No one employment sector is dominant. Key sectors include Administration, Retail, Customer Service, Marketing, IT, communications. **Less than 100 are key workers** (NHS Health Service Clinical Staff (excluding doctors and dentists); Public Sector Teachers; Police; Social Care Workers (with a professional qualification only);
- 62% are White British and 38% BAME which is similar to the Westminster population;
- 1,700 households have incomes between £26k and £60k (the minimum household income required is c £25k). The median income for those wanting a one bed is £44k and £52k for a two bed;
- The profile of applicants has been broadly consistent over the last few years.

4.16. Intermediate housing in Westminster also includes properties under the Homes for Westminster (HFW) scheme. These homes do not meet the criteria of 'affordable' set by the Greater London Authority based on their household income threshold. The GLA currently caps eligibility for affordable rent homes at £60k per household (London Living Rent) whereas Westminster's current policy this extends to £90k per household.

4.17. The Council has now mandated that all new intermediate rent homes, delivered by Westminster City Council at schemes around the city, will be available at London Living Rent prices to ensure they are genuinely affordable.

² Applicants can register their aspirations

Discounted Market Rent

- 4.18. With market rental prices in Westminster some of the highest in the country, discounted market rent provides an opportunity for people in above average tax rate brackets to live and work in the City. At the Ebury Bridge Estate, the consented scheme contained 19 homes at a sub-market rental level.
- 4.19. A three-bedroom discounted market rent home at the Ebury Bridge Estate was proposed to have target rent of over £20,550 per annum. This assumes a household may earn over the prescribed £60k p/a which also does not meet the GLA criteria of affordable rent.

Fairer Westminster Strategy

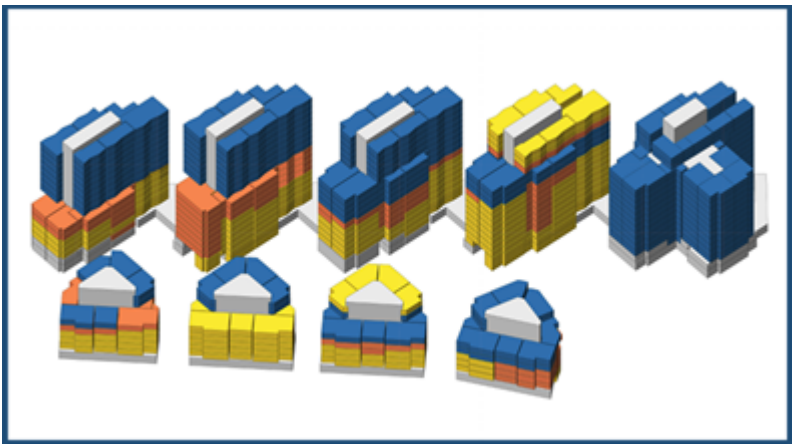
- 4.20. In October 2022, the Council announced its commitment to maximising the delivery of truly affordable housing across the Council's housebuilding pipeline. This Cabinet Member report began the process of ensuring that all Council-led development schemes prioritise low-cost social rent housing and provide Westminster residents and their families with truly affordable housing options.
- 4.21. The benefits of social housing are extensive. It provides residents with a stable, long-term home and grants security to tenants that often cannot be found in the private rented sector. The benefits to Westminster's communities can range from workforce supply to local businesses, through to strong family and care networks for established neighbourhoods. People on low incomes can continue to live close to jobs that require their skills within secure housing that is resilient to rising market prices.
- 4.22. In addition to the benefits to individuals and communities, the creation of more Council owned social rent homes provides the opportunity to move families out of temporary accommodation into secure homes and ultimately reduce the financial burden to the local authority. Temporary accommodation has a significant cost to the Council with homes often sourced at a higher rate from the private sector due to demand. While being costly to the Council, this type of accommodation can often be unsuitable for families with children and vulnerable people.
- 4.23. Westminster currently spends £59m on providing temporary accommodation for homeless families the Council has a statutory duty to house. We receive £44m in income to cover this cost resulting in a net annual cost to the Council of £14m. Reducing the cost of temporary accommodation is a challenge faced by local authorities across London. The provision of permanent Council housing not only reduces the homeless persons waiting list but reduces the reliance the Council has on using temporary accommodation both in the City and elsewhere in the UK.
- 4.24. In Belgravia a key provider of social rent properties has signalled their intention to convert void social rent properties to intermediate rent homes. With 236 social rent homes in Belgravia alone (over 400 in Belgravia and Mayfair), this will see a significant reduction in social rent homes in the locality of the Ebury Bridge Estate and remove Westminster's social housing nomination rights on those properties. The increase in social rent homes at the Ebury Bridge Estate will compensate somewhat for the lost social rent homes in these schemes.

Policy context and Scheme Viability

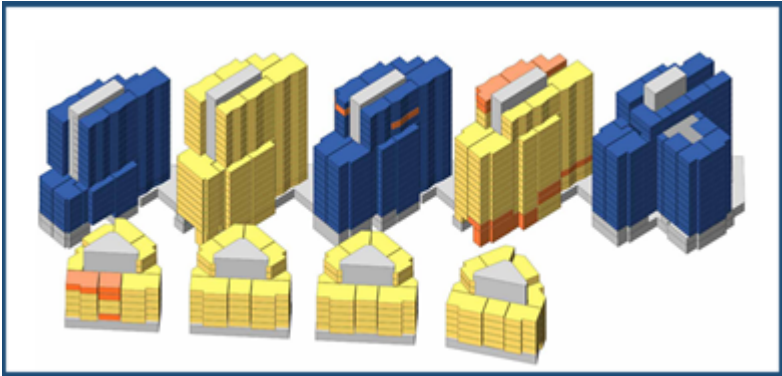
- 4.25. Westminster's City Plan 2019 – 2040 sets out the affordable housing vision for the City over the term of the plan. The City Plan mandates a minimum of 35% of new homes are affordable at major development schemes.
- 4.26. The overarching London Plan and the Homes for Londoners SPG sets out a long-term strategic aim of half of all new homes in London being affordable. The GLA's Supplementary Planning Guidance (SPG) 'Affordable Housing and Viability' further embeds the requirements for affordable housing on public sector land. The threshold is 50% of affordable housing on public sector land is met with the new proposals with the consented scheme achieving 47%. The consented scheme at the Ebury Bridge Estate is achieving a 43% of 'net new' affordable homes with a tenure split of 65% council homes for social rent and 35% intermediate housing across the redeveloped estate. With the Ebury Bridge Estate already surpassing the required minimum affordable housing requirement it is policy compliant.
- 4.27. Currently the City Plan states that of new affordable housing 60% of the affordable units will be 'intermediate' affordable housing for rent or sale and 40% will be social rent or London Affordable Rent.
- 4.28. The Council have recently undertaken a six-week Regulation 18 consultation for a Partial Review of the City Plan, which includes a proposal to amend the affordable housing requirements within policy 9. The Notice of the Partial Review (which will be subject to public examination in 2024/25) states that the Council would like to strengthen policy on the delivery of affordable housing to address the significant waiting list for both social housing intermediate rent housing and provide suitable homes for those who need it most. The Notice proposes updates to policy 9, stating that
- 'whilst the policy currently seeks a greater proportion of intermediate (60%) compared to social (40%) housing, the Council want to explore options to redress this balance with the objective of delivering a greater quantity of affordable housing as social, particularly on public land if it is shown to be viable.'*
- 4.29. The London Plan, the Mayor's Spatial Development Strategy for Greater London states:
- 'All schemes are expected to maximise the delivery of genuinely affordable housing and make the most efficient use of available resources to achieve this objective. Where grant or other public subsidy is available and would increase the proportion of affordable housing, this should be utilised.'*
- 4.30. The decision to proceed with resident ballot and an application to the Greater London Authority for grant funding has enabled the Council to potentially access circa £40m to increase the number of social rent homes at the scheme. The tariffs received from the GLA are specified on a scheme-by-scheme basis but range from £100,000 per social rent home to £26,000 for an intermediate rent home.

Tenure distribution

- 4.31. The tenure distribution for the consented scheme reflected the need to re-house the majority of returning secure tenants in the first phase of the development. It was anticipated that around 95 of the 198 re-provided social rent homes would be provided in phase 1 and would be allocated to returning secure tenants. The need to re-house the households returning to the Ebury Bridge Estate as early as possible significantly influenced the tenure distribution for phase 1 with many social tenants returning at once.
- 4.32. In the consented scheme, tenures were separated by floor with market sale homes generally concentrated on upper-level floors (see image below). The move towards tenure specific blocks retains the mixed tenure nature of the neighbourhood.



Consented Scheme tenure distribution



Proposed tenure distribution

- 4.33. As set out in the Cabinet Member report, there are a number of factors influencing the decision to update the tenure mix and distribution as follows:
 - Due to the rise in construction costs and inflation, the viability position of the scheme has become more challenging. The updated tenure distribution allows the market values to be optimised, which in turn helps viability and the provision of more social rent homes.

- Ongoing affordability for returning residents - service charges, energy bills and rents become a lot more reasonable for returning residents with the updated tenure distribution.
- Opportunity to maximise the number of new social homes being delivered to align with the Fairer Westminster Strategy The new proposal provides 131 more social rent homes than the current scheme.
- Retention of management control of social rent homes by the Council, to mitigate cost increases.
- There are opportunities to access funding via the GLA in the region of £40M due to the increased amount of social homes on the scheme.

Construction costs and inflation

- 4.34. Following the Covid-19 pandemic and the outbreak of war in Ukraine, the construction market has seen significant inflationary pressures. In 2022 between the period of January to March the construction industry saw a 10% rise in inflation. This translated to an additional circa £40M in construction costs on future phases of the Ebury Bridge Estate scheme and increased the affordability gap faced by the Council substantially. In order to tackle these viability challenges to the scheme, officers were required to look at mitigations.
- 4.35. Projected scheme costs and income have recently been updated following the significant rise in construction costs and a backdrop of general inflationary pressures. Details of these changes were included in the original cabinet member report.
- 4.36. Appointed sales agents, have carried out regular 'red-book' valuations. This has informed us that the consolidation of market sale homes in predominantly single tenure buildings has provided a value uplift. This forecasted uplift in achievable sales values has also enabled the further increase in truly affordable homes across the scheme. This has been implemented whilst retaining the character and the ambition for a mixed residential community. The buildings remain connected by a shared podium terrace space for residents and share the same quality and appearance.

Ongoing affordability for residents

- 4.37. Extensive consultation has taken place with Ebury Bridge Estate residents around the decision to move to blocks that are either predominantly affordable or market sale blocks. At the forefront of this consultation has been the Community Futures Group, a strategic resident-led body who have, for the last five years, provided a strong community voice on the development of the estate management strategy. This process has refined the estate and housing management specifications, with the aim of mitigating large increases in annual service charge bills for returning secure tenants and resident leaseholders.
- 4.38. At consultation events residents have expressed their desire to return to buildings which contain their neighbours and the original Ebury Bridge Estate community. They have welcomed the mitigation of service charge increases and have been keen to start the dialogue about returning to their permanent

new home. The tenure distribution allows tenants a greater deal of choice around the block they return to with housing options across the new neighbourhood.



Increased number of Social Rent Homes

- 4.39. The consolidation of affordable homes, the uplift in sales values for market sale homes and the ability to access GLA funding all enable the numbers of social rent homes to be increased (and a reduction of market sale homes). These proposals are subject to the resident ballot and Section 73 Planning application that are both underway.
- 4.40. The details of the tenure distribution, increased numbers of social units and location of affordable blocks are all outlined in the Landlord Offer document that has been issued to all resident leaseholders, secure tenants and temporary accommodation tenants. The forthcoming ballot will provide an opportunity for Ebury Bridge Estate residents to confirm the current proposals for the regeneration of the Ebury Bridge Estate including the changes outlined in the Ebury Estate Renewal – Delivery Strategy & Viability Position Cabinet Member Report.

Retention of Management by the Council

- 4.41. The Ebury Bridge Estate scheme has been designed as a tenure blind neighbourhood. There will be no external difference between market sale, intermediate ownership and social rent homes. Blocks will still contain a mixture of tenure types with returning leaseholders moving into both predominantly affordable housing blocks and predominantly market sale blocks. There will be equitable estate management service provision with a shared management hub and shared amenities across the neighbourhood.
- 4.42. All returning resident leaseholders have been provided with the choice to return to a predominantly market sale block or to an affordable block. The concentration of returning social tenants and resident leaseholders has enabled the forecasted service charge levels to remain affordable (and this was confirmed via consultation with residents).

- 4.43. Whilst estate management services will be shared by all residents across the estate, housing management (such as tenancy management) is likely to be delivered by the Council – for returning secure tenants and leaseholders. Both secure tenants and returning resident leaseholders have told us through consultation that they wish to retain their housing management relationship with the Council.
- 4.44. Although housing management services may be provided by different operators there will be a shared estate management approach. All buildings share the same build quality, energy systems, amenity and typical communal spaces with consistent home types and quality for Market and Affordable homes. The majority of all homes within the scheme are dual aspect, and these are equally represented between Affordable and Market homes. A consistent distribution of Adaptable homes M4(3) are proposed across buildings, ensuring there is a mix of tenure types, apartment size, orientation and level.
- 4.45. The external shared podium links (containing shared public gardens), estate management offices and other public spaces are provided equitably to all tenure types. Consistency in building layout and quality will mean there will be no distinguishable differences between buildings and in this way aims to create a cohesive and mixed community across the scheme as a whole.

GLA Funding

- 4.46. The Council has outlined its intention to seek external funding to maximise the number of truly affordable homes (council homes for social rent). The Ebury Bridge Estate project presents an opportunity to bid for Greater London Authority (GLA) funding for affordable homes.
- 4.47. To receive GLA funding, estate regeneration projects that involve the demolition of any social homes and the construction of 150 or more homes (of any tenure) must be supported by residents in a ballot. Although the construction of Phase 1 started on site in Autumn 2021 the GLA have confirmed that a ballot on the Landlord Offer which contains the current proposals for the scheme can take place.
- 4.48. Following consistent and meaningful engagement with residents throughout the delivery of the project to date, the binding resident ballot which is already underway will give both residents still living at the Ebury Bridge Estate and those who have temporarily moved away to provide their views on the proposals outlined in this paper.
- 4.49. The Council has submitted and had accepted a funding bid to the GLA for circa £40m. Residents have now been asked to vote on the current regeneration proposals, with the ballot set to close on 16th February 2023.
- 4.50. Civica Election Services (CES) will manage the resident vote and have written to all eligible voters. The Council's engagement team have contacted all eligible voters to discuss the scheme and the voting process.

5. Legal and Constitutional Implications

- 5.1. The legal implications in the Cabinet Member Report apply to this report. A copy of the Cabinet Member Report is appended at Appendix 1.
- 5.2. The Council's call-in arrangements are set out in the Council's Constitution and include terms of reference and procedure rules.

If you have any queries about this Report or wish to inspect any of the Background Papers, please contact James Green at jgreen@westminster.gov.uk

APPENDICES:

- Appendix A – Cabinet Member Report entitled 'Ebury Estate Renewal: Delivery Strategy and Viability Position'
- Appendix B – Comparison of Consented Scheme and New Proposal
- Appendix C – Further Details of Section 73
- Appendix D – Equalities Impact Assessment



City of Westminster

Cabinet Member Report

Decision Makers:	Cabinet Member for Climate Action Regeneration and Renters Cabinet Member for Finance and Council Reform
Date:	January 2023
Classification:	General Release
Title:	Ebury Bridge Estate Renewal – Delivery Strategy & Viability Position
Wards Affected:	Knightsbridge & Belgravia
Key Decision:	Key decision, due to significant expenditure.
Financial Summary:	Updated scheme viability presented for future phases as a result of construction and market pressures, amended delivery strategy and the tenures changes proposed in this paper.
Report of:	Debbie Jackson, Executive Director of Growth, Planning and Housing and Gerald Almeroth Executive Director of Finance and Resources

1 Executive Summary

- 1.1** Following the local election in May of this year and in-line with manifesto promises, the new administration has implemented a cross-council plan to deliver more truly affordable homes. This means that wherever the City Council is undertaking housing development schemes the emphasis will be on delivering new social rent homes to tackle the acute shortage in the borough.
- 1.2** The wholesale regeneration of the Ebury Bridge Estate provides an opportunity for the Council to significantly increase the number of new council homes for social rent and bring about the long-term physical, economic and social sustainability of the neighbourhood.
- 1.3** In July 2020 the scheme received approval for a hybrid planning application from the Local Planning Authority. This provided a detailed approval for buildings 7 & 8 (to be built in Phase 1) and outline consent for the remaining elements of the projects including the remaining seven buildings (reference: 20/04366/COOUT). Phase 1 of the scheme is now underway with residents set to return to new homes in 2024.
- 1.4** The consented scheme for the Ebury Bridge Estate provided 781 homes with over 50% affordable provision split between a mix of social rent and intermediate tenures. This report sets out a revised tenure mix for the scheme with an emphasis on social rent homes and an updated tenure distribution in order to deliver more affordable housing.
- 1.5** The Council has outlined its intention to seek external funding in order to deliver the revised tenure mix at the Ebury Bridge Estate. The Ebury Bridge Estate project presents an opportunity to bid for Greater London Authority (GLA) funding for affordable homes. To receive GLA funding, estate regeneration projects that involve the demolition of any social homes and the construction of 150 or more homes (of any tenure) must be supported by residents in a ballot. This report sets out the details and programme for this to take place.
- 1.6** The construction price for Phase 2 and Phase 3 of the development is yet to be fixed and confirmed. Due to construction costs and inflation, the viability position for the scheme has become more challenging and a key area of consideration is ongoing affordability for returning residents (in terms of service charges, energy bills and rents).
- 1.7** Over the past year the Ebury Bridge Estate regeneration team has worked with residents to identify ways of mitigating the cost-of-living increases. This has included working on tenure distribution options, the specification of estate management services and the 'Landlord Offer' to returning residents and those who will move into the new neighbourhood.

1.8 This work has informed the recommendations in this paper and the updated viability position which has set revised financial parameters for the project.

1.9 This report seeks approval of:

- The updated tenure mix and distribution for the scheme which will be formalised through a Section 73 Application of the Town & Country Planning Act 1990 (Section 73 Application) to the Local Planning Authority. A Section 73 Application is an application for permission to develop without complying with a condition(s) previously imposed in an existing planning permission. This includes the removal of intermediate rent housing and an increase in social rent homes. It also proposes to concentrate affordable tenures in individual buildings.
- A recommendation to enter into a deed of termination (or other document as appropriate) to terminate an Agreement for Lease between The Lord Mayor & Citizens of the City of Westminster (1) and Westminster Housing Investments Limited (WHIL) (2) (Agreement for Lease). The Agreement for Lease relates to the proposed grant of leases to WHIL to enable the letting of units within Phase 1 on intermediate rent and intermediate ownership terms. These tenure types no longer form part of the updated tenure mix.
- This report also outlines the process for obtaining the relevant GLA funding to support the revised mix, including the resident ballot.

1.10 Whilst the recommendations of this report focus on the updated tenure mix and distribution, Section 73 application and deed of termination, the following points are also of note:

- A contract variation to the Phase 1 building contract with the main contractor is likely to be required in light of the impact of the revised tenure mix in terms of cost and programme. It is anticipated that a further Cabinet Member Report will be required to approve this given the anticipated cost of the change.
- No further approval to spend is required at this point in time on the project as the necessary approvals were obtained in March and November 2021 which have not yet been exceeded. It is anticipated that further approvals to spend will be required in 2023 which will be included in the next Cabinet Member Report and associated business case.
- As a result of the revised phasing programme, a review of the consultant contracts on Phase 2 is taking place. This will involve splitting the contract in to two to reflect both Phase 2 & 3 and agreeing an apportioned fee for each phase which is reflective of the revised programme.

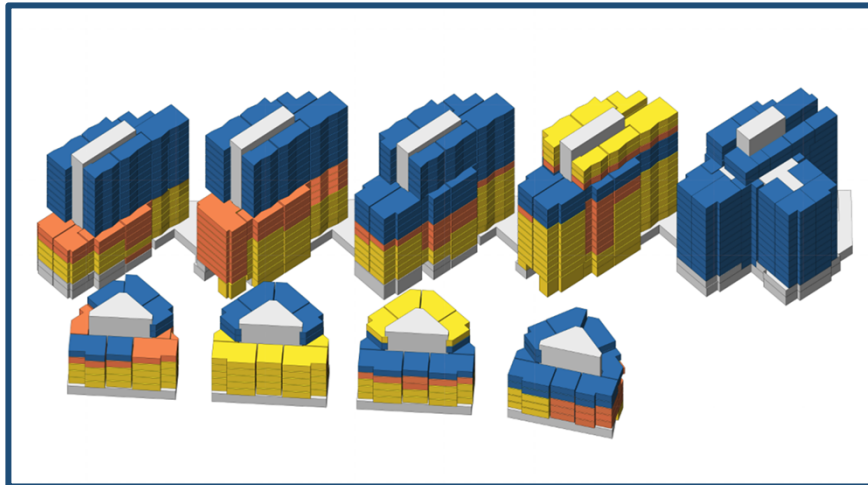
2 Recommendations

2.1 The Cabinet Member for Climate Action Regeneration and Renters and Cabinet Member for Finance and Council Reform are recommended to:

- 2.1.1 Approve the revised tenure mix and distribution for the scheme as set out in section 3 of this report;
- 2.1.2 Approve in principle the submission of a Section 73 Application in respect of the updated tenure mix and distribution and the Council entering into the related planning obligation as required;
- 2.1.3 Approve the termination of the Agreement for Lease as the letting of intermediate rent and intermediate ownership units within Phase 1 do not form part of the revised tenure mix;
- 2.1.4 Note the intention to hold an independent resident in ballot in line with the GLA's Affordable Housing Capital Funding Guide (section 8.6)
- 2.1.5 Delegate authority to the Executive Director of Growth Planning & Housing to approve any necessary steps and to approve deeds or documents to put these matters into effect.

3 Reasons for Decision

3.1 Current Scheme (Planning Consent)

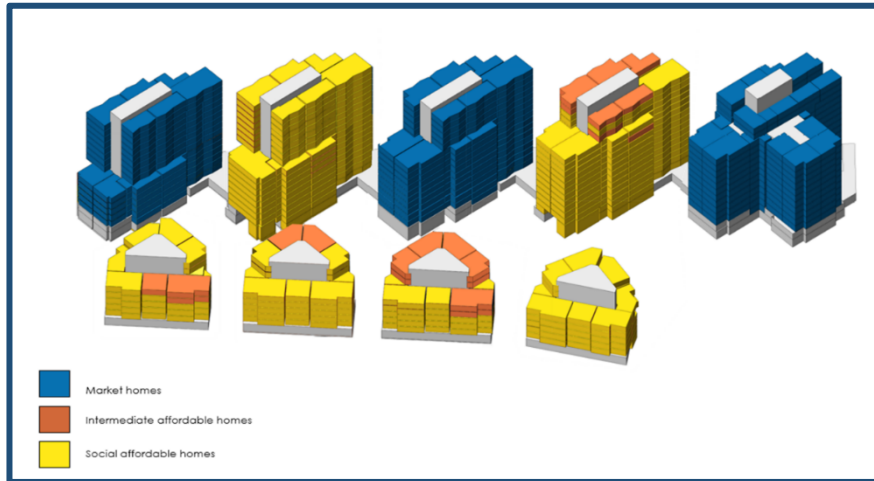


3.1.1 The current scheme that has received planning consent includes:

- Mixed tenure blocks on the drawing above blue showing the market homes, orange the intermediate homes and yellow the social homes.
- A 51% affordable housing uplift across the masterplan.
- Affordable housing comprised of 60% intermediate tenure and 40% social rent tenure.

- In terms of the social rent units, the current scheme provides 198 social rent replacement units and 41 new social rent units.

3.2 New Proposal



3.2.1 The new proposal includes:

- Separation of the market units into single tenure units in Blocks 5, 7 and 9.
- A 56% affordable housing uplift across the masterplan.
- An affordable housing split to comprise 91% social rent tenure and 9% intermediate tenure. The intermediate tenure will be limited to the returning leaseholders from the Ebury Bridge Estate.
- In terms of social rent the new proposal provides 198 social rent replacement units and 172 new social rent units.
- The below table demonstrates the updates made to the scheme in respect of each tenure. The final unit numbers and mix are subject to design development and further reserved matters applications.

Entire Scheme	Total	
	Consented Scheme	New Proposal
Social Rent (affordable)	41	172
Social Rent Replacement (affordable)	198	198
Intermediate Affordable Rent (affordable)	86	0
Intermediate Ownership (affordable)	21	21
Discounted Market Rent (affordable)	19	0
Market Rent (Market)	178	178
Market Sale (Market)	238	212
Total	781	781

(A full breakdown of the comparison between the consented scheme and the new proposal can be found in Appendix A).

3.3 There are a number of factors influencing the decision to update the tenure mix and distribution as follows:

- Due to the rise in construction costs and inflation, the viability position of the scheme has become more challenging. The updated tenure distribution allows the market values to be optimised, which in turn helps viability and the provision of more social rent homes.
- Ongoing affordability for returning residents - service charges, energy bills and rents become a lot more reasonable for returning residents with the updated tenure distribution.
- Opportunity to maximise the number of new social homes being delivered to align with the manifesto. The new proposal provides 131 more social rent homes than the current scheme.
- Retention of management for Council.
- There are opportunities to access funding via the GLA in the region of £40M due to the increased amount of social homes on the scheme.

3.4 The implications of the above changes include:

- A variation to the Phase 1 contract with the main contractor with cost and programme implications yet to be confirmed.
- A Section 73 Application will be required to amend the existing planning consent with regards to the affordable housing tenure mix within Phase 1.
- Following the changes proposed to the affordable housing tenure mix within Phase 1, there would be a decrease to 51% in the total number of affordable homes provided in Phase 1 (compared to 63% in the approved application). However, this change will enable an overall increase in the number of affordable homes delivered as part of the outline application, and subsequently, across the masterplan as a whole.
- Updates are also required, therefore, to the section 106 Unilateral Undertaking which relates to the hybrid planning permission so that it will also apply to development brought forward under the section 73 planning permission and to update the number of affordable housing units and redistribution of tenure locations. More detail on the Section 73 can be found in Appendix 2.
- To obtain the relevant GLA funding to deliver the new proposal, a resident ballot is required. More information on the ballot is outlined below.

3.5 Resident Ballot

- 3.5.1 The Council has outlined its intention to seek external funding to maximise the number of truly affordable homes (council homes for social rent). The Ebury Bridge Estate project presents an opportunity to

bid for Greater London Authority (GLA) funding for affordable homes. To receive GLA funding, estate regeneration projects that involve the demolition of any social homes and the construction of 150 or more homes (of any tenure) must be supported by residents in a ballot.

- 3.5.2 Although the construction of Phase 1 started on site in Autumn 2021 the GLA have confirmed that a ballot on the Landlord Offer which contains the current proposals for the scheme can take place. Following consistent and meaningful engagement with residents throughout the delivery of the project to date, the binding resident ballot will give both residents still living at the Ebury Bridge Estate and those who have temporarily moved away to provide their views on the proposals outlined in this paper.
- 3.5.3 The Council submitted a funding bid to the GLA for circa £40m in November 2022.
- 3.5.4 Residents will soon be asked to vote on the current regeneration proposals. Civica Election Services (CES) will manage the resident vote and have written to all eligible voters.
- 3.5.5 The Council's engagement team will contact every eligible voter to discuss the scheme and the voting process.

4 Background, including Policy Context

- 4.1 The Council's Renewal Strategy in 2010 identified the Ebury Bridge Estate as a strategic opportunity for renewal and growth. Since then the Council has been committed to bringing forward a wholesale renewal proposition in collaboration with residents. The regeneration will deliver physical, economic and sustainable change that will create a new, vibrant neighbourhood and place in the south of the borough and, importantly, the growth and new homes opportunity that was identified.
- 4.2 A hybrid planning application was approved in 2021 and the Council is well advanced in the delivery of the first phase of the development. This will deliver 226 new homes and the first public open square. The Council has also successfully delivered Ebury Edge, the meanwhile use facility that sits at the heart of the development offering local community facilities and enterprise space. The Council has the contractual arrangements in place to deliver future phases of demolition and new build required, subject to performance and financial viability.
- 4.3 Being a Council-led and phased renewal project, the opportunity to review what is delivered and how is within the gift of the Council. The opportunity to review and implement a revised tenure mix and deliver more social housing within the development has been possible, albeit with some planning, contractual and financial implications that are outlined within this paper and manageable from an operational perspective.

5 Financial Implications

- 5.1** Projected scheme costs and income have recently been updated following the significant rise in construction costs and a backdrop of general inflationary pressures. This increases the capital deficit for the scheme by circa £55m to £184m as shown in the table below. This is against the last reported financial position for the scheme when the Phase 1 Full Business Case was agreed by Cabinet members in August 2021.
- 5.2** In addition to refreshing for inflationary pressures, the updated position also takes account of increased sales values, changes related to design development, a revised CIL payment and an increase in the level of scheme contingency. The updated position also includes the financial impact of changes made to the delivery programme resulting in an expanded phase 2 and accelerated delivery plan as approved by Cabinet Member in August 2022.
- 5.3** The latest proposed tenure mix changes recommended as part of this paper increase the level of new social homes being delivered through the scheme at a cost of £17m. A successful ballot result and the opportunity to secure GLA funding of £38m would bring the overall capital deficit back down to £147m, an increase of £34m on the previous FBC position. This increase in deficit shall be funded through increased borrowing within the Housing Revenue Account (HRA) and this movement has been taken into account as part of budget planning for the HRA Business Plan for 23/24.

	Capital Deficit		Affordability Gap	
FBC (August 2021)		£113m		£40m
<i>Construction inflation & market pressure</i>	<i>£41m</i>			
<i>Design development</i>	<i>£13m</i>			
<i>Contingency, finance and service costs</i>	<i>£17m</i>			
		£184m		£112m
<i>Expanded Phase 2</i>	<i>(£16m)</i>			
		£168m		£94m
<i>Tenure arrangement & 100% social provision</i>	<i>£17m</i>			
		£185m		£97m
<i>GLA grant</i>	<i>(£38m)</i>			
Revised Position		£147m		£59m
Movement against FBC		£34m		£19m

6 Legal Implications

- 6.1** The Council has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness - the best value duty.
- 6.2** The Council has a general power of competence under section 1 of the Localism Act 2011; this is the power to do anything an individual can do, provided it is not prohibited by other legislation.
- 6.3** Section 8 of the Housing Act 1985 provides the Council with a duty to consider housing needs in respect of its district. Section 9 of the Housing Act 1985 provides the Council with the power to provide housing accommodation. Under Section 111 of the Local Government Act 1972 the Council has the power to do anything incidental to the exercising of any of its functions.
- 6.4** In determining a Council own planning application or amendments to any planning consents the Council (as Local Planning Authority) must assess the application as it would any other application in accordance with all statutory and policy requirements. In respect of all Council own applications the law requires appropriate functional separation. It is therefore particularly important to ensure that throughout the process the development/corporate landowner function of the Council is kept separate from the Local Planning Authority function.
- 6.5** Subject to approval of the Local Planning Authority to the Section 73 Application, contract variations to the Phase 1 building contract with the main contractor will need to be considered. If a contract variation(s) is required in light of the impact on the works programme for the development and any associated contract sum increase, further approvals will be required with regard to the development changes and related financial, legal and procurement implications.

7 Carbon Impact

- 7.1** The Ebury Bridge Estate development is a high performing sustainable development that utilises ground and air source heat pumps for the generation of all heating and cooling in the development. In addition, it provides infrastructure for electric car charging across all car parking provision in accordance with statutory requirements. Save for this, the development it is a low car development due to its proximity to public transport links and connectivity. Although the development pays a small carbon offset payment, the development is far more carbon efficient than the current estate and sees this benefit materialise in Year 12.

8 Equalities Impact

- 8.1 The updated tenure mix and distribution for the scheme means that mixed tenure blocks will no longer be delivered in the manner originally envisaged but this update means an overall uplift in the affordable housing provision across the masterplan can be achieved with a focus on delivering more social rent homes.
- 8.2 The Council reviews and updates the relevant sections of the independent Equality Impact Assessment (EQIA) at key milestones during the project and a copy of the current EQIA is at Appendix 3). The EQIA will be updated in support of the next reserved matters application for the scheme.
- 8.3 The Council requires all partners, professional advisers and contractors to align with the Council's equality duties and also the requirements stipulated in the Considerate Constructors Scheme. The Considerate Constructors Scheme has made inclusivity a key objective and is actively requiring participants to recruit from under-represented groups.

9 Consultation

- 9.1 The consultation with Ebury Bridge Estate residents continues to be delivered consistently by the on-site community engagement team who have been based at the estate since July 2017. The commitment of the Council to work with residents on key decisions throughout the project led to the establishment of the Ebury Bridge Community Futures Group (**CFG**). The CFG is the resident let steering group and the top tier of the Ebury Bridge engagement structure. This means that the residents have continued to play a key role in all strategic decisions and were consulted on the proposed tenure distribution options. In addition, over the past two and a half years the CFG have been regularly consulted on estimated service charges and the specification of the future management provision.
- 9.2 In Autumn of 2022, all resident leaseholders and secure tenants (both still living on the estate or temporarily rehoused) were invited to engagement session to provide feedback on which block they wish to return to. Residents indicated that whatever measures could be implemented to mitigate the cost of service charges would be preferred over fully mixed tenure buildings. The move towards a separation of tenures which reduces the overall service charge levels for tenants and leaseholders was broadly welcomed.
- 9.3 On 15 November 2022, the Knightsbridge and Belgravia ward councillors were consulted on the proposals set out in this report. The councillors requested further details on the changes proposed to be made to the scheme which had already been granted planning consent. The request included a breakdown on bedroom sizes and numbers and tenure changes which has now been provided.
- 9.4 Ward members were supportive of the progress made on the construction of Phase 1 of the scheme and resident liaison carried out by the main contractor.

It was noted that there have been no resident concerns raised with ward councillors in relation to construction work.

If you have any queries about this Report or wish to discuss further, please contact:

Vikki Everett, Head of Development at veverett@westminster.gov.uk or 07971 017583; or

Lyndsey Gamble, Strategic Finance Manager at lgamble@westminster.gov.uk or 07739 413577

BACKGROUND PAPERS

None

APPENDICES

Appendix A - Comparison of Consented Scheme and New Proposal

Appendix B – Further Details of Section 73

Appendix C - Equalities Impact Assessment

NB: For individual Cabinet Member reports only

For completion by the **Cabinet Member for Climate Action, Regeneration and Renters**

Declaration of Interest

I have <no interest to declare / to declare an interest> in respect of this report

Signed: _____ Date: _____

NAME: **Councillor Matt Noble**

State nature of interest if any:

(N.B: If you have an interest, you should seek advice as to whether it is appropriate to make a decision in relation to this matter)

For the reasons set out above, I agree the recommendation(s) in the report entitled **Ebury Bridge Estate Renewal – Delivery Strategy & Viability Position** and reject any alternative options which are referred to but not recommended.

Signed: _____

Cabinet Member for Communities and Regeneration

Date: _____

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additional comment:

If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Director of Law, City Treasurer and, if there are resources implications, the Director of People Services (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

Note to Cabinet Member: Your decision will now be published and copied to the Members of the relevant Policy & Scrutiny Committee. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed from

publication to allow the Policy and Scrutiny Committee to decide whether it wishes to call the matter in.

For completion by the **Cabinet Member for Finance and Council Reform**

Declaration of Interest

I have <no interest to declare / to declare an interest> in respect of this report

Signed: _____ Date: _____
NAME: **Councillor David Boothroyd**

State nature of interest if any:

(N.B: If you have an interest, you should seek advice as to whether it is appropriate to make a decision in relation to this matter)

For the reasons set out above, I agree the recommendation(s) in the report entitled **Ebury Bridge Estate Renewal – Delivery Strategy & Viability Position** and reject any alternative options which are referred to but not recommended.

Signed: _____

Date: _____

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

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	1b1p		1b2p		2 bed		3 bed		4 bed		5 bed		Total	
Entire Scheme	Base Case	Now	Base Case	Now	Base Case	Now	Base Case	Now	Base Case	Now	Base Case	Now	Base Case	Now
Social Rent (affordable)	0	0	0	47	6	80	25	36	7	7	3	2	41	172
Social Rent Replacement (affordable)	0	0	50	50	86	83	54	59	8	5	0	1	198	198
Intermediate Affordable Rent (affordable)	0	0	38	0	45	0	3	0	0	0	0	0	86	0
Intermediate Ownership (affordable)	0	0	5	6	12	11	4	3	0	1	0	0	21	21
Discounted Market Rent (affordable)	0	0	0	0	7	0	12	0	0	0	0	0	19	0
Market Rent (Market)	46	46	82	82	50	50	0	0	0	0	0	0	178	178
Market Sale (Market)	18	18	85	75	103	85	32	32	0	2	0	0	238	212
Total	64	64	260	260	309	309	130	130	15	15	3	3	781	781

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Appendix B – Further Details of Section 73

- The hybrid planning permission for the Ebury Bridge Estate includes full details for Phase 1 including the tenure mix, which is shown on the approved drawings. The proposed number of homes, types and quantities remain consistent across buildings 7 and 8 with the approved hybrid outline scheme planning permission.
- As a result, the tenure location for Phase 1 are proposed to be redistributed with no change to unit sizes. The tenure development proposes a market led block (Building 7) and affordable led block (Building 8) which results in an increased number of market homes across Phase 1, whilst still achieving 51% affordable homes for Phase 1. Furthermore, with regards to the affordable homes, a higher number of social homes and reduced number of intermediate homes are proposed within Phase 1 to respond to the emerging borough-wide policy direction and coordinated with the needs of returning residents.
- The changes can be summarised as follows:
 - Amendment to the tenure distribution of Phase 1 so that Building 7 comprises solely market-led housing units and Building 8 a solely affordable-led development.
 - Amendment to the affordable housing tenure mix within Phase 1, to seek an increase from 98 to 100 social homes, and reduction in provision of intermediate homes, from 44 to 16.
 - Amendment to the provision of market homes within Phase 1, to increase number of homes from 84 to 110.
- The effect of the above changes does, however, require an update of the Phase 1 approved drawings and this will need to be secured through the Section 73 Application.
- Following the changes proposed to the affordable housing tenure mix within Phase 1, there would be a decrease to 51% in the total number of affordable homes provided in Phase 1 (compared to 63% in the approved application). However, this change will enable an overall increase in the number of affordable homes delivered as part of the outline application, and subsequently, across the masterplan as a whole.
- Updates are also required, therefore, to the section 106 Unilateral Undertaking which relates to the hybrid planning permission so that it will also apply to development brought forward under the section 73 planning permission and to update the number of affordable housing units and redistribution of tenure locations.
- Whilst the precise tenure split for the affordable units in the outline area is to be agreed through reserved matters applications, it is proposed to update the tenure split of the uplift units across the development to 85 – 95% social rented units and 5 – 15% intermediate units paving the way for these future submissions and reflecting the aspiration to increase the number of social homes across the whole masterplan.

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Ebury Bridge Renewal

Detailed Equality Impact Assessment

July 2020

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Ebury Bridge Renewal

Detailed Equality Impact Assessment

July 2020

Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
A	June 2019	SM SS	HF	JB	First draft
B	April 2020	NL EW	SM HG	JB	Draft for client comment
C	July 2020	NL EW	SM	JB	Final report for submission

Information class: Standard

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Executive summary

Overview of the commission

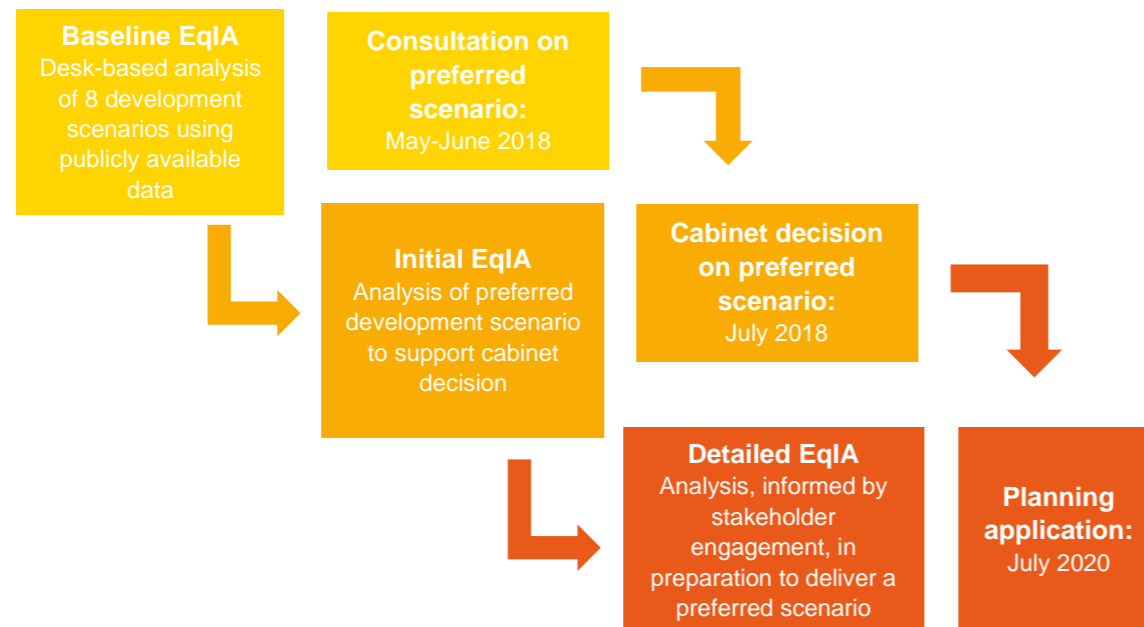
Mott MacDonald were commissioned by Westminster City Council ('the Council') to undertake an Equality Impact Assessment (EqIA) of the redevelopment of the Ebury Bridge Estate between Pimlico and Belgravia in the City of Westminster.

Summary of the EqIA

In order to fully understand the impacts of the redevelopment, the EqIA process has been split into three stages (see Figure 1, below). The EqIA process is focussed on the actual and potential effects likely to be experienced by those living and working on the Estate in light of their 'protected characteristics' under the Equality Act 2010. It identifies any differential or disproportionate effects (both positive and negative) on those with protected characteristics arising from the redevelopment and sets out the mitigation or enhancement measures put in place by the Council to address them.

This EqIA is the third stage of the process prior to application for planning permission, and is aligned to the Council's decision-making process, set out below. This detailed EqIA is intended to provide further analysis of the preferred development scenario, drawing on stakeholder engagement, and as such will inform the Council of the potential risks and opportunities of the preferred scenario, wholesale renewal for which a planning application is being made.¹

Figure 1: EqIA phases



Source: Mott MacDonald

1.1 Findings

The research and analysis process for this EqIA has identified several risks and opportunities that are likely to arise because of the redevelopment of the Estate. The assessment considers the impacts of the redevelopment process – particularly the impact on residents and businesses directly affected by the need to relocate for an extended period in order to facilitate the redevelopment. The assessment also explores the impact of the delivery of the renewed Estate on the current and future Estate community.

The table below sets out findings from the assessment. Potential risks and opportunities in the first column have been identified through a review of published literature, the scope of which is based on an understanding of the context and proposed activities associated with the Estate redevelopment. Protected characteristic groups that may be differentially affected are set out in the second column. Potential disproportionate effects are set out in the third column – highlighting where the pool of people likely to experience the effect is larger due to the sociodemographic profile of the Estate. Assessment of equality effects has been undertaken considering the

¹ Arup (2020) 'Ebury Bridge Renewal Planning Statement'.

Westminster City Council (2018) 'Decision – Ebury Bridge: Estate Renewal' Available at : <https://committees.westminster.gov.uk/ieDecisionDetails.aspx?ID=910>

characterisation of the effects – including sensitivity of the affected parties to the redevelopment, distribution of those groups on the Estate, nature of the effect and mitigation measures in place to address the effect. Recommendations have been made for addressing any potential residual effects on these groups.

These findings are summarised below from Chapter 5. An action plan is available in Chapter 6.

Impact on residents during redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Social infrastructure and access to services:</p> <p>The renewal process involves temporary and permanent resettlement of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. It can increase residents' distances from facilities or places of social connection located on or near their neighbourhood.</p> <p>This can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and pregnant women may also experience negative health impacts from this, including increased stress and anxiety.</p> <p>Within 500m of the Estate there are the following community resources: 15 health care services, one care / nursing home, two children's nurseries, five churches, four community services, eight educational facilities, one leisure facility, one playground, two police stations, five public / village hall / other community facilities, one public convenience and nine public parks or gardens.</p> <p>The loss of social connections may result in disproportionate effects on certain groups on the Estate due to increased distances to community resources such as local schools (e.g. St Barnabas Primary school, St Gabriel's School, Churchill Gardens Primary Academy and Pimlico Academy) or cultural and religious facilities (e.g. St Barnabas' Church Pimlico and St Mary's Church). Local shops, such as those on Ebury Bridge Road, may also decide to close as a result of the redevelopment.</p>	<ul style="list-style-type: none"> Children Older people People from BAME backgrounds Disabled people Pregnant women Religion and belief 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). Religion and belief: Publicly available data shows that there is a higher proportion of Christian residents on the Estate compared to the rest of the borough. 	<p>To mitigate these effects, the Council has set out the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas (as summarised in section 2.3) to provide information on housing options, financial compensation and practical support for residents. The key mitigation in this policy that responds to maintaining social connections within the Estate is that all existing Council tenants and resident leaseholders will have a right to return to a new home on the redeveloped Estate.</p> <p>Within the policy, the Council recognises that many tenants and leaseholders have connections to their local area and will want to remain there. A range of rehousing options (including replacement affordable housing options such as social rent and intermediate ownership) are available for tenants and leaseholders who want to stay in or close to the Estate to suit different circumstances. This should help residents to ultimately be able to return to the Estate, and therefore continue to access the social infrastructure that is important to them.</p> <p>Where households are rehoused temporarily or permanently, their housing needs will be considered.</p> <ul style="list-style-type: none"> The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems – where a resident leaseholder cannot return as an owner the Council will offer a Council tenancy. All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. Private tenants have been offered rehousing support through the Trailblazers service based on their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. Temporary Accommodation (TA) tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere <p>There is also dedicated support available to residents who need to access it, for ongoing information around the redevelopment.</p> <p>In terms of enhancement measures, the redevelopment consists of new community infrastructure.</p>	<p>This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to-date records of changing needs and circumstances – particularly those who are most affected by relocation; continue to hold community meetings and events during the process of redevelopment, including events for residents who have relocated in order to remediate feelings of social isolation; continue to work with local businesses to prevent business closures and ensure residents in the area can continue to access their services; continue to communicate rehousing options to residents, including processes for accessing Council housing and affordable housing being built as part of the redevelopment; continue to offer support to those in private accommodation through the Trailblazer service; ensure that access to community resources is maintained throughout the renewal process where possible; and for families with school-aged children, temporary or permanent housing off the Estate should not be at such a distance as to necessitate and involuntary school change.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Access to finance and affordable housing:</p> <p>Where renewal schemes require residents to resettle, it can lead to an increase in financial outgoings due to costs associated with moving and obtaining new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who have trouble accessing appropriate and mainstream financial services, such as bank accounts, loans and mortgages.</p>	<ul style="list-style-type: none"> Young people Older people People from BAME backgrounds Disabled people Women 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<p>Housing options are available within the HRA, which include replacement of housing for existing Council tenants and leaseholders on the Estate. A mix of housing options will be available to provide a ladder of housing opportunity. At least 50% will be affordable for social and intermediate rent, including the homes set aside for those residents with a right to return to the Estate.</p> <p>For resident leaseholders, an equity loan scheme is available to help with buying one of the new properties which will be of a higher value but will have similar costs to their existing home.</p> <p>As set out above, there is also support for vulnerable private tenants and TA tenants to source suitable housing.</p> <p>The Council has developed strategies to ensure that residents are able to access finance in order to relieve some of the financial burden associated with relocation. These include the following compensation measures:</p> <ul style="list-style-type: none"> Compensation equal to the open market value of the property (for leaseholders); Home loss payments, a sum in recognition of the inconvenience of having to move out of an existing property, which is set at a minimum of £6,400 (as of April 2020); and Disturbance payments for reasonable expenses arising as a direct consequence of the Council purchase of a property. These payments may include costs such as costs of removals (including additional support for vulnerable residents), disconnections and reconnections, redirection of mail, fitting of existing curtains and carpets, early mortgage redemption fees or mortgage and tender fees arising from the purchase of a new property, stamp duty land tax and other fees arising from the purchase of a replacement property and costs of new school uniforms. <p>This compensation and availability of affordable housing options will serve to manage the main financial effects of rehousing.</p>	<p>This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas.</p> <p>To manage any residual effects, it is recommended the Council:</p> <ul style="list-style-type: none"> continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to date records of changing needs and circumstances—particularly those who are most affected by financial exclusion, who may be experiencing increased financial insecurity due to Covid-19; continue to communicate rehousing options available to residents, including information for private tenants, Temporary Accommodation tenants and leaseholders on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby; ensure homes built on the Estate provide a mix affordable housing options e.g. social rent and shared ownership/equity options. As of July 2020, the current planned housing mix provides this range of options; and explore service charge levels in detail to determine whether there are mechanisms to maximise affordability for those wishing to return to the Estate.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Appropriate and accessible housing:</p> <p>Certain groups who currently reside on the Estate may experience adverse effects if temporary or permanent rehousing is not adequate for their needs.</p> <p>Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children and people requiring adaptable and accessible housing.</p>	<ul style="list-style-type: none"> Children Disabled people People from BAME backgrounds 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>As set out above, the Council has developed policies to ensure that there is support available for finding appropriate and accessible housing. Where households are rehoused temporarily or permanently, their housing needs will be considered.</p> <ul style="list-style-type: none"> The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems. All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. Private tenants have been offered rehousing support through the Trailblazers service on the basis of their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. Temporary Accommodation tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere. <p>Those with special accessibility requirements are prioritised through the rehousing process. Where possible they are relocated in the HRA, otherwise housing that suits their needs is sourced in the local area. Adapted and accessible housing has been found for all current tenants requiring it, which meets mobility and housing needs as assessed through the Housing Needs Assessment process. Adaptations may also be funded through disturbance payments.</p> <p>Housing for families will be provided as part of the redevelopment, including replacement housing for families based on the number of bedrooms required, to prevent any overcrowding.</p> <p>The overall housing provision on the Estate will be enhanced by re-providing homes to a higher standard with lower energy and maintenance costs, ensuring housing on the Estate meets residents' needs and involving residents in the design of the new homes.</p>	<p>This effect is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> when re-providing any accessible or adaptable housing as part of the redeveloped Estate, the new housing should ensure there is adequate specialised housing for disabled people including homes for wheelchair users; when re-providing housing as part of the redeveloped Estate, ensure there is adequate housing to suit the needs of families; this includes providing a enough homes with more than two bedrooms within the total number of units provided, to prevent any overcrowding; ensure that work begins as early as possible on sites where a large increase in the provision of affordable homes is possible; continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to date records of changing needs and circumstances – particularly those who are most affected by a loss of affordable and appropriate housing; and continue to provide information on rehousing options available to residents, including information for private tenants, Temporary Accommodation tenants and leaseholders on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby.
<p>Health effects:</p> <p>Evidence has suggested health effects related to housing demolition, such as changes to air quality and noise pollution and effects related to housing displacement, such as social isolation, can arise for particular groups that are represented within the Estate and local area.</p> <p>Some groups, such as older and disabled people can differentially experience both isolation and</p>	<ul style="list-style-type: none"> Children Older people Disabled people Pregnant women 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line 	<p>In order to manage health effects related to stress due to relocating, the Council will be providing rehousing support (as outlined above).</p> <p>To manage health effects related to noise and air quality, demolition works will be monitored closely and disruption will be minimised as much as possible.² This would typically be managed through the creation of a Construction Environmental Management Plan (CEMP), which would be implemented by the contractor carrying out the works.</p>	<p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> continue to provide ongoing support to residents through the rehousing process; identify and work with vulnerable people whose protected characteristics may make them more vulnerable to adverse health effects; and develop a CEMP as part of the demolition and construction works.

² City of Westminster (2019) Ebury Bridge News April 2019. Available at: https://www.westminster.gov.uk/sites/default/files/203_1_wcc_ebury_bridge_newsletter_april_issue_21_aw.pdf

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>construction effects, which can create more severe health impacts on these groups.</p>		<p>with Greater London (21%).</p> <ul style="list-style-type: none"> There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 		
<p>Safety and security</p> <p>In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.</p> <p>It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and BAME people.</p>	<ul style="list-style-type: none"> Young people Older people BAME people Disabled people LBGT people Men Women 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<p>Effects on personal security will be managed through security that is in place seven days a week between 7PM and 5AM as well as hoardings used to secure empty blocks and additional lighting. There is also a process in place for reporting and addressing any incidents of Anti-Social Behaviour (ASB) within the Estate. This process has been publicised through the Ebury Bridge newsletter.³</p>	<p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> consider the use of Property Guardians, people who will reside in and oversee the property for a short term, to secure the vacant Estate properties; and continue to monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with remaining residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.
<p>Accessibility and mobility in the area:</p> <p>Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. Construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.</p>	<ul style="list-style-type: none"> Older people Disabled people 	<ul style="list-style-type: none"> There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<p>The Council is engaging with residents on an ongoing basis around parking and access requirements.</p> <p>Accessibility of the Estate will be considered through the process of construction planning (e.g. ensuring hoarding does not sever the Estate).</p>	<p>The consultation process highlighted that some stakeholders are particularly concerned around parking. There are concerns that the scheme will have a negative impact on existing parking spaces on surrounding local roads.</p> <p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> ensure any blue badge / accessible parking is retained for homes requiring it; ensure that accessibility of the Estate is planned for and monitored through the construction process through the development of a CEMP.

³ City of Westminster (2019) Ebury Bridge News April 2019. Available at: https://www.westminster.gov.uk/sites/default/files/203_1_wcc_ebury_bridge_newsletter_april_issue_21_aw.pdf

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Information and communication:</p> <p>The process of regeneration often requires two-way communication between residents and the council and or housing authorities for residents to understand the options available to them.</p> <p>The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication</p>	<ul style="list-style-type: none"> • Older people • Disabled people • BAME people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> • There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>The Council has developed a robust engagement approach that has been ongoing since the early stages of the project.</p> <p>Engagement has been undertaken through a variety of mechanisms to ensure residents are kept informed of rehousing information, updates around the wider redevelopment and opportunities to provide feedback on the process.</p> <p>The consultation process has taken several forms to encourage participation and ensure that emerging designs were formed in collaboration with residents. Such processes included:</p> <ul style="list-style-type: none"> • Community Futures Group: the steering committee has continued to play a key role in the delivery of the scheme during consultation. • Dedicated consultation space: a vacant shop at No 9 Ebury Bridge Road has been used to provide a welcoming and accessible space for residents to visit. • Resident drop-ins: the designated redevelopment architects have provided themed sessions for residents to provide feedback. Subjects such as public realm, placemaking, re-housing and phasing have been covered. • Ebury Bridge website: a website has been created to provide an accessible platform for up to date scheme information. • Online consultation tool: for those unable to attend consultation events in person, or wanting to provide anonymous feedback, an online tool has been developed. • Newsletters: 26 editions of the Ebury Bridge Newsletter have been distributed over the last 18 months. Each copy provides details on how to give feedback. • Leaflet drops: all residents within a 1000m radius of the Estate have received leaflets and booklets with the option to provide feedback. • Targeted consultation meetings: the project team have met with 15 different amenity and resident groups in the area on a one-to-one basis. • Exhibition: a public exhibition was held over a two-week period. Three events took place on Saturday's and in the evenings to ensure participation.⁴ • Mail out information packs: A printed pack has been distributed to all households with final design information, with a feedback form and link to provide feedback online. • Phone calls: Follow up phone calls have been made to suit different communication needs, to enable those who may find using online methods more difficult to provide feedback • Face to face meetings: In exceptional situations where it is required and the resident is not presenting symptoms, arrangements can be made to meet face to face using social distancing guidelines. 	<p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> • monitor the reach and impact of online engagement (in particular, for the duration of the Covid-19 crisis) to ensure older people, disabled people and BAME people continue to be reached and can provide input to the redevelopment process; • continue to advise residents on ways they can meaningfully engage in decision making and understand options available to them; • continue to provide services such as language interpretation and face to face engagement; and • continue to publish information and seek feedback through a variety of mediums and different formats.

⁴ Westminster City Council (2020): 'Ebury Bridge Estate Renewal: Second round consultation CFG'.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations

Impact on businesses during redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Loss of business and/or employment:</p> <p>The renewal process may result in the temporary or permanent closure and/or relocation of businesses. These changes may create redundancies or result in current business owners and staff being unable to access employment, due to several reasons. These could include: relocation of the business to a location that is difficult to access for staff (those that cannot afford to or are otherwise unable to travel long distances); businesses that are only viable as they serve a specific local need or community (such as BAME communities), or older people who lack the time or resources to re-establish a business .</p> <p>Groups that are most likely to face barriers to employment are most likely to be affected by loss of employment.</p>	<ul style="list-style-type: none"> Older people Disabled people BAME people Young people Women 	<ul style="list-style-type: none"> Publicly available data is not available for businesses as it is based on place of residence. 	<p>Although there is no statutory obligation to relocate impacted businesses, in order to prevent businesses from facing closure, and their staff facing redundancy, the Council has developed support for businesses.</p> <p>There is no formal Council policy for businesses, however businesses will be offered the first right of refusal on the new units available within the redevelopment.</p> <p>As businesses will need to relocate temporarily, the Council will work with them on a phased rent increase over the next three years, to help mitigate financial impacts of moving to a higher value property.</p> <p>Those who wish to sell their business have also been offered the chance to do so. One business has indicated they wish to pursue this, and the Council has provided a figure based on their rateable value to extinguish their lease.</p> <p>One business, a pharmacy, was identified by the Council as providing essential services to those living on the Estate. The Council is currently looking into ways to maintain the pharmacy throughout the redevelopment.</p> <p>Existing businesses have also been offered bespoke business development support in order to ensure they are equipped to maximise the opportunity that the regeneration will bring and deal with the</p>	<p>In 2019, feedback from businesses showed that they felt they had not been as engaged as residents in the redevelopment process. Following this, further actions were taken by the Council to improve their business response (see column, left).</p> <p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, is recommended that the Council:</p> <ul style="list-style-type: none"> continue to work proactively through face to face engagement with vulnerable business owners and employees; continue to provide business development support to help businesses deal with periods of inactivity and change; maintain businesses in place for as long as possible, if they plan to return to premises on the Estate; ensure businesses are fully informed of the timescales that would affect them as soon as possible, including when they would need to vacate the premises and the period of time they would be inactive for before being able to reopen on the redeveloped Estate; consider providing financial support to businesses to facilitate relocation after Council takes possession of a property; and signpost to resources for finding employment or other support if an owner or employee is facing redundancy.
<p>Impact of redundancy on health and wellbeing:</p> <p>Involuntary job loss due to redevelopment and renewal can have differential health and well-being effects for certain groups.</p> <p>Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions.</p> <p>Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.</p>	<ul style="list-style-type: none"> Children Older people 	<ul style="list-style-type: none"> Publicly available data is not available for businesses as it is based on place of residence. 		

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Difficulty accessing commercial finance</p> <p>For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises, which can be more difficult for particular groups.</p>	<ul style="list-style-type: none"> People from BAME backgrounds 	<ul style="list-style-type: none"> Publicly available data is not available for businesses as it is based on place of residence. 	<p>challenges of temporary relocation, such as information on how they might diversify their business.</p>	
<p>Reduced job satisfaction:</p> <p>Redevelopment may result in the relocation of businesses. This may increase commuting distances for owners and employees, which studies have shown as having a greater impact on job satisfaction for women over men.</p>	<ul style="list-style-type: none"> Women 	<ul style="list-style-type: none"> Publicly available data is not available for businesses as it is based on place of residence. 		

Impact on community following redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
<p>Improved housing provision:</p> <p>Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption.</p> <p>Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home</p>	<ul style="list-style-type: none"> Children Older people Disabled people BAME people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>The regenerated Estate will provide improved housing, with respect to appropriateness, accessibility and affordability. In order to further enhance measures:</p> <ul style="list-style-type: none"> ensure final housing mix that is delivered meets the needs of current and future residents (e.g. ensuring at least 10% of homes are accessible); and where possible, provide new housing that exceeds current minimum building standards e.g. Decent Homes Standard.
<p>Provision of community resources and improved social cohesion</p> <p>Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation.</p> <p>An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.</p>	<ul style="list-style-type: none"> Children Older people Disabled people BAME people Pregnant women LGBT 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>The regenerated Estate will provide new community resources including a community space that will provide a mix of uses. In order to further enhance measures:</p> <ul style="list-style-type: none"> continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements; and monitor effects of increased population on community resources (such as schools and health care) and ensure these are mitigated.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
<p>Improved public realm and green space</p> <p>Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition, the opening up of green space has been shown to impact positively on both physical and mental health.</p> <p>Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.</p>	<ul style="list-style-type: none"> Children Older people Disabled people BAME people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>The regenerated Estate will provide additional green space and new play space. In order to further enhance measures:</p> <ul style="list-style-type: none"> enable ongoing involvement of the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people; and ensure that inclusive design principles are followed in the design of public spaces.
<p>Tackling crime and disorder</p> <p>Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.</p>	<ul style="list-style-type: none"> Young people Disabled people BAME people LGBT people Men Older people Women Children 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>The regenerated Estate will provide an opportunity to incorporate new security measures. This can be enhanced by:</p> <ul style="list-style-type: none"> following Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm;⁵ applying recommendations for safety and security in design where relevant (e.g. CCTV, lighting, active frontages that generate passive surveillance, design that avoids vandalism).
<p>Improved access, mobility and navigation:</p> <p>Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are several equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area.</p> <p>Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.</p>	<ul style="list-style-type: none"> Children Older people Disabled people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<p>The regenerated Estate will improve connectivity and accessibility across the Estate. To enhance this, it is recommended to:</p> <ul style="list-style-type: none"> ensure the design of movement networks specifically addresses the mobility and user needs of different groups. This can be achieved by applying principles of inclusive design;⁶ and apply design that creates a safer environment for all transport users by managing potential conflicts between modes.
<p>New employment opportunities:</p> <p>Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access</p>	<ul style="list-style-type: none"> Older people Disabled people BAME people Women Young people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate 	<p>The regenerated Estate will provide new retail space and opportunities for employment through construction jobs, meanwhile use spaces and apprenticeships secured via social value commitments. Where possible, current businesses are receiving support (as outlines above) to relocate to the new Estate. Beyond improving outcomes for existing businesses, there are also opportunities to improve equality of outcomes by:</p>

⁵ Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications

Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: <https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf>

⁶ Design Council (2006) 'The Principles of Inclusive Design'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf>

Department for Transport (2005) 'Inclusive mobility' Available at: <https://www.gov.uk/government/publications/inclusive-mobility>

Department for Transport (2007) 'Manual for Streets'. Available at: <https://www.gov.uk/government/publications/manual-for-streets>

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
employment and education can serve to help address issues of inequality and improve social mobility.		(17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	<ul style="list-style-type: none">working with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. BAME people, disabled people, young people.

1. Introduction

This chapter sets out the purpose and scope of the detailed Equality Impact Assessment (EqIA) for the redevelopment of the Ebury Bridge Estate ('the Estate') in the City of Westminster, London. The EqIA has been undertaken by Mott MacDonald on behalf of Westminster Council ('the Council').

The chapter sets out the requirements of the Equality Act 2010 ('the Equality Act'), the approach to EqIA and tasks undertaken throughout this process.

1.2 Purpose of the EqIA

The purpose of the EqIA is to help Westminster Council ('the Council') understand the potential risks and opportunities of the proposal, focussing on people with characteristics protected under the Equality Act.

This detailed EqIA outlines the findings of the impact assessment for the preferred scenario and provides recommendations for mitigation and further mitigation enhancement where appropriate.

1.2.1 The Equality Act 2010 and Public Sector Equality Duty

This EqIA has been undertaken in order to fulfil Council's obligations under current UK equality legislation, and in particular the Equality Act 2010. The Act sets out a Public Sector Equality Duty (PSED), at section 149 and is set out in Figure 2 below.

Figure 2: Article 149 of the Equality Act 2010: The Public Sector Equality Duty

- (1) A public authority must, in the exercise of its functions, have due regard to the need to—
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
 - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Source: Equality Act 2010

The PSED is intended to support good decision-making. It encourages public authorities such as the Council to understand how different people will be affected by their activities. This means services and policies are appropriate and accessible to all and meet different people's needs. The Council must demonstrate that it has shown due regard to the aims of the PSED throughout the decision-making process to deliver the Programme. The process used to do this must take account of the protected characteristics which are identified below in section 1.2.2.

1.2.2 Protected characteristics

An EqIA provides a systematic assessment of the likely or actual effects of policies or proposals on social groups with the following protected characteristics (as defined by the Equality Act):⁷

Table 1: Protected characteristic table and definitions

Protected characteristic	Equality and Human Rights Commission (EHRC) definition
Age	A person belonging to a particular age (for example 32-year olds) or range of ages (for example 18 to 30-year olds).
Disability	A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	Marriage is a union between a man and a woman or between a same-sex couple. Couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism). Generally, a belief should affect someone's life choices or the way they live for it to be included in the definition.
Sex	A man, woman or non-binary person.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

An EqIA does this through the following approaches:

- Assessing whether one or more of these groups could experience disproportionate effects (over and above the effects likely to be experienced by the rest of the population) as a result of the proposal. An EqIA includes examining both potential positive and negative effects.
- Identifying opportunities to promote equality more effectively.
- Developing ways in which any disproportionate negative impacts could be removed or mitigated to prevent any unlawful discrimination and minimise inequality of outcomes.

1.2.3 Assessing equality impacts

While the PSED does not specify a particular process for considering the likely effects of policies, programmes and projects on different sections of society for public authorities to follow,

⁷ Government Equalities Office/Home Office (2010): 'Equality Act 2010'. Available at: www.legislation.gov.uk

this process is usually undertaken through some form of equality analysis, which can include EqlAs.

Undertaking an EqlA helps to demonstrate how a public body is complying with the PSED by:

- providing a written record of the equality considerations which have been taken into account;
- ensuring that decision-making includes a consideration of the actions that would help to avoid or mitigate any negative impacts on particular protected groups; and
- supporting evidence-based and more transparent decision-making.

By understanding the effect of their activities on different people, and how inclusive delivery can support and open opportunities, public bodies can be more efficient and effective. The EqlA process therefore helps public bodies to deliver the Government's overall objectives for public services.

1.3 Overall approach to the EqlA

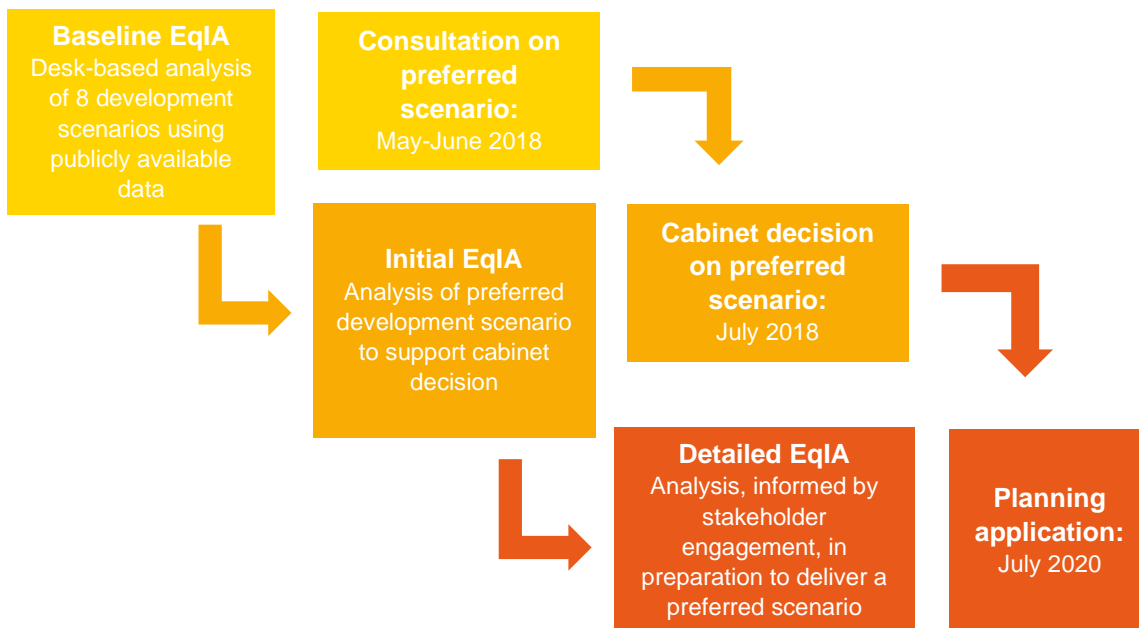
The approach to this EqlA employs the bespoke Mott MacDonald INCLUDE toolkit, which sets out the following steps:



1.3.1 Stages of the EqlA

The EqlA is in the third stage of a three-stage process, aligned to the Council's decision-making process, set out in Figure 3 below.

Figure 3: EqlA activity against development process



The first stage, a baseline EqlA undertaken in January 2018 comprised a series of tasks undertaken to understand the equality effects of several scenarios for the redevelopment of the Estate. Once potential effects were identified, they were assessed against the redevelopment scenarios and mitigation measures proposed by the Council. The findings of the baseline assessment were then used to inform the selection of a preferred scenario for redevelopment.

The initial EqlA built on the baseline EqlA, focussing on the preferred scenario identified by the Council and providing more detailed analysis on that basis. The initial EqlA was used to inform the Cabinet decision on the preferred scenario in July 2018.

This detailed EqlA is intended to provide further detail and analysis on the preferred scenario that is being taken forward by the Council, following Cabinet approval. The detailed EqlA is informed by engagement with residents and businesses on the basis of their protected characteristics. The EqlA will be submitted with an application for planning permission in June 2020.

A description of the tasks that were undertaken throughout the EqlA stages is provided below.

Understanding the project

- **Discussion with Council and external representatives:** Discussions were undertaken with the Council and their advisors, Pinnacle Regen, throughout the baseline, initial and detailed EqlA stages to better understand the Estate area, options for redevelopment, proposed redevelopment process, and support plans for those who will be affected.⁸ At the baseline stage, an initial review of the Ebury Bridge Renewal scenarios matrix was undertaken.

⁸ In the baseline and initial stages, discussions were also undertaken with Pinnacle Regen, who were working on the redevelopment on behalf of the Council. Pinnacle Regen provided expertise on regeneration and advice to the Council on the redevelopment of the Ebury Estate.

- **Site visit:** A site visit was undertaken during the initial EqlA stage, in June 2018, to improve understanding of the site character and context, and to further identify any community facilities and resources located onsite and nearby. This provided site-specific information which helped to inform the assessment.
- **Review of redevelopment programme:** Documentation and information associated with the redevelopment programme was undertaken throughout all EqlA stages, including newsletters and other engagement materials, reports, phasing plans, background and contextual information, presentations and online publications.
- **Review of redevelopment policies and other measures:** Information on intended measures to support those affected by redevelopment and to mitigate and manage effects was reviewed throughout the all EqlA stages, including:
 - Policy for Leaseholders in Housing Renewal Areas
 - Policy for Tenants in Housing Renewal Areas
 - planned support for longstanding businesses on the Estate

Evidence, distribution and proportionality

- **Desk-based evidence and literature review:** In order to better understand the potential risks and opportunities arising from the redevelopment, and to help to identify possible mitigation measures and opportunities associated with the programme, relevant published literature from governmental, academic, third sector and other sources were reviewed and updated throughout all EqlA stages. This allowed for the characterisation of potential risks and opportunities typically associated with regeneration projects, to understand whether they applied in this instance.
- **Desk-based demographic analysis of the area:** A social and demographic profile of the Estate was collated using publicly available data and compared with wider social and demographic data for Westminster, London and England to further build a picture of the area in which the Estate is located. This work was undertaken in the baseline stage and updated in subsequent stages.

Engagement and analysis

- **Residents equality survey:** The Council undertook a household equality survey of all households in May 2018, including secure Council tenants, resident leaseholders, Temporary Accommodation households and private tenants. The survey was provided through paper forms and was available to complete online. It was handed out in person on doorsteps and at the Regeneration Base, as well as across all Council project team interactions. Translation support was provided where requested.

A second survey was completed between August and November 2018 completed through one to one sessions with a relocations officer for secure Council tenants as part of the Housing Needs Assessment, with a similar survey conducted with resident leaseholders between November 2018 and February 2019 as part of a Housing Preferences discussion. The second household equality survey was also sent out by post to non-resident leaseholders in June 2019, and for non-secure Council tenants, equality data collected during sign up has been used.

Analysis of the findings of these surveys, in addition to the publicly held data relating to the Ebury Bridge Estate households, has helped to build a demographic profile of residents within the Estate and provided the Council with a better understanding of their needs based on their protected characteristics.

- **Business equality survey:** The Council undertook an equality survey of businesses in January 2019. The survey was provided through paper forms, in person with the Council project team with each of the businesses. As with the residents' survey, analysis of the findings of this survey has helped to build a demographic profile of businesses within the Estate and provided the Council with a better understanding of their needs based on their protected characteristics.
- **Evidence gathering:** Supplementing the findings of the surveys, an evidence gathering exercise was conducted with a sample of people representing residents and businesses on the Estate. These took place through two meetings with residents and businesses in May 2019. The exercise sought to provide background to the EqIA and seek to identify with participants the potential for any additional effects of the redevelopment and corresponding opportunities to mitigate and manage adverse effects.
- **Analysis of results:** Following collection of all engagement data, survey data was aggregated for the area and findings from the evidence gathering exercise were reviewed in order to identify common themes. The analysis of results is provided in this detailed EqIA.

Impact assessment

Assessment of potential adverse and beneficial effects: Potential risks and opportunities were examined using the findings from the research undertaken in the tasks above. Assessment of equality risks was undertaken in light of the sensitivity of the affected parties to the redevelopment, and distribution of people with protected characteristics in the area of the Estate. Both risks and opportunities were identified in the context of the mitigation measures implemented or proposed by the Council.

The intention of this is to identify any risks and opportunities at an early stage and minimise the potential for adverse impacts. These mitigation measures have been reviewed and updated at each stage of the EqIA.

Drawing conclusions and action planning

- **Drawing conclusions:** Based on the impacts identified, a series of conclusions have been drawn and updated at each EqIA stage which set out the effects, those who may be or are affected and opportunities to minimise or mitigate the impact.
- **Making recommendations:** A series of further recommendations were developed and updated at each EqIA stage, to help manage the redevelopment in a way that minimises the potential for adverse effects where appropriate.
- **Developing an equality action plan:** An action plan has been developed which outlines the responsibilities to involved affected parties following submission of this detailed EqIA for the Council.

1.4 Methodology for identifying effects

1.4.1 Assessing equality effects

The assessment of effects across the EqIA process is predominantly qualitative and describes, in as much detail as possible, the nature of the impact on:

- residents living on the Estate;
- commercial properties on the Estate, including employees and customer bases;
- owners of commercial and residential property on the Estate; and
- the local community.

The assessment considers:

- whether the redevelopment will have a positive or negative effect on the lives of those who live in the area;
- the relationship of the impact to the land assembly programme (e.g. direct relationship such as loss of property or indirect relationship such as loss of access to services);
- the length of time that people are affected for;
- the severity of the change;
- the number of people likely to be affected; and
- the resilience of those who are affected.

1.4.2 Differential effects

Differential effects occur where people with protected characteristics are likely to be affected in a different way to other members of the general population. This may be because groups have specific needs or are more susceptible to the effect due to their protected characteristics. Differential effects are not dependent on the number of people affected.

1.4.3 Disproportionate effects

Disproportionate effects occur where there is likely to be a comparatively greater effect on an equality group than on other sections of the general population. Disproportionate effects may occur if the affected community includes a higher than average proportion of people with a particular protected characteristic, or because people from a particular protected characteristic group are the primary users of an affected resource.

2 The Ebury Bridge Estate: redevelopment context

This chapter sets out the context of Ebury Estate and the proposed redevelopment. It provides background to the Estate including its history and current situation, before outlining the details of the preferred scenario

2.1 Overview: Ebury Bridge Estate

The Estate is located south of London Victoria and north of the River Thames, bordered by Ebury Bridge Road and Pimlico to the west, and railway lines running into Victoria station to the east. The surrounding area is of primarily residential in character in an urban setting, with some surrounding taller, higher density buildings that indicate a more central city setting.

Figure 4: Ebury Bridge Estate

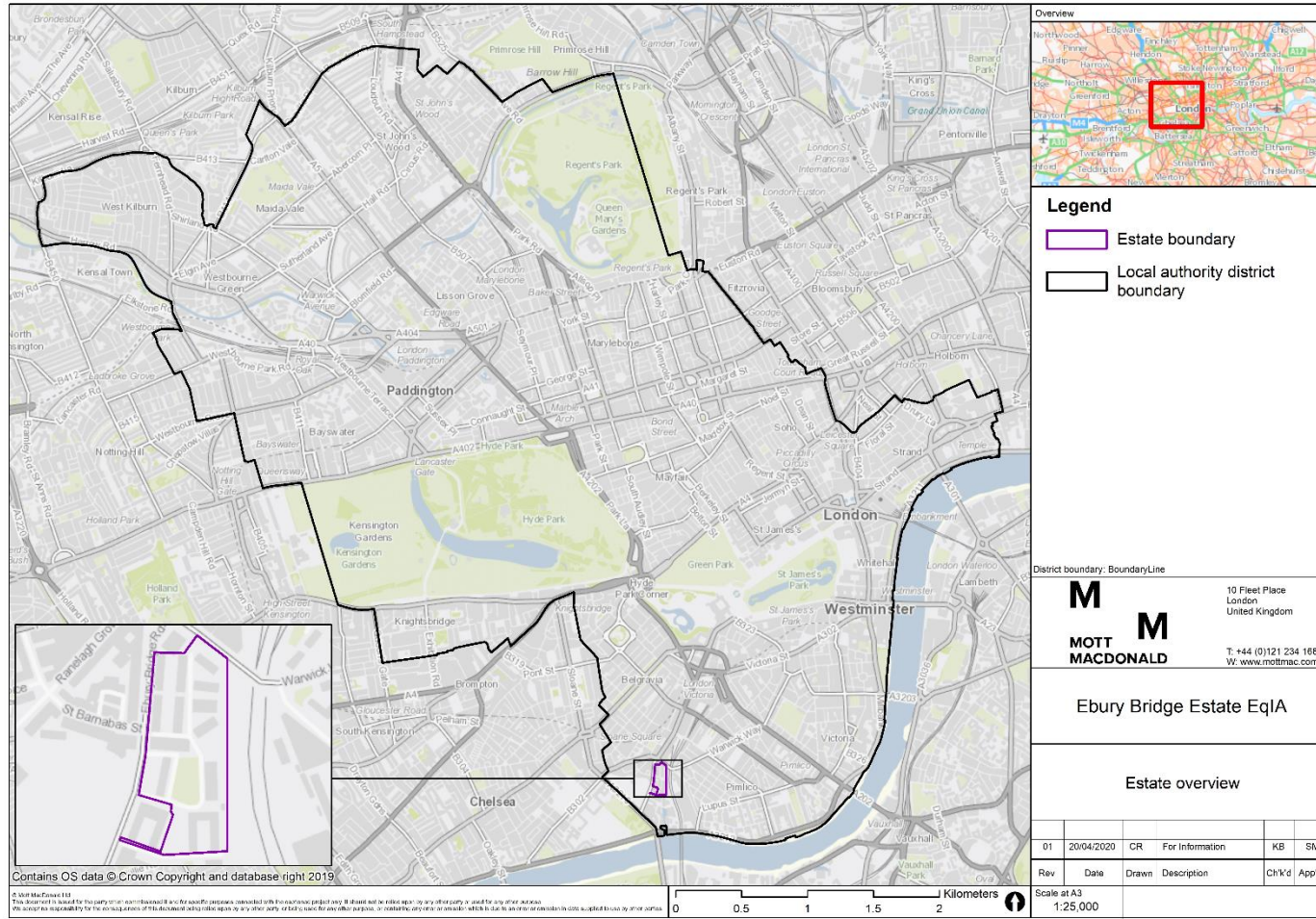


Source: Mott MacDonald, 2018

Figure 5, below, shows the location of the Estate within Westminster and Greater London.

Figure 5: Ebury Bridge Estate, City of Westminster

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Source: Mott MacDonald, 2020

There are 13 council-owned housing blocks that exist within the Estate boundary, excluding Cheylesmore, a privately-owned block not included in the redevelopment. These housing blocks comprise 336 flats socially rented (including Temporary Accommodation), private leasehold (originally sold through the Right to Buy) and private tenancy. The housing blocks are referred to throughout the report and are as follows:

- Bridge
- Bucknill
- Dalton
- Doneraile
- Edgson (now demolished)
- Hillersdon
- Mercer
- Pimlico
- Rye
- Victoria
- Wainwright
- Wellesley
- Westbourne

A Building Condition Survey of the external and common elements of all blocks on the Estate was conducted by Keegans from April-May 2018. The survey noted that 11 of the 13 blocks were constructed in 1930, and that Edgson House and Wainwright House were constructed later, in the 1970s and 1990s, respectively.⁹

A walk-through site visit of the Ebury Bridge Estate found that though the buildings used similar material, they tended to differ in form, character and community feel. The visit identified several facilities on site including a children's playground, a number of small central green spaces, a fenced community garden and a fenced multi-use games area.

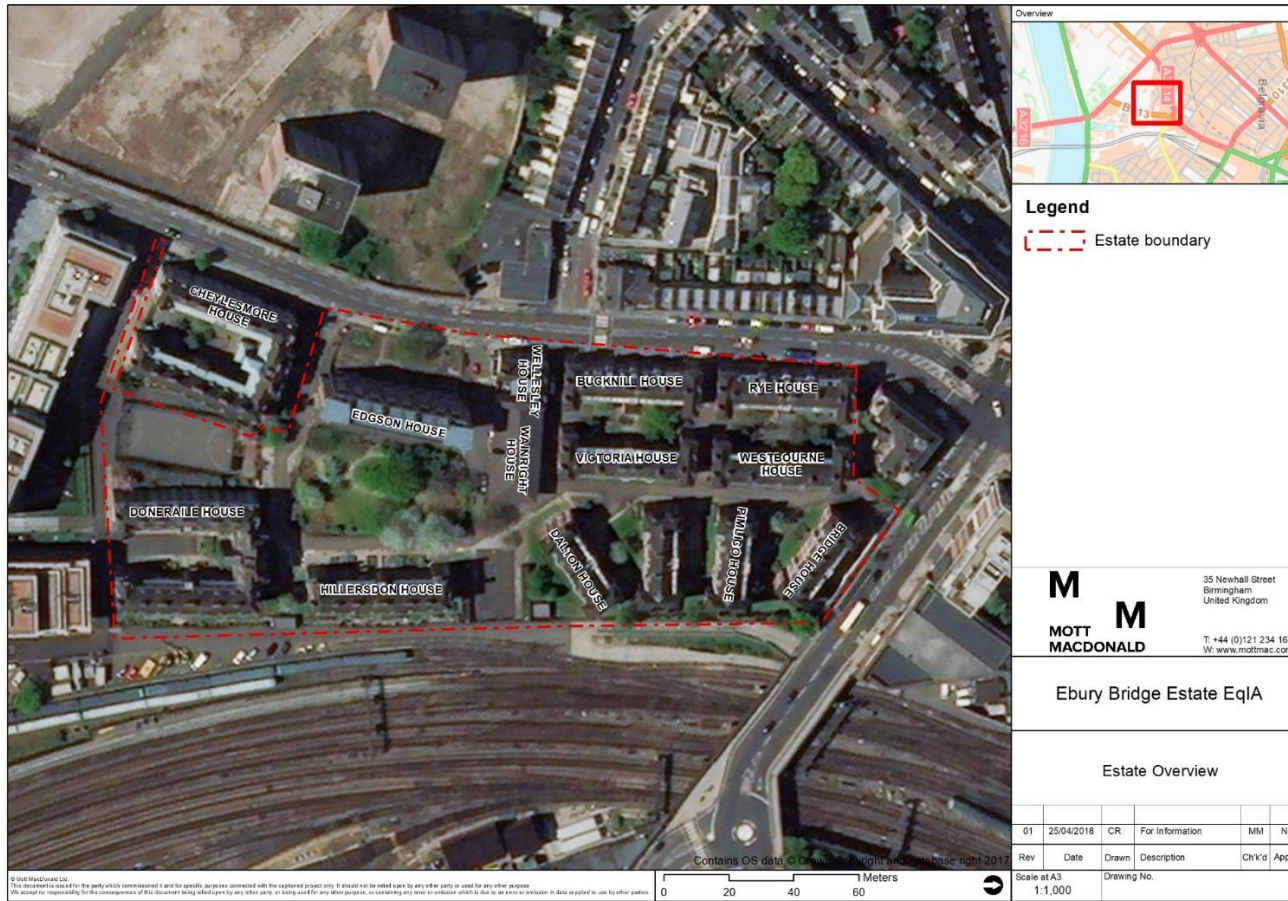
Figure 6 below details the location of the housing blocks mentioned above.

There are also seven businesses operating on the Estate, situated along a retail parade on Ebury Bridge Road. Further detail is provided in Chapter 4: Estate profile and engagement.

⁹Keegans Group (2018): 'Condition report for Ebury Bridge Estate'

Figure 6: Ebury Bridge Estate map

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Source: Mott MacDonald

2.2 Renewal of the Estate

2.2.1 Proposed redevelopment

The Council first developed a renewal scheme for the Estate in 2013 following extensive consultation with the existing community. In June 2017, the Council informed residents that the previously consented scheme was not viable and could not be taken forward. The Council, however, remained committed to regeneration of the Estate and delivering the scheme objectives for the community, including affordable housing, density, play space, housing quality, inclusive access and energy. It therefore opened the conversation to the community again and a number of scenarios were put forward for consideration. The process is outlined in more detail below:

2.2.2 Renewal scenarios

Eight scenarios were initially considered for the redevelopment of the Estate. Of the eight scenarios, one involved the complete refurbishment of the Estate with no new builds, four required part refurbishment/part demolition of the Estate and new builds, and three required the complete demolition of the Estate with new builds.

Following the development of these scenarios, a methodical assessment was carried out involving residents of the Estate and the Community Futures Group. The Community Futures Group is a steering committee who has been working in close collaboration with the Council throughout the renewal process. The group is made up of Estate residents and a businessperson, who represent all current, future and decanted tenants, leaseholders and businesses in engaging with the Council and in the overall process.

The assessment of the scenarios focussed on the extent to which each scenario could match the following criteria:

- **Desirability:** how well each scenario met the Council's strategic objectives and priorities of residents and stakeholders;
- **Viability:** how financially viable and sustainable the scenarios are; and
- **Feasibility:** how each scenario could be implemented and attract a delivery partner.

The eight scenarios were scored against the above criteria to show which scenarios performed well overall, with the preferred scenario identified in May 2018.

2.2.3 Announcement of preferred scenario

Following consultation and engagement with residents, the Council determined that its preferred scenario for the Estate was scenario seven – the complete demolition and re-provision of the Estate. This scenario includes phased decant, demolition and re-provision of all blocks, with the provision of around 750 new homes built across the Estate (of which at least 50% would be affordable for social and intermediate rent).¹⁰ Part of this 50% would consist of the re-provision of the social rented units for those with the right to return. Under the preferred scenario, all existing secure tenants and resident leaseholders have a right to return to a new home on the Estate.¹¹

¹⁰ Social rent would only change depending on the national government formula for setting these amounts. Intermediate rent is set at up to 80% of the market rent value of a similar property in the area.

¹¹ Secure tenants include Council tenants not in Temporary Accommodation. Temporary Accommodation is provided for unintentionally homeless households in priority need under Part 7 of the 1996 Housing Act (as amended). UK Government (1996) Housing Act. Available at: <https://www.legislation.gov.uk/ukpga/1996/52/part/VII>

The remainder would be split 40% social and 60% intermediate rent, in line with Council policy. The rest would be available to own through a range of tenures that would provide a ladder of housing opportunity, and would rehouse all leaseholders wishing to remain.¹²

Under scenario seven, all social and intermediate units would remain in Council ownership and re-housing of residents would occur in stages, with a primary objective of minimising disruption. It would also improve the public realm offering on the Estate and create new retail offerings and community facilities. The key benefits of this scenario include:

- new homes built to meet the housing needs of residents;
- provision of high quality homes with lower energy and maintenance costs;
- provision of a number of new affordable homes in Westminster;
- integration of new community facilities including a community space, outdoor play spaces;
- re-provision of retail units, with an increased floor space, and improved access for deliveries to the Estate;
- improved quality of public spaces and enhancing levels of security and safety; and
- creation of a place with a unique identity.

2.2.4 Current situation

2.2.4.1 Cabinet decisions

Cabinet gave approval to take scenario seven forward as the preferred scenario in July 2018, including the full demolition, re-provision and enhancement of housing on the Estate.

In October 2018, Cabinet decided on a preferred option for delivery of Estate renewal through the Housing Revenue Account (HRA) and the Council's wholly owned housing company, Westminster Housing Investments Limited (WHIL). One of the main incentives for taking this route is felt to be the flexibility that the Council would have to amend the tenure mix of the market sale element of the scheme (such as market rent and potentially sub-market rent) and create hybrid delivery options which could enable more varied participation by the private sector.¹³

In March 2019, following market engagement and consultation with the Community Futures Group, it was found that the market response aligned with the Council's desire to retain Ebury land and to create a ladder of housing opportunity for those living in Westminster.

2.2.4.2 Phasing and design

In response to market testing, a revised tenure mix has been developed to maintain (as of July 2020) the 198 replacement social rent homes and 21 homes for resident leaseholders wishing to return to a new home on the estate. In addition to replacing the homes for existing residents, new rental (including intermediate and social rent) and sale homes will be built.

The Council have progressed with work to acquire leasehold interests on the Estate and the decant and vacant possession of the priority blocks to enable the delivery of a first phase of development. Edgson House was completely vacated and demolition took place in late 2019.

¹² City of Westminster (2018) Cabinet Member Report. Available at:
<https://westminster.moderngov.co.uk/documents/s29546/Ebury%20Delivery%20Options%20Cabinet%20Report.pdf>

¹³ City of Westminster (2019) Cabinet Member Report (2019). Available at:
<https://westminster.moderngov.co.uk/documents/s29546/Ebury%20Delivery%20Options%20Cabinet%20Report.pdf>

Construction on the site, which will be used for 'meanwhile use' provision where temporary retail and community facilities will be provided for the neighbourhood, began in February 2020.

The proposal is that the Council builds a first phase of 226 new social, intermediate and market homes, which will offer re-housing to all secure tenants and resident leaseholders wishing to stay on the site or return if they have already opted to move temporarily off site. The initial phasing had planned for Phase 2 and 3 residents only having to make one move, but due to updates to the plan, Phase 2 residents will now make two moves in order to accelerate the process. Phase 1 residents, who have already moved, and Phase 3 residents will only move once.

In January 2020, detail around the design of proposed homes was published as a result of residents requesting further information. Existing homes were surveyed to act as a comparator to the new homes that are proposed. Two thirds of existing homes did not comply with modern space standards, 25% had dual aspect living spaces and none had any private outside space. Conversely, all new homes will comply with modern space standards, with the majority having private outside space and all having access to communal and public open space. Within the Detailed Area, more than 95% of new homes will have dual aspect living spaces with 26% of the new homes being suitable for families.

Further detail and designs of the redevelopment have also been made available, providing visualisations of the Estate upon completion. As well as new housing provision, the redevelopment will include a community space and outdoor games area, improve connectivity to local streets, improve daylight to the public realm (including community gardens) and create a new public central square.¹⁴ Opportunities are also being explored for complementary non-residential amenity spaces such as a co-working office space, a nursery, a café and/or a gym.

The final design of the Estate will be subject to a hybrid outline planning application with full detail for Phase 1 followed by Reserved Matters for subsequent phases.

2.3 Support for affected residential and business properties

Throughout the housing renewal process, the Council have been actively engaging with residents to inform them of all rehousing options and other support available to them. Options for leaseholders and tenants are detailed below.

2.3.1 Approach to acquisitions and engagement

Every reasonable effort will be made to move tenants and negotiate the acquisition of leaseholders' properties by agreement, informing them of relevant procedures and providing sufficient time to consider their rehousing options. If it is not possible to reach an agreement, the Council may apply to the court for a possession order or may use its powers of Compulsory Purchase.¹⁵

Regular engagement with residents has been undertaken throughout the process to keep them up to date and informed of key decisions and how they might be affected. Stage one consultation for the redevelopment took place between September 2019 and November 2019.

¹⁴ Westminster City Council (2020): 'Ebury Bridge Estate Renewal: Second round consultation CFG'.

¹⁵ Westminster City Council (2018): 'Policy for Leaseholders in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf
Westminster City Council (2018): 'Policy for Tenants in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/tenant_policy_consultation_draft_23.11.2018.pdf

The consultation process took several forms to encourage participation and ensure that emerging designs were formed in collaboration with residents. Such processes included:

- **Community Futures Group:** the steering committee has continued to play a key role in the delivery of the scheme during consultation.
- **Dedicated consultation space:** a vacant shop at No 9 Ebury Bridge Road has been used to provide a welcoming and accessible space for residents to visit.
- **Resident drop-ins:** the designated redevelopment architects have provided themed sessions for residents to provide feedback. Subjects such as public realm, placemaking, re-housing and phasing have been covered.
- **Ebury Bridge website:** a website has been created to provide an accessible platform for up to date scheme information.
- **Online consultation tool:** for those unable to attend consultation events in person, or wanting to provide anonymous feedback, an online tool has been developed.
- **Newsletters:** 26 versions of the Ebury Bridge Newsletter have been distributed over the last 18 months. Each copy provides details on how to give feedback.
- **Leaflet drops:** all residents within a 1000m radius of the Estate have received leaflets and booklets with the option to provide feedback.
- **Targeted consultation meetings:** the project team have met with 15 different amenity and resident groups in the area on a one-to-one basis.
- **Exhibition:** a public exhibition was held over a two-week period. Three events took place on Saturday's and in the evenings to ensure participation.¹⁶

The second stage of consultation is currently ongoing as of April 2020. Due to the onset of COVID-19 and restrictions on public gatherings and meetings between non-household members, some planned engagement activities have moved online, where new information leaflets and exhibition boards are being published and made available for comment. Residents are also able to register for live webinars and access contact details for more information. A printed pack has been distributed to all households with this information as well, with a feedback form and link to provide feedback online. Follow up phone calls have been made to suit people with different communication needs, to enable those who may find using online methods more difficult to provide feedback. In exceptional situations where it is required and the resident is not presenting symptoms, arrangements can be made to meet face to face using social distancing guidelines.

2.3.2 Support available to leaseholders

All existing resident leaseholders living on the Estate are have a right to return to a new home on the Estate.¹⁷ The support available to resident leaseholders is determined by the Council's 'Policy for Leaseholders in Housing Renewal Areas'. The Council's aim is to ensure that all resident leaseholders have the option to remain in, or return to, the Housing Renewal Area (HRA), and that reasonable efforts will be made to help them to remain homeowners with similar rights as they have now.¹⁸ However, housing costs cannot be replicated exactly, as lending rates and conditions are subject to change. Utility, ground rent and service charge costs may also be different at the new properties. Practical, non-financial help will also be available for leaseholders to help move outside the Housing Renewal Area should they wish. Free

¹⁶ Westminster City Council (2020): 'Ebury Bridge Estate Renewal: Second round consultation CFG'.

¹⁷ Westminster City Council (2018): 'Policy for Leaseholders in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

¹⁸ Westminster City Council (2018): 'Policy for Leaseholders in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

independent advice will be made available to each leaseholder to access the best options for them.

Rehousing options

It is expected that the new homes of similar size built in the HRA will be of higher value than the leaseholders' current home. The table below outlines the range of options the Council has made available for resident leaseholders who want to remain in the HRA and therefore continue to access local social infrastructure.¹⁹

Table 2: Re-housing options for resident leaseholders wishing to remain in the HRA

Option available	Description of option
Option 1: Buying one of the new build homes with an equity loan or on a shared equity basis	<p>Leaseholders are eligible for this option where they agree to put the value of their existing property into the purchase, plus their home loss payments. Two equity loads are available:</p> <p>Buying with an equity loan: The external organisation will sell one of the new build properties to the leaseholder at market value. The Council will offer the leaseholder an interest free equity loan to make up the difference between the leaseholder's contribution and the market value of the property.</p> <p>Buying on a shared equity basis: The leaseholder will purchase a share in the equity of the new build property directly from the Council. The leaseholder's share will be their contribution to the property, and the Council's share will be the difference between this amount and the market value.</p> <p>Under this option the new property cannot have a greater number of bedrooms than the leaseholder's exiting property. However, if leaseholders can finance the cost of additional rooms themselves, this may be possible.</p> <p>Disabled adaptations that are present in a leaseholders existing property will be reinstated in the new property and funded by the Council. An assessment of adaptations will be carried out by the Council's Occupational Therapist.</p>
Option 2: Becoming a shared owner at one of the new properties	<p>This option is available to leaseholders who are not eligible for an equity loan or shared equity option. Leaseholders will be eligible if they have sufficient funds to buy at least a 25% share in one of the new properties and meet all other housing costs.</p> <p>Leaseholders can buy an initial share of between 25 and 75% of the property and will pay a rent of up to 3% on the remaining share held by the Council.</p>
Option 3: Buying one of the new homes outright	<p>Leaseholders have the option to buy one of the new properties outright should they have sufficient funds. In this instance, subject to availability and their personal finances, leaseholders are able to buy a property larger than their previous home.</p>
Option 4: Buying another leasehold property in the HRA	<p>Leaseholders may buy a replacement property in the HRA that is not subject to acquisition. In this instance, the Council will assist in locating a property that is for sale.</p>
Option 5: Becoming a tenant in the HRA	<p>Leaseholders may be able to remain in the HRA by becoming a social housing or intermediate tenant. Resident leaseholders may be eligible for this option where none of the alternative options are appropriate due to their financial circumstances and suitable reasonable alternative accommodation is available, or where they wish to be a tenant and owner occupation is no longer suitable because of their, or a partner's ill health or disability. Eligibility will be based on the length of time the leaseholder has lived in the HRA, the location of employment, support networks and other reasonable factors, and vulnerability issues such as age, ill health or disability. In some cases, leaseholders will be given priority to bid for social housing properties within the HRA. This may be the case where the leaseholder:</p> <ul style="list-style-type: none"> • has children attending local schools in the HRA and the travel time and/or costs to the school from elsewhere are unreasonable in the long term; • is receiving or providing support to a family member in the HRA, and the provision of such support is not sustainable from elsewhere in the long term; or

¹⁹ Excluding those who brought through the Flexible Ownership and Rent to Mortgage schemes.

Option available	Description of option
	<ul style="list-style-type: none"> has employment in, or in close proximity to, the HRA, and the travel time and/or costs to the employment site from elsewhere are unreasonable in the long term.²⁰

Source: Westminster City Council, 2018

The HRA leaseholder policy states that where the leaseholder does not wish to remain in the HRA, the Council will provide practical, non-financial help to assist leaseholders to buy another replacement property. Where the options in Table 2 are unsuitable for the leaseholder, the Council may offer financial help to buy a replacement property in another part of Westminster, but close to the HRA, with an equity loan or on a shared equity basis. The Council recognises the importance of social infrastructure; this option may be offered where leaseholders have a need to remain close to HRA due to employment, support networks, or other factors deemed reasonable and are unable to afford to buy another property outright of the same size and type.²¹

The Council has made the equity loan scheme available to help with buying one of the new properties which will be of a higher value but will have similar costs to their existing home. The funding would make up the difference between the residents' contribution and the price of the new property. The conditions in the HRA leaseholder policy state that if permission is granted by the mortgage lender, residents may be able to rent the property out once it has been purchased. Should the resident wish to sell the property, permission must be granted by the Council and the resident would be responsible for the costs associated with the sale of the property.

Should new homes be unavailable to move into straight away, the Council's HRA leaseholder policy states that temporary housing will be offered to resident leaseholders. Where this is the case, leaseholders will generally be offered an assured shorthold tenancy in the local area, where possible. In some circumstances temporary housing from the Council's own housing stock may be available. The Council notes that it will make every reasonable effort to consider the leaseholder's needs. For example, the location of support networks, employment and schools will be considered and appropriate disabled adaptations made in the allocation of temporary housing. The policy sets out that the Council will make one reasonable offer of temporary housing to leaseholders; there will be a right to appeal against the Council's offer of temporary housing. Where the appeal is successful an alternative offer will be made and if the appeal is unsuccessful the original offer will be reiterated.²²

Financial compensation

Every resident leaseholder is entitled to the following statutory compensation:

- **Compensation equal to the open market value of the property:** The Council will appoint a qualified valuer to value the property, or leaseholders can appoint a valuer themselves and the Council will reimburse reasonable costs associated with this.
- **Home Loss Payment:** This is to compensate resident leaseholders for having to move at a time which is not of their choosing. The amount is 10% of the market value of the

²⁰ Westminster City Council (2018): 'Policy for Leaseholders in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

²¹ Westminster City Council (2018): 'Policy for Leaseholders in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

²² Westminster City Council (2018): 'Policy for Leaseholders in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

property subject to levels set by Government of a minimum of £6,400 and maximum of £64,000.²³

- **A disturbance payment:** This is to cover all the reasonable costs of moving such as costs of removals (including additional packing support for vulnerable residents), disconnections and reconnections, redirection of mail, fitting of existing curtains and carpets and costs of new school uniforms.

Non-resident leaseholders are also entitled to the above compensation, however the value of the home loss payment would be at 7.5% of the market value of the property, and the disturbance payment would be an amount to cover reasonable costs of acquiring a new property, within one year.²⁴

2.3.3 Support available to tenants

After undergoing a consultation process in 2018, the 'Policy for Tenants in Housing Renewal Areas' was approved by Council in 2019.²⁵ It provides guidance on the support offered to different types of tenants in HRAs. The details of support for different tenancy types are set out below.

2.3.3.1 Council tenants

The HRA tenant policy sets out that the general approach to rehousing Council tenants is to provide support through the entire moving process. The Council will provide a named officer to answer any queries and advise tenants about their rehousing rights and options. They will also make available to tenants an independent advisor.

Options available to Council tenants

The policy states that all existing Council tenants living on the Estate, otherwise known as the HRA, will have a right to return to the Estate. There are a range of options available to Council tenants who wish to return to the Estate, or move elsewhere:²⁶

- **Option 1:** Move straight into one of the new social homes, if this is possible.
- **Option 2:** Move into another social home in Westminster for a temporary period, and then move into one of the new homes in the HRA when they are ready.
- **Option 3:** Move into a social home not on the Estate. This could be in the local area or in another part of Westminster. This could also mean moving into community supportive housing (housing that is generally designated for older people) if tenants prefer this and are 60 or over and eligible.
- **Option 4:** Have high priority to buy one of the new intermediate homes that may be for sale in the HRA, this would include lower-cost options such as shared ownership.

The Council intends to make every effort for tenants to have the same or similar tenancy rights and rent levels in their new homes, as far as it is possible. The tenancy type would only change if the tenant chose to move to a housing association property.

²³ UK Government (2019) The Home Loss Payments (Prescribed Amounts) (England) Regulations 2019. Available at: <http://www.legislation.gov.uk/uksi/2019/1117/made>

²⁴ Westminster City Council (2018): 'Policy for Leaseholders in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/leaseholder_policy_for_housing_renewal_areasfinal21.9.2018.pdf

²⁵ Westminster City Council (2019): 'Policy for Tenants in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/policy_for_tenants_in_housing_renewal_areas_2019_final.pdf

²⁶ Westminster City Council (2019): 'Policy for Tenants in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/policy_for_tenants_in_housing_renewal_areas_2019_final.pdf

The Housing Needs Assessment will determine the type of home needed based on the type and size requirements of the tenants.

The HRA tenant policy describes the limited circumstances in which Council tenants will not have the right to remain or return to the HRA, including:

- where there has been a change in household occupancy and circumstances after a fixed point in time where plans will be finalised;
- where there is a need for specialist housing (housing that is accompanied by support, such as housing for young people, those with mental health problems or learning difficulties); and
- where a tenancy has been lost due to a breach of the agreement.

Rehousing process

According to the HRA tenant rehousing policy, the process for rehousing Council tenants follows three stages:

1. **Housing Needs Survey:** At this stage the tenant considers all options and the Council finds out who is in the household, type of new home needed and any particular needs the tenant has which includes medical issues or disabilities, anything that could affect rehousing such as employment, schools or other support services and any additional support they may need to move.
2. **Housing Needs Assessment:** At this stage a detailed assessment of the size and type of new home needed is undertaken.
3. **Rehousing:** The chosen option is confirmed in writing and generally cannot be changed. Rehousing will then begin.

Detailed information about household members who are eligible to be included are outlined in the policy document.²⁷

When rehousing, returning tenants that have had to move away temporarily will have the first priority for the new homes (those choosing Option 2) and other households that need to move will have second priority. Tenants will have the highest priority to move, over other groups that need housing such as leaseholders.

For those choosing Options 3, where the tenants will move out of the HRA, there will only be one move.

Financial compensation

Council tenants are entitled to the following statutory compensation:

- **Home loss payment:** This is available to tenants that have been living in the property for over 12 months to compensate tenants for having to move at a time which is not of their choosing. On a case by case basis the Council may choose to make a payment to residents who have been residing in their home for under 12 months. The amount is set by government and is a minimum of £6,400 and maximum of £64,000 per household.²⁸
- **A disturbance payment:** This is to cover all the reasonable costs of moving such as costs of removals (including additional support for vulnerable residents), disconnections and

²⁷ Westminster City Council (2019): 'Policy for Tenants in Housing Renewal Areas'. Available at: https://www.westminster.gov.uk/sites/default/files/policy_for_tenants_in_housing_renewal_areas_2019_final.pdf

²⁸ UK Government (2019) The Home Loss Payments (Prescribed Amounts) (England) Regulations 2019. Available at: <http://www.legislation.gov.uk/ukSI/2019/1117/made>

reconnections, redirection of mail, fitting of existing curtains and carpets and costs of new school uniforms.

Advice, support and information

The HRA policy for tenants affirms that tenants will be given sufficient time to choose their rehousing option and they will be supported through the process of moving. The Council will provide named officers who can be contacted by residents for advice and an independent advisor will also be made available.

The Council will also provide additional assistance to vulnerable tenants and may work with third parties to identify and address any special needs.

2.3.3.2 Private tenants

All private tenants will be required to relocate and they will not be entitled to housing on the Estate. Regarding private tenants, the Council has set out in the HRA tenant policy that they will communicate with private tenants as early as possible to explain what is happening and when. All private tenants will be visited at least once and will be advised of where they can get support and advice if they are at risk of homelessness.

The Council will refer those who are at risk of homelessness to their Homelessness Trailblazer Service, which offers support to those at risk of homelessness at an early stage, for as long as the service is running.

The Council will offer additional support to vulnerable households where it is needed.

2.3.4 Support available to businesses

There is no formal Council policy for businesses, however businesses will be offered the first right of refusal on the new units available within the redevelopment. This means that businesses currently on the Estate will have priority for opening a business within the retail space being developed as part of the renewal scheme. This excludes those who are temporarily on the Estate under a short-term lease, which they entered into since the redevelopment started with full knowledge of the regeneration process and their temporary status.

As businesses will need to relocate temporarily, the Council will work with them on a phased rent increase over the next three years. Those who wish to sell their business have also been offered the chance to do so. One business has indicated they wish to pursue this and the Council has provided a figure based on their rateable value to extinguish their lease.

One business, a pharmacy, was identified by the Council as providing essential services to those living on the Estate. The Council is currently looking into ways to maintain the pharmacy throughout the redevelopment.

Existing businesses have also been offered bespoke business development support in order to ensure they are equipped to maximise the opportunity that the regeneration will bring and deal with the challenges of temporary relocation, such as information on how they might diversify their business.

3 Equality risks and opportunities

This chapter sets out a summary of the existing evidence of risks and opportunities associated with the Ebury Bridge Estate redevelopment and associated protected characteristic groups who may be differentially or disproportionately affected, based on the desk-based review which is available in Appendix B.

3.1 Summary

The below table summarises the existing evidence of potential risks and opportunities and associated protected characteristic groups who may be disproportionately or differentially affected, prior to consideration of any Council mitigation measures in place. Risks are defined as potential adverse effects resulting from the redevelopment, and opportunities are defined as potential benefits. Protected characteristic groups include those defined in Chapter 1. For the purposes of this EqlA, sub-groups have been identified within certain protected characteristic group categories based on the desk-based evidence review to improve the assessment.

- Within '**age**', all age ranges are considered, but specific sub-groups include children (aged under 16), younger people (aged 16-24), and older people (aged over 65).
- Within '**disability**' no effects on sub-groups have been found through the evidence review.
- Within '**marriage and civil partnership**' no effects on sub-groups have been found through the evidence review.
- Within '**race**', all races and ethnicities are considered, but the sub-group of Black, Asian and Minority Ethnic (BAME) is identified to refer to non-White British communities.
- Within '**religion and belief**', all religious and belief groups are considered, but the term 'Minority faith groups' refers to religious groups who are not Christian (Buddhist, Hindu, Jewish, Muslim, Sikh, and 'other').
- Within '**sexual orientation**' and '**gender reassignment**', all sexual orientations and gender statuses are considered, but the 'Lesbian, Gay, Bisexual, Transgender Plus' (LGBT+) community is considered together.
- Within '**sex**', the sub-groups of men and women are used.
- Within '**pregnancy and maternity**', pregnant women are reported as a sub-group where the effect only relates to pregnancy.

Table 3: Effects on residents during redevelopment

Effects on residents during redevelopment	Potentially affected groups	Risk or opportunity?
<p>Social infrastructure and access to community resources</p> <p>The renewal process can involve temporary or permanent resettlement of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. In particular it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood.</p> <p>This can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and pregnant women may also experience negative health impacts from this, including increased stress and anxiety.</p>	<ul style="list-style-type: none"> ● Children ● Older people ● Disabled people ● BAME people ● Minority faith groups ● Pregnant women 	Risk
<p>Access to finance and affordable housing</p> <p>Where renewal schemes require residents to resettle, it can lead to an increase in financial outgoings due to costs associated with moving and obtaining new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who experience difficulty accessing appropriate and mainstream financial services, such as bank accounts, loans and mortgages.</p>	<ul style="list-style-type: none"> ● Young people ● Older people ● Disabled people ● BAME people ● Women 	Risk
<p>Appropriate and accessible housing</p> <p>Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable temporary and permanent housing that meets the needs of families with children, groups that are more likely to face overcrowded housing conditions and people requiring adaptable and accessible housing.</p>	<ul style="list-style-type: none"> ● Children ● Disabled people ● BAME people 	Risk
<p>Health effects</p> <p>Health effects may arise as a result of the environmental effects of demolition and construction processes, such as changes to air quality or noise pollution. Health effects may also result from social isolation due to housing relocation, such as poorer mental health, obesity, alcoholism, and a greater risk of hospitalisation.</p>	<ul style="list-style-type: none"> ● Older people ● Disabled people ● Pregnant women ● Children 	Risk
<p>Safety and security</p> <p>In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.</p> <p>It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and BAME people.</p>	<ul style="list-style-type: none"> ● Young people ● Disabled people ● BAME people ● LGBT people ● Men ● Older people ● Women ● Children 	Risk
<p>Accessibility and mobility in the area:</p> <p>Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.</p>	<ul style="list-style-type: none"> ● Older people ● Disabled people 	Risk

Effects on residents during redevelopment	Potentially affected groups	Risk or opportunity?
<p>Information and communication: The process of regeneration often requires two-way communication between residents and the council and or housing authorities in order for residents to understand the options available to them. The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication</p>	<ul style="list-style-type: none"> ● Older people ● Disabled people ● BAME people 	Risk

Table 4 Effects on businesses during redevelopment

Effects on businesses during redevelopment	Potentially affected groups	Risk or opportunity?
<p>Loss of employment The renewal process may result in the temporary or permanent closure and/or relocation of businesses. These changes may create redundancies or result in current business owners and staff being unable to access employment, due to relocation of the business to a difficult to access location for staff, businesses that are only viable as they serve a specific local need or community, or older people who lack the time or resources to re-establish a business ..</p>	<ul style="list-style-type: none"> ● BAME people ● Older people ● Disabled people ● Young people ● Women 	Risk
<p>Impact of redundancy on health and well-being Involuntary job loss due to redevelopment and renewal can have differential health and well-being effects for certain groups. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions. Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.</p>	<ul style="list-style-type: none"> ● Older people ● Children 	Risk
<p>Difficulty accessing commercial finance For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises, which can be more difficult for particular groups.</p>	<ul style="list-style-type: none"> ● BAME people 	Risk
<p>Reduced job satisfaction Redevelopment may result in the relocation of businesses. This may increase commuting distances for owners and employees, which studies have shown as having a greater impact on job satisfaction for women over men.</p>	<ul style="list-style-type: none"> ● Women 	Risk

Table 5 Effects on Ebury community following redevelopment

Effects following redevelopment	Potentially affected groups	Risk or opportunity?
<p>Improved housing provision: Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption. Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home.</p>	<ul style="list-style-type: none"> ● Children ● Older people ● Disabled people ● BAME people 	<p>Opportunity</p>
<p>Provision of community resources and improved social cohesion Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation. An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.</p>	<ul style="list-style-type: none"> ● Children ● Older people ● Disabled people ● BAME people ● Pregnant women ● LGBT 	<p>Opportunity</p>
<p>Improved public realm and green space Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition the opening up of green space has been shown to impact positively on both physical and mental health. Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child’s cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.</p>	<ul style="list-style-type: none"> ● Children ● Older people ● Disabled people ● BAME people 	<p>Opportunity</p>
<p>Tackling crime and disorder Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.</p>	<ul style="list-style-type: none"> ● Young people ● Disabled people ● BAME people ● LGBT people ● Men ● Older people ● Women ● Children 	<p>Opportunity</p>
<p>Improved access, mobility and navigation: Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.</p>	<ul style="list-style-type: none"> ● Children ● Older people ● Disabled people 	<p>Opportunity</p>

Effects following redevelopment	Potentially affected groups	Risk or opportunity?
<p>New employment opportunities: Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility.</p>	<ul style="list-style-type: none"> ● Older people ● Disabled people ● BAME people ● Women ● Young people 	Opportunity

4 Estate profile and proportionality

This chapter is split into three sections: the first provides an overview of the socio-demographic profile of the Estate. An overview of residential and business properties and community resources is provided in the second section. The third section provides the results of equality surveys that were undertaken by the Council.

It should be noted that, although attempts were made to capture data from those who are directly affected by the redevelopment, the Estate profile does not capture the demographics of all occupiers and owners of property within the Estate. Details of the equality survey can be found in Appendix C.

4.1 Socio-demographic profile of the area

The area profile summary below provides a demographic characterisation of the area in which the Estate falls. The baseline compares the socio-demographic profile of the Estate with the City of Westminster, the Greater London region, and England. The summary includes analysis of protected characteristic groups under the Equality Act 2010 and the current socio-economic context of the area. In comparing these regions, where the Estate deviates by more than 3%, the difference is considered to be significant and is reported as such.

The data used in the baseline is the most current publicly available data from the Office of National Statistics. Where there are higher proportions of certain groups on the Estate, this is written in **bold text**.

A more detailed breakdown of the baseline can be found in Appendix A.

The table also outlines where groups were identified through the equality surveys as being present on the Estate. Details of the surveys are available in Appendix C.

Table 6 Socio-demographic baseline

Protected Characteristic	Estate comparison with Westminster, Greater London and England ²⁹	Equality survey results ³⁰
Age	<ul style="list-style-type: none"> The proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%).³¹ Population of young people (16-24) is consistent with other areas. The percentage of working age people (aged between 16 and 64) (66%) is lower than Westminster (71%) but broadly in line with Greater London and England (65% and 64%, respectively). 	<ul style="list-style-type: none"> In both the resident surveys, a range of ages were represented across households. Households with children (15), young people (16), working age people (65) and older people (33) were identified through the surveys. Across the commercial properties which completed the survey, there is a spread in the ages of the reported owners. Older people were identified but no younger people (under 25) were highlighted. The same is also true across those employed

²⁹ ²⁹ To determine the population within the Estate code point data was used. Code point data is a point representing a postcode area (there are multiple within the Estate boundary). Each code point is assigned with Lower Super Output Area (LSOA) data from the LSOA that the point falls in. An LSOA is the smallest geographical area (an average of 1,500 residents and 650 households) for which most population data is published (beyond Census data).

³⁰ Some households may be double-counted as results are from two separate and different surveys.

³¹ When comparing populations between areas, where the Estate differs by more than 3%, the difference is considered to be significant and is reported this way – e.g. <3% is consistent with other areas and >3% is higher or lower than other areas.

	<ul style="list-style-type: none"> Population of older people (65+) living on the Estate (10%) is consistent with Greater London (12%) and lower than Westminster (13%) and England (18%). The percentage of older people over 65 years within the Estate (10%) is broadly in line with Westminster and Greater London (13% and 12%, respectively) but lower than England (18%). 	<p>by the commercial properties who took part in the survey.</p> <ul style="list-style-type: none"> None of the commercial properties which completed the survey, reported having an owner or employing any staff with a long-term physical or mental health condition, disability or illness. However, two properties did not know or preferred not to disclose such information about their employees.
<p>Disability³²:</p>	<ul style="list-style-type: none"> There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<ul style="list-style-type: none"> 39 households who responded to the surveys identified at least one disabled person in the household. None of the commercial properties which completed the survey, reported having an owner or employing any staff with a long-term physical or mental health condition, disability or illness. However, two properties did not know or preferred not to disclose such information about their employees.
<p>Gender reassignment</p>	<ul style="list-style-type: none"> No information is publicly available for the Estate.³³ 	<ul style="list-style-type: none"> No households who responded to the survey identified a household member as being trans. None of the commercial properties which completed the survey reported having owners or employing staff who identify as trans. However, two properties did not know or preferred not to disclose such information about their employees.
<p>Marriage and civil partnerships</p>	<ul style="list-style-type: none"> Population of those who are married or in a civil partnership is lower than or consistent with other areas. 	<ul style="list-style-type: none"> 30 households who responded to the surveys identified at least one person who is married or in a civil partnership in the household. The commercial properties which took part in the survey identified some owners who are married. The same is also true for employees.
<p>Pregnancy and maternity</p>	<ul style="list-style-type: none"> The general fertility rate (live births per 1000 women aged 16-44) and total fertility rate (avg. number of children born per woman) is lower than other areas. 	<ul style="list-style-type: none"> No respondents to the surveys identified anyone in their household as currently pregnant, however 3 households identified someone as being pregnant in the last 12 months. None of the commercial properties which took part in the survey reported any of their owners or employees as being, or recently having been, pregnant. Two of the properties, did not know or preferred not to disclose such information about their employees.
<p>Race</p>	<ul style="list-style-type: none"> The Estate has a lower proportion of people from a Black, Asian or Minority 	<ul style="list-style-type: none"> 61 households who responded to the surveys identified at least one person who

³² Defined here as 'People whose day to day activities are limited in any way as a result of being disabled or because of a long-term health condition'

³³ For the purpose of this report, it is assumed that the proportion of Trans people is in line with other areas. However, it should be noted that effects on this group are still assessed in light of Council mitigation measures and recommendations made on the assumption that this group is present on the Estate.

	<p>Ethnic (BAME) background (43%) when compared to Westminster (61%) and Greater London (55%) but higher than England (20%).</p> <ul style="list-style-type: none"> There is a higher percentage of Other White people in the Estate (19%) compared to London (13%) and England (5%), but this is broadly in line with Westminster (21%). The next largest minority ethnic group on the Estate is Irish, followed by Mixed - White and Black African. 	<p>was from a BAME background in the household.</p> <ul style="list-style-type: none"> The commercial properties which took part in survey reported having owners and employing staff who are from a BAME background. Two properties did not know or preferred not to disclose such information about their employees.
<p>Religion</p>	<ul style="list-style-type: none"> The Estate has a higher proportion of Christian residents in comparison to the City of Westminster and London but lower than England. Muslim is the next largest religious group represented on the Estate Populations of people from other religious and faith groups are consistent with other areas. 	<ul style="list-style-type: none"> A range of religious beliefs were identified through the surveys. Of those who responded to the surveys, most households who identified as having a religion had at least one person who was Christian. The next most common religion was Muslim. The commercial properties which took part in the survey reported having owners and employing staff who identified with a religion. Two properties did not know or preferred not to disclose such information about their employees.
<p>Sex</p>	<ul style="list-style-type: none"> The population of men and women is consistent with other areas. 	<ul style="list-style-type: none"> Both men and women were identified through the household surveys. The commercial properties who took part in the survey identified having male owners as well as female. The same is also true for those employed by the properties. Two of the properties preferred not to disclose or didn't know about their staff.
<p>Sexual orientation</p>	<ul style="list-style-type: none"> No information is publicly available for the Estate.³⁴ 	<ul style="list-style-type: none"> Of the households who took part in the surveys, six households identified at least one person as having a sexual orientation other than straight. Across those commercial properties which took part in the survey it was reported that there are those with an alternative sexual orientation to heterosexual. One property preferred not to say about the owner and two preferred not to disclose or didn't know about their staff.

4.2 Residential properties, business and community resources

4.2.1 Overview of residential properties on the Estate

There are 134 residents currently living on the Estate. Those dwelling within the properties are a mix of secure Council tenants, non-secure Council tenants living in Temporary Accommodation, private tenants and resident leaseholders. There are 59 secure Council tenants who previously resided within the Estate but have temporarily moved due to the rehousing process and are waiting to return. There are 26 non-resident leaseholders owning property within the Estate.

³⁴ As above, impacts on different sexual orientations groups (e.g. LGB people) are assessed in the same way as those on trans people.

Table 7: Residents by tenure type ^{*35}

Tenure type	Number of residents
Secure tenants living onsite	75
Secure tenants offsite waiting to return	59
Non-secure tenants (Temporary Accommodation)	6
Private Tenants	26
Resident Leaseholders	27

Source: Westminster City Council, 2020

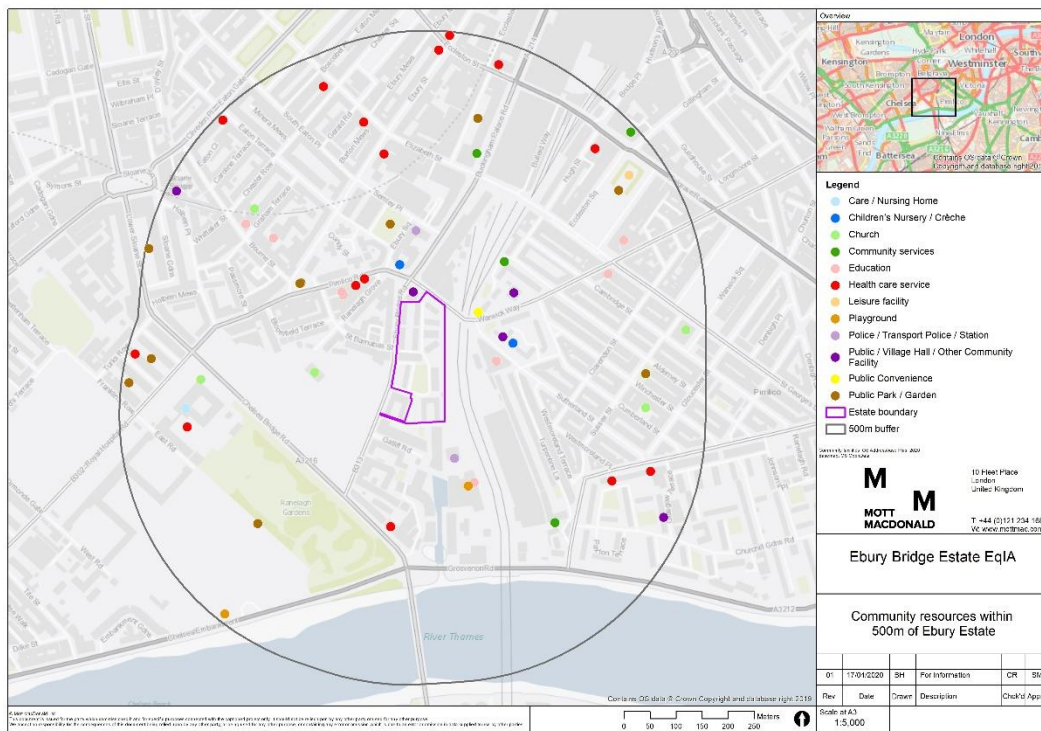
4.2.2 Overview of community resources on the Estate

There are a number of community facilities and resources located both within, and in close proximity to, Tustin Estate which are likely to be accessed by protected characteristic groups, or if they were to be lost, would potentially adversely affect protected characteristic groups. Within the estate boundary there are a few facilities, including a community green space, children’s playground, community garden and multi-use games area. During the initial stages of the EqIA there was a youth centre on the Estate within Edgson House, however the youth centre has since closed due to lack of interest from the community. The organisation running programming at the youth centre has been invited to do so within the facilities that will be built on the redeveloped Estate.

Within 500m of the Estate there are the following community resources: 15 health care services, one care / nursing home, two children’s nurseries, five churches, four community services, eight educational facilities, one leisure facilities, one playground, two police stations, five public / village hall / other community facilities, one public convenience and nine public parks or gardens.

³⁵ Correct as of May 2020

Figure 7: Community resources with 500m of the Estate



Source: AddressBase, 2020

4.2.3 Overview of businesses on the Estate

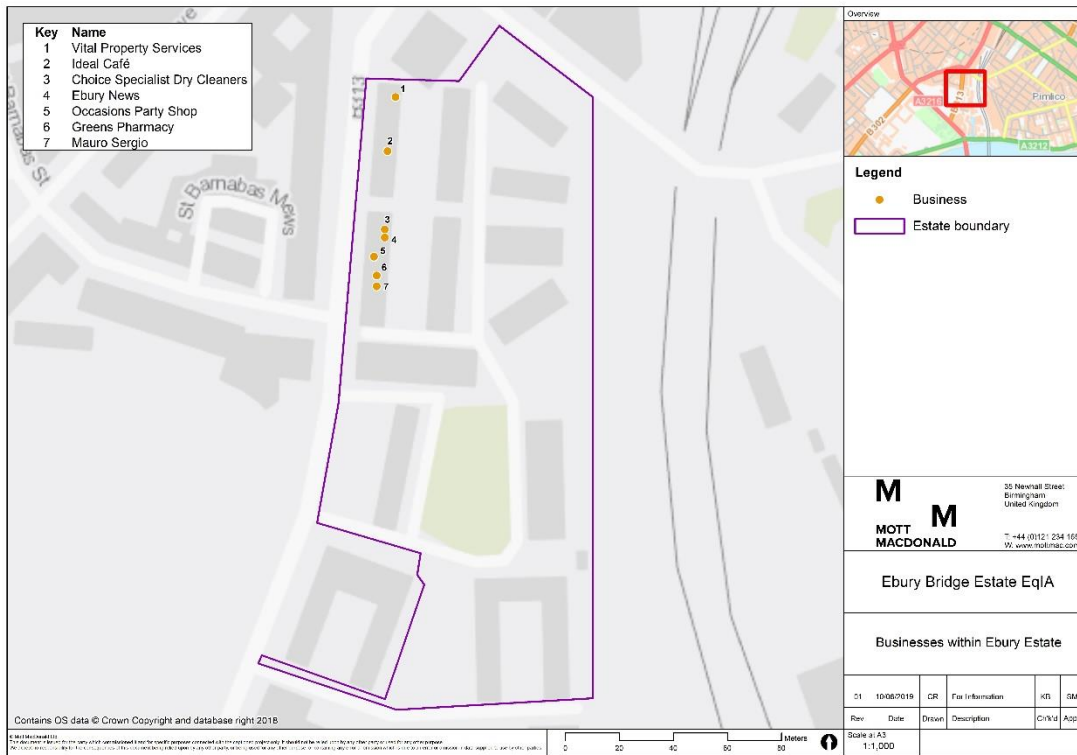
There are seven commercial properties which have been identified within the Estate that have been in occupation from the beginning of the redevelopment process. According to the equality survey results discussed later in this chapter, the businesses are microbusinesses – small in size, owned by one to two people, with one to four employees. These may be affected by the demolition and rebuild of the Estate, which could have equality impacts on owners and employees, and potentially local residents who are customers.

Table 8 below describes the businesses and their type, whilst Figure 7 maps their location.

Table 8 Businesses on the Estate

Name	Type	Location
Vital Property Services	Estate Agents	Unit 3, Ebury Bridge Road
Ideal Café	Café	Unit 11-13, Ebury Bridge Road
Choice Specialist Dry Cleaners	Dry Cleaners	Unit 21, Ebury Bridge Road
Ebury News	Newsagent	Unit 23, Ebury Bridge Road
Occasions Party Shop	Party Shop	Unit 27, Ebury Bridge Road
Greens Pharmacy	Chemist	Unit 29-31, Ebury Bridge Road
Mauro Sergio	Hairdressers	Unit 33, Ebury Bridge Road

Figure 8: Businesses on the Estate



Source: Mott MacDonald 2020

4.3 Use of the Estate profile information in the EqIA

The demographic information about the Estate gained through the engagement outlined above and through publicly available data is considered to be sufficient to provide a picture of the Estate and to make judgements based on this information.

It should be noted that in considering effects, potential effects have not been ruled out if a protected characteristic group has not been identified on the Estate. Rather, the information gathered has been used to identify where there may be disproportionate effects on groups.

5 Impact assessment

This chapter sets out the results of the detailed Equality Impact Assessment of the redevelopment on protected characteristic groups and outlines existing Westminster Council mitigation measures.

5.1 Overview

The following table summarises the potential effects of the redevelopment on those living and operating businesses on the Estate, specifically in relation to their protected characteristics. The review of existing literature has highlighted the potential impacts that might be experienced by each protected characteristic group, and the in-depth literature review, broken down by impact and group affected, can be found in Appendix B. The table also considers where groups may be disproportionately affected, understood through the information provided in the demographic profile of residents, community resources and commercial properties, available in Chapter 4.

Assessment of equality effects is undertaken in light of the sensitivity of the affected parties to the redevelopment and distribution of those groups on the Estate, established through the above activities, as well as the nature of the effect (such as whether it is permanent or temporary) and mitigating actions that been put forward by the Council, such as rehousing assistance and compensation measures. As well as focusing on the impact on equality groups on the Estate during redevelopment, this chapter also considers the potential effects on the Estate community and wider City of Westminster community following redevelopment, including the potential for reduction of existing inequalities on the Estate.

The need for existing residents and businesses to relocate is the main consequence arising from the redevelopment. All residential property and businesses will have to be vacated to enable the Estate to be demolished and redeveloped. Those that will be relocating will likely include vulnerable people who may differentially or disproportionately experience effects resulting from demolition of housing or businesses and temporarily moving.

Once delivered, the regeneration will result in the provision of new and improved housing stock (including affordable housing) within the City of Westminster, and also addressing existing issues of poor quality housing (creating issues such as accessibility, fuel poverty, and overcrowding) for those living on the Estate. There will also be improvements to the public realm and community resources which will help improve equality for those on the Estate, such as changes that will affect safety, accessibility, inclusion and health and well-being. There is also the opportunity for increased business opportunities for existing and new businesses in Westminster.

All of this is considered in light of the protected characteristics of those who may be affected in the table below.

Table 9 Impact on residents during redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Social infrastructure and access to services:</p> <p>The renewal process involves temporary and permanent resettlement of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood.</p> <p>This can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and pregnant women may also experience negative health impacts from this, including increased stress and anxiety.</p> <p>Within 500m of the Estate there are the following community resources: 15 health care services, one care / nursing home, two children's nurseries, five churches, four community services, eight educational facilities, one leisure facility, one playground, two police stations, five public / village hall / other community facilities, one public convenience and nine public parks or gardens.</p> <p>The loss of social connections may result in disproportionate effects on certain groups on the Estate due to increased distances to community resources such as local schools (e.g. St Barnabas Primary school, St Gabriel's School, Churchill Gardens Primary Academy and Pimlico Academy) or cultural and religious facilities (e.g. St Barnabas' Church Pimlico and St Mary's Church). Local shops, such as those on Ebury Bridge</p>	<ul style="list-style-type: none"> • Children • Older people • People from BAME backgrounds • Disabled people • Pregnant women • Religion and belief 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> • Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • Religion and belief: Publicly available data shows that there is a higher proportion of Christian residents on the Estate compared to the rest of the borough. 	<p>To mitigate these effects, the Council has set out the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas (as summarised in section 2.3) to provide information on housing options, financial compensation and practical support for residents. The key mitigation in this policy that responds to maintaining social connections within the Estate is that all existing Council tenants and resident leaseholders will have a right to return to a new home on the redeveloped Estate.</p> <p>Within the policy, the Council recognises that many tenants and leaseholders have connections to their local area and will want to remain there. A range of rehousing options (including replacement affordable housing options such as social rent and intermediate ownership) are available for tenants and leaseholders who want to stay in or close to the Estate to suit different circumstances. This should help residents to ultimately be able to return to the Estate, and therefore continue to access the social infrastructure that is important to them.</p> <p>Where households are rehoused temporarily or permanently, their housing needs will be considered.</p> <ul style="list-style-type: none"> • The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems – where a resident leaseholder cannot return as an owner the Council will offer a Council tenancy. • All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. • Private tenants have been offered rehousing support through the Trailblazers service on the basis of their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. • Temporary Accommodation (TA) tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere <p>There is also dedicated support available to residents who need to access it, for ongoing information around the redevelopment.</p> <p>In terms of enhancement measures, the redevelopment consists of new community infrastructure.</p>	<p>This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas.</p> <p>To manage any residual effects it is recommended that the Council:</p> <ul style="list-style-type: none"> • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to-date records of changing needs and circumstances– particularly those who are most affected by relocation; • continue to hold community meetings and events during the process of redevelopment, including events for residents who have relocated in order to remediate feelings of social isolation; • continue to work with local businesses to prevent business closures and ensure residents in the area can continue to access their services; • continue to communicate rehousing options to residents, including processes for accessing Council housing and affordable housing being built as part of the redevelopment; • continue to offer support to those in private accommodation through the Trailblazer service; • ensure that access to community resources is maintained throughout the renewal process where possible; and • for families with school-aged children, temporary or permanent housing off the Estate should not be at such a distance as to necessitate and involuntary school change.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
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Road, may also decide to close as a result of the redevelopment.

Access to finance and affordable housing:

Where renewal schemes require residents to resettle, it can lead to an increase in financial outgoings due to costs associated with moving and obtaining new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who experience difficulty accessing appropriate and mainstream financial services, such as bank accounts, loans and mortgages.

- Young people
- Older people
- People from BAME backgrounds
- Disabled people
- Women

Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:

- The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).
- There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).

Housing options are available within the HRA, which include replacement of housing for existing Council tenants and leaseholders on the Estate. A mix of housing options will be available to provide a ladder of housing opportunity. At least 50% will be affordable for social and intermediate rent, including the homes set aside for those residents with a right to return to the Estate.

For resident leaseholders, an equity loan scheme is available to help with buying one of the new properties which will be of a higher value but will have similar costs to their existing home.

As set out above, there is also support for vulnerable private tenants and TA tenants to source suitable housing.

The Council has developed strategies to ensure that residents are able to access finance in order to relieve some of the financial burden associated with relocation. These include the following compensation measures:

- Compensation equal to the open market value of the property (for leaseholders);
- **Home loss payments**, a sum in recognition of the inconvenience of having to move out of an existing property, which is set at a minimum of £6,400 (as of April 2020); and
- **Disturbance payments** for reasonable expenses arising as a direct consequence of the Council purchase of a property. These payments may include costs such as costs of removals (including additional support for vulnerable residents), disconnections and reconnections, redirection of mail, fitting of existing curtains and carpets, early

This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas.

To manage any residual effects, it is recommended the Council:

- continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to date records of changing needs and circumstances– particularly those who are most affected by financial exclusion, who may be experiencing increased financial insecurity due to Covid-19;
- continue to communicate rehousing options available to residents, including information for private tenants, Temporary Accommodation tenants and leaseholders on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby;
- ensure homes built on the Estate provide a mix affordable housing options e.g. social rent and shared ownership/equity options. As of July 2020, the current planned housing mix provides this range of options; and
- explore service charge levels in detail to determine whether there are mechanisms to maximise affordability for those wishing to return to the Estate.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
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mortgage redemption fees or mortgage and tender fees arising from the purchase of a new property, stamp duty land tax and other fees arising from the purchase of a replacement property and costs of new school uniforms.

This compensation and availability of affordable housing options will serve to manage the main financial effects of rehousing.

<p>Appropriate and accessible housing:</p> <p>Certain groups who currently reside on the Estate may experience adverse effects if temporary or permanent rehousing is not adequate for their needs.</p> <p>Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children and people requiring adaptable and accessible housing.</p>	<ul style="list-style-type: none"> • Children • Disabled people • People from BAME backgrounds 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> • Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>As set out above, the Council has developed policies to ensure that there is support available for finding appropriate and accessible housing. Where households are rehoused temporarily or permanently, their housing needs will be considered.</p> <ul style="list-style-type: none"> • The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems. • All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. • Private tenants have been offered rehousing support through the Trailblazers service on the basis of their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. • Temporary Accommodation tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere. <p>Those with special accessibility requirements are prioritised through the rehousing process. Where possible they are relocated in the HRA, otherwise housing that suits their needs is sourced in the local area. Adapted and accessible housing has been found for all current tenants requiring it, which meets mobility and housing</p>	<p>This effect is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> • when re-providing any accessible or adaptable housing as part of the redeveloped Estate, the new housing should ensure there is adequate specialised housing for disabled people including homes for wheelchair users; • when re-providing housing as part of the redeveloped Estate, ensure there is adequate housing to suit the needs of families; this includes providing a sufficient number of homes with more than two bedrooms within the total number of units provided, to prevent any overcrowding; • ensure that work begins as early as possible on sites where a large increase in the provision of affordable homes is possible; • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to date records of changing needs and circumstances – particularly those who are most affected by a loss of affordable and appropriate housing; and • continue to provide information on rehousing options available to residents, including information for private tenants, Temporary Accommodation tenants and leaseholders on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby.
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Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
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			<p>needs as assessed through the Housing Needs Assessment process. Adaptations may also be funded through disturbance payments.</p> <p>Housing for families will be provided as part of the redevelopment, including replacement housing for families based on the number of bedrooms required, to prevent any over crowding.</p> <p>The overall housing provision on the Estate will be enhanced by re-providing homes to a higher standard with lower energy and maintenance costs, ensuring housing on the Estate meets residents' needs and involving residents in the design of the new homes.</p>	
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Health effects:

Evidence has suggested health effects related to housing demolition, such as changes to air quality and noise pollution and effects related to housing displacement, such as social isolation, can arise for particular groups that are represented within the Estate and local area.

Some groups, such as older and disabled people can differentially experience both isolation and construction effects, which can create more severe health impacts on these groups.

- Children
- Older people
- Disabled people
- Pregnant women

Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:

- **Children:** the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%).
- There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).

In order to manage health effects related to stress due to relocating, the Council will be providing rehousing support (as outlined above).

To manage health effects related to noise and air quality, demolition works will be monitored closely and disruption will be minimised as much as possible.³⁶ This would typically be managed through the creation of a Construction Environmental Management Plan (CEMP), which would be implemented by the contractor carrying out the works.

This impact is considered to be managed overall through the mitigation measures set out.

To manage any residual effects, it is recommended that the Council:

- continue to provide ongoing support to residents through the rehousing process;
- identify and work with vulnerable people whose protected characteristics may make them more vulnerable to adverse health effects; and
- develop a CEMP as part of the demolition and construction works.

³⁶ City of Westminster (2019) Ebury Bridge News April 2019. Available at: https://www.westminster.gov.uk/sites/default/files/203_1_wcc_ebury_bridge_newsletter_april_issue_21_aw.pdf

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Safety and security</p> <p>In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime.</p> <p>It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and BAME people.</p>	<ul style="list-style-type: none"> Young people Older people BAME people Disabled people LBGT people Men Women 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<p>Effects on personal security will be managed through security that is in place seven days a week between 7PM and 5AM as well as hoardings used to secure empty blocks and additional lighting. There is also a process in place for reporting and addressing any incidents of Anti-Social Behaviour (ASB) within the Estate. This process has been publicised through the Ebury Bridge newsletter.³⁷</p>	<p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> consider the use of Property Guardians, people who will reside in and oversee the property for a short term, to secure the vacant Estate properties; and continue to monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with remaining residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.
<p>Accessibility and mobility in the area:</p> <p>Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.</p>	<ul style="list-style-type: none"> Older people Disabled people 	<ul style="list-style-type: none"> There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<p>The Council is engaging with residents on an ongoing basis around parking and access requirements.</p> <p>Accessibility of the Estate will be considered through the process of construction planning (e.g. ensuring hoarding does not sever the Estate).</p>	<p>The consultation process highlighted that some stakeholders are particularly concerned around parking. There are concerns that the scheme will have a negative impact on existing parking spaces on surrounding local roads.</p> <p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> ensure any blue badge / accessible parking is retained for homes requiring it; ensure that accessibility of the Estate is planned for and monitored through the construction process through the development of a CEMP.
<p>Information and communication:</p> <p>The process of regeneration often requires two-way communication between residents and the council and or housing authorities in order for residents to understand the options available to them.</p> <p>The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some</p>	<ul style="list-style-type: none"> Older people Disabled people BAME people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but 	<p>The Council has developed a robust engagement approach that has been ongoing since the early stages of the project.</p> <p>Engagement has been undertaken through a variety of mechanisms to ensure residents are kept informed of rehousing information, updates around the wider redevelopment and opportunities to provide feedback on the process.</p> <p>The consultation process has taken several forms to encourage participation and ensure that emerging designs were formed in collaboration with residents. Such processes included:</p> <ul style="list-style-type: none"> Community Futures Group: the steering committee has continued to play a key role in the delivery of the scheme during consultation. Dedicated consultation space: a vacant shop at No 9 Ebury Bridge Road has been used to 	<p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> monitor the reach and impact of online engagement (in particular, for the duration of the Covid-19 crisis) to ensure older people, disabled people and BAME people continue to be reached and are able to provide input to the redevelopment process; continue to advise residents on ways they can meaningfully engage in decision making and understand options available to them; continue to provide services such as language interpretation and face to face engagement; and continue to publish information and seek feedback through a variety of mediums and different formats.

³⁷ City of Westminster (2019) Ebury Bridge News April 2019. Available at: https://www.westminster.gov.uk/sites/default/files/203_1_wcc_ebury_bridge_newsletter_april_issue_21_aw.pdf

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication</p>		<p>lower than Westminster (61%) and Greater London (55%).</p>	<p>provide a welcoming and accessible space for residents to visit.</p> <ul style="list-style-type: none"> • Resident drop-ins: the designated redevelopment architects have provided themed sessions for residents to provide feedback. Subjects such as public realm, placemaking, re-housing and phasing have been covered. • Ebury Bridge website: a website has been created to provide an accessible platform for up to date scheme information. • Online consultation tool: for those unable to attend consultation events in person, or wanting to provide anonymous feedback, an online tool has been developed. • Newsletters: 26 editions of the Ebury Bridge Newsletter have been distributed over the last 18 months. Each copy provides details on how to give feedback. • Leaflet drops: all residents within a 1000m radius of the Estate have received leaflets and booklets with the option to provide feedback. • Targeted consultation meetings: the project team have met with 15 different amenity and resident groups in the area on a one-to-one basis. • Exhibition: a public exhibition was held over a two-week period. Three events took place on Saturday's and in the evenings to ensure participation.³⁸ • Mail out information packs: A printed pack has been distributed to all households with final design information, with a feedback form and link to provide feedback online. • Phone calls: Follow up phone calls have been made to suit different communication needs, to enable those who may find using online methods more difficult to provide feedback • Face to face meetings: In exceptional situations where it is required and the resident is not presenting symptoms, arrangements can be made to meet face to face using social distancing guidelines. 	

³⁸ Westminster City Council (2020): 'Ebury Bridge Estate Renewal: Second round consultation CFG'.

Table 10 Impact on businesses during redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
<p>Loss of business and/or employment:</p> <p>The renewal process may result in the temporary or permanent closure and/or relocation of businesses. These changes may create redundancies or result in current business owners and staff being unable to access employment, due to a number of reasons. These could include: relocation of the business to a location that is difficult to access for staff (those that cannot afford to or are otherwise unable to travel long distances); businesses that are only viable as they serve a specific local need or community (such as BAME communities), or older people who lack the time or resources to re-establish a business.</p> <p>Groups that are most likely to face barriers to employment are most likely to be affected by loss of employment.</p>	<ul style="list-style-type: none"> Older people Disabled people BAME people Young people Women 	<ul style="list-style-type: none"> Publicly available data is not available for businesses as it is based on place of residence. 	<p>Although there is no statutory obligation to relocate impacted businesses, in order to prevent businesses from facing closure, and their staff facing redundancy, the Council has developed support for businesses.</p> <p>There is no formal Council policy for businesses, however businesses will be offered the first right of refusal on the new units available within the redevelopment.</p> <p>As businesses will need to relocate temporarily, the Council will work with them on a phased rent increase over the next three years, to help mitigate financial impacts of moving to a higher value property.</p> <p>Those who wish to sell their business have also been offered the chance to do so. One business has indicated they wish to pursue this and the Council has provided a figure based on their rateable value to extinguish their lease.</p> <p>One business, a pharmacy, was identified by the Council as providing essential services to those living on the Estate. The Council is currently looking into ways to maintain the pharmacy throughout the redevelopment.</p> <p>Existing businesses have also been offered bespoke business development support in order to ensure they are equipped to maximise the opportunity that the regeneration will bring and deal with the challenges of temporary relocation, such as information on how they might diversify their business.</p>	<p>In 2019, feedback from businesses showed that they felt they had not been as engaged as residents in the redevelopment process. Following this, further actions were taken by the Council to improve their business response (see column, left).</p> <p>This impact is considered to be managed overall through the mitigation measures set out.</p> <p>To manage any residual effects, it is recommended that the Council:</p> <ul style="list-style-type: none"> continue to work proactively through face to face engagement with vulnerable business owners and employees; continue to provide business development support to help businesses deal with periods of discontinuity and change; maintain businesses in place for as long as possible, if they plan to return to premises on the Estate; ensure businesses are fully informed of the timescales that would affect them as soon as possible, including when they would need to vacate the premises and the period of time they would be inactive for before being able to reopen on the redeveloped Estate; consider providing financial support to businesses to facilitate relocation after Council takes possession of a property; and signpost to resources for finding employment or other support if an owner or employee is facing redundancy.
<p>Impact of redundancy on health and wellbeing:</p> <p>Involuntary job loss due to redevelopment and renewal can have differential health and well-being effects for certain groups.</p> <p>Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions.</p> <p>Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.</p>	<ul style="list-style-type: none"> Children Older people 	<ul style="list-style-type: none"> Publicly available data is not available for businesses as it is based on place of residence. 		
<p>Difficulty accessing commercial finance</p> <p>For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises, which can be more difficult for particular groups.</p>	<ul style="list-style-type: none"> People from BAME backgrounds 	<ul style="list-style-type: none"> Publicly available data is not available for businesses as it is based on place of residence. 		
<p>Reduced job satisfaction:</p> <p>Redevelopment may result in the relocation of businesses. This may increase commuting distances for owners and employees, which studies have shown as having a greater impact on job satisfaction for women over men.</p>	<ul style="list-style-type: none"> Women 	<ul style="list-style-type: none"> Publicly available data is not available for businesses as it is based on place of residence. 		

Table 11 Impact on community following redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
<p>Improved housing provision: Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption. Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home</p>	<ul style="list-style-type: none"> Children Older people Disabled people BAME people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>The regenerated Estate will provide improved housing, with respect to appropriateness, accessibility and affordability. In order to further enhance measures:</p> <ul style="list-style-type: none"> ensure final housing mix that is delivered meets the needs of current and future residents (e.g. ensuring at least 10% of homes are accessible); and where possible, provide new housing that exceeds current minimum building standards e.g. Decent Homes Standard.
<p>Provision of community resources and improved social cohesion Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation. An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.</p>	<ul style="list-style-type: none"> Children Older people Disabled people BAME people Pregnant women LGBT 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>The regenerated Estate will provide new community resources including a community space that will provide a mix of uses. In order to further enhance measures:</p> <ul style="list-style-type: none"> continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements; and monitor effects of increased population on community resources (such as schools and health care) and ensure these are mitigated.
<p>Improved public realm and green space Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition the opening up of green space has been shown to impact positively on both physical and mental health. Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.</p>	<ul style="list-style-type: none"> Children Older people Disabled people BAME people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<p>The regenerated Estate will provide additional green space and new play space. In order to further enhance measures:</p> <ul style="list-style-type: none"> enable ongoing involvement of the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people; and ensure that inclusive design principles are followed in the design of public spaces.
<p>Tackling crime and disorder Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.</p>	<ul style="list-style-type: none"> Young people Disabled people BAME people LGBT people Men Older people Women 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 	<p>The regenerated Estate will provide an opportunity to incorporate new security measures. This can be enhanced by:</p>

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
	<ul style="list-style-type: none"> Children 	<p>14%), however this figure is in line with the proportion of disabled people in England (17%).</p> <ul style="list-style-type: none"> The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). 	<ul style="list-style-type: none"> following Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm;³⁹ applying recommendations for safety and security in design where relevant (e.g. CCTV, lighting, active frontages that generate passive surveillance, design that avoids vandalism).
<p>Improved access, mobility and navigation: Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.</p>	<ul style="list-style-type: none"> Children Older people Disabled people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> Children: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<p>The regenerated Estate will improve connectivity and accessibility across the Estate. To enhance this, it is recommended to:</p> <ul style="list-style-type: none"> ensure the design of movement networks specifically addresses the mobility and user needs of different groups. This can be achieved by applying principles of inclusive design;⁴⁰ and apply design that creates a safer environment for all transport users by managing potential conflicts between modes.
<p>New employment opportunities: Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility.</p>	<ul style="list-style-type: none"> Older people Disabled people BAME people Women Young people 	<p>Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas:</p> <ul style="list-style-type: none"> The Estate has a higher proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). 	<p>The regenerated Estate will provide new retail space and opportunities for employment through construction jobs, meanwhile use spaces and apprenticeships secured via social value commitments. Where possible, current businesses are receiving support (as outlines above) to relocate to the new Estate. Beyond improving outcomes for existing businesses, there are also opportunities to improve equality of outcomes by:</p> <ul style="list-style-type: none"> working with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. BAME people, disabled people, young people.

³⁹ Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications

Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: <https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf>

⁴⁰ Design Council (2006) 'The Principles of Inclusive Design'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf>

Department for Transport (2005) 'Inclusive mobility'. Available at: <https://www.gov.uk/government/publications/inclusive-mobility>

Department for Transport (2007) 'Manual for Streets'. Available at: <https://www.gov.uk/government/publications/manual-for-streets>

6 Conclusions and action plan

6.1 Conclusion

The EqlA has identified a number of risks, opportunities and potential impacts that could arise for those with protected characteristics, as a result of the redevelopment of the Estate. The details of these impacts are set out in detail in Chapter 5: Impact Assessment.

The assessment has found that the regenerated Estate has the potential to provide improved living conditions, housing quality, accessibility, public realm and community facilities. There is, therefore, a compelling case in the public interest and for the existing Estate community for the redevelopment. This must be weighed against the acknowledged potential risks set out above. In this case, the Council has sought to mitigate these through a range of reasonable and proportionate measures focused on engagement, rehousing and relocation assistance and compensation options in order to improve the outcomes of the redevelopment for the current and future Estate community.

6.2 Action plan

The following action plan seeks to establish activities and responsibilities following the planning application to continue to identify and address equality issues where they arise.

Table 12 Action plan

Action	Responsibility	Implementation
<p>Create a communications and engagement plan which focusses on outreach through and following the planning application process, including:</p> <ul style="list-style-type: none"> Closely monitoring the reach and impact of online engagement methods through the Covid-19 crisis; continuation of engagement activities providing updates on designs, opportunities to provide feedback, and wider information on the development process <p>Consideration should be given to ensuring all information is provided in appropriate formats and languages to suit different needs, ensuring all consultation information is available to everyone.</p>	Westminster City Council	<p>Programme of future engagement events to be kept under review by the Council. Planning and development progress to be kept updated on the dedicated website.</p> <p>All information should be shared in a transparent manner.</p> <p>Marginalised groups to be included in decision-making processes throughout the entirety of the consultation process.</p> <p>Any extended public consultation process must therefore ensure delivery of proper feedback to local communities and use evidence-based community engagement initiatives.</p> <p>Any new equality issues that arise as a result of the engagement that are not identified in this document are flagged.</p> <p>Each task should be assigned to an appropriate party.</p>

Action	Responsibility	Implementation
<p>Follow up on equality concerns identified through outreach and engagement processes and maintain up-to-date records of changing needs. This is applicable to residents (*both tenants and leaseholders), and businesses.</p>	<p>Westminster City Council</p>	<p>The Council should ensure contact is maintained with all stakeholders so that any changing needs, particularly those of an equality nature as set out in this EqIA, are flagged.</p> <p>The circumstances of all stakeholders should be kept on record by the Council and the Council should seek to understand characteristics of any households affected by a CPO.</p> <p>A responsible party should be assigned.</p>
<p>Develop a strategy that highlights the responsible parties' commitment to supporting existing businesses and employment in the local area through the redevelopment.</p>	<p>Westminster City Council</p>	<p>The responsible parties should develop a clear written strategy for the existing businesses on the Estate</p> <p>This strategy should also address, if feasible, proposals for maximising employment, apprenticeship and training opportunities created by the development, for residents and the community.</p>
<p>Create a strategy to manage effectively the noise, air pollution and accessibility impacts during the construction works.</p>	<p>Westminster City Council</p>	<p>Before and during the construction period, measures should be implemented to limit the negative impacts of noise, reduced air quality and reduced accessibility.</p> <p>This could include the development and adoption of a CEMP, which should be made publicly available and accessible to all.</p> <p>A responsible party is to be assigned.</p>
<p>Determine what extra support could be provided to vulnerable residents, owners and employees. Consideration should be given to all recommendations detailed in the summary table in Chapter 5.</p>	<p>Westminster City Council</p>	<p>The Council will determine whether suggestions are reasonable and will update their approach to support and engagement as required.</p>

Appendices

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A. Area profile and proportionality

A.1 Socio-demographic profile of the area

The area profile below provides a wider contextual demographic characterisation of the area in which the Estate falls. The data includes the current social and economic context of the area and relevant comparators, namely the City of Westminster, the Greater London region, and England. In comparing these regions, where the Estate deviates by more than 3%, the difference is significant and is reported as such.

The demographic data has been sourced from publicly available data and only applies to the resident population.⁴¹

A.1.1 Age

The tables and figures below show the population for key age groups within the Estate and the above comparator areas. The figures show both the proportion and density of each age group within the different areas.⁴²

A.1.1.1 Children (under 16 years)

The table below indicates that the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%).

A.1: Children (under 16 years)

Location	Total population, 2018	Children (under 16 years)	%
Estate	1,174	150	24%
Westminster	317,256	42,869	17%
Greater London	8,908,081	1,834,795	21%
England	55,977,178	10,748,458	19%

Source: Office for National Statistics (2019) mid- year population estimates

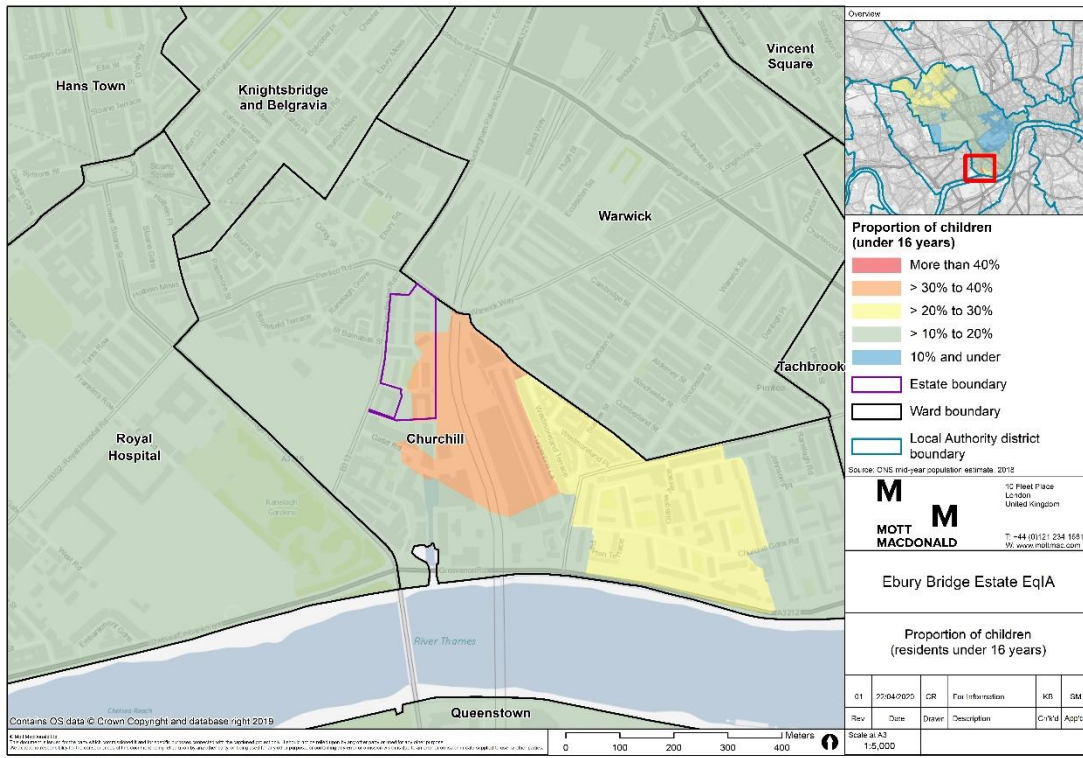
:

Map A.1, below, shows that the proportion of young people within the Estate is low to the north and west, but rises to 30- 40% in an area to the south east. These proportions are higher than most areas surrounding the Estate

⁴¹ In order to calculate statistics for the Estate, codepoint data was used, which includes a point representing each postcode area. Lower Super Output (LSOA) data is shared between the codepoints that fall within each LSOA, and is summed up for where the codepoints fall within the Estate.

⁴² In order to calculate statistics for the Estate, codepoint data was used, which includes a point representing each postcode area. Lower Super Output (LSOA) data is shared between the codepoints that fall within each LSOA, and is summed up for where the codepoints fall within the Estate.

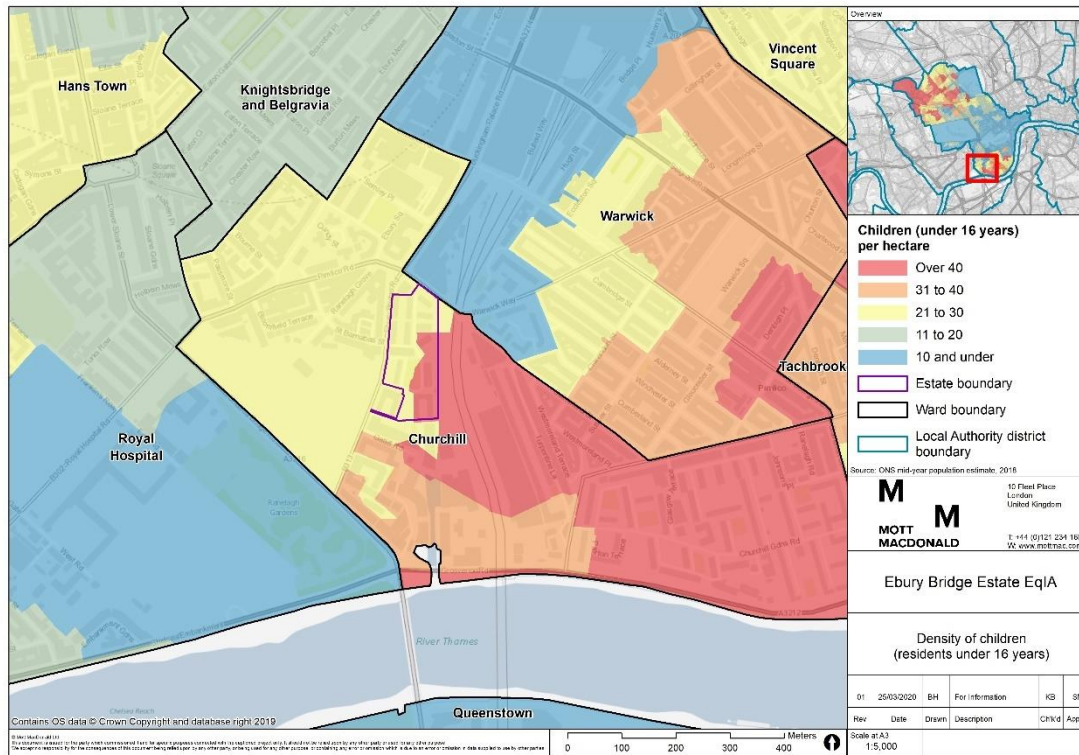
. A.1: Proportion of children on Estate



Source: Mott Macdonald, 2020

The following figure, Map A.2, illustrates that the population density of children on the Estate is higher than the areas to the north and west of the Estate.

A.2: Density of children on the Estate



Source: Mott Macdonald, 2020

A.1.1.2 Young people (16-24 years)

Table A.2 shows that the proportion of young people aged 16-24 within the Estate (9%) is broadly in line with Westminster, Greater London and England (11%, 10% and 11% respectively).

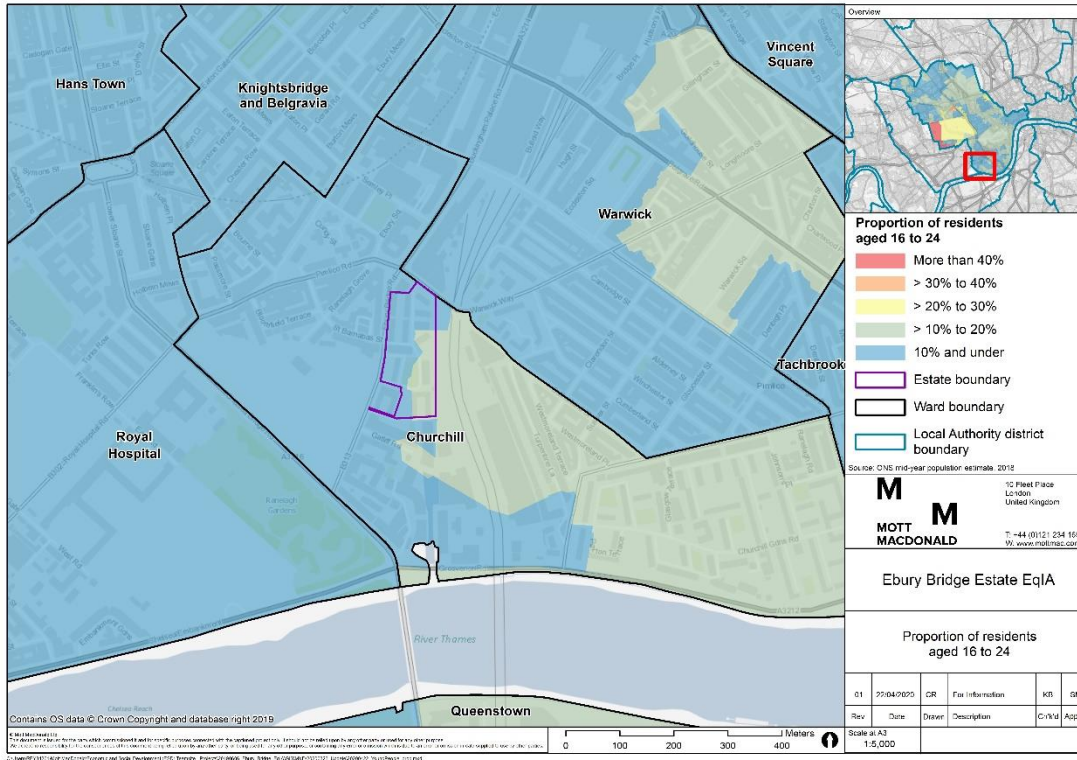
A.2: Young people (16-24 years)

Location	Total population, 2018	Young people (16-24 years)	%
Estate	624	57	9%
Westminster	255,324	28,126	11%
Greater London	8,908,081	933,076	10%
England	55,977,178	6,005,483	11%

Source: Office of National Statistics (2018) Mid- year population estimates

The map below shows that the proportion of young people is less than 10% in a large area to the north and west of the Estate but rises slightly to 10-20% in an area to the east of the Estate. These proportions are reflected in the areas immediately surrounding the estate.

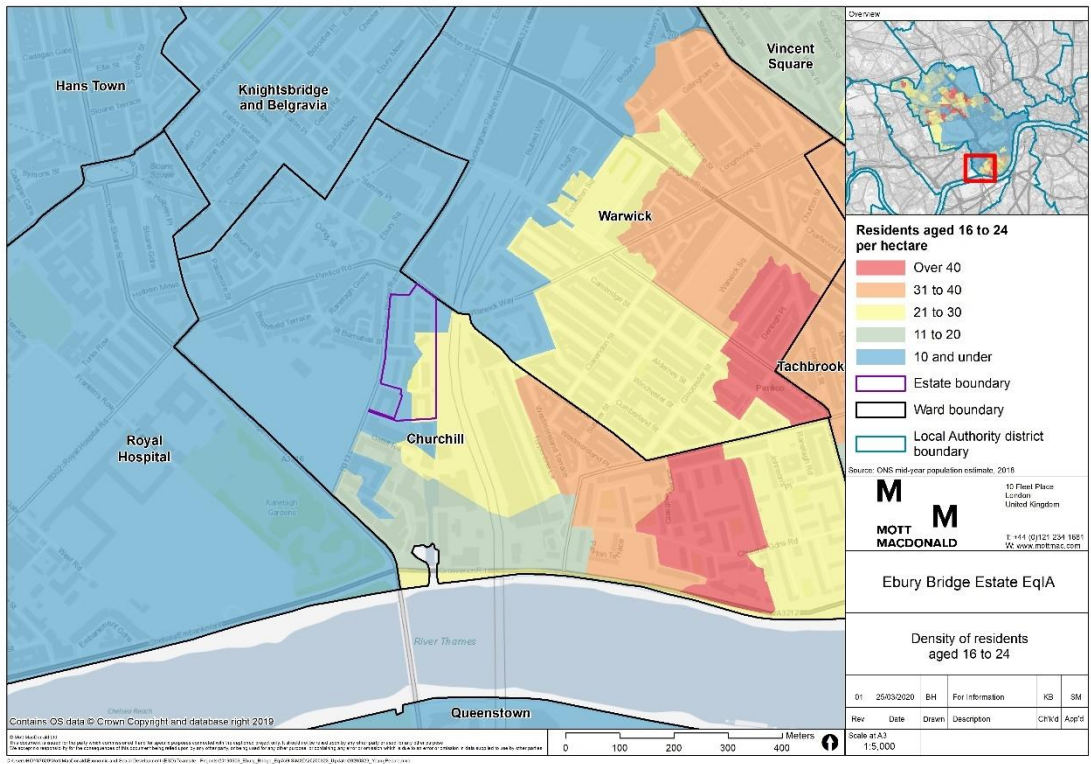
A.3: Proportion of young people on Estate



Source: Mott Macdonald, 2020

Map A.4, below, demonstrates that the density of young people in the Estate is low to the west, which is in line with the areas surrounding the Estate to the north and west. To the east of the estate, this density rises to 21 to 30 young people per hectare which is generally in line with the areas to the east.

A.4: Density of young people on the Estate



Source: Mott Macdonald

A.1.1.3 Working age people (16- 64)

The percentage of working age people (aged between 16 and 64) (66%) is lower than Westminster (71%) but broadly in line with Greater London and England (65% and 64%, respectively).

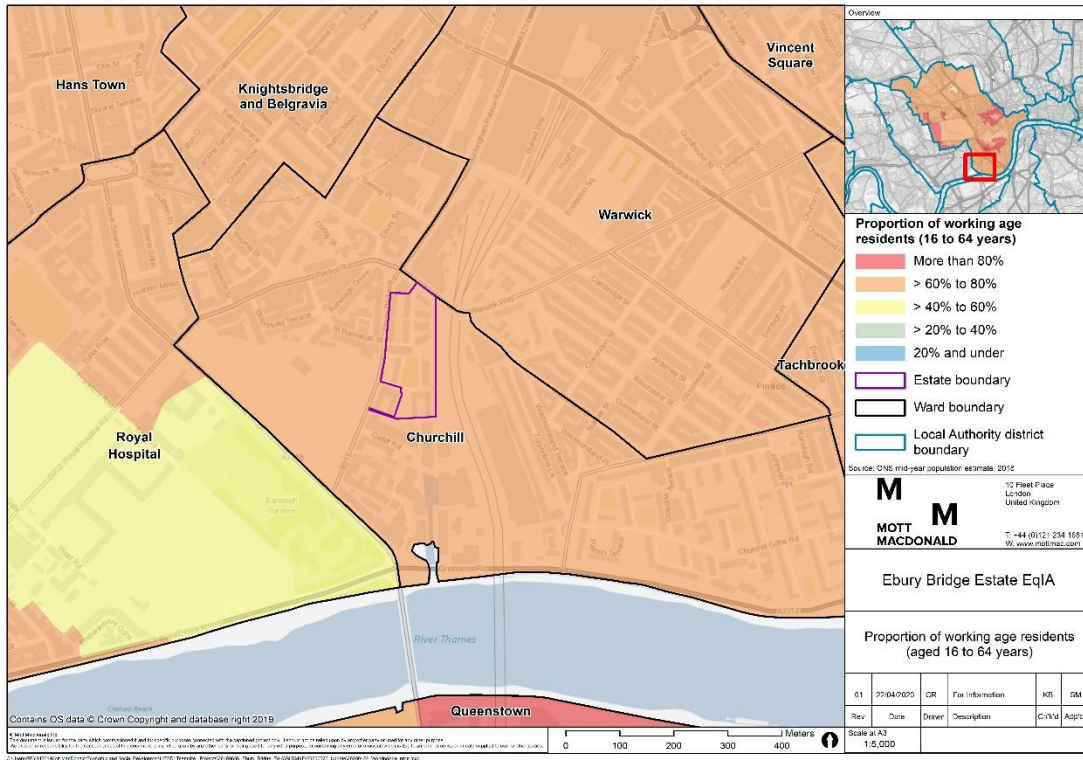
A.3: Working age people (16-64)

Location	Total population, 2018	Working age population	%
Estate	624	411	66%
Westminster	255,324	181,102	71%
Greater London	8,908,081	6,014,073	65%
England	55,977,178	35,049,467	64%

Source: ONS 2019 mid-year population estimates

Map A.5, below, demonstrates that there is a high proportion of working aged residents within the Estate and that this is reflected in the areas surrounding the Estate.

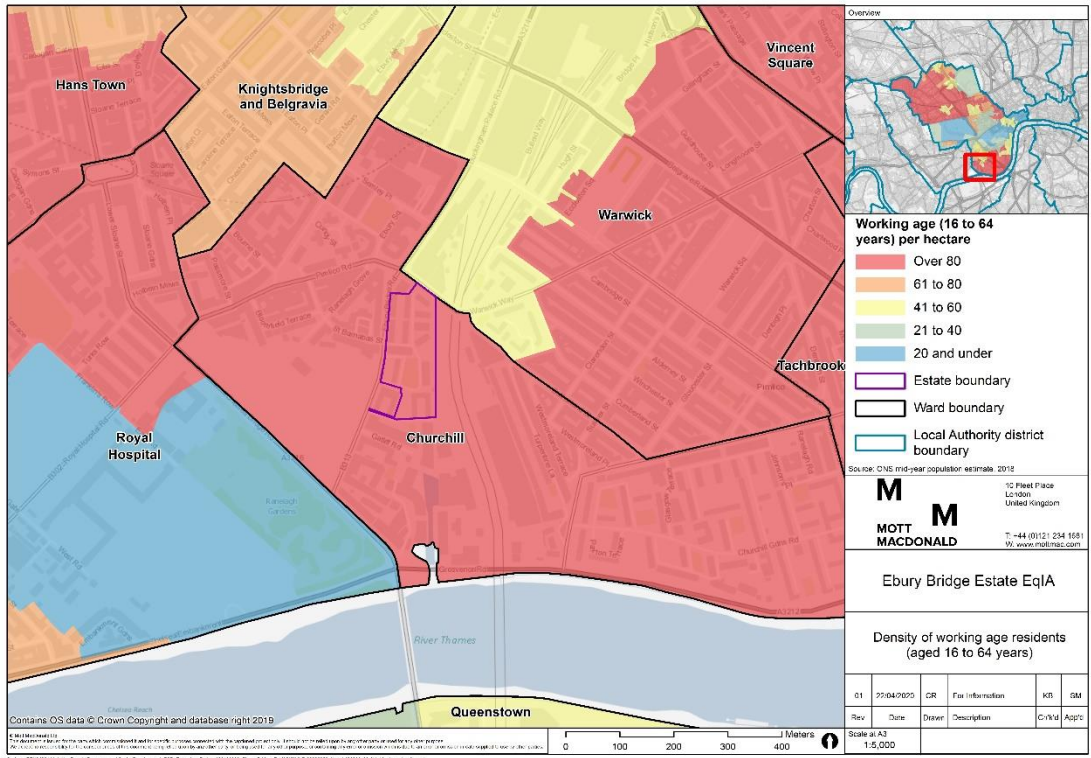
A.5: Proportion of working age residents on Estate.



Source: Mott Macdonald, 2020

The map below demonstrates that there is a high density of working age people within the Estate and this is reflected in most areas immediately surrounding the estate. However, this density falls in areas south and north of the Estate.

A.6: Density of working age residents on Estate



Source: Mott Macdonald

A.1.1.4 Older people (over 65 years)

The percentage of older people over 65 years within the Estate (10%) is broadly in line with Westminster and Greater London (13% and 12%, respectively) but lower than England (18%).

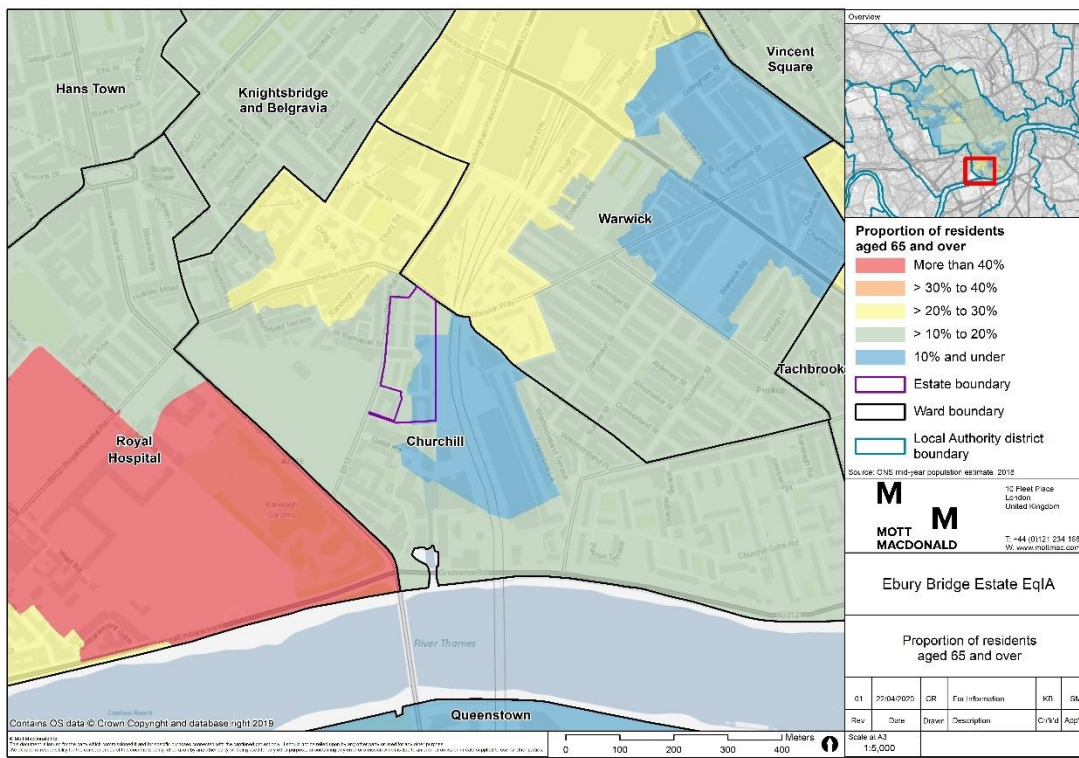
A.4: Older people (65+ years)

Location	Total population, 2018	Older people (65+ years)	%	%
Estate	1,174	64	10%	
Westminster	317,256	31,353	13%	8%
Greater London	8,908,081	1,059,213	12%	12%
England	55,977,178	10,179,253	18%	18%

Source: Office for National Statistics (2019) Mid-year population estimate

The map below demonstrates that there is a low proportion of older people living within the Estate. To the north and west areas of the site this is slightly higher, at between 10 and 20%, but this falls to under 10% in the area to the south east. This is mostly in line with the surrounding areas; however, it is lower than in the areas immediately to the north of the Estate.

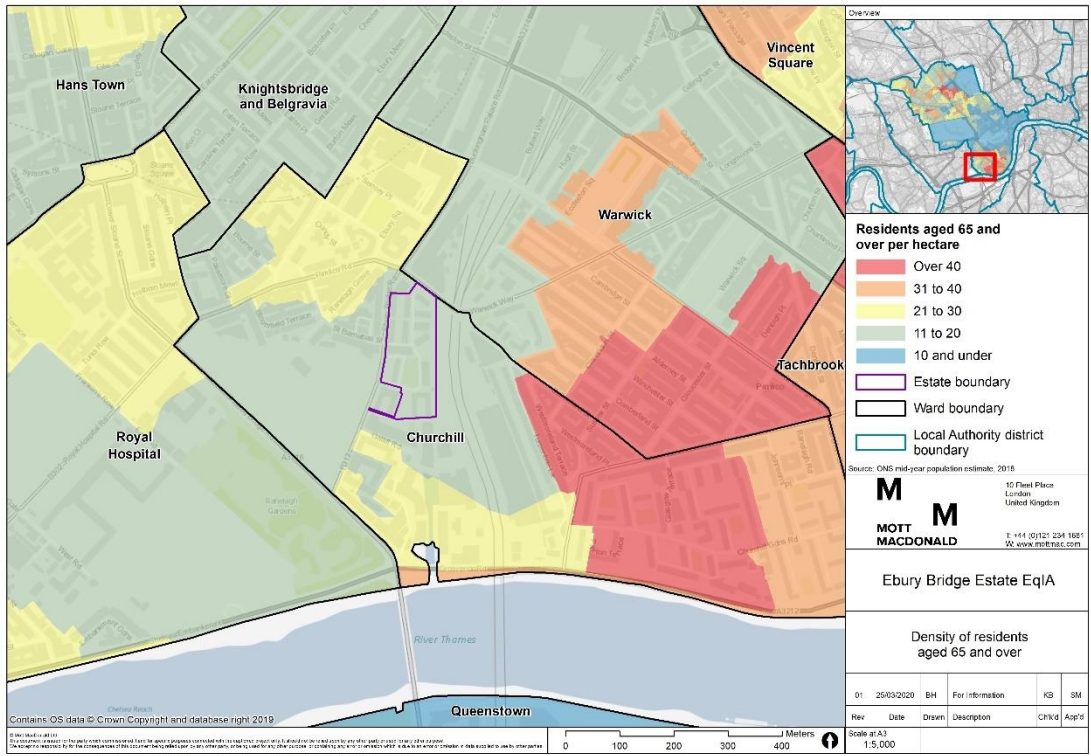
A.7: Proportion of older residents on estate



Source: Mott Macdonald, 2020

Map A.8, below, demonstrates that that density of older people over 65 years within the Estate, from 11- 20 older persons per hectare is in line with the proportion of older people living in the areas immediately surrounding the Estate, but lower than areas further east.

A.8: Density of older residents on Estate



Source: Mott MacDonald, 2020

A.1.2 Disabled people

The table below shows the proportion of the population who have a long-term health problem or disability that limits their day to day activities living in the Estate, Westminster, Greater London, and England.

There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). People in existing poor health with long-term conditions that limit their day-to-day activities may be more sensitive to changes such as increased air pollutants from construction.

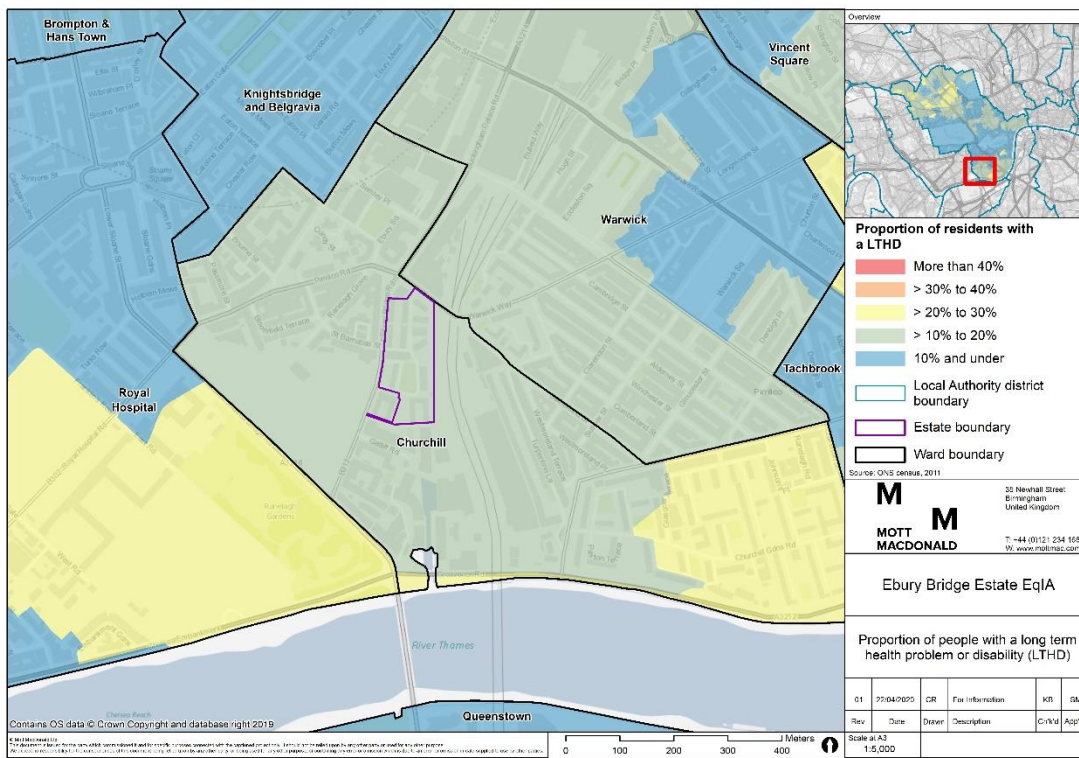
A.5: Population with a long- term health problem or disability limiting day- to- day activities

Disability	Estate	City of Westminster	London	England
Day-to-Day Activities Limited a Lot	8%	7%	7%	8%
Day-to-Day Activities Limited a Little	9%	7%	7%	9%
Day-to-Day Activities Not Limited	83%	86%	86%	82%

Source: Office for National Statistics, 2011 census

The map below shows that there is a low proportion of people with a long-term health problem or disability living on the Estate (10-20%). This is in line with the areas immediately surrounding the Estate.

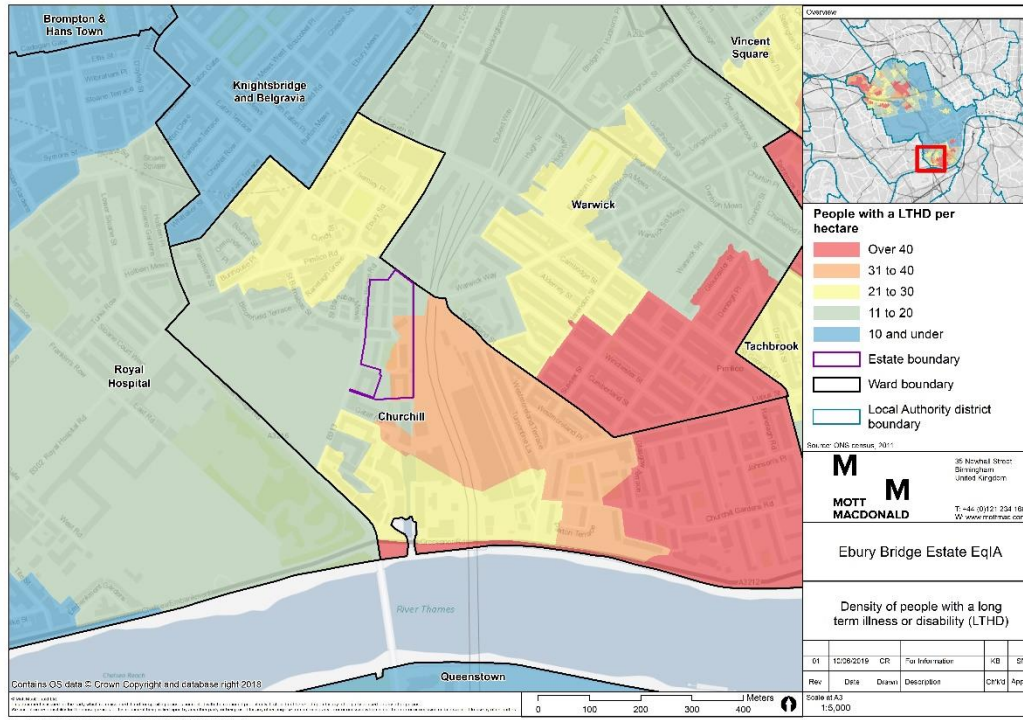
A.9: Proportion of residents with a long-term health problem or disability limiting day-to-day activities



Source: Mott MacDonald, 2020

The map below demonstrates that the density of disabled people within the Estate ranges from 11-20 persons per hectare to the west, and 31 to 40 persons per hectare to the east. These densities are in line with the areas immediately surrounding the Estate.

A.10: Density of residents with a long- term health problem or disability limiting day- to-day activities



Source: Mott Macdonald, 2020

A.1.3 Gender reassignment

There are no official or census data for the number of gender variant people in the study area, London or England. The ONS, though, has estimated that the size of the Trans community in the UK could range from 65,000 to 300,000.⁴³

A.1.4 Marriage and civil partnerships

The proportion of married residents of the Estate (32%) is in line with that of the City of Westminster (33%) but lower than that of London (40%) and England (47%).

The proportions of people in a civil partnership living on the Estate (1%) is in line with figures for the City of Westminster, London and England (1%, <1%, and <1% respectively). The percentage of separated residents on the Estate (5%) is in line with that of the City of Westminster, London and England (all 3%).

⁴³ ONS (2009): 'Trans Data Position Paper'.

A.6: Population married or in a civil partnership

	All usual residents aged 16+, 2011	Married	% married	In a civil partnership	% in a civil partnership	Separated (still legally married or in a civil partnership)	% separated
Estate	405	128	32%	4	1%	19	5%
City of Westminster	186,812	60,903	33%	1,539	1%	6,404	3%
London	6,549,173	2,608,345	40%	27,425	<1%	211,500	3%
England	42,989,620	20,029,369	47%	100,288	<1%	1,141,196	3%

Source: Office for National Statistics, 2011 census

A.1.5 Pregnancy and maternity

The tables below show the number of live births, the General Fertility Rate and the Total Fertility Rate for City of Westminster, London and England.

A.7: Live births by mothers' usual area of residence

Births	City of Westminster	Greater London	England
Female population aged between 16 and 44	121,852	4,459,151	28,309,236
Total population	255,324	8,908,081	55,977,178
Live births by mothers' usual area of residence	2,510	120,673	625,651
Live births by mothers' usual area of residence (%)	1%	1.3%	1.1%

Source: Office for National Statistics (2018) Live births in England and Wales

The table above shows that the number of live births for the City of Westminster area (1%) is in line with figures in Greater London (1.3%) and England (1.1%)

A.8: General and total fertility rates

Births and fertility rate	City of Westminster	London	England
General Fertility Rate (GFR)*	43.9	60.2	59.2
Total Fertility Rate (TFR)**	1.2	1.6	1.7

Source: Office for National Statistics (2018) Live births in England and Wales

* number of live births per 1,000 women aged 15-44

** number of live children that a group of women would bear if they experienced the age-specific fertility rates of the calendar year in question throughout their childbearing lifespan

The City of Westminster has a lower general fertility rate (number of live births per 1000 women) than London and England.

A.1.6 Race and ethnicity

The table below provides a breakdown of the population of the Estate, City of Westminster, London and England by ethnicity.

A.9: Population by race and ethnicity

Ethnicity	Ethnic group	Estate	City of Westminster	London	England
White	White British	38%	35%	45%	80%
	Irish	3%	2%	2%	1.0%
	Gypsy or Traveller	0.0%	0.0%	0.1%	0.1%
	Other White	19%	21%	13%	5%
Mixed/ multiple ethnic groups	White and Black Caribbean	1.3%	0.9%	1.5%	0.8%
	White and Black African	1.9%	0.9%	0.8%	0.3%
	White and Asian	1.2%	1.6%	1.2%	0.6%
	Other Mixed	1.5%	1.8%	1.5%	0.5%
Asian/Asian British	Indian	1.5%	3.3%	6.6%	2.6%
	Pakistani	1.5%	1.1%	2.7%	2.1%
	Bangladeshi	1.5%	2.9%	2.7%	0.8%
	Chinese	1.5%	2.7%	1.5%	0.7%
	Other Asian	1.5%	4.6%	4.9%	1.5%
Black/African/Caribbean/Black British	Black African	1.5%	4.2%	7.0%	1.8%
	Black Caribbean	1.5%	2.0%	4.2%	1.1%
	Other Black	1.5%	1.3%	2.1%	0.5%
	Arab	1.5%	7.2%	1.3%	0.4%
	Any Other Ethnic Group	1.5%	3.9%	2.1%	0.6%

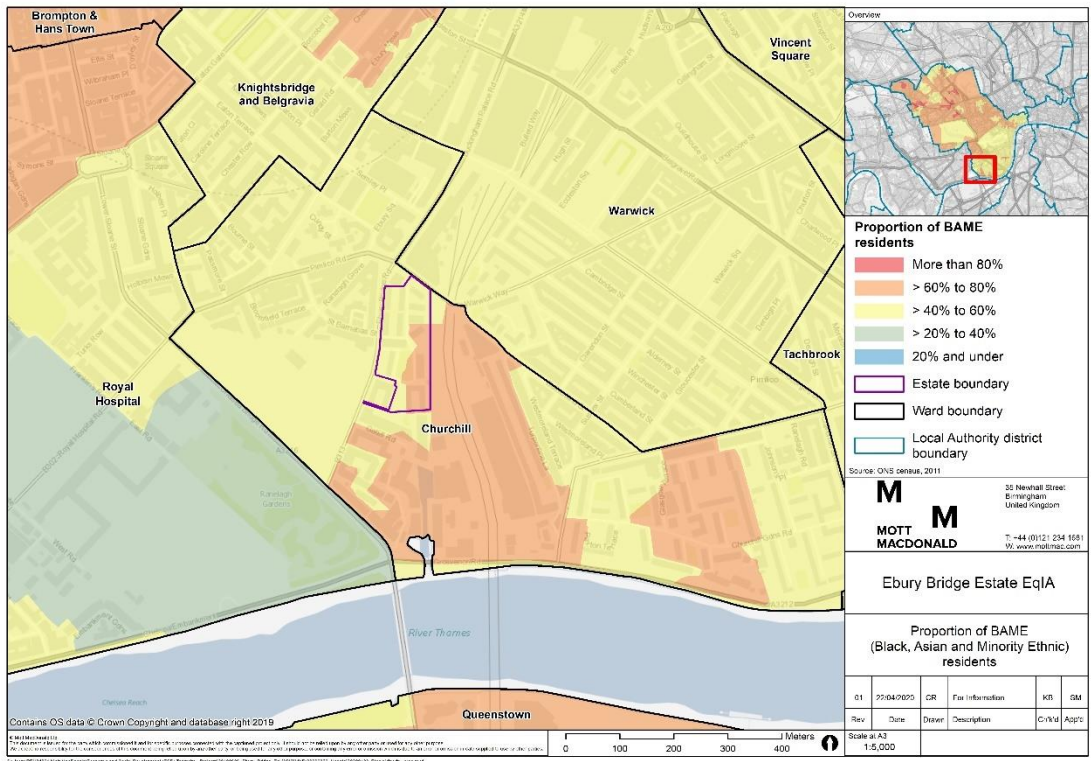
Source: Office for National Statistics (2011) National Census

The table shows the following patterns:

- The Estate has a lower proportion of people from a Black, Asian or Minority Ethnic (BAME) background (43%) when compared to Westminster (61%) and Greater London (55%) but higher than England (20%).
- There is a higher percentage of Other White people in the Estate (19%) compared to London (13%) and England (5%), but this is broadly in line with Westminster (21%).
- The next largest minority ethnic group on the Estate is Irish, followed by Mixed - White and Black African.

The Estate has a high proportion of people from a BAME background living in the area to the north and west of the Estate (40- 60%), and this rises even further to the southeast corner (60- 80%). This is in line with the areas immediately surrounding the estate, although further west to the Royal Hospital ward, the proportion of people from a BAME background drops.

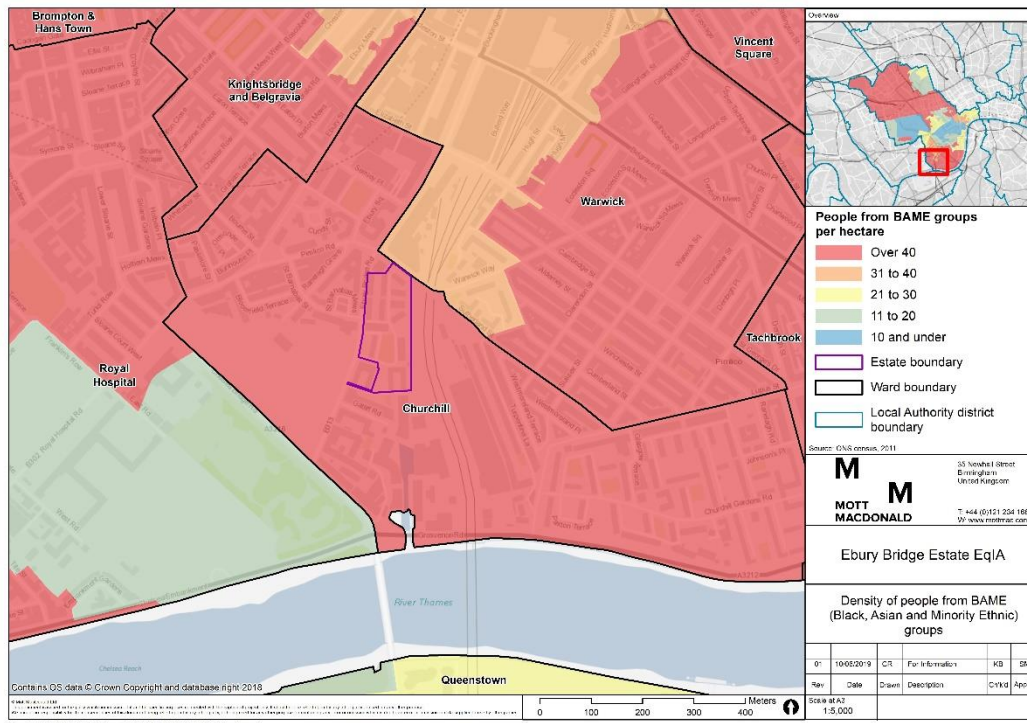
A.11: Proportion of residents from a BAME background



Source: Mott Macdonald

The Estate has a high density of people from BAME people, with over 40 per hectare. This is in line with the areas immediately surrounding the Estate.

A.12: Density of residents from a BAME background



Source: Mott Macdonald, 2020

A.1.7 Religion and belief

Table A.10 below provides a religious profile of the Estate and City of Westminster, compared with London and England.

A.10: Population by religion and belief

Religion and belief	Estate	City of Westminster	London	England
Christian	53%	45%	48 %	59%
Buddhist	1.3%	1.5%	1%	0.5%
Hindu	0.4%	2%	5.5%	1.5%
Jewish	0.6%	3%	2%	0.5%
Muslim	19%	18%	12%	5%
Sikh	0.2%	0.2%	1.5%	0.8%
Other Religion	0.6%	0.6%	0.6%	0.4%
No Religion	16%	20%	21%	25%
Religion Not Stated	8%	9%	9%	7%

Source: Office for National Statistics (2011) National Census

The table shows the following:

- The Estate has a higher proportion of Christian residents in comparison to the City of Westminster and London but lower than England.
- Muslim is the next largest religious group represented on the Estate

A.1.8 Sex

The table below shows the proportion of the population who are male and female in the Estate and City of Westminster, compared to London and England. The ratio of men and women on the Estate is in line with the national average.

Table 13: Population by sex

Sex	Estate	City of Westminster	London	England
Male	49.9%	52.3%	49.9%	49.4%
Female	50.1%	47.7%	50.1%	50.6%

Source: Office for National Statistics (2018) Mid-Year Population Estimates

A.1.9 Sexual orientation

There is no data available on this protected characteristic for the study area. However, emerging experimental statistics relating to sexual identity are available nationally and at a regional level.

In 2016, estimates from the Annual Population Survey (APS)⁴⁴ showed that 93.4% of the UK population identified as heterosexual or straight and 2.0% of the population identified themselves as lesbian, gay or bisexual (LGB). This comprised of:

- 1.2% identifying as gay or lesbian
- 0.8% identifying as bisexual
- A further 0.5% of the population identified themselves as “Other”, which means that they did not consider themselves to fit into the heterosexual or straight, bisexual, gay or lesbian categories.
- A further 4.1% refused or did not know how to identify themselves.

In the same survey, London had the highest percentage of the population who identify as LGB. In 2016, around 2.7% of the population in London identified themselves as LGB, the highest proportion of any English region. The Office for National Statistics suggested that this could be explained by the younger age structure or the diversity of the population of London.

⁴⁴ Source: Office for National Statistics (2017): . See: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2016>

B. Analysis of existing evidence

This chapter sets out the findings of the desk-based review process, providing a literature review of the potential effects of the redevelopment on people with protected characteristics. Section B.1 sets out the impacts on residents and community resources during renewal, Section B.2 discusses the potential risks and effects on businesses during renewal and Section B.3 provides an overview of the potential effect on the community following the renewal process.

Analysis of existing evidence

B.1 Impact on residents and community resources during the renewal process

B.1.1 Loss of social infrastructure and access to community resources

The temporary resettlement of residents and demolition of housing can lead to the risk of loss of social infrastructure and access to these resources. It can potentially increase residents' distances from facilities or places of social connection located on or near their neighbourhood. This can impact on all parts of the community but can differentially affect the following groups.

Children

The instability caused by relocation has the potential to be particularly disruptive to children. Such disruption can result in stress and anxiety relating to, for example, changing schools and the need to adapt to new routines, staff, facilities and peers. It is generally accepted that children develop better in stable environments with a degree of routine; sudden and dramatic disruptions can be both stressful and affect feelings of security.⁴⁵

Evidence outlined by the Centre for Social Justice has indicated that where residential moves are accompanied by school moves for older children, the impact can be severe. It suggests that school moves can disrupt learning and are associated with a weaker educational performance within secondary school, particularly for children from disadvantaged backgrounds.⁴⁶ Only 27 per cent of students who move secondary schools three times or more achieve five A* to C grade GCSEs, compared to the national average of 60 per cent.⁴⁷ Research from the Centre for Social Justice also found that two or more school moves before the age of twelve can lead to behavioural problems later in childhood.⁴⁸

Children with autism spectrum conditions may also find new routines, expectations, and social relationships of a new school environment to be especially challenging, which can have further negative effects on educational attainment and wellbeing.⁴⁹

⁴⁵ Sandstrom, H and Huerta, S (2013) 'The Negative Effects of Instability on Child Development' Available at: <https://www.urban.org/sites/default/files/publication/32706/412899-The-Negative-Effects-of-Instability-on-Child-Development-A-Research-Synthesis.PDF>

⁴⁶ The Centre for Social Justice (2016) 'Home Improvements, a social justice approach to housing policy'. Available at: <https://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/08/Home-Improvements-full-report.pdf>

⁴⁷ The Centre for Social Justice (2016): 'Home Improvements, a social justice approach to housing policy'.

⁴⁸ The Centre for Social Justice (2016) 'Home Improvements, a social justice approach to housing policy'. Available at: <https://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/08/Home-Improvements-full-report.pdf>

⁴⁹ University of Manchester (undated) 'The impact of primary-secondary school transition for children with autism spectrum conditions: a longitudinal, mixed-methods study'. Available at: <http://documents.manchester.ac.uk/display.aspx?DocID=20008%20>

Relocation can often also mean a longer journey travelling to school, which can result in negative impacts on health and well-being due to increased travel time spent inactive. Research has found that the travel distance to school influences the transportation mode choice of children, and longer distances can result in a change from active transportation such as cycling or walking, to sedentary transportation, such as vehicular transport.⁵⁰

Children from low-income families may be particularly affected by relocation due to loss of local informal childcare support. A study from the Joseph Rowntree Foundation showed that informal childcare support from grandparents was one important factor in enabling parents to work, generating income and preventing families from going without daily necessities.⁵¹

Relocation can also have negative mental health effects on children and adolescents for several reasons, including weakened social ties, disturbed social networks, household disruption, social isolation and a reduction in parent-child interactions.⁵²

Loss of relationships with peers and adults can cause anxiety and hinder both social development⁵³ and educational attainment. Children at key stage two experience an average of a twelve per cent drop in Maths and English attainment within a year of a changing schools.⁵⁴

The loss of facilities where children can socialise, and play could be particularly detrimental to children living in the local area. Demolition and resource relocation could adversely affect access to child social networks. Evidence suggests that early years provision plays an important role in a child's development and that free play in early childhood is a vital experience through which children learn social, conceptual and creative skills, as well as increasing their knowledge and understanding of the world.⁵⁵

Older people

The loss of long-standing community links risks creating feelings of isolation, loneliness and community severance, particularly amongst older people.⁵⁶ Age UK research indicates that physical isolation, a lack of social resources and a removal of familiarity can all contribute to feelings of isolation and loneliness amongst older people.⁵⁷ This in turn can lead to negative health outcomes such as poorer mental health, a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism) and a greater risk of hospitalisation.⁵⁸ Loneliness increases the likelihood of mortality by 26 per cent among those over the age of 65 and raises the risk of developing conditions, such as high blood pressure, heart disease and stroke.⁵⁹ The link between older people and the likelihood of experiencing feelings of isolation and loneliness

⁵⁰ Yeung, J., Wearing, S., & Hills, A. P. (2008). *Child transport practices and perceived barriers in active commuting to school. Transportation Research Part A: Policy and Practice*, 42(6), 895-900.

⁵¹ Joseph Rowntree Foundation (2016) 'Falling short: the experience of families living below the minimum income standard'. Available at: <https://www.jrf.org.uk/report/falling-short-experiences-families-below-minimum-income-standard>

⁵² Morris, T, Manley D, Northstone, K, Sabel, C. (2017): 'How do moving and other major life events impact mental health? A longitudinal analysis of UK children'

⁵³ Adam, Emma K., and P. Lindsay Chase-Lansdale. (2002): 'Home Sweet Home(s): Parental Separations, Residential Moves, and Adjustment in Low-Income Adolescent Girls.' *Developmental Psychology* 8(1) :792–80

⁵⁴ RSA. (2013): 'Falling between the cracks; Exploring in-year admissions in schools in England'

⁵⁵ Nation Children's Bureau (2007): 'Free Play in Early Childhood'

⁵⁶ Age UK (2015): 'Loneliness and Isolation evidence review'

⁵⁷ Age UK (2015) 'Evidence Review: Loneliness in Later Life'. Available at: https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health--wellbeing/rb_june15_loneliness_in_later_life_evidence_review.pdf.

⁵⁸ IoTUK (2017): 'Social Isolation and Loneliness in the UK' Available at: <https://iotuk.org.uk/social-isolation-and-loneliness-report/>

⁵⁹ Age UK (2015): 'Campaign to end loneliness: threat to health'.

indicates that this group may be disproportionately negatively affected by relocation. This can equally be the case for older people remaining in or very close to an area being redeveloped.⁶⁰

As demolition for redevelopment proceeds, local amenities and services (such as shops, community centres and health facilities) may opt to close. Some community resources may be included in demolition or may themselves close. The loss of these resources can have a disproportionately negative effect on older people remaining in neighbouring areas, who may, in turn, find it more challenging to travel to new services outside of their neighbourhood.⁶¹

Furthermore, for local businesses, changes to or even the loss of their traditional customer base following the relocation of residents can force closures, further reducing the choice of services available to people in the community, with older people among the most likely to be affected. Research from Age UK found that reduced access to community facilities can, have serious negative effects on mental health and wellbeing, and increase rates of cardiovascular disease in older people.⁶²

Relocation can also be emotionally challenging as people are often emotionally attached to their home, their possessions and the associated memories they hold. Relocation, therefore, can involve rediscovering forgotten possessions and reliving memories both good and bad, especially among older people who are more likely to have lived in the same home for a long time.⁶³

Those over the age of 65 are more likely to have greater attachment to their home,⁶⁴ so the prospect of losing it can increase feelings of stress and anxiety and impact on overall wellbeing. This may be exacerbated by the breaking of key social networks such as links with families and neighbours, which research shows older people can be more reliant on compared to other age groups.⁶⁵

Disabled people

Relocation has the potential to cause stress, anxiety and uncertainty for disabled people. Changes, both minor and major, to some disabled people's routines and surroundings may adversely affect feelings of security and comfort. For example, research shows that people on the autism spectrum, tend to prefer set routines (such as traveling via the same routes) and rigid structures (such as preferences to room layouts or objects) as they can help to bring order to their daily life so that they know what is going to happen and when.⁶⁶ Similarly, for those suffering from dementia or Alzheimer's learning about and interpreting new environments can be difficult, and relocation can create feelings of dissonance, confusion and discomfort.⁶⁷

Relocation can also create stress, anxiety and uncertainty for people with disabilities regarding the accessibility of their new home. A report published by the EHRC identifies that across all housing tenures, there is a severe shortage of accessible housing. For example, one in three

⁶⁰ Age UK (2015): 'Loneliness and Isolation evidence review'

⁶¹ A. Power (2008) 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability'. Available at: <https://www.sciencedirect.com/science/article/pii/S0301421508004709>

⁶² Age UK (2015): 'Campaign to end loneliness': 'Threat to health'

⁶³ Age Action Alliance (2019): 'Moving house gets harder the older you are, but a new guide to helping the elderly move, declutter and downsize can really help'

⁶⁴ Age UK (2015): 'Loneliness and Isolation evidence'

⁶⁵ IoTUK (2017): 'Social Isolation and Loneliness in the UK'

⁶⁶ National Autistic Society (2016) 'Obsessions, repetitive behaviour and routines'. Factsheet. Available at: <https://www.autism.org.uk/about/behaviour/obsessions-repetitive-routines.aspx>

⁶⁷ Son, G. R., Therrien, B., & Whall, A. (2002). 'Implicit memory and familiarity among elders with dementia'. *Journal of Nursing Scholarship*, 34(3), 263-267. Available at: <https://lemosandcrane.co.uk/resources/Journal%20of%20Nursing%20Scholarship%20-%20Implicit%20Memory%20and%20Familiarity%20Among%20Elders%20with%20Dementia.pdf>

disabled people living in private rented properties live in unsuitable accommodation. This figure is one in five for disabled people living in social housing, and one in seven for disabled people who own their own home. Overall, in England, only 7% of homes offer the basic four accessibility features to make a home fully accessible (level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level).⁶⁸ This suggests that disabled people are more likely to be concerned about the accessibility of their new home compared to other residents. Additionally, a report by Leonard Cheshire Disability highlights that only 4% of those with mobility impairments who have looked for accessible homes said they were easy to find. In addition, they also found that some disabled people have also experienced difficulties in terms of local authorities being reluctant to fund adaptations that would allow them to live independently.⁶⁹

The disruption of social networks caused by relocation may also cause negative health outcomes for people with mental health problems and autism, many of whom depend on social networks to maintain their standard of living⁷⁰. People with mental health problems may be disproportionately impacted by stress and anxiety, especially if relocation is unexpected or accompanied by financial stress⁷¹. Research from Wilding (2017) found that increased rates of mental ill health are associated with residential relocation.⁷²

The loss of community links may also have a disproportionate impact on disabled people. Findings from the Jo Cox Commission on Loneliness found that over half of disabled people say they are lonely, with around one in four feeling lonely every day.⁷³ The report also states that forming and maintaining social connections can be a challenge for people with a range of disabilities, including those with sensory impairments, learning disabilities, autism, physical and mobility impairments, mental health conditions, dementia, head and brain injury, neurological conditions, cancer and HIV. As disabled people can experience more barriers to forming social connections the loss of existing local social connections through residential displacement or loss of social resources could lead to disabled people experiencing further loneliness and isolation.

Some disabled people may also be adversely affected due to changes to their environment and routines caused by relocation. Research shows that to an autistic person, set routines, times and particular routes can help to bring order to their daily lives, which can often be chaotic.⁷⁴ Similarly, for those suffering from dementia or Alzheimer's, learning about and interpreting new environments can be difficult, and relocation can create feelings of dissonance, confusion and discomfort.⁷⁵

Pregnancy and maternity

⁶⁸ DCLG (2015). 'English Housing Survey: Adaptations and Accessibility Report' Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf

⁶⁹ Leonard Cheshire Disability (2014): 'The hidden housing crisis' Available at: <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

⁷⁰ National Autism Society. (2017): 'Moving house' URL: <https://www.autism.org.uk/movinghouse> 56

⁷¹ Wilding et al., (2018): 'Place and preference effects on the association between mental health and internal migration within Great Britain' Health and Place. 52(1), pp 180-187

⁷² Wilding et al., (2018): 'Place and preference effects on the association between mental health and internal migration within Great Britain' Health and Place. 52(1), pp 180-187

⁷³ Sense for the Jo Cox Commission on Loneliness (2017) 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

⁷⁴ National Autistic Society (2016) 'Obsessions, repetitive behaviour and routines'. Factsheet. Available at: <https://www.autism.org.uk/about/behaviour/obsessions-repetitive-routines.aspx>

⁷⁵ Son, G. R., Therrien, B., & Whall, A. (2002). 'Implicit memory and familiarity among elders with dementia'. *Journal of Nursing Scholarship*, 34(3), 263-267. Available at: <https://lemonsandcrane.co.uk/resources/Journal%20of%20Nursing%20Scholarship%20-%20Implicit%20Memory%20and%20Familiarity%20Among%20Elders%20with%20Dementia.pdf>

Evidence has suggested that women who move home while pregnant tend to experience an increase in stress and depression levels above and beyond that of women who move home when not pregnant.⁷⁶ Evidence also suggests that the stress and physical exercise involved with relocation can slightly increase the risk of miscarriage, preterm delivery, small for gestational age new-borns, low birthweight, preeclampsia / gestational hypertension and can exacerbate deep vein thrombosis which pregnant women are more at risk of.⁷⁷

Where relocation results in the need to make changes to preestablished antenatal services and relationships, this could adversely affect people who are pregnant. A 2015 survey carried out by the Care Quality Commission assessed the impact that having the same midwife had on pregnant women. The results showed that women who had the same midwife throughout pregnancy had more positive midwifery experiences than those who did not. Negative experiences were most likely to be experienced by those who wanted to see the same midwife but were unable to.⁷⁸

BAME and/or minority faith groups

People from BAME and minority faith communities are also more likely to experience adverse effects as a result of relocation. It has been identified that these groups may be more reliant on social networks, faith and cultural facilities. They are likely to have concerns over loss of social networks and facilities, as well as fears of isolation, harassment or language barriers in new locations.⁷⁹ Additional research found that Black African and Caribbean communities tend to experience greater difficulty in accessing health care than other sections of the population. Rehousing is likely to exacerbate the issue.⁸⁰

B.1.2 Access to finance and affordable housing

Where renewal schemes require residents to resettle, it can lead to an increase in their financial outgoings due to costs associated with securing new accommodation and moving to a new house. A new mortgage or higher rental payments may be required, while relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who have trouble trying to access appropriate and mainstream financial services, such as bank accounts, loans and mortgages. Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, certain groups are particularly vulnerable to financial exclusion. These include, **young people** not in employment, **lone parents**, **ethnic minority** groups and **older people**.⁸¹

Financial exclusion is also geographically focussed. It is often the case that large numbers of financially excluded individuals live in areas where there are high levels of **deprivation**.

⁷⁶ Tunstall, H., Pickett, K. and Johnsen, S. (2010): 'Residential mobility in the UK during pregnancy and infancy: Are pregnant women, new mothers and infants 'unhealthy migrants'?'

⁷⁷ NHS (2016): 'Deep vein thrombosis'; Royal College of Physicians and Faculty of Occupational Medicine (date unknown): 'Advising women with a healthy, uncomplicated, singleton pregnancy on: heavy lifting and the risk of miscarriage, preterm delivery and small for gestational age'

⁷⁸ Care Quality Commission (2015): '2015 survey of women's experiences of maternity care'. Available at: https://www.cqc.org.uk/sites/default/files/20151215b_mat15_statistical_release.pdf

⁷⁹ BME Health Forum (2010) 'Good Access in Practice: Promoting community development in the delivery of healthcare'; Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'. Available at: <https://www.jrf.org.uk/report/addressing-housing-affordability-clearance-and-relocation-issues-housing-market-renewal>

⁸⁰ BME Health Forum (2010) 'Good Access in Practice: Promoting community development in the delivery of healthcare'.

⁸¹ Joseph Rowntree Foundation (2008): 'Financial inclusion in the UK: Review of policy and practice'. Available at: <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/2234.pdf>

Research suggests that approximately 35% of people living in deprived do not have a bank account, and that 68% of financially disengaged people living in the top 10% most financially exclude postcodes.⁸²

Young people, older people, disabled people, BAME people and women

In the UK, certain groups are particularly vulnerable to financial exclusion. These include young people not in employment, older people, disabled people, people from BAME people, and women.⁸³ For example, young people may be unable to purchase a property due to reduced availability of social housing and increasing house prices.⁸⁴

Research by the Joseph Rowntree Foundation found that older people often lack the same financial means and income flexibility compared to other age groups, especially younger people and those in employment.⁸⁵ A lack of financial means can limit the range of ownership options available to older people and relocation may cause older people to use savings and investments in order to secure a new home. This can potentially affect their long-term financial independence and stability.⁸⁶ Research from the Council of Mortgage Lending⁸⁷ shows that older people only account for one per cent of all mortgage lending, which further indicates that they may experience difficulties in accessing finance to facilitate relocation.

People who are disabled and who live in social housing could experience particularly acute adverse effects. The introduction of the 'removal of the spare room subsidy' or 'bedroom tax' in 2013 has had a disproportionate impact on disabled people in social housing; two thirds of those affected have a disability. Research shows that disabled people have found it much more difficult to take up proposed mitigation measures, such as taking up work, working longer hours or downsizing, and thus have had their income reduced by between £12 and £22 per week, depending on the number of spare bedrooms. These changes have resulted in increased poverty and adverse effects on health, well-being and social relationships of disabled residents in social housing.⁸⁸

Further, according to evidence presented to the House of Commons Communities and Local Government Committee, low income BAME households often have limited experience of institutional loan finance.⁸⁹ They may also be less able to access commercial loans due to poor credit-ratings or their location in 'high risk' postcodes. BAME households may also be impacted by the availability of affordable housing when relocating to new areas. Two-fifths of people from a BAME background live in low-income households⁹⁰ and a 2017 report highlights that rents are less affordable for most BAME people when compared to White British households.⁹¹ Additionally, evidence from the Runnymede Trust suggests that BAME households could be more likely to experience difficulties in finding suitable housing that accommodates their needs

⁸² Resolution Foundation (2007): 'In brief: Financial exclusion'.

⁸³ Joseph Rowntree Foundation (2008): '*Financial inclusion in the UK: Review of policy and practice*'. Available at: <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/2234.pdf>

⁸⁴ Financial Conduct Authority (2016) 'Access to Financial Services in the UK' Available here: <https://www.fca.org.uk/publication/occasional-papers/occasional-paper-17.pdf>

⁸⁵ Joseph Rowntree Foundation. (2007): 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders.

⁸⁶ Joseph Rowntree Foundation. (2007): 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'

⁸⁷ Council of Mortgage Lending. (2015): 'Pension tension: the challenges for older borrowers'

⁸⁸ Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. *Journal of Public Health*, 38(2), 197-205.

⁸⁹ House of Commons Communities and Local Government Committee (2011) '*Regeneration Sixth Report of Session 2010–12*'. Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

⁹⁰ The Poverty Site (2017). See: <http://www.poverty.org.uk/06/index.html>

⁹¹ Shelter (2017) '*BAME homelessness matters and is disproportionately rising – time for the government to act*'. Available at: <http://blog.shelter.org.uk/2017/10/bame-homelessness-matters-and-is-disproportionately-rising-time-for-the-government-to-act/>

and such people from BAME communities are more likely to experience homelessness than their white counterparts.⁹²

B.1.3 Appropriate and accessible housing

Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of the following groups:

Children

Families with children may also find it difficult to find housing that can accommodate their needs. A 2016 report highlighted that 3.6 million children in England are thought to be affected by poor housing, and a higher proportion of children live in overcrowded conditions than any other age group.⁹³ Children who live in overcrowded accommodation have an increased risk of developing respiratory conditions, infections and psychological problems.⁹⁴

Overcrowding can also increase the risk of injury. For example, bed sharing, which is more likely to occur in overcrowded houses, has been identified as a factor contributing to Sudden Infant Death Syndrome (SIDS). Sleep disturbance is also more common amongst children in overcrowded households. Overall, overcrowded conditions present a potential source of stress and can negatively impact a child's emotional and physical health in the long term.⁹⁵

Older people

When relocating, older people are also more likely to need specialist housing which meets their needs. Evidence estimates that the potential national demand for specialist retirement housing, which cannot be met from existing stock.⁹⁶ As such, it is likely to be more difficult for older people to relocate to appropriate housing. Health effects, such as increases in respiratory disease, have been associated with poor housing and could arise because of the need to relocate to a less well-suited property. Older people have a higher rate of health conditions such as respiratory disease, compared to the general population. This makes such effects more likely to arise amongst this group.⁹⁷

Disabled people

Disabled people (particularly those with mobility impairments) often experience difficulties trying to find a suitable, accessible home. Research from Leonard Cheshire Disability highlights that only 4% of those with mobility impairments who have looked for accessible homes said they were easy to find. In addition, they also found that some disabled people have also experienced

⁹² Runnymede Trust (2014) 'Black and Asian Britons more likely to be homeless or live in overcrowded houses'.

<https://www.runnymedetrust.org/news/558/272/Black-and-Asian-Britons-more-likely-to-be-homeless-or-live-in-overcrowded-homes.html>

⁹³ National Children's Bureau (2016): 'Housing and the health of young children: Policy and evidence briefing for the VCSE sector'. Available at:

<https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf>

⁹⁴ House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'.

Available at: <https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf>

⁹⁵ National Children's Bureau (2016): 'Housing and the health of young children: Policy and evidence briefing for the VCSE sector'. Available at:

<https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf>

⁹⁶ Housing Age UK (2014): 'Housing in later life'

⁹⁷ Housing Age UK (2014): 'Housing in later life'

difficulties in terms of local authorities being unable or reluctant to fund adaptations that would allow them to live independently.⁹⁸

A report published by the Equality and Human Rights Commission has further highlighted some of the existing issues in terms of housing for disabled people. The report states that across all housing tenures, there is a severe shortage of accessible housing. For example, one in five disabled people living in social housing live in unsuitable accommodation. This figure is one in three for disabled people who rent privately and one in seven for those who own their own home. Overall, in England, only 7% of homes offer the basic four accessibility features to make a home fully accessible (level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level).⁹⁹ One conclusion of the report was that the lack of certainty in finding and pressure on social care budgets of supported housing has led to a massive reduction in planned schemes despite increasing demand.¹⁰⁰

BAME

Research by the Runnymede Trust highlighted that people from all BAME groups are more likely to live in overcrowded housing when compared to the White British population. For example, around 40% of Black African and 36% of Bangladeshi people in the UK live in overcrowded housing.¹⁰¹

B.1.4 Health effects

Children

Children are likely to be disproportionately affected by changes in noise pollution and air quality that may occur throughout the demolition and construction stages of a scheme.

Exposure to air pollution during infancy can result in neurodevelopment and long-term cognitive health problems.¹⁰² Research from Asthma UK highlights that air pollution is more detrimental to children when compared to other age groups with the condition. This is due to children have faster breathing rates and lungs that are still developing.¹⁰³

Additionally, the WHO state that occupational noise, such as construction machinery and transportation noise, can have adverse effects on children.¹⁰⁴ Children exposed to such noise can experience adverse cognition,¹⁰⁵ and other psychological,¹⁰⁶ and physiological¹⁰⁷ effects.

⁹⁸ Leonard Cheshire Disability (2014): 'The hidden housing crisis' Available at: <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

⁹⁹ DCLG (2015). 'English Housing Survey: Adaptations and Accessibility Report' Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf

¹⁰⁰ Equality and Human Rights Commission (2018): 'Housing and disabled people: Britain's hidden crisis'. Available at: <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-britains-hidden-crisis-main-report.pdf>

¹⁰¹ Runnymede Trust (2016) 'Ethnic Inequalities in London: Capital For All'. Available at: <https://www.runnymedetrust.org/uploads/images/London%20Inequality%20report%20v3.pdf>

¹⁰² Royal College of Physicians (2016) 'Every breath we take: the lifelong impact of air pollution'. Available at: <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

¹⁰³ Asthma UK (2017). 'Pollution'. Available at <https://www.asthma.org.uk/advice/triggers/pollution/>

¹⁰⁴ Gupta, A. et al (2018): 'Noise Pollution and Impact on Children Health'. Available at: <https://link.springer.com/article/10.1007/s12098-017-2579-7>; World Health Organisation (2011): 'Burden of disease from environmental noise Quantification of healthy life years lost in Europe'

¹⁰⁵ Including reading, concentration, memory and attention

¹⁰⁶ Including mental health, annoyance, isolation and disturbed sleep

¹⁰⁷ Including cardiovascular disease, tinnitus, muscle spasm and increased levels of stress hormone.

Children are especially vulnerable as they may be unable to recognise or cope with dangerous noise levels, and because they are in a critical period of cognitive development and learning.¹⁰⁸

Older people and disabled people

As noted above, for older people and disabled people, the loss of community connections due to relocation may lead to feelings of isolation and loneliness. These are in turn linked to negative health outcomes such as poorer mental health, a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism), and a greater risk of hospitalisation.¹⁰⁹

Older people and disabled people are also likely to be disproportionately affected by changes in air quality that may arise throughout the demolition and construction stages of a redevelopment. Older people with respiratory conditions such as asthma are likely to be more susceptible to the effects of air pollution when compared to other groups. This is particularly the case if they have underlying COPD (Chronic Obstructive Pulmonary Disease).¹¹⁰ Disabled people with cardiovascular and respiratory conditions are also at an increased risk of becoming ill and needing treatment as a result of air pollution.¹¹¹

Increased noise exposure may also arise as a result of demolition and construction. Research has linked increases in noise to several adverse outcomes for older people, including cardiovascular diseases, sleep disturbance, tinnitus, and stress.¹¹²

Pregnancy and maternity

Potential health effects are associated with the demolition of housing and the displacement of residents. For example, it has been found that the birth weight of babies can be affected by demolition and displacement. This is due to the potential for expectant mothers to experience an increase in stress and loss of social support when displacement occurs.¹¹³

Additionally, antenatal exposure to air pollution may alter the lung development of a baby whilst in the womb. If a baby is exposed to significant levels of air pollution, this can increase the risk of premature birth and low birth weight.¹¹⁴

B.1.5 Safety and security

In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime such as increased vandalism, arson, break-ins and other damage to neighboring homes.¹¹⁵

Children, young people, older people, disabled people, BAME people, LGBT people, men and women

¹⁰⁸ World Health Organisation. (no date): 'Children and noise: Children's health and the environment – WHO training package for the health sector

¹⁰⁹ IoTUK (2017) 'Social Isolation and Loneliness in the UK'. Available at: <https://iotuk.org.uk/social-isolation-and-loneliness-report/>

¹¹⁰ Asthma UK (2017). 'Pollution'. Available at <https://www.asthma.org.uk/advice/triggers/pollution/>

¹¹¹ Department for Environmental Food and Rural Affairs (2013): 'Guide to UK Air Pollution Information Resources'. Available at:

¹¹² World Health Organisation (2011): 'Burden of disease from environmental noise Quantification of healthy life years lost in Europe'. Available at: http://www.who.int/quantifying_ehimpacts/publications/e94888.pdf?ua=1

¹¹³ Kramer, M., et al. (2012): 'Housing Transitions and Low Birth Weight Among Low-Income Women: Longitudinal Study of the Perinatal Consequences of Changing Public Housing Policy'. Available at: <https://www.ncbi.nlm.nih.gov/pubmed/23078464>

¹¹⁴ British Lung Foundation (2016): 'How air pollution affects your children's lungs'. Available at: <https://www.blf.org.uk/support-for-you/signs-of-breathing-problems-in-children/air-pollution>

¹¹⁵ Power, A. (2010): 'Housing and sustainability: demolition or refurbishment?' Available at https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1406191156_060618_Guide_to_UK_Air_Pollution_Information_Resources-issue_2-FINAL.pdf <https://www.icevirtuallibrary.com/doi/abs/10.1680/udap.2010.163.4.205>

This potential increase in crime can impact several vulnerable groups remaining in the community during demolition who are more likely to be a victim or witness of crime. An Ipsos MORI survey on public views of policing in England and Wales in 2016 determined that groups who were more likely to have had contact with their local police as a victim or witness include: young people aged 16-34, disabled people, those from BAME backgrounds, and lesbian, gay, bisexual and transgender (LGBT) people.¹¹⁶

The Crime Survey for England and Wales (CSEW), has also identified that several protected characteristic groups are more likely to be victims to crime:

- Men are more likely to be victims of violent crime than women.¹¹⁷
- Mixed and Asian ethnic groups are more likely to have said they were victim of crime compared to white people.¹¹⁸
- Younger people aged 16 to 24 are more likely to be victims of violence than those in older age groups.¹¹⁹

In addition, the fear of crime is also more prevalent amongst the following groups, and consequently this can influence individual mental health and wellbeing.¹²⁰

- Evidence from Age UK suggests that although older people are generally at a lower risk of crime compared to other ages, they are often more fearful of crime.¹²¹
- Fear of crime can be an issue for women when they are travelling. Data from the ONS Crime Survey for England and Wales suggests that women fear more for their safety than men when walking alone at night – two fifths of women reported feeling ‘somewhat unsafe’ and one in eight reported feeling ‘very unsafe’.¹²²
- A study by Transport for London highlights that BAME individuals are more likely to express concerns over safety and security when travelling (particularly after dark) than white people and are more likely to say that their frequency of travel is affected ‘a lot’ or ‘a little’ due to these concerns.¹²³
- Research from Stonewall demonstrates that LGBT people often fear for their safety and wellbeing in public spaces and on pedestrian journeys.¹²⁴

It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as children, older people, BAME people and women.¹²⁵

¹¹⁶ Ipsos MORI (2016): ‘Public views of policing in England and Wales’. Available at: <https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Publications/sri-public-views-of-policing-in-england-and-wales.pdf>

¹¹⁷ Office for National Statistics (2018) ‘The nature of violent crime in England and Wales: year ending March 2018’ Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/thenatureofviolentcrimeinenglandandwales/yearendi ngmarch2018>

¹¹⁸ Gov.uk (2019) ‘Victims of crime’. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest>

¹¹⁹ ibid

¹²⁰ Stafford, M et al. (2006) ‘Association between fear of crime and mental health and physical functioning’. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2040373/>

¹²¹ Age UK (2006) ‘Crime and fear of crime: help the aged policy statement 2006’. Available at: https://www.ageuk.org.uk/documents/en-gb/for-professionals/communities-and-inclusion/crime_and_fear_of_crime_2006_pro.pdf?dtrk=true

¹²² ONS (2015) Crime Survey for England and Wales. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/2015-07-16>

¹²³ Transport for London (2013) ‘Attitudes to Safety and Security – Annual Report’. Available at: <https://tfl.gov.uk/corporate/publications-and-reports/safety-and-security>

¹²⁴ Stonewall (2017) LGBT in Britain: Hate Crime. Available at: <https://www.stonewall.org.uk/comeoutforLGBT/lgbt-in-britain/hate-crime>

¹²⁵ Lorenc, T et al (2013) ‘Fear of crime and the environment: systematic review of UK qualitative evidence’. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3666893/>

B.1.6 Accessibility and mobility in the surrounding area

Evidence has indicated that during construction the accessibility and mobility of the local area can be impacted. In particular, construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as impacts on wayfinding.¹²⁶ This can particularly affect the following groups:

Older people

Older people are more likely than others to suffer from mobility issues, which can affect their experiences and lead to difficulties when travelling.¹²⁷ Anything which may further affect older people's ability to travel is therefore likely to disproportionately affect this group.

Disabled people

Evidence has suggested that lack of access can exclude people with disabilities or make them dependant on others.¹²⁸ People with a disability can experience difficulties with access ranging from finding accessible transport options to physical barriers when making journeys.¹²⁹ As such, any additional barriers to access resulting from construction activity is likely to disproportionately affect this group.

B.1.7 Information and communication

The process of regeneration often requires two-way communication between residents and the council and or housing authorities for residents to understand the options available to them. The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication. These include **older people**, **disabled people** and **people from BAME backgrounds**.

Older people

The use of technology and the internet to communicate updates about the housing relocation, may be a barrier for older people. Research has found that almost 20% of people aged 65-74 have never been online, this means they risk missing out on information regarding updates, alterations to moving dates, all of which may affect them.¹³⁰

Disabled people

Research has found that people with a range of disabilities can find communication with new people challenging.¹³¹ For example, depending on the nature, severity and onset of the sensory

¹²⁶ BRE Environment (2001) 'Sustainable Construction: Working with the community'. Available at: http://projects.bre.co.uk/productive_workplace/pdf/ImpactsOfConstruction.pdf

¹²⁷ Government Office for Science (2015) How can transport provision and associated built environment infrastructure be enhanced and developed to support the mobility needs of individuals as they age? Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/443508/gs-15-7-future-ageing-transport-er23.pdf

¹²⁸ World Health Organisation and World bank (2011) 'World report on disability'. Available at: https://www.who.int/disabilities/world_report/2011/en/

¹²⁹ World Health Organisation and World bank (2011) 'World report on disability'. Available at: https://www.who.int/disabilities/world_report/2011/en/

¹³⁰ Office for National Statistics (2018): 'Internet users, UK: 2018'

¹³¹ Sense for the Jo Cox Commission on loneliness (2017): 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

impairment, people with sensory impairments may experience difficulties in accessing information and communication as they may use British Sign Language or may require information in additional formats such as large print or braille.¹³²

Additionally, some people with learning disabilities, dementia, brain injuries or neurological conditions and those on the autism spectrum can experience difficulties processing social information and language, which can mean that they don't understand everything that is being said or the motivations of other people or might not be able to express themselves.¹³³

People from BAME backgrounds

Communication may be particularly challenging for people from certain BAME backgrounds, which might increase the risk that these people do not fully understand information such as the housing options available to them. According to 2011 census data, for example, out of all ethnic groups whose first language is not English, people with a Bangladeshi background were least likely to speak English well or at all.¹³⁴ There is also a gender divide in these statistics, with women making up 60% of people who could not speak any English.¹³⁵ Pakistani and Bangladeshi women are five times as likely as men from the same background to not speak any English.¹³⁶

B.2 Impact on businesses during renewal

B.2.1 Loss of employment

The renewal process may result in the closure and relocation of businesses. These changes may affect staff, resulting in redundancies or result in current staff being unable to access employment at the business once it has relocated. The following protected characteristic groups face barriers to employment and are therefore more likely to be affected by loss of existing employment due to business closure or relocation.

Older people

Research suggests that those who are older when they are made redundant experience additional barriers to returning to employment, including the potential challenge of securing interviews for new positions.¹³⁷ According to research by Age UK, once unemployed, only 23% of people aged 50 years or above secure a new job within three months (compared to 35% of 35-49-year olds).¹³⁸ Research by Anglia Ruskin University found that older white British men were 22% less likely to be invited for interview when compared to their 28-year-old counterparts, and that that ageism increases for older male BAME applicants, and female applicants (of all ethnicities).¹³⁹ These groups may therefore experience disproportionate negative impacts as a result of the loss of existing businesses and associated employment.

¹³² Sense for the Jo Cox Commission on Loneliness (2017): 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

¹³³ Sense for the Jo Cox Commission on Loneliness (2017): 'Someone cares if I'm not there'. Available at: <https://www.sense.org.uk/support-us/campaign/loneliness/>

¹³⁴ Office for National Statistics (2018): 'English language skills'

¹³⁵ Office for National Statistics (2018): 'English language skills'

¹³⁶ Office for National Statistics (2018): 'English language skills'

¹³⁷ Leeds University Business School (2004): 'The Economic and Social Impact of Redundancies from Corus and Allied Steel and Wire in Wales'

¹³⁸ Age UK (2013): 'Older Workers at High Redundancy Risk' available at: <https://www.ageuk.org.uk/latest-press/archive/older-workers-at-high-redundancy-risk/>

¹³⁹ The Prince's Responsible Business Network (2017). 'Factsheet: Why employers need to tackle ageism in redundancy and recruitment processes.' Available at: https://age.bitc.org.uk/sites/default/files/business_in_the_community_factsheet_-_tackling_age_bias_in_processes.pdf

Older people may also be disproportionately affected by the potential closure of small businesses, where self-employment is common. Research shows that part-time self-employment is highest among those over the age of 55, and that older people are the fastest growing age group of self-employed people, with those aged over 70 showing the greatest increase of those becoming self-employed out of the total UK workforce between 2001 and 2015.¹⁴⁰

Disabled people

According to research from the Equality and Human Rights Commission, disabled people are more likely to experience barriers to employment than non-disabled people. More than a third of disabled people in employment (36%) say that they are limited in the amount or type of work that they do compared with less than a fifth (19%) of non-disabled people. This increases to (66 %) for unemployed disabled people who say they are limited in the amount or type of work they could do, compared to 31 % of unemployed non-disabled people.¹⁴¹ This means that disabled people could be disproportionately impacted by loss of employment, particularly if their current working conditions would be difficult to find or replicate elsewhere

In addition, the employment and educational attainment rate for disabled people in the UK is considerably lower than the rate for non-disabled people.¹⁴² Disabled people are therefore less likely to be in employment and more likely to live in areas of higher deprivation.

BAME people

People from a BAME background may be disproportionately impacted by loss of employment; they are more likely to experience unemployment, and to face barriers to employment and social mobility. Research has shown that while educational attainment among people of minority ethnic backgrounds has improved, this has not been reflected in social mobility and job opportunities.¹⁴³ Research around barriers to employment for ethnic minorities suggests that in part this may be due to geographical distribution of opportunities and labour market segregation. It has been argued that demographic groups congregate in different sectors of the labour market and tend to cover lower-paid jobs.¹⁴⁴

For all working age groups in 2017 (between 16 and 64 years old) White people had a lower rate of unemployment than people across non-White ethnic groups.¹⁴⁵ According to analysis of the latest UK census carried out by Middlesex University, there are significant variations in the level of unemployment by ethnicity, with White groups experiencing lower than average rates of

¹⁴⁰ Institute of Directors (2017) 'The Age of the Older Entrepreneur'. Available at:

<https://www.iod.com/Portals/0/PDFs/Campaigns%20and%20Reports/Start%20ups/Older-Entrepreneur-Report-IoD.pdf>

¹⁴¹ Equality and Human Rights Commission (2013). *Barriers to unemployment and unfair treatment at work: a quantitative analysis of disabled people's experiences*. Available at: <https://www.equalityhumanrights.com/sites/default/files/research-report-88-barriers-to-employment-and-unfair-treatment-at-work-disabled-peoples-experiences.pdf>

¹⁴² Merton Accord (2018): 'Merton Accord: Health, social care and wellbeing consortium, membership prospectus'. Available at: <https://www.mvsc.co.uk/sites/mertonconnected.com/files/Prospectus%20Merton%20Accord%20Launch%20Version%20240118.pdf>

New Policy Institute (2016) 'Disability and poverty: Why disability must be at the centre of poverty reduction'. Available at: https://www.npi.org.uk/files/3414/7087/2429/Disability_and_poverty_MAIN_REPORT_FINAL.pdf

¹⁴³ Brown, L., Heath, A., Li, Y., & Nazroo, J. (2013). *Addressing ethnic inequalities in social mobility: research findings from the CoDE and Cumberland Lodge policy workshop*. Available at: <http://hummedia.manchester.ac.uk/institutes/code/briefings/policy/code-social-mobility-briefing-Jun2014.pdf>

¹⁴⁴ Social Mobility Commission (2016) 'Ethnicity, Gender and Social Mobility'. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/579988/Ethnicity_gender_and_social_mobility.pdf

¹⁴⁵ UK Government (2018) 'Unemployment'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

unemployment whilst Gypsy / Irish traveller, 'other Black', Bangladeshi and Black African groups having a rate twice as high as the national average.¹⁴⁶

Women and young people

Those that are more likely to face unemployment also include young people and women. Statistics released in 2018 have shown that for the first time since the 1980s, British women are more likely to be unemployed than men. For young people, amongst those aged 16-24, 11.2% are Not in Education, Employment or Training (NEET). Recent unemployment statistics for the UK show that young people are around four times more likely to be unemployed than their adult counterparts aged 25-64.¹⁴⁷

B.2.2 Impact of redundancy on health and wellbeing

Children

Involuntary redundancy may also disproportionately impact the wellbeing of the children of those directly affected. Research has shown that redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.¹⁴⁸ This, in turn, is connected to effects on children's education attainment. Studies have shown that effects of parental redundancy on children including higher likelihood of grade repetition, dropout, suspension or expulsion from school, lower educational attainment and lower income of children in adulthood.¹⁴⁹

Older people

Involuntary job loss due to redevelopment and renewal may have disproportionate health impacts for older workers. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions.¹⁵⁰

B.2.3 Difficulty accessing commercial finance

For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises.

BAME people

Research indicates that businesses owned by members of some ethnic groups are more likely to be denied a loan outright in comparison to White-owned businesses. Black African owned businesses are four times more likely to be denied a loan outright, Black Caribbean-owned businesses are three and a half times more likely, Bangladeshi-owned businesses are two and

¹⁴⁶ Kaye, N., (2011) "BME populations in London: statistical analysis of the latest UK census", *Middlesex University London*.

¹⁴⁷ UK Government (2018) 'Unemployment'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

¹⁴⁸ Brand, J. E. (2015). 'The far-reaching impact of job loss and unemployment'. *Annual review of sociology*, 41, 359-375. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4553243/>

¹⁴⁹ Brand, J. E. (2015). 'The far-reaching impact of job loss and unemployment'. *Annual review of sociology*, 41, 359-375. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4553243/>

¹⁵⁰ Gallo, W. T., Bradley, E. H., Falba, T. A., Dubin, J. A., Cramer, L. D., Bogardus Jr, S. T., & Kasl, S. V. (2004). 'Involuntary job loss as a risk factor for subsequent myocardial infarction and stroke: findings from the Health and Retirement Survey'. *American journal of industrial medicine*, 45(5), 408-416. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1351254/pdf/nihms-6175.pdf>

a half times more likely, and Pakistani-owned businesses are one and a half times more likely. This suggests that BAME-owned businesses tend to experience greater difficulties in securing financial support, which could be detrimental where redevelopment results in a reduction in affordable commercial premises.¹⁵¹

B.2.4 Reduced job satisfaction

Where businesses are required to relocate as a result of renewal, this may increase commuting distances for owners and employees. Time spent commuting is negatively associated with wellbeing.¹⁵²

Women

An increased commuting distance may increase the associated time and cost of travelling to reach work. Evidence has shown that an increase in commuting time can impact on job satisfaction, and that for women, longer commutes have a greater impact on job satisfaction than for men.¹⁵³ The greater impact for women may be related to greater household and family responsibilities which can place more responsibilities and time pressure on women.

B.3 Impact on community following renewal projects

The following section outlines the evidence around potential effects on local communities following completion of urban and residential renewal projects.

B.3.1 Tackling crime and disorder

Levels of crime have in part be attributed to the urban environment. Using theoretical approaches such as Rational Choice Theory¹⁵⁴ and Broken Windows Theory,¹⁵⁵ a strong argument has developed which links the design of neighbourhoods and towns to levels of crime and disorder.¹⁵⁶ It has been argued that the opportunity for some forms of crime can be reduced through better thought-out approaches to planning and design of neighbourhoods and towns. For example, concepts such as Crime Prevention Through Environmental Design (CPTED)¹⁵⁷ are more frequently used today to ensure buildings and public spaces are designed in a way that aims to reduce the occurrence of crime and alter the environmental factors that might encourage criminal behaviour. Indeed, evidence suggests that homes built to 'Secured by Design' principles can reduce burglary and crime rates by up to 75%.¹⁵⁸

Children, young people, older people, disabled people, BAME people, men, women and LGBT people

¹⁵¹ Enterprise Research Centre (2013): 'Diversity and SMEs'. Available at: https://www.enterpriseresearch.ac.uk/wp-content/uploads/2013/12/ERC-White-Paper-No_3-Diversity-final.pdf

¹⁵² Stoll et al (2012) Well-being evidence for policy: A review. New Economics Foundation (London). Available at: https://b3cdn.net/nefoundation/10b8aabd90c5771ff9_a0m6bv5a.pdf

¹⁵³ Economic and Social Research Council (2017) 'Understanding the Impact of Commuting on Peoples' Lives'. Available at: <https://www.understandingsociety.ac.uk/research/publications/524659>

¹⁵⁴ Felson and Clarke (1998) 'Opportunity Makes the Thief, Practical Theory of Crime Prevention'. Available at: <https://pdfs.semanticscholar.org/09db/dbce90b22357d58671c41a50c8c2f5dc1cf0.pdf>

¹⁵⁵ Wilson and Kelling (1982) 'Broken Windows: The police and neighbourhood safety'. Available at: <https://www.theatlantic.com/magazine/archive/1982/03/broken-windows/304465/>

¹⁵⁶ See for example, Monahan and Gemmill (2015) 'Reducing Crime Hotspots in City Centres'. Available at: <http://www.bre.co.uk/filelibrary/Briefing%20papers/102417-Crime-Hotspots-Briefing-Paper-v4.pdf>

¹⁵⁷ Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications

¹⁵⁸ Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: <https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf>

Changes to the urban environment that affect crime and disorder can impact on those who are more likely to be a victim or witness of crime, including young people, disabled people, people from BAME backgrounds, men and LGBT people. Changes may also affect those who are likely to be adversely impacted by fear of crime, including children, older people, BAME people, women and LGBT people.

B.3.2 Improved access, mobility and navigation

Renewal processes open opportunities to create spaces and places for all, using principles of inclusive or universal design. There are seven principles of inclusive design aimed at ensuring that the design and composition of an environment can be accessed and effectively used by all, regardless of age, size ability or disability.¹⁵⁹ It also provides an opportunity to implement Crime Prevention Through Environmental Design (CPTED),¹⁶⁰ particularly in relation to strategies around ensuring clear sight lines, adequate lighting, reduction of isolated routes, mixed land use and signs and information.

As outlined below, there are a few equality groups who can experience difficulties with access, mobility and navigation or can be particularly affected by limited access. Any improvements to the accessibility and mobility of an area for all people are therefore likely to disproportionately benefit these groups:

Children

Children who cannot move about safely and independently on foot and bicycle often become more dependent on their parents for mobility needs, and less physically active themselves. This, in turn, can reduce opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.¹⁶¹

Evidence also suggests that there are particular issues around road safety for children who are travelling on foot, as children are more likely to be injured or killed as pedestrians in a road traffic accident.¹⁶² This figure increases for children living in low-income areas, due to greater exposure to higher levels of traffic.¹⁶³

Older people

Older people are more likely to suffer from mobility issues, which can affect their experiences of, and lead to difficulties when, travelling.¹⁶⁴ In particular, research by Age UK has highlighted safety concerns for older people regarding travel and transport. Older people walk more slowly than others which can be a problem when crossing the road, and road crossings often do not give older people enough time to cross safely.¹⁶⁵ Around 40% of pedestrian deaths in Great

¹⁵⁹ National Disability Authority (2019) 'What is Universal Design'. Available at: <http://universaldesign.ie/What-is-Universal-Design/>

¹⁶⁰ Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications

¹⁶¹ WHO (2011) 'Health co-benefits of climate change mitigation -Transport sector'. Available at: https://www.who.int/hia/green_economy/transport_sector_health_co-benefits_climate_change_mitigation/en/

¹⁶² WHO (2008) 'World report on child injury prevention'. Available at: https://www.who.int/violence_injury_prevention/child/injury/world_report/Road_traffic_injuries_english.pdf

¹⁶³ Social Exclusion Unit (2003). 'Making the connections: transport and social exclusion'. Social Exclusion Unit, *The Stationery Office, London*. Available at: http://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_policy/---invest/documents/publication/wcms_asist_8210.pdf

¹⁶⁴ Government Office for Science (2015) 'How can transport provision and associated built environment infrastructure be enhanced and developed to support the mobility needs of individuals as they age?' Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/443508/gs-15-7-future-ageing-transport-er23.pdf

¹⁶⁵ Age UK (2015): 'The future of transport in an ageing society'. Available at: https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/rb_june15_the_future_of_transport_in_an_ageing_society.pdf

Britain are among older people aged 60 and over. The risk of an accident crossing the road increases rapidly with age from the early 60s, very rapidly from 70 years old and substantially after the age of 79.¹⁶⁶

Disabled people

A major obstacle to maintaining continuity of accessibility when travelling from one point to another is an inaccessible pedestrian environment. Common issues for disabled people can include non-existent or poorly maintained footways, inaccessible overpasses or underpasses, crowded footways, hazards for people with visual impairments and deafblind people, lack of traffic controls, lack of aids at street crossings for people with visual impairments, and dangerous local traffic behaviours.¹⁶⁷ This can have a knock-on impact in terms of health and wellbeing. Evidence shows that over half of disabled people (53%) have reported feeling lonely. Although the causes of loneliness are complex and vary between individuals, one factor which has been identified is the barrier to making social connections for practical reasons in terms of being able to travel. Improving links, making sure to consider accessibility, could therefore help disabled people to maintain and establish social connections.¹⁶⁸

Disabled people are also more likely to be involved in a pedestrian collision than their non-disabled counterparts. The risk is said to be higher for the following reasons:

- wheelchair users experiencing difficulties if a kerb is not dropped or if there are a lack of accessible routes. Wheelchair users can also be less visible to motorists;
- those with a sight or hearing impairment are sometimes unable to anticipate the actions of other road users;
- those with mobility impairments can cross the road slowly and can be at risk of falling if the surface is uneven; and
- those with an intellectual disability can experience difficulties in making good judgements about safety, such as when it is safe to cross a road.¹⁶⁹

Finally, wayfinding strategies can improve public realm inclusion for disabled people with those with physical, cognitive or sensory impairments.¹⁷⁰ Benefits may arise from orientation support that includes clear information, signage and intuitive wayfinding.

Ensuring inclusive design is implemented in renewal projects can therefore help to protect against some of these issues occurring.

B.3.3 Improved public realm and green space

Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home.¹⁷¹ In addition, green space has been shown to impact

¹⁶⁶ RoSPA (2018): 'RoSPA pedestrian safety policy paper'. Available at: <https://www.rospa.com/rospaweb/docs/advice-services/road-safety/pedestrians/pedestrian-policy-paper.pdf>

¹⁶⁷ WHO (2011) 'World Report on Disability'. Available at: https://www.who.int/disabilities/world_report/2011/en/

¹⁶⁸ Sense (2017): 'Someone cares if I'm not there'. Available at: https://www.nat.org.uk/sites/default/files/publications/loneliness_report_-_someone_cares_if_im_not_there.pdf

¹⁶⁹ RoSPA (2018): 'RoSPA pedestrian safety policy paper'. Available at: <https://www.rospa.com/rospaweb/docs/advice-services/road-safety/pedestrians/pedestrian-policy-paper.pdf>

¹⁷⁰ NHS (2005). 'Wayfinding'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/148500/Wayfinding.pdf

¹⁷¹ House of Commons Women and Equalities Committee (2017): 'Building for Equality: Disability and the Built Environment'.

positively on both physical and mental health, including through increased wellbeing and decreased tension, anxiety, and depression.¹⁷²

The improvement of public space through renewal can benefit the following groups:

Children

Research carried out by UCL highlighted that urban green space can have a positive role in a child's cognitive functioning.¹⁷³ The study found that children who lived in areas with more green space outperformed those from areas with less green space. Exposure to green space is also important for a child's wellbeing and healthy development. However, children living in London can experience barriers in access to green space compared to the rest of the UK. This is due to the high population densities, deficiencies in green space and poor access to private gardens that are characteristic of London.¹⁷⁴

The presence of urban green space also presents an opportunity to incorporate play space into regeneration schemes. Research by Play England has highlighted the benefits of play to children, and how play is central to a child's physical, psychological and social wellbeing. Play space can enable children to form friendships, interact with others and feel part of a group, something that is important to levels of self-esteem. Play space can also encourage children to have familiarity with an area and identify as part of a community. Participating in outdoor activities with family can also help social bonding and positive relationships within family units¹⁷⁵

Lastly, ensuring that outdoor play space is fun and enjoyable for children is a key motivator for physical activity and exercise.¹⁷⁶ Body Mass Index (BMI) scores are used as a common indicator of whether someone is a healthy weight, overweight or obese, with a score of 30 or above indicating obesity.¹⁷⁷ Research has found that children living in areas with more green space have lower BMI scores than children living in areas with less green space.¹⁷⁸

Older people

Evidence suggests that inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people as social isolation has been linked to poor health and increased mortality rates.¹⁷⁹

BAME people

Research has found that in urban areas BAME people tend to have less access to local green space, and the space they can access is often of poor quality. For example, in the UK, wards that have a BAME population of less than 2% have six times as much green space as wards

¹⁷² Houses of Parliament, Parliamentary Office of Science & Technology (2016): 'Green Space and Health'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/fuel-poverty/latest>
<http://researchbriefings.files.parliament.uk/documents/POST-PN-0538/POST-PN-0538.pdf>

¹⁷³ UCL (2018): 'Greener neighbourhoods may be good for children's brains'. Available at: <https://www.ucl.ac.uk/ieo/news/2018/sep/greener-neighbourhoods-may-be-good-childrens-brains>

¹⁷⁴ London Sustainable Development Commission (2011): 'Sowing the seeds: Reconnecting London's children with nature'. Available at: https://www.london.gov.uk/sites/default/files/lfdc_-_sowing_the_seeds_-_full_report_2011.pdf

¹⁷⁵ Mansfield et al. (2018). Family and Outdoor recreation. What Works Centre for Wellbeing (London). Available at: <https://whatworkswellbeing.org/product/familyand-outdoor-recreation>

¹⁷⁶ Play England (2012): 'A literature review on the effects of a lack of play on children's lives'. Available at: <http://www.playengland.net/wp-content/uploads/2015/09/a-world-without-play-literature-review-2012.pdf>

¹⁷⁷ NHS (2015): 'Overview: Obesity'. Available at: <https://www.nhs.uk/conditions/obesity/>

¹⁷⁸ Public Health England (2014): 'Local action on health inequalities: Improving access to green spaces'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/357411/Review8_Green_spaces_health_inequalities.pdf

¹⁷⁹ World Health Organisation (2016): 'Urban green spaces and health, a review of evidence'. Available at: http://www.euro.who.int/_data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1

where the BAME population is over 40%.¹⁸⁰ The provision of green space through a renewal process is therefore likely to benefit this group through providing them with better access to such space.

Disabled people

Public spaces can often be inaccessible for disabled people. The presence of vehicular traffic and lack of accessible design (such as the use of appropriate paving and lighting) can present a barrier to using outdoor, shared public spaces.¹⁸¹

Access to green spaces has been shown to have health benefits for disabled people. This is particularly the case with autistic individuals and those with other learning disabilities. Visiting green space has been shown to enhance levels of focus and attention, as well as reduced levels of anxiety and can boost self-esteem for such groups.¹⁸² More generally access to green space can have positive benefits in terms of improving physical health and mental wellbeing through encouraging greater physical activity. It can promote greater social interaction and build social capital resulting in positive health benefits.¹⁸³

B.3.4 Provision of community resources and improved social cohesion

Children, older people, disabled people, BAME people, pregnant women and LGBT people

Community resources provide important places of social connection and promote wellbeing for children, older people, disabled people, people from a BAME background and pregnant women. Local spaces that support and encourage interactions between users and contribute to a shared sense of identity, are linked to increased relations between neighbours, as well as perceived social cohesion and an attachment to place.¹⁸⁴ For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation.¹⁸⁵ Indeed, levels of social cohesion and strong local relationships between individuals within communities can have beneficial effects on quality of life and wellbeing.¹⁸⁶

Older people are especially vulnerable to loneliness and social isolation.¹⁸⁷ According to Age UK, around 1.4 million people in England over the age of 50, reported being 'often lonely'.¹⁸⁸ A potential contributing factor of loneliness has been identified as the lack of opportunities for older people to socialise or attend events.¹⁸⁹ The introduction of community-based services

¹⁸⁰ Commission for Architecture and the Built Environment (2010): 'Community green: Using local spaces to tackle inequality and improve health'. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/community-green-full-report.pdf>

¹⁸¹ House of Commons Women and Equalities Committee (2017): 'Building for Equality: Disability and the Built Environment'.

¹⁸² Gaudion and McGinley (2012) 'Green spaces- outdoor environments for adults with autism'. Available at: <https://www.rca.ac.uk/documents/331/GreenSpacesX.pdf>

¹⁸³ Weldon, S and Bailey C (2007) 'New pathways for health and well-being in Scotland: Research to understand and overcome barriers to accessing woodlands'. Available at: https://www.forestresearch.gov.uk/documents/1406/New_Pathways_to_health_Nov2007.pdf

¹⁸⁴ Wickes et al. (2019). Neighbourhood social conduits and resident social cohesion. *Urban Studies* 2019, Vol. 56(1) 226–248

¹⁸⁵ What works wellbeing (2018) 'Places, spaces, people and wellbeing: full review – A systematic review of interventions to boost social relations through improvements in community infrastructure'. Available at: <https://whatworkswellbeing.org/product/places-spaces-people-and-wellbeing/>

¹⁸⁶ Buonfino (2006) Neighbouring in contemporary Britain. A think piece for the Joseph Rowntree Foundation Housing and Neighbourhoods Committee. Joseph Rowntree Foundation

¹⁸⁷ NHS (2018) 'Loneliness in older people'. Available at: <https://www.nhs.uk/conditions/stress-anxiety-depression/loneliness-in-older-people/>

¹⁸⁸ Age UK (2018) 'All the Lonely People: Loneliness in Later Life'. Available at: <https://www.ageuk.org/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/loneliness/loneliness-report.pdf>

¹⁸⁹ Merton Council (2017) 'Tackling loneliness in Merton'. Available at: <https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwi2t83Bov7eAhXKlcAKHTb2CccQFjAAegQI>

have can therefore have a positive effect in terms of reducing isolation and increasing social capital.

Disabled people are more likely to experience social isolation and therefore the provision of a service that brings people together and encourages integration is likely to deliver positive effects for this group. A 2017 survey conducted by disability charity Scope has shown that 67 % of disabled people have felt lonely in the past year, and on a typical day one in eight disabled people have had less than half an hour's interaction with someone else.¹⁹⁰

For children making new friends, and social contact in general, can help improve confidence and is an important life skill.¹⁹¹ Learning that takes place outside of the classroom is also seen as a powerful way of stimulating further learning. Provision of community resources and hubs which aim to bring people together will likely encourage integration and potentially positively impact on those people who regularly use the services, including young people. This will likely support in improving wellbeing and developing social capital.

Improved provision of affordable and accessible facilities for sports and physical activity would positively affect groups that often face barriers to participation, including older people, disabled people, BAME communities, and those who identify as LGBT.¹⁹²

B.3.5 New employment opportunities

Older people, disabled people, BAME people, women and young people

Renewal and regeneration where done effectively can act as a means of promoting economic growth and supporting job creation.¹⁹³ For example, property development can contribute to urban economic regeneration through the enabling of local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility, this may particularly benefit the protected characteristic groups who are more likely to face barriers to employment. These groups include older people, disabled people, women, young people and those from a BAME background.

B.3.6 Improved housing provision

Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability (which would have an effect on the groups identified in section B.1.2 and B.1.3 which include children, disabled people and BAME people), as well as its quality and efficiency in energy consumption. Interventions which make houses safer and healthier have been found to have a positive impact on physical health. For example, interventions to reduce mould have impacted upon better respiratory health for

CRAC&url=https%3A%2F%2Fwww2.merton.gov.uk%2FLoneliness%2520Final%2520Report.docx&usg=AOvVaw13aJW-pUzi74X-CqpU3DiK

¹⁹⁰ Scope (2017): 'Nearly half of disabled people chronically lonely'. Available at: <https://www.scope.org.uk/press-releases/nearly-half-of-disabled-people-chronically-lonely>

¹⁹¹ Yu, SY et al. (2011) 'Children's Friendship Development: A Comparative Study'. Available at: <http://ecrp.uiuc.edu/v13n1/yyu.html>

¹⁹² Assembly, N. I. (2010) 'Barriers to Sports and Physical Activity Participation'. Available at: <http://archive.niassembly.gov.uk/researchandlibrary/2010/1810.pdf>

¹⁹³ Communities and Local Government (2012) 'Regeneration to enable growth: A toolkit supporting community-led regeneration'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/5983/2064899.pdf

residents.¹⁹⁴ Where existing communities are supported to be rehoused into the area, this can affect all parts of the community, but can have a disproportionate effect on the below groups:

Children and older people

Through redevelopment, homes can be re-provided to a high standard, including better sound proofing and lower energy costs and consumption levels.¹⁹⁵

Young people and older people are both often at risk for increased vulnerability to noise pollution.¹⁹⁶ Reduced levels of noise as a result of redevelopment can therefore disproportionately affect these groups.

While the Decent Homes Standard (DHS) requires local authorities to make sure all social housing provides a reasonable degree of thermal comfort to its residents it does not require them to ensure all social housing is heated affordably. It therefore does not always automatically serve to address issues such as fuel poverty.¹⁹⁷ The provision of new housing offers an opportunity to provide well insulated housing which can be more affordably heated.

Fuel poverty and cold housing can have several detrimental effects on individual's physical and mental health. Children living in cold homes are more than twice as likely to suffer from a variety of respiratory problems than children living in warm homes. Cold housing can negatively affect children's educational attainment, emotional wellbeing and resilience.¹⁹⁸ Effects of cold housing are also evident among older people in terms of higher mortality risk, physical health and mental health. Older people spend on average 80% of their time at home, making them more susceptible to cold or damp related health problems. Cold temperatures can increase the levels of minor illnesses such as colds and flu, contribute towards excess winter deaths, negatively affect mental health, and exacerbate existing conditions such as arthritis and rheumatism.¹⁹⁹ They groups are therefore likely to benefit disproportionately from any redevelopment of housing.

Disabled people

Improvements to the housing can help to reduce energy consumption and in turn reduce energy bills²⁰⁰. Research from disability charity Scope evidences that long term impairments or conditions have a significant impact on energy costs, with many disabled people consuming more energy because of their impairment or condition. Those with limited mobility report having to use more heating to stay warm.²⁰¹ Any improvements to energy consumption may disproportionately affect this group.

People from BAME backgrounds

¹⁹⁴ Mansfield et al. (2018). Family and Outdoor recreation. What Works Centre for Wellbeing (London). Available at: <https://whatworkswellbeing.org/product/familyand-outdoor-recreation/>

¹⁹⁵ City of Westminster Council (2018): 'My Ebury: Shaping the preferred scenario'.

¹⁹⁶ Brandon, P (2018) 'Noise pollution and older adults – a real health hazard'. Available at: <http://www.ageucate.com/blog/noise-health-hazard-seniors-dementia/>; Gupta, A, et al. (2018) 'Noise Pollution and Impact on Children Health.' Available at: <https://www.ncbi.nlm.nih.gov/pubmed/29313308>

¹⁹⁷ Centre for Sustainable Energy (2006): 'Tackling fuel poverty at local and regional level: opportunities to deliver action and policies to stimulate success'. Available at: https://www.cse.org.uk/downloads/reports-and-publications/fuel-poverty/tackling_fuel_poverty_at_local_&_regional_level.pdf

¹⁹⁸ Marmot Review Team (2011) 'The Health Impacts of Cold Homes and Fuel Poverty'. London: Department of Epidemiology and Public Health, University College London.

¹⁹⁹ The Housing and Ageing Alliance (2013) 'Policy Paper: Health, Housing and Ageing', Available at www.housingalliance.org.uk/HAA/

²⁰⁰ HBF (2017) 'You've got the power: Energy efficiency and new build homes'. Available at: https://www.hbf.co.uk/documents/7273/HBF_Report_-_YOUVE_GOT_THE_POWER_-_OCT_FINAL.pdf

²⁰¹ Scope (2018) 'Out in the Cold', Available at <https://www.scope.org.uk/Scope/media/Images/Out-in-the-cold.pdf>

In England, fuel poverty is more common within ethnic minority households when compared to White households.²⁰² Data has highlighted that in 2015, 16% of ethnic minority households were living in fuel poverty compared to 10% of White households.²⁰³ As such, any improvements which reduce energy consumption and subsequently lowers household bills, is likely to disproportionately affect this group.

B.3.7 Safety and security

In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime such as increased vandalism, arson, break-ins and other damage to neighboring homes.²⁰⁴

Children, young people, older people, disabled people, BAME people, LGBT people, men and women

This potential increase in crime can impact several vulnerable groups remaining in the community during demolition who are more likely to be a victim or witness of crime. An Ipsos MORI survey on public views of policing in England and Wales in 2016 determined that groups who were more likely to have had contact with their local police as a victim or witness include: young people aged 16-34, disabled people, those from BAME backgrounds, and lesbian, gay, bisexual and transgender (LGBT) people.²⁰⁵

The Crime Survey for England and Wales (CSEW), has also identified that several protected characteristic groups are more likely to be victims to crime:

- Men are more likely to be victims of violent crime than women.²⁰⁶
- Mixed and Asian ethnic groups are more likely to have said they were victim of crime compared to white people.²⁰⁷
- Younger people aged 16 to 24 are more likely to be victims of violence than those in older age groups.²⁰⁸

In addition, the fear of crime is also more prevalent amongst the following groups, and consequently this can influence individual mental health and wellbeing.²⁰⁹

- Evidence from Age UK suggests that although older people are generally at a lower risk of crime compared to other ages, they are often more fearful of crime.²¹⁰

²⁰² This does not include White ethnic minority households.

²⁰³ Department for Business, Energy and Industrial Strategy (2017): 'Ethnicity facts and figures: Fuel poverty'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/fuel-poverty/latest>

²⁰⁴ Power, A. (2010): 'Housing and sustainability: demolition or refurbishment?' Available at https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1406191156_060618_Guide_to_UK_Air_Pollution_Information_Resources-issue_2-FINAL.pdf <https://www.icevirtuallibrary.com/doi/abs/10.1680/udap.2010.163.4.205>

²⁰⁵ Ipsos MORI (2016): 'Public views of policing in England and Wales'. Available at: <https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Publications/sri-public-views-of-policing-in-england-and-wales.pdf>

²⁰⁶ Office for National Statistics (2018) 'The nature of violent crime in England and Wales: year ending March 2018' Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/thenatureofviolentcrimeinenglandandwales/yearendi-ngmarch2018>

²⁰⁷ Gov.uk (2019) 'Victims of crime'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest>

²⁰⁸ *ibid*

²⁰⁹ Stafford, M et al. (2006) 'Association between fear of crime and mental health and physical functioning'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2040373/>

²¹⁰ Age UK (2006) 'Crime and fear of crime: help the aged policy statement 2006'. Available at: https://www.ageuk.org.uk/documents/en-gb/for-professionals/communities-and-inclusion/crime_and_fear_of_crime_2006_pro.pdf?dtrk=true

- Fear of crime can be an issue for women when they are travelling. Data from the ONS Crime Survey for England and Wales suggests that women fear more for their safety than men when walking alone at night – two fifths of women reported feeling 'somewhat unsafe' and one in eight reported feeling 'very unsafe'.²¹¹
- A study by Transport for London highlights that BAME individuals are more likely to express concerns over safety and security when travelling (particularly after dark) than white people and are more likely to say that their frequency of travel is affected 'a lot' or 'a little' due to these concerns.²¹²
- Research from Stonewall demonstrates that LGBT people often fear for their safety and well-being in public spaces and on pedestrian journeys.²¹³

It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as children, older people, BAME people and women.²¹⁴

²¹¹ ONS (2015) Crime Survey for England and Wales. Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/2015-07-16>

²¹² Transport for London (2013) 'Attitudes to Safety and Security – Annual Report'. Available at: <https://tfl.gov.uk/corporate/publications-and-reports/safety-and-security>

²¹³ Stonewall (2017) LGBT in Britain: Hate Crime. Available at: <https://www.stonewall.org.uk/comeoutforLGBT/lgbt-in-britain/hate-crime>

²¹⁴ Lorenc, T et al (2013) 'Fear of crime and the environment: systematic review of UK qualitative evidence'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3666893/>

C. Equality surveys

C.1 Findings from the survey

The approach used for the equality surveys with residents and businesses is set out in detail in Chapter 1. Analysis of the findings of these surveys, in addition to the publicly held data relating to the Ebury Bridge Estate households, has helped to build a demographic profile of residents within the Estate and provided the Council with a better understanding of their needs based on their protected characteristics.

C.1.1 Demographics of residents on the Estate

A total of 46 households completed the initial residents survey which was provided to households on June 2018 and a total of 49 households took part in the survey which was undertaken in August 2018. Those who completed the June 2018 residents survey were asked to outline their personal demographic details. Those who completed the August 2018 residents survey were asked to outline the demographic details of their household. As such, both surveys provide some insight into the presence of protected characteristics across residents. However, given the differences between the questioning of the two survey the results have not been combined and have been discussed separately below:

Age

In both the resident surveys, a range of ages were represented across households. Looking specifically at the presence of children (under 16) young people (16- 24) and older people (over 65):

- No children under 16 were identified through the June 2018 survey
- 15 households which took part in the August 2018 survey reported children under 16
- 2 participants of the June 2018 survey reported being between the ages of 16 and 24
- 14 households which took part in the August 2018 survey reported that someone in their household was between 16 and 24
- 27 participants of the June 2018 survey reported being between the ages of 16-64
- 38 households which took part in the August 2018 survey reported that someone in their household was between 16 and 64
- 16 participants of the June 2018 survey reported being aged 65 or over.
- 17 households which took part in the August 2018 survey reported that someone in their household was 65 or over.

Disability

Across the households which took part in the resident surveys:

- 17 participants of the June 2018 survey reported having a physical disability or mental health illness. 9 participants either did not respond to this question or selected 'prefer not say'.
- 22 households which took part in the August 2018 survey reported that someone in their household had a disability or long-term illness.

Gender reassignment

No participant of the June 2018 survey reported being trans and, similarly, no households which completed the August 2018 survey reported any member of the household as being trans. However, 4 participants who took part in the June 2018 survey did not provide an answer to this question and 2 households which completed the August 2018 survey did not provide an answer.

Marriage and civil partnerships

Across the households which took part in the resident surveys:

- 10 participants of the June 2018 survey reported being married or in a civil partnership, 13 did not provide a response or selected 'prefer not say'.
- 20 households which completed the August 2018 survey reported someone in their household as being married or in a civil partnership, 8 did not provide a response or selected 'prefer not say'.

Pregnancy and maternity

None of those who responded to the June 2018 survey reported being pregnant or pregnant in the last year (6 participants did not respond to this question).

For the households which took part in the August 2018 survey, no household reported a member as being pregnant (7 households did not respond to this question), however three households reported that a member of the household had a baby within the last 12 months (11 households did not respond to this question).

Race and ethnicity

A range of ethnicities were reported across both resident surveys:

- 26 of those who responded to the June 2018 survey reported being from a BAME background (3 didn't provide a response or selected 'prefer not to say')
- 35 households which completed the August 2018 survey reported someone in the household as being from a BAME background.

Religion and belief

A range of religious belief were reported across both the resident surveys:

- Of those who responded to the June 2018 survey: 17 reported being Christian; 8 reported being Muslim; one reported as other; 9 reported as non-religious; and 11 either did not respond to the question or chose 'prefer not to say'.
- Of those households which completed the August 2018 survey 23 reported someone in the household as being Christian; 10 reported someone in their household as being Muslim; 2 reported someone in their household as being Jewish; 8 reported that someone in their household was non-religious, and 6 either did not respond to the question or chose 'prefer not to say'.

Sexual orientation

Across the households which took part in the resident surveys:

- 3 participants of the June 2018 survey reported as being of sexual orientation other than heterosexual. 12 participants either did not respond to this question or chose 'prefer not to say'.

- 3 households which completed the August 2018 survey reported that someone in their household was a sexual orientation other than heterosexual. 3 households either did not respond to this question or chose 'prefer not to say'.

Sex

Across the households which took part in the residents' surveys:

- 31 participants of the June 2018 survey reported being female and 13 reported as being male (one participant did not respond to this question)
- 43 households which completed the August 2018 survey reported that at least one member of the household was female and 32 reported that at least one member of the household was male (one household did not respond to this question).

C.1.2 Demographics of commercial properties

A total of six commercial properties took part in the commercial property survey. Those who completed this survey were asked to outline the demographic details of the commercial business owners as well as the details of the employees working on the property. Given the small number of businesses and the potential to identify responses, actual figures have not been reported on. Instead, the below outlines where the findings indicated the presence of individuals with a protected characteristic within the business.

Age

Across the commercial properties which completed the survey, there is a spread in the ages of the reported owners. Older people were identified but no younger people (under 25) were highlighted. The same is also true across those employed by the commercial properties who took part in the survey.

Disability

None of the commercial properties which completed the survey, reported having an owner or employing any staff with a long-term physical or mental health condition, disability or illness. However, two properties did not know or preferred not to disclose such information about their employees.

Gender reassignment

None of the commercial properties which completed the survey reported having owners or employing staff who identify as trans. However, two properties did not know or preferred not to disclose such information about their employees.

Marriage and civil partnerships

The commercial properties which took part in the survey identified some owners who are married. The same is also true for employees.

Pregnancy and maternity

None of the commercial properties which took part in the survey reported any of their owners or employees as being, or recently having been, pregnant. Two of the properties, did not know or preferred not to disclose such information about their employees.

Race and ethnicity

The commercial properties which took part in survey reported having owners and employing staff who are from a BAME background. Two properties did not know or preferred not to disclose such information about their employees.

Religion and belief

The commercial properties which took part in the survey reported having owners and employing staff who identified with a religion. Two properties did not know or preferred not to disclose such information about their employees.

Sex

The commercial properties who took part in the survey identified having male owners as well as female. The same is also true for those employed by the properties. Two of the properties preferred not to disclose or didn't know about their staff.

Sexual orientation

Across those commercial properties which took part in the survey it was reported that there are those with an alternative sexual orientation to heterosexual. One property preferred not to say about the owner and two preferred not to disclose or didn't know about their staff.

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