

Huguenot House options

Equality Impact Assessment

24 February 2021

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Introduction

1.1 Overview

This report sets out the requirements of the Equality Act 2010 ('the Equality Act'), and the potential impacts of the options for Huguenot House on people with characteristics protected under this legislation. At this stage, the findings set out within this report are based on a desk-based review of available evidence and information specific to Huguenot House where available.

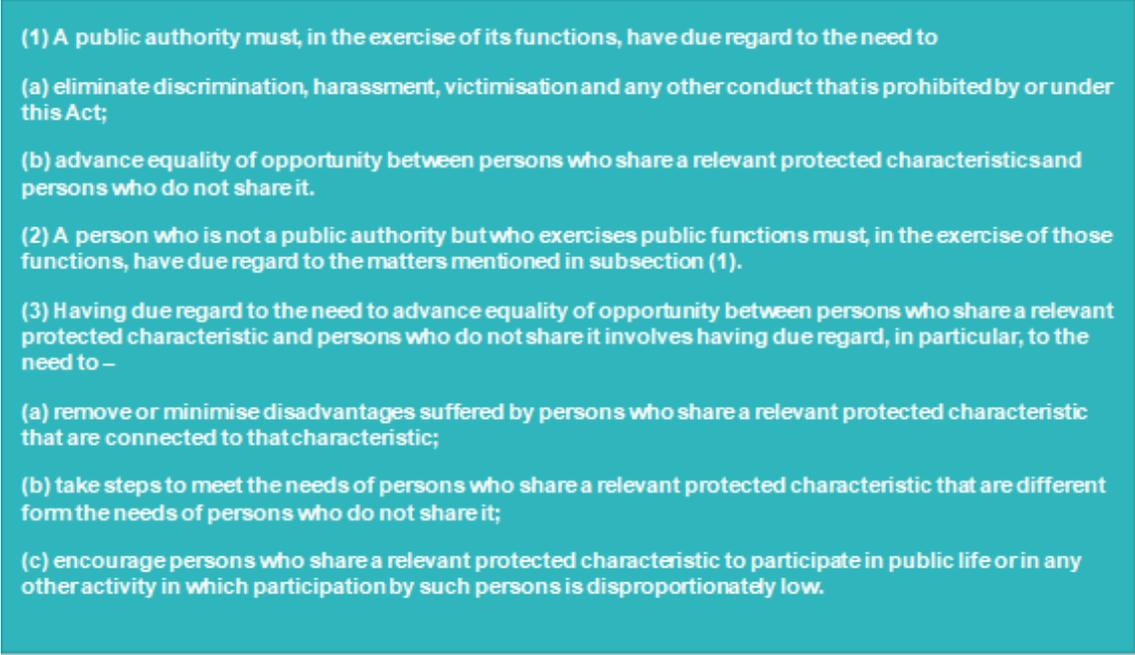
The EqIA considers the actual and potential impacts likely to be experienced by residents and leaseholders of Huguenot House in light of their 'protected characteristics'. It identifies any disproportionate impacts (both positive and negative) on residents with protected characteristics arising from the proposed options, sets out the mitigation measures put in place by the Council to manage these effects, and make recommendations where effects are not yet managed.

1.2 The Equality Impact Assessment

1.2.1 The Equality Impact Assessment and Public Sector Equality Duty

This EqIA has been undertaken in partial fulfilment of the Council's obligations under current UK equality legislation, and in particular the Equality Act. A Public Sector Equality Duty (PSED) is established at section 149 of the Equality Act, and this is set out in the Figure below.

Figure 2.1 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 characteristics 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.**

The PSED is intended to support good decision-making – it encourages public bodies such as the Council to understand how different people will be affected by their activities. This helps to ensure policies and services are appropriate and accessible to all and meet different people's

needs. The Council must have due regard to the aims of the PSED throughout the decision-making process for improving the site. The process used to do this must take account of the protected characteristics which are identified below.

1.2.2 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, this process is usually undertaken through some form of equality analysis. This can include EqIA.

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

The PSED specifies that public bodies should minimise disadvantages experienced by people due to their protected characteristics, take steps to meet the different needs of people from protected groups, and encourage participation from these groups where participation is disproportionately low. Undertaking equality analysis such as an EqIA 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 a consideration of the action that would help to avoid or mitigate any negative impacts on particular protected groups; and
- supporting evidence-based and more transparent decision-making.

1.2.3 Protected characteristics

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

Table 2.1 Protected characteristics

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 they have 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. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'.
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after birth and is linked to maternity leave in employment context.
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.

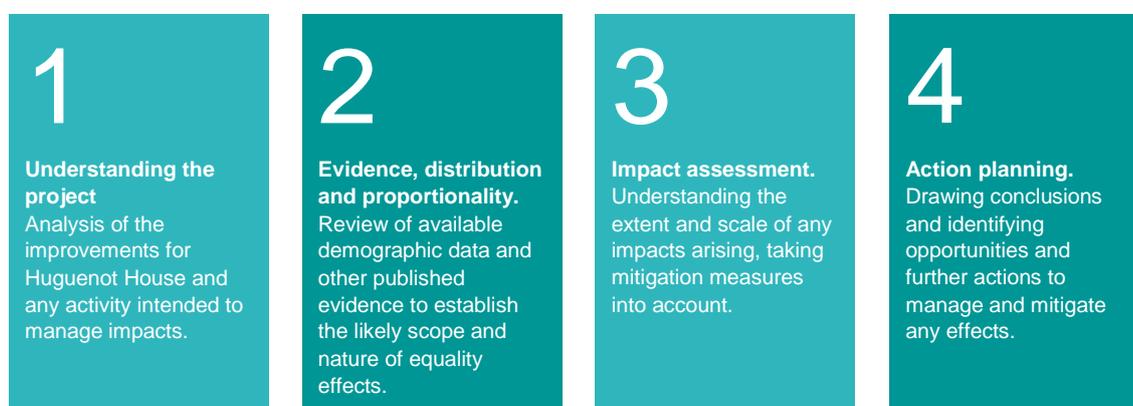
The analysis determines the likely or actual effects of policies or proposals on social groups by:

- 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 development.
- 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.

1.3 Approach

1.3.1 Our overall approach to the EqIA

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



1.3.2 Previous EqIA tasks undertaken

Previous EqIA tasks have helped to understand the equality impacts of several options for Huguenot House. A desk-based evidence and literature review has been conducted, in conjunction with a demographic analysis of the surrounding area, to help identify potential impacts associated with the project. A site visit has been undertaken to further identify any community facilities and resources located onsite and nearby. This provided context and site-specific information which helped inform equality impacts.

Once potential impacts were identified, they were assessed against the proposed options, giving consideration to the mitigation measures proposed by the Council. From this analysis, a series of 'next steps' were established to guide future decision-making, along with additional mitigation or enhancement measures to supplement those proposed by the council.

1.3.3 Tasks undertaken as part of the EqIA Update (2020)

Tasks for this EqIA comprised an assessment of the equality impacts of several up-to-date options for Huguenot House. A desk-based evidence and literature review was conducted to inform the assessment. Material specific to Huguenot House was reviewed, including consultation material, option descriptions, previous EqIA work and the most recent lease schedule. Due to the lack of demographic data for Huguenot House residents and businesses, the most up to date, relevant and specific Office for National Statistics (ONS) data sources were

used. Data was retrieved at Lower Super Output Area (LSOA)¹ and borough level where possible to support the findings uncovered in the desk-based evidence and literature review. Mitigation and enhancement measures put in place by the Council (including housing and relocation policies for residents in the City of Westminster) have also been considered, alongside the potential to expand the current period of public consultation.

1.3.4 Future tasks to be undertaken as part of the EqIA

The next stage of the EqIA should review any future changes to options for Huguenot House, including the addition of any new options. Updates to impacts and the associated literature review should also be undertaken, reflecting any potential changes in options. Consideration should also be given to analysing and including the results of future public consultation, as well as carrying out equalities-based stakeholder engagement with the local community.

1.4 Approach to identifying equality effects

1.4.1 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 impact due to their protected characteristics. These effects are not dependent on the number of people affected.

The desk-based research stages of the analysis are used to explore the potential effects of the various options for Huguenot House. The output of this work identifies those protected characteristic groups that are likely to experience effects arising from the options and explains why.

1.4.2 Disproportionate effects

Disproportionate effects occur where there is likely to be a comparatively greater effect on people from a particular protected characteristic group than on other members of the general population. Disproportionate effects may occur if the affected community comprises of 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.

Identifying disproportionate effects involves determining the demographic composition of the area where effects are expected to arise; this work identifies the numbers and proportions of people from protected characteristic groups around Westminster and London.

1.4.3 In-combination effects

In-combination effects may occur on a protected characteristic group where a particular group would experience multiple impacts, or where a disproportionately represented group are also likely to experience differential impacts.

1.4.4 Assessing impacts

The assessment of impacts across the EqIA process is predominantly qualitative, and describes, where possible and applicable:

1. Whether the impact is positive, negative or neutral

¹ LSOAs are the smallest geographical areas in England and Wales where populations and a wide range of other datasets are collected. There are approximately 33,000 LSOAs in England and Wales, each with an average population of 1,600.

2. Whether the impact is a direct relationship (e.g. loss of property) or an indirect relationship (e.g. disrupted access to services), affecting lives of people from protected characteristic groups
3. The duration, frequency and permanence of the impacts
4. The severity of the impact and the amount of change relative to the baseline
5. Any existing regulatory standards already in place
6. The size of the population experiencing the impact or the extent of usage of a particular facility or service
7. Local equality priorities, supported by evidence and the views of professional stakeholders
8. The views of local people, captured through consultation and engagement
9. The capacity of the affected groups to absorb the impacts (their resilience), including access to alternatives

1.5 Purpose of this report

It is important that those involved in making decisions understand the full range of potential impacts that any changes could have on the local population. It is particularly important to understand the potential impacts, on groups and communities who will be the most sensitive to service changes.

An EqIA examines both potential positive and negative effects of a proposed policy being implemented. It assesses whether one or more groups could experience disproportionate effects (over and above the effects likely to be experienced by the rest of the population).

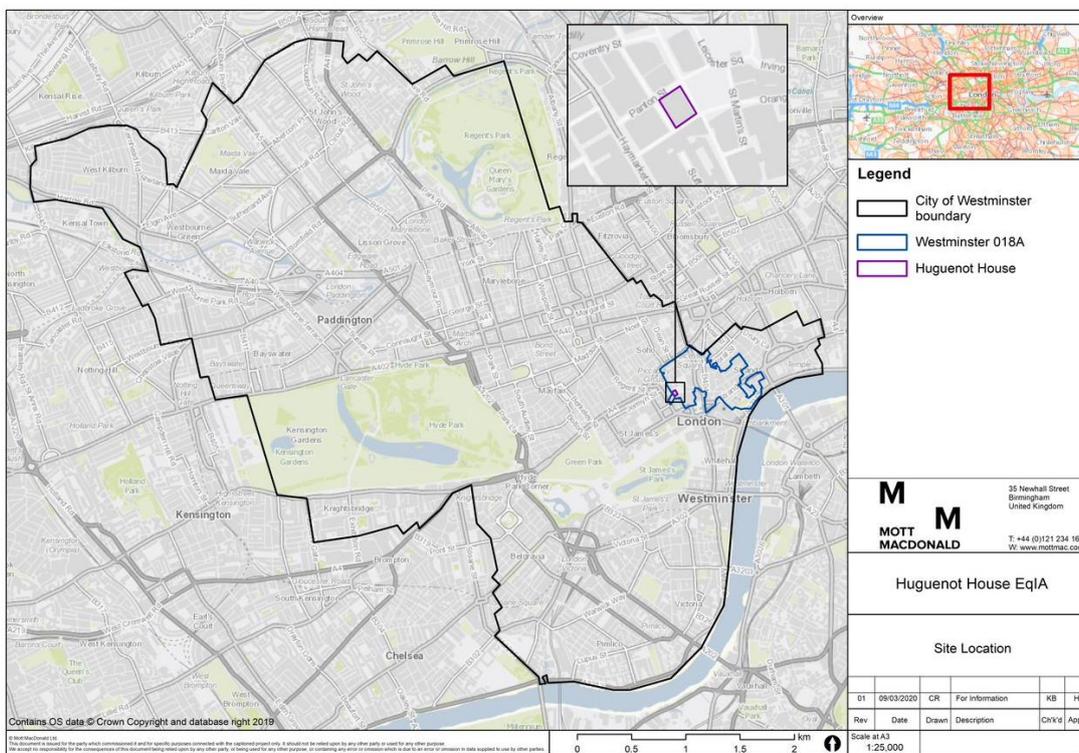
The purpose of this report is to provide updates to the baseline and context for the whole EqIA process to ensure the council is informed in its decision-making role regarding which option will be progressed for Huguenot House.

2 Huguenot House – development context

2.1 Overview: Huguenot House

Huguenot House is an ‘island site’, located just off Leicester Square in the City of Westminster (as shown in the below Figure). The building is mixed usage including a cinema, offices, a car park and 35 residential flats. The Council has proprietorship of 16 of the flats (including a caretaker and two secure tenants). The majority of the flats were sold during the 1980s on long leases through the right-to-buy process. The Council has emphasised that the site is in need of significant economic investment with contributions likely to be required from leaseholders if a refurbishment is to go ahead. The proposed redevelopment of the area is supported by wide ranging land use and organisational policy frameworks.

Figure 2.1 Huguenot House site location



Source: Mott MacDonald, 2020

2.2 Case for improvement

Following the July 2017 Council Cabinet meeting, Councillors outlined that each of the options for Huguenot House should be assessed against the Council’s ‘City for All Objectives’² and on this basis a decision would be made on what option would be taken forward. At present, the income from the commercial tenants is set to decrease and a ‘do nothing scenario’ is not likely

² Westminster’s City Council’s ‘City for All Objectives’ are as follows: 1. A city of opportunity 2. a city that offers excellent local services 2. a caring and fairer city 3. A healthier and greener city 4. A city that celebrates its communities. Further information on the objectives can be found here: <https://www.westminster.gov.uk/city-for-all>.

to be an option for the Council. Therefore, the proposed development is supported by a number of land use and policy frameworks. The main project objectives are to:

- Align any outcomes with the councils City for All strategy document to include, Greener and Cleaner, Safer and Thriving Communities;
- Ensure all stakeholder input is considered from the consultation before any decision is made; and
- Ensure that the final option chosen delivers value for money for the council and community.

2.2.1 Condition of Huguenot House

Argyll Environmental have previously carried out a number of searches on the building to understand what condition it is in. The Site Solutions report revealed the following findings outlined in Table 2.1 below:

Table 2.1: Argyll Environmental search

Type of search	Findings
Flood search	The property is not considered to be at a significant risk of flooding.
Contamination search	There is a low to moderate on-site contamination risk and no significant contamination linkage has been identified.
Environmental hazard search	There is a potential ground instability hazard and geotechnical surveys may need to be reviewed. There is also one or more telecommunications base station located within 100m of the House. Telecommunications equipment emits electromagnetic fields which may have adverse health effects.
London Underground search	There are London Underground Limited railway services in the vicinity of the property, but they are not sufficiently close as to affect Huguenot House.

Source: Mott Macdonald 2018

2.3 Huguenot House – leases

Huguenot House is subject to a number of commercial and residential leases. Table 2.2 below highlights tenants and the expiry date of their lease. Table 2.3 below shows residential leases, the lease term and lease date.

Table 2.2: Commercial leases in Huguenot House

Tenant	Expiry Date
ABC Cinemas Limited	07/01/2023
Interim Spaces	29/07/2023
Q-Park	31/08/2024
London Power Networks PLC	31/10/2026

Source: Westminster City Council, 2020

Table 2.3: Residential leases in Huguenot House

Flat	Lease Term	Lease date
1	Service Tenancy	25/02/2013
2	WCC	AST
3	WCC	AST
4	WCC	AST
5	WCC	AST

Flat	Lease Term	Lease date
6	WCC	AST
7	Lease	16/06/2003
8	WCC	AST
9	Lease	14/05/1984
10	Lease	22/10/1980
11	Lease	28/09/1982
12	WCC	AST
13	Lease	31/03/1983
14	Lease	25/02/1991
15	Secure Tenancy	09/01/1969
16	WCC	AST
17	Lease	05/09/2001
18	Lease	13/01/1986
19	Lease	19/01/1984
20	WCC	AST
21	WCC	AST
22	Lease	01/08/1990
23	Lease	26/02/2014
24	WCC	AST
25	WCC	AST
26	Lease	30/09/1982
27	Lease	01/03/1984
28	Lease	20/01/1984
29	WCC	AST
30	Secure Tenancy	05/09/2016
31	WCC	AST
32	Lease	02/04/1984
33	Lease	20/06/1988
34	Lease	01/05/1967
35	Lease	05/03/1990

Source: Westminster City Council, 2020

2.4 Options under consideration

Since 2016, several options have been under consideration for the future of Huguenot House. Following the July 2017 Council Cabinet meeting, Westminster City Council Officers were asked to report back with a full analysis of the feedback from a formal consultation with residents on a range of six options. The options were presented to stakeholders at several consultation events throughout 2018. In 2020, the six options were refreshed and a new option of ‘mixed use redevelopment’ was also added to this list. An overview of all seven options currently under consideration for Huguenot House is provided below in Table 2.4.

Table 2.4: Options for the Huguenot House

Option Name	Description
Conversion from office to residential use	Partially redevelop the building by converting the existing offices into ten new homes. As a planning condition of changing the use from offices to homes, 50% of all homes would be affordable. As a result, the Council would therefore be required to refurbish the building as a whole. The building would also be updated in the same way as put forward in the Refurbishment option. Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place.
Retain and extend existing building	This option would replace the existing podium and car park with 14 new homes, with 50% of all homes being affordable. This would be a planning condition of changing the use of the building. As a result, the Council would therefore be required to refurbish the building as a whole. The building would also be updated in the same way as put forward in the Refurbishment option. Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place.
Maintenance	With this option there is a 30-year maintenance plan to keep the building up to standard. In the short term, continued maintenance of the existing building would be through repairing windows, rendering, roof and façade. One lift and the building's water tank would also be replaced. In the longer term, maintenance would include replacing windows, heating, electrical and fire alarm systems. Partial new fabric and new efficient plant would be installed to reduce emissions and result in carbon reduction. This option would not lead to any new housing units, any improvements to the public realm or modernisation to the existing leisure and commercial facilities. Minimal disruption to both residents and the local community is expected with this option as both leaseholders and secure tenants can remain in their homes for the duration of the works.
Refurbishment	This option would have a 30-year design life applied. Refurbishment would mean maintaining the building, but also making more considerable improvements over a short period of time. Refurbishment would include replacing both lifts, a new roof being fitted, new windows and façade, new heating, electrical and fire alarm systems, and decorating shared spaces (such as painting and new carpets). Leaseholders would also be able to opt-in for new kitchens and bathrooms under this option. As well as this, the fire strategy and safety systems would be upgraded to reduce emissions and result in carbon reduction. This option would not lead to creation of new housing units or any improvements to the public realm. Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place.
Sale	This option includes sale of the building, which means the prospective purchaser would have control of the asset. The level of disruption that this would cause to the existing residents and local community is therefore unclear at this stage.
Redevelopment	This option includes the delivery of around 50 new homes, of which 50% would be affordable housing. A cinema, 75 car parking spaces and four shops would also be delivered under this option. Fire fighting and life safety systems, as well as stairs, lifts, lift lobbies and corridors, would all be updated under this option. Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place, with the option to return to Huguenot House if they wish.
Mixed use redevelopment	This option would incorporate residential and office accommodation, a cinema, a hotel and a casino. This option would provide around 24 new homes, with at least 50% of those being affordable housing. Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place, with the option to return to Huguenot House if they wish.

2.4.1 Changes to the options

Whilst the Council considers these to be the final options, some of the details are based on indicative schemes which may alter as a result of further design development work. Market

conditions, residents' feedback, as well as disruption and uncertainty caused by COVID-19, will be considered by the Council should revisions to these options be deemed necessary.

2.4.2 Comparison of options

All options have been considered in the tables below to highlight what each option involves, the ease of delivery, the cost, and what the options mean for those living in and visiting the building. Key areas to consider within these four categories for people with a Protected Characteristic have been addressed within each table.

Table 2.5: Option comparison: scheme components

Option	Refurbishment	Decanting and demolition	New homes	Affordable housing	Disabled adaptations	Retail offerings and community facilities	Greener, cleaner and safer communities	Creation of new employment
Conversion from office to residential use	Partially redevelop the building.	Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place.	10 new homes would be created.	50% of homes would be affordable for social or intermediate rent.	The new homes could not fully comply with modern standards. Therefore, they would not be fully adaptable for disabled residents.	n/a	By keeping the existing building, it avoids the carbon emissions associated with demolition. Repairs and improvements may make very minor improvements to energy efficiency, although improvements would be limited if the old building is kept. No new green space would be provided.	Some new job opportunities and apprenticeships for local people during the works. By removing the office space, businesses would be required to move and employment may be lost.
Retain and extend existing building	Replace the existing podium and car park with new homes.	Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place.	14 new homes would be created.	50% of homes would be affordable for social or intermediate rent.	The new homes could not fully comply with modern standards. Therefore, they would not be fully adaptable for disabled residents.	n/a	Repairs and improvements may make very minor improvements to energy efficiency, although improvements to the energy efficiency of the existing building are limited. No new green space would be provided. Substantial structural and some demolition work is necessary which means more carbon emissions during the works.	Some new job opportunities and apprenticeships for local people during the works.

Option	Refurbishment	Decanting and demolition	New homes	Affordable housing	Disabled adaptations	Retail offerings and community facilities	Greener, cleaner and safer communities	Creation of new employment
Maintenance	Continued maintenance of the building with a 30-year maintenance plan.	Both leaseholders and secure tenants can remain in their homes for the duration of the works.	n/a	n/a	n/a	n/a	By keeping the existing building, it avoids the carbon emissions associated with demolition. Repairs and improvements may make very minor improvements to energy efficiency, although there would be no significant improvement in energy and carbon efficiency of the building. No new green space would be provided.	n/a
Refurbishment	Refurbishment of the building in both the short-term and long-term.	Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place.	n/a	n/a	n/a	n/a	By keeping the existing building, it avoids the carbon emissions associated with demolition. Repairs and improvements may make very minor improvements to energy efficiency, although there would be no significant improvement in energy and carbon efficiency of the building. No new green space would be provided.	Some new job opportunities and apprenticeships for local people during the works. Offices would be refurbished to a higher standard, making them attractive for businesses to rent, bringing more economic activity to the area.
Sale	No control over the intentions of the new purchaser.							

Option	Refurbishment	Decanting and demolition	New homes	Affordable housing	Disabled adaptations	Retail offerings and community facilities	Greener, cleaner and safer communities	Creation of new employment
Redevelopment	n/a	Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place.	50 new homes would be created. Existing residents would have the option to return to Huguenot House if they wish.	50% of homes would be affordable for social or intermediate rent.	New homes would be designed to be adaptable for disabled residents.	A cinema, 75 car parking spaces and four shops would be delivered under this option.	The new building would be more energy efficient, resulting in lower bills for residents and lower carbon emissions. Modern bathrooms and plumbing would mean more efficient water usage, reducing both water bills and waste. The design also includes some green space. New offices may not be more energy efficient due to modern facilities, and substantial structural and demolition work means more carbon emissions during the works.	Construction would offer significant employment opportunities and apprenticeships for local people. More office, shops and a cinema could attract more businesses and jobs to the area.
Mixed use redevelopment	n/a	Both leaseholders and secure tenants would be required to relocate elsewhere while the works take place.	24 new homes would be created. (11 fewer homes than currently) Existing residents would have the option to return to Huguenot	50% of homes would be affordable for social or intermediate rent.	All new homes would be designed to be adaptable for disabled residents.	New office accommodation, a cinema, a hotel and a casino would be delivered under this option.	The new building would target some of the highest environmental standards and would be significantly more energy-efficient (resulting in lower bills for residents and lower carbon emissions). Modern bathrooms and plumbing would mean more efficient water usage, reducing both water bills and	Construction would offer employment opportunities and apprenticeships for local people. More office and additional commercial spaces could attract more businesses and jobs to the area.

Option	Refurbishment	Decanting and demolition	New homes	Affordable housing	Disabled adaptations	Retail offerings and community facilities	Greener, cleaner and safer communities	Creation of new employment
			House if they wish.				waste. The design also includes some green space. The commercial units may not be significantly more energy efficient due to modern facilities, and substantial structural and demolition work is necessary which means more carbon emissions during the works	

Source: Westminster City Council, 2020

Table 2.6: Option comparison: deliverability

Option	Length of delivery ³				Support available	Disruption to residents
	Pre-construction	Construction	Void period	Total construction period		
Conversion from office to residential use	6 months	6 months	9 months	21 months	Free independent housing advice would be made available to leaseholders to assess the options available for them. Practical non-financial help would be made available to leaseholders who wish	Leaseholders and secure tenants would be required to move out while works take place. This is likely to be for up to six months. All secure tenants would be able to return to their home once works are completed. No changes to

³ The phases are broken down into pre-construction - design of the scheme and planning permission (where relevant and) and vacant possession, construction – works undertaken to complete the scheme, void period – period to let the commercial accommodation and / or sell the residential units.

Option	Length of delivery ³				Support available	Disruption to residents
	Pre-construction	Construction	Void period	Total construction period		
					to move outside the development. In cases where leaseholders require additional assistance, the Council would provide this.	tenancies or leases for residents.
Retain and extend existing building	30 months	30 months	12 months	72 months	Free independent housing advice would be made available to leaseholders to assess the options available for them. Practical non-financial help would be made available to leaseholders who wish to move outside the development. In cases where leaseholders require additional assistance, the Council would provide this.	Leaseholders and secure tenants would be required to move out while works take place. This is likely to be for up to 30 months. to be for up to six months. All secure tenants would be able to return to their home once works are completed. No changes to tenancies or leases for residents.
Maintenance	3 months	12 months	n/a	15 months	n/a	Residents (including both leaseholders and secure tenants) to remain in the building throughout the programme of maintenance.
Refurbishment	9 months	18 months	n/a	27 months	Free independent housing advice would be made available to leaseholders to assess	Leaseholders and secure tenants would be required to move out for a short period while some types of works take place. All

Option	Length of delivery ³				Support available	Disruption to residents
	Pre-construction	Construction	Void period	Total construction period		
					<p>the options available for them.</p> <p>Practical non-financial help would be made available to leaseholders who wish to move outside the development.</p> <p>In cases where leaseholders require additional assistance, the Council would provide this.</p>	<p>residents would be able to return to their home once works are completed.</p>
Sale	No control over the intentions of the new purchaser.					
Redevelopment	30 months	30 months	15 months	75 months	<p>Free independent housing advice would be made available to leaseholders to assess the options available for them.</p> <p>Practical non-financial help would be made available to leaseholders who wish to move outside the development.</p> <p>In cases where leaseholders require additional assistance, the Council would provide this.</p>	<p>Leaseholders and secure tenants would be required to move out while works take place. This is likely to be for up to 30 months.</p> <p>Both leaseholders and secure tenants would have the option to return to the building if they wish.</p>
Mixed use redevelopment	30 months	30 months	15 months	75 months	<p>Free independent housing advice would be made available to leaseholders to assess</p>	<p>Leaseholders and secure tenants would be required to move out while works</p>

Option	Length of delivery ³				Support available	Disruption to residents
	Pre-construction	Construction	Void period	Total construction period		
					<p>the options available for them.</p> <p>Practical non-financial help would be made available to leaseholders who wish to move outside the development.</p> <p>In cases where leaseholders require additional assistance, the Council would provide this.</p>	<p>take place. This is likely to be for up to 30 months.</p> <p>Both leaseholders and secure tenants would have the option to return to the building if they wish.</p> <p>However, some residents (11 households which are WCC sub tenants) would not be able to return due to reduction in the number of new homes</p>

Source: Westminster City Council, 2020

Table 2.7 Option comparison: cost

Option	Total cost of option ⁴	Cost implications to leaseholders ⁵
Conversion from office to residential use	£3.45 million	Leaseholders would be charged an estimated £25,000 - £45,000 depending on the terms of their lease. The total amount is dependent on the exact scope of works and individual leaseholder contribution percentages in the leases.
Retain and extend existing building	£42.55 million	Leaseholders would be charged an estimated £25,000 - £45,000 depending on the terms of their lease. The total amount is dependent on the exact scope of works and individual leaseholder contribution percentages in the leases.
Maintenance	£1.215 million	Leaseholders would be charged an estimated £25,000 - £45,000 depending on the terms of their lease. The total amount is dependent on the exact scope of works and individual leaseholder contribution percentages in the leases.
Refurbishment	£4.6 million	Leaseholders would be charged an estimated £25,000 - £45,000 depending on the terms of their lease. The total amount is dependent on the exact scope of works and individual leaseholder contribution percentages in the leases.

⁴ Cost estimates accurate as of June 2018. Costs were provided by Gardiner & Theobald (Cost Consultant) including professional fees of 15% and exclude VAT.

⁵ Under the terms of their lease, leaseholders are only charged for maintenance works and would not be charged for any improvement works. This is why these costs are the same across the various options.

Option	Total cost of option ⁴	Cost implications to leaseholders ⁵
Sale	No control over the intentions of the new purchaser.	
Redevelopment	£57.73 million	No cost implications for leaseholders.
Mixed use redevelopment	Approximately £57.73 million	No cost implications for leaseholders.

Source: Westminster City Council, 2020

2.5 The Council's commitments

The Council intends to offer rights and options to residents of Huguenot House similar to those currently available to tenants and leaseholders located in Housing Renewal Areas (HRAs). An overview of the Council's plans to support residents has been provided below, demonstrating the Council's commitments to those impacts by the options to improve Huguenot House.

2.5.1 Westminster City Council's Policy for Tenants of Huguenot House

The Policy sets out the Council's proposals for rehousing tenants in Huguenot House who need to move to facilitate redevelopment. A policy will be developed for Huguenot House in the event that a redevelopment option is chosen. The policy will outline headline financial compensation and the general processes that must be followed when homes need to be acquired that are occupied by council tenants, private tenants and homeless households in temporary accommodation. Support that will be offered to tenants by the Council is also outlined.

Table 2.8 Options available to tenants

	Options for council tenants	Options for homeless households in temporary accommodation	Options for private tenants
Rehousing options	<ul style="list-style-type: none"> Move straight into one of the new social homes, if this is possible Move into another social home in Westminster for a temporary period, but then move into one of the new social homes in Huguenot House when they are ready Move into Community Supportive Housing (sheltered housing) for those that are eligible and 60 or over. Become a homeowner through a low-cost home ownership scheme, if they qualify for this option (being eligible for "intermediate housing" and able to afford to buy a new intermediate home) 	<ul style="list-style-type: none"> All homeless households that have been placed in temporary accommodation by the Council would generally be offered alternative temporary accommodation Households in temporary housing do not have a right to remain in or return to the Huguenot House site, would be prioritised for alternative temporary accommodation in London 	n/a
Financial entitlements	<ul style="list-style-type: none"> A Home Loss Payment – to compensate tenants for having to move at a time which is not of their choosing (amount set and review each year by government, as of January 2021 it was £6,300) A Disturbance Payment – to cover the reasonable costs of moving (as removal costs, redirection of mail, disconnection and reconnection of appliances and the refitting of curtains and carpets) 	n/a	n/a

Support offered	<ul style="list-style-type: none"> Tenants would be given sufficient time to choose their rehousing option and they would be supported throughout the process of moving, in order to minimize the stress induced by this process. Named council officer/s and also an independent advisor would be available to contact to offer advice. Additional assistance would be provided to vulnerable tenants to identify and address any special needs. 	<ul style="list-style-type: none"> The Council would visit and advise of the relevant timescales, such as when they would need to move and the processes that would be followed. Where a household in temporary accommodation is estimated to be within twelve months of being able to successfully bid or be made offers for social housing, they would be awarded additional priority to bring this forward. 	<ul style="list-style-type: none"> The Council would make every effort to communicate with private tenants as early as possible to explain what is happening and when. Those at risk of homelessness would be referred to the Council's Early Intervention Trailblazer Service (which offers support to those at risk of homelessness at an early stage) for as long as the service is running. Additional support would be offered to vulnerable households where it is needed.
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2.5.2 Westminster City Council's Policy for Leaseholders in Huguenot House

The Policy sets out the Council's proposals for Leaseholders in Huguenot House, providing a range of rehousing options for resident leaseholders where the council wants to acquire their property. The policy will aim to support leaseholders who wish to remain in the local area and continue to be homeowners with similar housing costs.

Resident leaseholders will have several options available to return to the Huguenot House site, and one option available if they want to move away. There will only be one option available for non-resident leaseholders, which is to sell their property to the council and receive the statutory financial compensation. All the options are outlined in more detail in Table 2.9 below.

Table 2.9: Options available for leaseholders

	Options for resident leaseholders wishing to remain in Huguenot House	Option for resident leaseholders who do not wish to remain in Huguenot House	Option for non-resident leaseholders
Rehousing options	<ul style="list-style-type: none"> Option 1:⁶ Buy one of the new homes with an equity loan or on a shared equity basis Option 2: Buy one of the new homes on a shared ownership basis Option 3: Buy one of the new homes outright Option 4: Buy another leasehold property in Huguenot House Option 5: Become a social or an intermediate tenant in Huguenot House 	<p>Receive help and support to move away from the Huguenot House site:</p> <ul style="list-style-type: none"> A social or an intermediate tenancy might be offered in Westminster. 	<p>Sell their property to the council and receive the statutory financial compensation.</p>

⁶ These options are available to all residents living in all HRAs in Westminster. They are not related to options for Huguenot House listed in Table 2.5.

Financial entitlements	<ul style="list-style-type: none"> • For Options 1,2 and 3 the council would pay for independent financial advice if it is wanted. • For Option 4 the council would offer assistance to leaseholders to find another property • For Option 5, leaseholders would receive 75% of the market value of their property, rather than 100%, a Home Loss Payment of 10% of the open market value of their property, and a Disturbance Payment to reflect the cost of moving 	<ul style="list-style-type: none"> • Receive a Home Loss Payment which is 10% of the market value of the property being sold subject to a cap which is set by the Government. • Receive a Disturbance Payment to cover all reasonable expenses associated with the sale of the property, moving, and in connection with the purchase of a replacement property. • An equity loan or shared equity might be offered to buy another property close to Huguenot House in some limited circumstances; where this option is agreed leaseholders would receive 75% of the market value of their property, rather than 100%; 	<p>Every non-resident leaseholder would receive:</p> <ul style="list-style-type: none"> • the market value of the property being acquired; • a basic Loss Payment (7.5% of the market value of the property, but currently capped by the government at £75,000); • a Disturbance Payment in relation to costs incurred in acquiring a replacement property, within one year.
Support offered	<ul style="list-style-type: none"> • When leaseholders need to relocate to temporary housing, the Council would make every reasonable effort to offer a property which meets leaseholders' preferences and requirements, including their support networks, employment and schools and the needs of any disabled household members. • Any disabled adaptations present in a leaseholder's existing property would be reinstated in the temporary housing at no cost to the leaseholder. 	<ul style="list-style-type: none"> • Help to find a property or with the whole process of buying. 	<p>n/a</p>

3 Consultation

3.1 Overview

The Huguenot House consultation period has been ongoing since 2017. Consultation has been carried out with primary stakeholders at the block on the different options for the future of the building, in line with Section 105 of the Housing Act 1985, and alongside a non-statutory consultation with other stakeholders.

Included in consultation to date has been the logistics, anticipated costs, how best the options meet the Council's 'City for All' criteria, and the impact on residents and the surrounding area. Throughout the consultation, the Council's 'City for All' priorities were explored with any option taken for the ward required to meet its objectives. Outlined below is the consultation process that has taken place for the options to date.

3.1.1 Consultation in 2017-2018

In July 2017, the council decided to consult on options for Huguenot House pursuant to the aspirations set out in its 'City for All' policy.

Between 2017 and 2018, residents and stakeholders were consulted on a range of options as part of a statutory Section 105 consultation alongside a non-statutory consultation. At the request of residents, a new 'retain and extend existing building' option was put forward as an additional option during this consultation period. There were six consultation events and workshops held with stakeholders, which offered them the opportunity to give feedback on all the proposed options. If a resident was unable to attend these, the project team offered to hold one-to-one meetings to discuss the options.

Feedback from residents illustrated that the previous consultation information provided may be too complex to understand without professional advice. In response to this, the September and October 2018 consultation events were transformed into workshops, with the aim of making the events more accessible and constructive. After the October event, a further six-week period was given to residents and stakeholders to offer feedback or to organise one-to-one meetings.

3.1.2 Consultation in 2019-2020

Since October 2018, the council had taken time to ensure the options are robust and fully take into account the requirements of all Huguenot House occupiers, as expressed during previous consultation. During the continuing consultation period a new project team was assembled and in August 2019 it began the process of reviewing existing feedback and considering the best way to progress consultation.

As part of the consultation process, the project has had a designated email address which has been monitored for any consultation feedback in the absence of any additional consultation events.

Engagement with residents of Huguenot House since August 2019 has centred on the appointment of a new building management company. Aston Rose were selected following an assessment which actively included Residents. The council has subsequently focused on outstanding maintenance issues following the introduction of Aston Rose.

Four drop-in sessions were held in the foyer of Huguenot House, with 'maintenance' a stated priority for discussion. The aim of these was to introduce new project team members and answer any questions on either the consultation or resulting from the appointment of Aston Rose. Most of the feedback received since 2019 has been from residents and focused on block maintenance, rather than the other options for Huguenot House under consultation.

In addition to the four drop-in sessions, from August 2019, the council has sent out regular letters to all residential tenants and leaseholders of Huguenot House informing them of the actions that are being taken on building maintenance issues and providing updates on the consultation process. These letters have stated clearly that the consultation is still open and identified ways stakeholders could give feedback. There have been four letters sent to residents in August, September, October, and December 2019.

3.1.2.1 Feedback received between 2017 and 2020

Feedback received from residents of Huguenot House to date has largely consisted of the following:

- Although many residents have not been positive towards many of the potential options, they do appear to be in favour of refurbishment, should they be able to remain in occupation of their property throughout.
- Residents have regularly stated that the maintenance of Huguenot House has been neglected, with some expressing that they believe this has been the case to enable the redevelopment of Huguenot House.
- Some residents have expressed their opposition to redevelopment as an option on the basis of disruption, loss of their homes, concerns over the right to return, and a belief that the building remains fit for purpose.
- Concerns have been raised around the loss of parking, traffic management and implications of redevelopment around levels of sunlight. However, the predominant view of residents has been that they wish to remain in place and oppose any development scheme regardless of design.
- Some feedback acknowledged that Huguenot House is not architecturally fit for purpose, both commercially and residentially.
- Several leaseholders stated that they have already sold their properties to the Council over the past few years.
- Residents highlighted that they want to work with the Council to create a scheme that benefits all.
- Residents have requested involvement in the appointment of a new block management company which was accepted and acted upon by the Council. Aston Rose was appointed on in October and a five-year planned maintenance programme was agreed to ensure essential works are undertaken as soon as possible.
- The Council recognised the objection of residents and the disruption that would be caused by redevelopment and made the following offers to residents:
 - A right to return (extended to residents despite Huguenot House not being within a designated Housing Regeneration Area and therefore not subject the Council's Right to Return policy).
 - Suitable temporary housing.
 - Compensation payments.

3.1.3 Consultation in 2020-2021

The most recent consultation for Huguenot House took place between 9 November 2020 and 15 January 2021. This round of consultation took place following a decision made by the Cabinet Member responsible for regeneration. The decision was made that a further round of consultation with refreshed options, reviewed in light of socio-economic, policy and regulatory changes since 2018, and a further new option, should be pursued.

A consultation approach was agreed with the Cabinet Member, setting out a strategy for a new round of Section 105 compliant consultation to run for nine weeks, commencing in November 2020. It was agreed that this round of consultation would target residents and commercial occupiers of Huguenot House as its central audience. However, a stakeholder database was also developed to ensure local businesses, groups and other stakeholders would also receive consultation materials and be able to engage throughout the consultation period should they wish.

In light of the COVID-19 pandemic, the consultation was designed to be a digital-led engagement with activity focused on online events and materials shared by post, email and via an online consultation hub designated to Huguenot House. The consultation was promoted via consultation booklets, letters directing key stakeholders to the designated consultation webpage, and an e-newsletter circulated to all residents and stakeholders for whom the Council had email addresses. Stakeholders were able to contribute to the consultation using the following methods:

- **Online:** residents could review the options, view an animated introduction video, and fill out an online feedback form.
- **Webinars:** residents could register for one of three webinars held on Zoom throughout November and December. The webinars were recorded and uploaded onto the consultation page for residents and stakeholders to watch back if they were unable to attend.
- **Email:** a designated Huguenot House email inbox was monitored for comments, questions, and webinar registrations throughout the consultation period and continues to be monitored at present.
- **Post:** feedback forms were provided to residents who received booklets, and they could send their feedback to a Council office address.
- **Telephone:** a designated phone line was set up so that stakeholders could call to set up one-to-one meetings, leave feedback, request a booklet, or ask questions about the proposals. The consultation team also proactively called residents and near neighbours for whom the council had phone numbers to ensure they had received materials and offer the opportunity to discuss the options with the project team.
- **One-to-one meetings:** residents and stakeholders were encouraged to set up personal meetings via Zoom or Microsoft Teams to discuss their concerns and questions with the project team.

To ensure that the consultation was as inclusive as possible, the consultation team supplemented digital engagement methods with engagement via phone and post. For example, the Council also offered to:

- Provide internet-enabled tablets or devices to those who may not have access to them, as well as support in setting these up.
- Help residents to set up Zoom accounts and talk them through the process prior to webinars or meetings.
- Meet via phone if preferred by the resident.

- Share materials via post, including written feedback forms.

3.1.3.1 Feedback received between 2020 and 2021

Resident feedback

The consultation team engaged with thirteen resident and non-resident leaseholders over the course of the consultation (48% of Huguenot House households). Two one-to-one Zoom meetings with residents also took place, as well as ongoing correspondence with residents and the Huguenot House Residents Association (HHRA). However, it should be noted that the Honorary Secretary of the HHRA wrote to the Council in November 2020 stating that they did not intend to engage with the consultation.

Whilst organised webinars were attended by only three participants, these were watched back more than 50 times when posted to the website. In addition, the consultation website achieved over 450 unique page views during the consultation period. Feedback from phone calls, completed forms, correspondence and meetings held with residents is summarised below:

- The residents who have written to the Council are generally not in favour of any option which would require them to move and raised matters outside the scope of consultation (e.g. the outstanding service charges and ongoing maintenance matters).
- General support for any option across the correspondence was for maintenance of Huguenot House.
- The leaseholder costs associated with refurbishment or any option that includes refurbishment, estimated at between £25,000 and £40,000, were also raised as a concern by resident and non-resident leaseholders alike.
- Non-resident leaseholders generally expressed their openness to redevelopment, their concerns over the leaseholder charges that the maintenance, refurbishment and partial redevelopment options would entail and a willingness to discuss selling their homes if 'market plus' offers are made available.

Wider stakeholder feedback

The Council held workshops with local stakeholders throughout the consultation period. In addition, the consultation team engaged with businesses via email, phone and post. However, it is acknowledged that due to the COVID-19 pandemic many businesses may not have received the council's letters, emails or phone calls as a result of being temporarily closed. Feedback from consultation held with wider stakeholders is summarised below:

- Businesses communicated that they wished to be kept informed about disruption (especially road closures) regardless of the option that is progressed.
- Several businesses highlighted that they favoured redevelopment of Huguenot House but were somewhat concerned with the proposed commercial uses (particularly the hotel and casino) put forward.
- One business was not in favour of the new mixed use redevelopment option but was willing to consider the redevelopment on the grounds that it is a residential-led scheme. The business expressed that its preference was for more homes in central London rather than commercial uses such as a hotel or casino.
- One business felt the regeneration of the area was key and wanted to see quality retail and better shop frontages to enhance the street.

- Another business stressed the need for a high-quality building to reflect the local area but asked that it was ensured the ground floor is utilised with a retail offer.
- One business noted its support for parking to be provided as part of a new development, citing wider concerns over reduced parking in central London.
- The consensus amongst businesses and stakeholders was largely that the building needed to be redeveloped and that such a project could have far-reaching benefits for the wider area.

4 Area profile

4.1 Overview

The demographic profile of the area in which Huguenot House is located is outlined below. Due to the lack of demographic data for Huguenot House residents and businesses, the profile shows the proportion of people with different protected characteristics living in the LSOA in which Huguenot House resides, Westminster 018A (where this data is available). LSOAs are the smallest geographical areas in England and Wales where populations and a wide range of other datasets are collected. There are approximately 33,000 LSOAs in England and Wales, each with an average population of 1,600. Westminster 018A (the study area) is mapped in Figure 2.1. Data is also provided for the City of Westminster, London and England as comparators. Maps of the site based on nationally available data are also provided.

4.2 Equality profile

4.2.1 Age

The table below shows the population by age group including children, young people, the working age population and older people. Please note the groups below are not mutually exclusive and the columns are not intended to sum to 100%.

Table 4.1: Population by age group

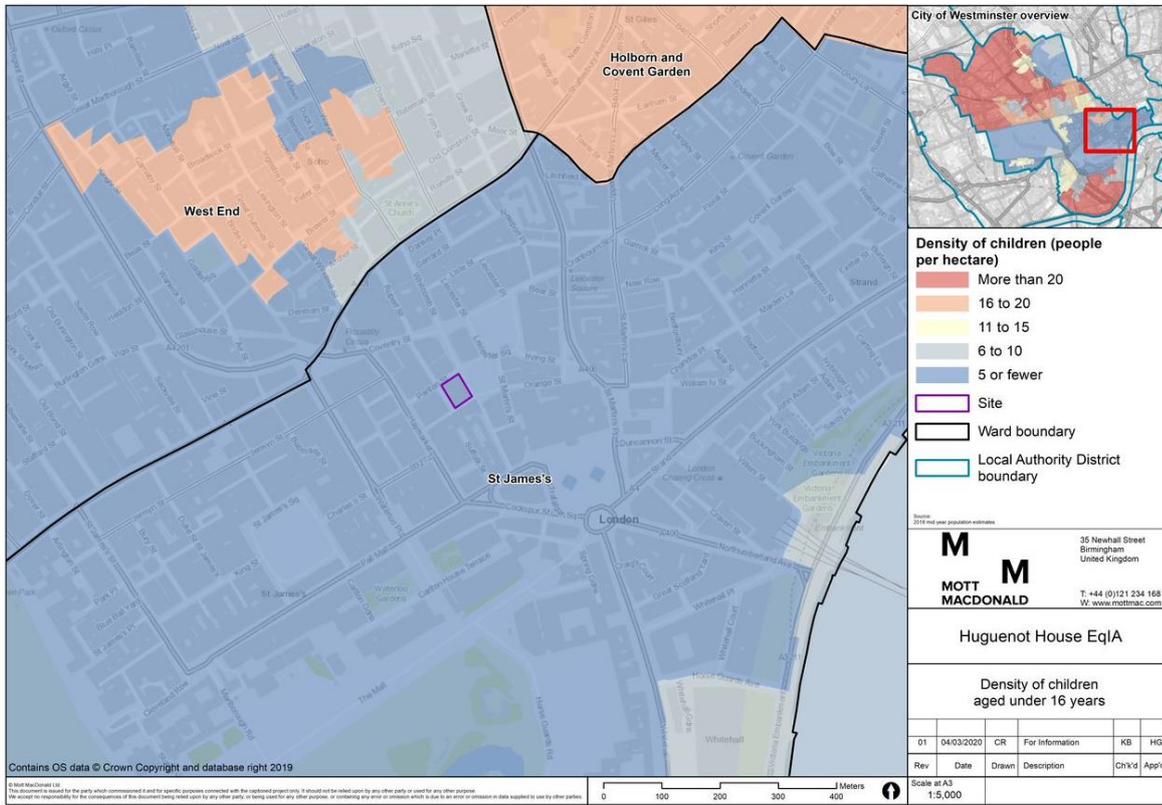
Age	Westminster 018A	City of Westminster	London	England
Children (aged 0-15)	8%	17%	17%	19%
Young people (aged 16-24)	4%	11%	11%	11%
Working age population (aged 16-64)	78%	71%	71%	63%
Older people (aged 65 and over)	14%	14%	12%	18%

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

The table above shows:

- The study area has a notably lower proportion of children (aged 0-15), at 8%, than the City of Westminster (17%), London (17%) and England (19%).
- The proportion of young people (aged 16-24) in the study area (4%) is also considerably lower than the City of Westminster, London and England (11% in all three areas).
- The working age population (aged 16-64) in the study area is 78%. This is higher than the City of Westminster and London average (both 71%) and considerably higher than England (63%).
- Older people (aged 65 and over) make up 14% of the study area's population. This is in line with the City of Westminster average, slightly higher than London average (12%) and lower than England average (18%).

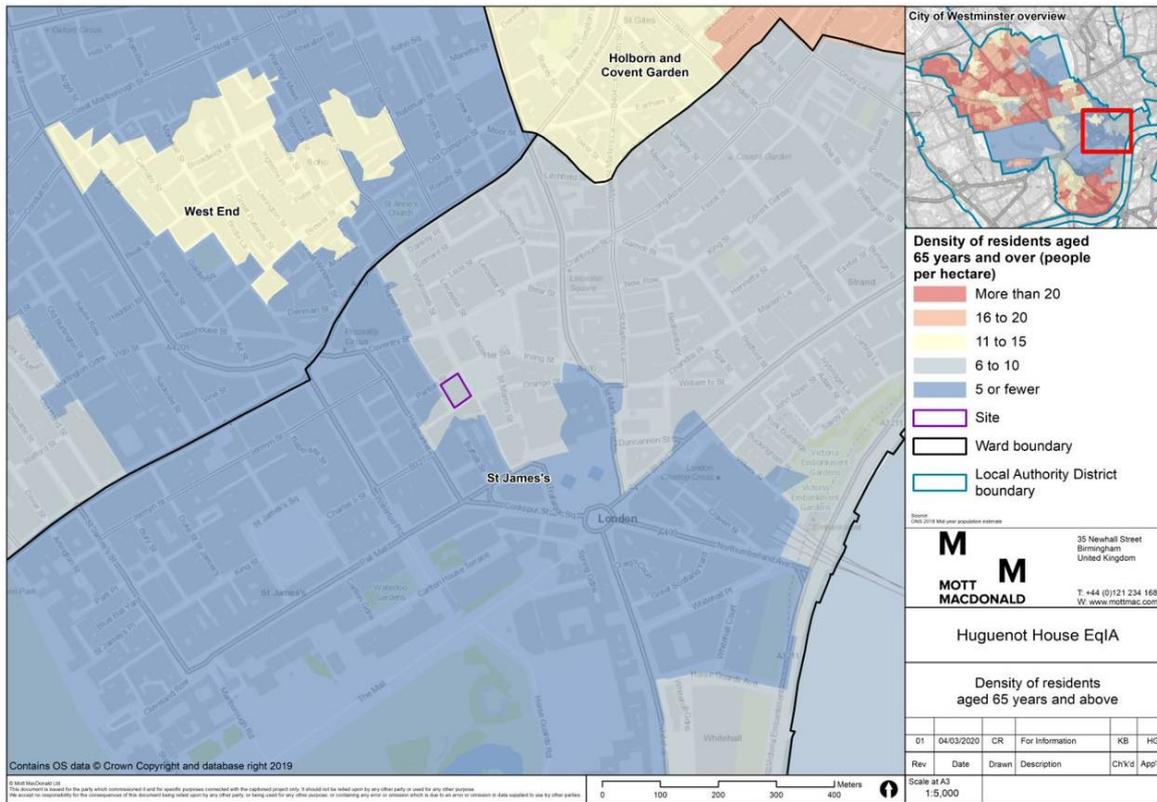
Figure 4.1 Density of total population aged 0-15



Source: Mott MacDonald, 2020

Figure 3.1 shows that the density of children aged under 16 within the site boundary is five or fewer. This is in line with the wider St James's ward, but lower than certain areas of West End and Holborn and Covent Garden wards.

Figure 4.3 Density of total population aged 65 and over



Source: Mott MacDonald, 2020

Figure 3.3 shows that the density of older people aged 65 and over within the site boundary is six to 10. This is in line with the north east of St James's ward, and slightly higher when compared to the south of the ward. The population density for this group within the site is slightly lower when compared to certain areas within West End and Holborn and Covent Garden wards.

4.2.2 Disability

The table below shows the proportion of the population with a disability that limits their day-to-day activities.

Table 4.2 Population by disability

Disability	Westminster 018A	City of Westminster	London	England
Day-to-Day Activities Limited a Lot	7%	7%	7%	8%
Day-to-Day Activities Limited a Little	8%	7%	7%	9%
Day-to-Day Activities Not Limited	86%	86%	86%	82%

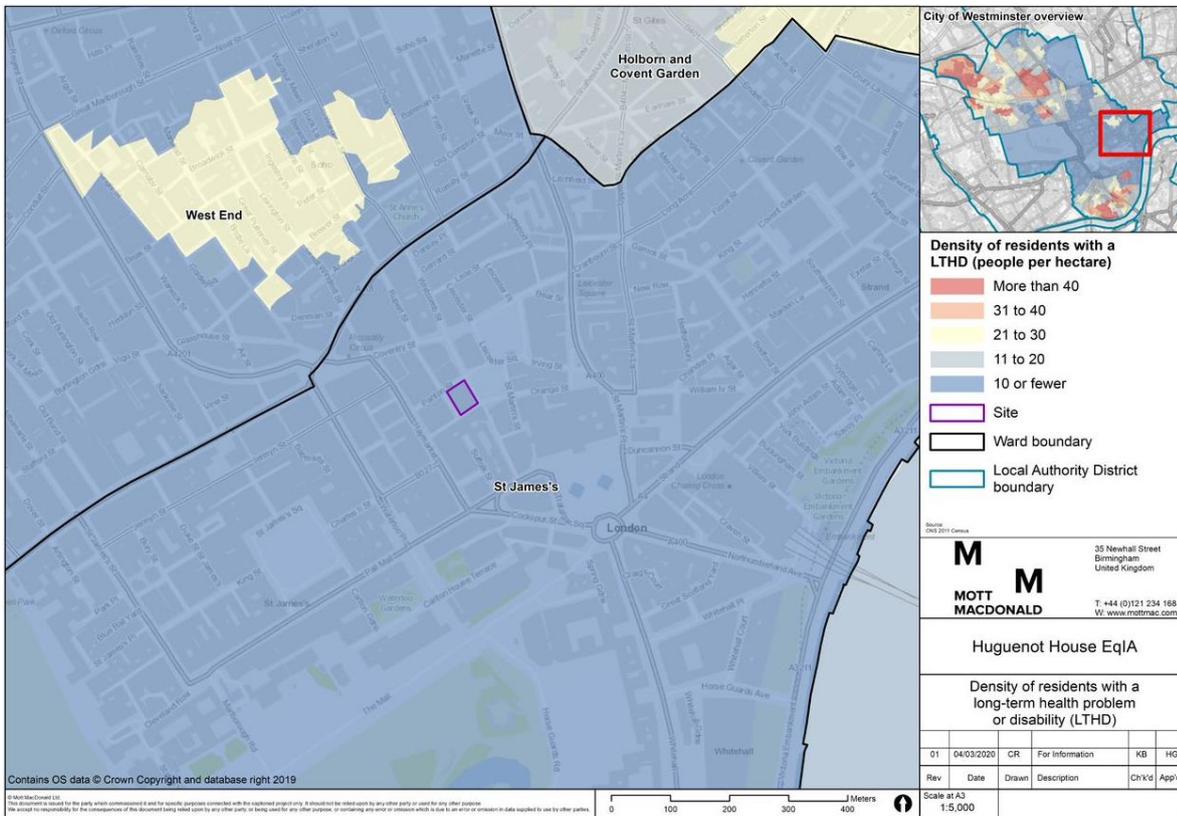
Source: Census, 2011

The table above shows:

- The proportion of the study area's population whose day-to-day activities are limited a lot (7%) is the same as the City of Westminster and London averages, and largely in line with the England average of 8%.

- The proportion of the study area's population whose day-to-day activities are limited a little is 8%. This is in line with the City of Westminster, London and England averages (all 7%).

Figure 4.4 Density of total residents with a long-term health problem or disability



Source: Mott MacDonald, 2020

Figure 3.4 shows that the density of those with a long-term health problem or disability is 10 or fewer. This is in line with the wider St James's ward, but lower when compared to certain areas within West End and Holborn and Covent Garden wards.

4.2.3 Gender reassignment

There is no robust data for gender variant people in Westminster or the UK more widely. The Government Equalities Office, though, has estimated that the size of the Trans community in the UK could range 200,000 to 500,000.⁷

4.2.4 Marriage and civil partnership

The Equality Act says you must not be discriminated against in employment because you are married or in a civil partnership. As this report is focussed on infrastructure, no relevant impacts are anticipated. Therefore, demographic data for this groups has not been included in the area profile.

⁷ Government Equalities Office (2018): 'Trans People in the UK'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721642/GEO-LGBT-factsheet.pdf

4.2.5 Pregnancy and maternity

The table below shows the number of live births and the Total Fertility Rate (TFR) for the City of Westminster, London and England. No data is available for the study area.

Table 4.3 Population by live births and fertility rate

Births and fertility rate	City of Westminster	London	England
Live births	2,510	120,673	625,651
Live births per female 16-44 years	0.04	0.06	0.06
Total Fertility Rate	1.16	1.63	1.70

Source: Office for National Statistics (2018) Live births in England and Wales (data not available at LSOA level).

The table above shows that live births per female (16-44 years) for the City of Westminster (0.04) is slightly below the London and England averages (both 0.06). Also, the TFR in the City of Westminster is lower than both the London and England averages (1.16 compared to 1.63 and 1.70, respectively).

4.2.6 Race and ethnicity

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

Table 4.4 Population by race and ethnicity

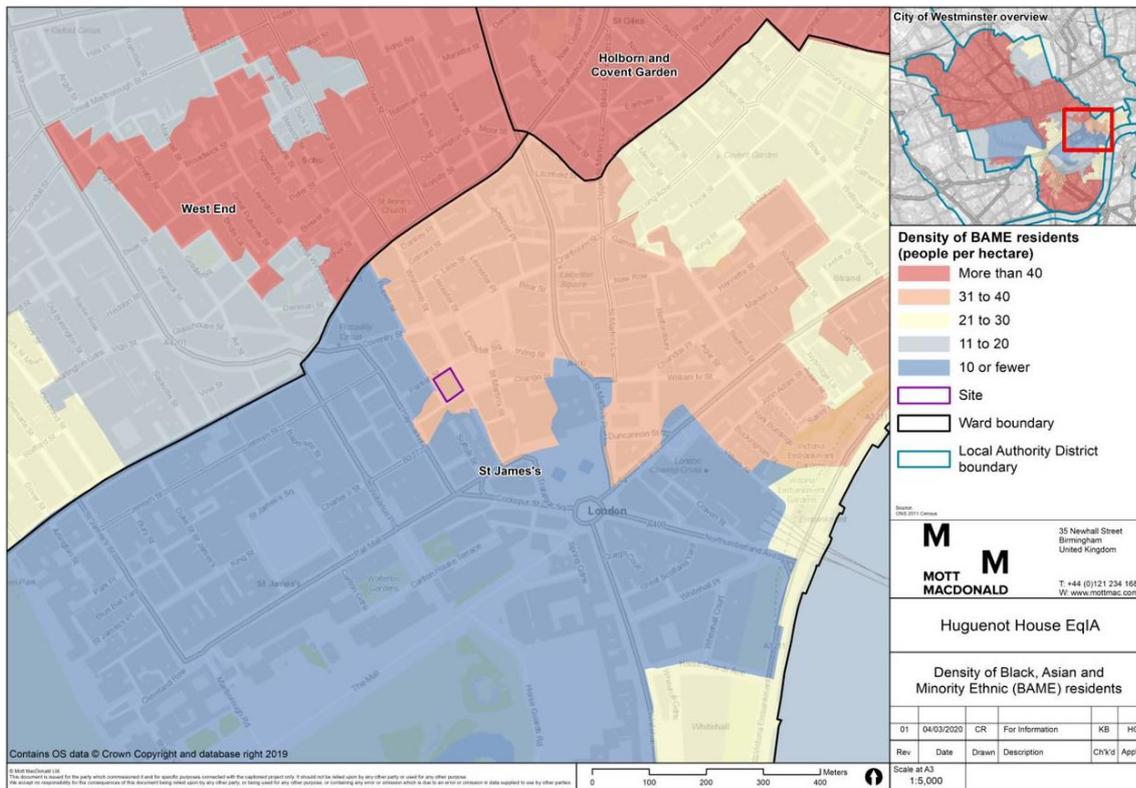
Race and ethnicity		Westminster 018A	City of Westminster	London	England
White	White British	38%	35%	45%	80%
	Irish	2%	2%	2%	1%
	Gypsy or Irish Traveller	0%	0%	0%	0%
	Other White	22%	24%	13%	5%
Mixed/multiple ethnic groups	White and Black Caribbean	0%	1%	1%	1%
	White and Black African	1%	1%	1%	0%
	White and Asian	1%	2%	1%	1%
	Other Mixed	2%	2%	1%	1%
Asian/Asian British	Indian	2%	3%	7%	3%
	Pakistani	1%	1%	3%	2%
	Bangladeshi	4%	3%	3%	1%
	Chinese	16%	3%	2%	1%
	Other Asian	3%	5%	5%	2%
Black/African/Caribbean/Black British	Black African	3%	4%	7%	2%
	Black Caribbean	0%	2%	4%	1%
	Other Black	0%	1%	2%	1%
Other ethnic group	Arab	2%	7%	1%	0%
	Any Other Ethnic Group	2%	4%	2%	1%

Source: Census, 2011

The above table shows:

- The ethnic composition of the study area differs for some ethnic groups when compared to the City of Westminster, London and England averages.
- The White British population in the study area (38%) is slightly higher than the City of Westminster average (35%), but considerably lower than London (45%) and England (80%) averages.
- The proportion of Chinese population in the study area (16%) is considerably higher than that of the City of Westminster (3%), London (2%) and England (1%).
- The proportion of Other White population in the study area is 22%. This figure is in line with the City of Westminster average (24%), but considerably higher than both the London and England averages (13% and 5%, respectively).

Figure 4.5 Density of total population who are from a Black, Asian or minority ethnic (BAME) group



Source: Mott MacDonald, 2020

Figure 3.5 shows that the density BAME residents within the site boundary is 31 to 40. This is considerably higher when compared to the south of St James's ward (BAME density of 10 or fewer), and slightly higher than the north of St James's Ward (BAME density of 21 to 30). However, the BAME density within the boundary is lower when compared to certain areas within West End and Holborn and Covent Garden wards (both with a BAME density of more than 40 in some areas).

4.2.7 Religion and belief

The table below provides a religious profile of the study area, City of Westminster, London and England.

Table 4.5 Population by religion and belief

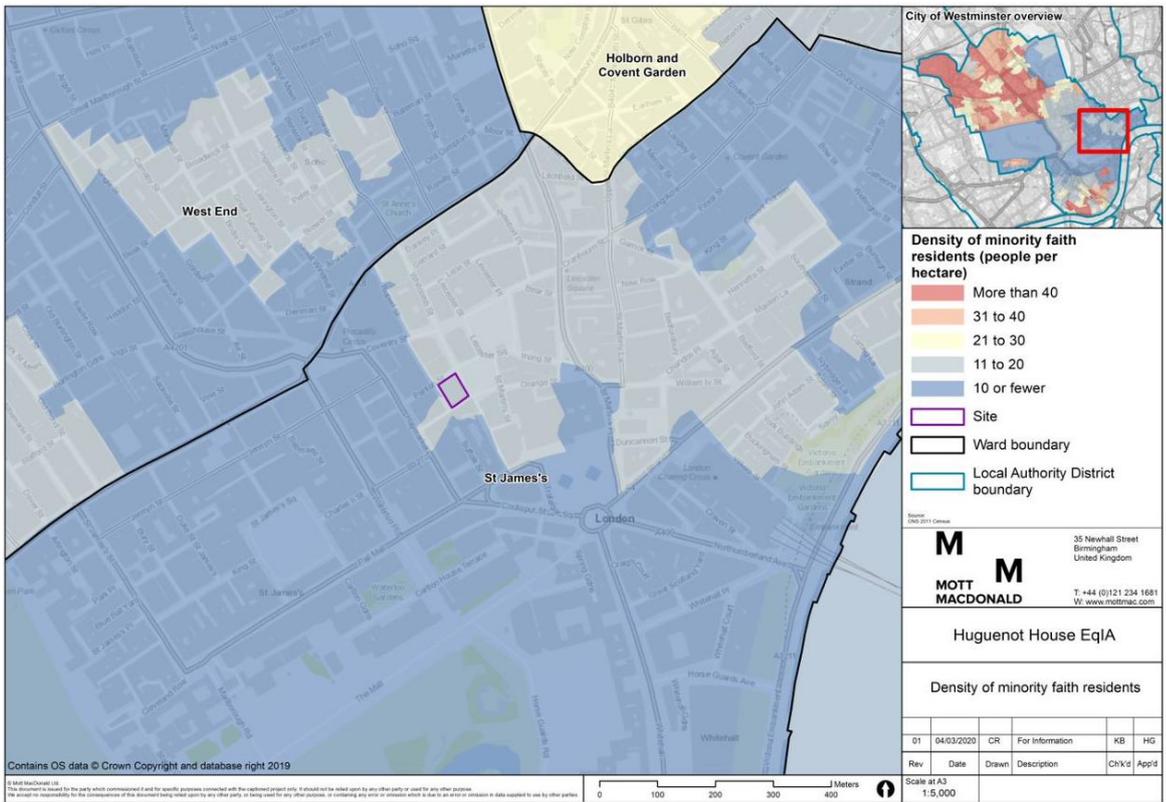
Religion and belief	Westminster 018A	City of Westminster	London	England
Christian	40%	45%	48%	59%
Buddhist	7%	1%	1%	0%
Hindu	1%	2%	5%	2%
Jewish	1%	3%	2%	0%
Muslim	9%	18%	12%	5%
Sikh	1%	0%	2%	1%
Other Religion	1%	1%	1%	0%
No Religion	32%	20%	21%	25%
Religion Not Stated	10%	9%	8%	7%

Source: Census, 2011

The above table shows:

- The proportion of Christian population in the study area (40%) is lower than the City of Westminster (45%), London (48%) and England (59%) averages.
- The Buddhist population in the study area (7%) is considerably higher when compared to the City of Westminster (1%), London (1%) and England averages (0%).
- The Muslim population in the study area is 9%. This is half the size of the City of Westminster Muslim population (18%), slightly lower than the London population (12%), and higher than the London average of 5%.
- The proportion of those with no religion in the study area is 32%. This is considerably higher than the City of Westminster, London and England.

Figure 4.6 Density of total residents from a minority faith group



Source: Mott MacDonald, 2020

Figure 3.6 shows that the density of residents from a minority faith group within the site boundary is 10 or fewer. This is in line with the majority of the wider St James's ward and neighbouring West End ward, but slightly lower when compared to Holborn and Covent Garden ward.

4.2.8 Sex

The table below shows the proportion of the population who are male and female in the study area, City of Westminster, London and England.

Table 4.6: Population by sex

Sex	Westminster 018A	City of Westminster	London	England
Male	57%	52%	50%	49%
Female	43%	48%	50%	51%

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

The table above shows that

- The difference in the proportion of men and women in the study area is 14% - this is considerably higher when compared to that of the City of Westminster, London and England.

4.2.9 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 2018, estimates from the Annual Population Survey (APS)⁸ showed that 94.6% of the UK population identified as heterosexual or straight and 2.3% of the population identified themselves as lesbian, gay or bisexual (LGB). This comprised of:

- 1.4% identifying as gay or lesbian
- 0.9% identifying as bisexual
- A further 0.6% 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 2.5% refused or did not know how to identify themselves.

According to the dataset, people in London are most likely to identify as LGB. In 2018, 2.8% of the London population identified as LGB compared to the 1.4% national average. It is suggested that the higher proportion of people identifying as LGB in London may be explained by the younger age structure of the population.

4.3 Socio-economic profile

The table below shows the proportion of the population in the City of Westminster, London and England who are employed and unemployed. In addition, proportion of specific occupations are also compared. Data for the study area is not available for socioeconomic factors.

Table 4.7 Population by employment status

Employment status	City of Westminster	London	England
Employment rate – aged 16-64	68%	74%	75%
Employment rate – Black Asian and Minority Ethnic (BAME) aged 16-64	56%	66%	66%
Unemployment rate – aged 16-64	5%	5%	4%
% Managers, directors and senior officials	22%	12%	11%
% professional occupations	32%	26%	21%
% associate prof & tech occupations	20%	19%	15%
% administrative and secretarial occupations	7%	10%	10%
% skilled trades occupations	3%	7%	10%
% caring, leisure and other service occupations	5%	7%	9%
% sales and customer service occupations	5%	6%	7%
% process, plant and machine operatives	0%	4%	6%

Source: Office for National Statistics (2018) Annual population survey (not available at LSOA level)

The table above shows:

- The employment rate in the City of Westminster (68%) is comparatively lower than London (74%) and England (75%) averages.

⁸ Source: Office for National Statistics (2018): Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2018>

- The proportion of the population in the City of Westminster who work in professional, skilled or managerial positions is higher than the London and England averages.
- The unemployed working age population in the City of Westminster (5%) is in line with London (5%) and England (4%) averages.

The table below shows the proportion of children in low income families in the City of Westminster, London and England.

Table 4.8 Population by children in low income families

Children in low income families	City of Westminster	London	England
% of children in low-income families (under 16)	27%	19%	17%
% of children in low-income families (under 18)	29%	19%	17%

Source: Children in Poverty, Borough and Ward, 2016, Greater London Authority (not available at LSOA level)

The table above shows:

- The proportion of children in the City of Westminster who are aged under 16 in low income families (27%) is considerably higher than both London (19%) and England (17%) averages.
- The proportion of children aged under 18 who live in low-income families in the City of Westminster (29%) is also considerably higher than London (19%) and England (17%) averages.

4.4 Summary

The table below demonstrates where demographic groups in the study area are under or over-represented when compared to the London and national averages, where this data is available.

Table 4.9: Summary of demographic groups

Protected characteristic group		London average	National average
Age	Children	Below average	Below average
	Younger people	Below average	Below average
	Working age	Above average	Above average
	Older people	In-line	Above average
Disability	Day-to-Day Activities Limited a lot	In-line	In-line
	Day-to-day activities Limited a little	In-line	In-line
Gender reassignment		No data available	No data available
Marriage and civil partnership		n/a	n/a
Pregnancy and maternity	Live births	No data available	No data available
	Total fertility rate	No data available	No data available
Race and ethnicity	White	Below average	Below average
	White Gypsy or Irish Traveller	In-line	In-line
	Mixed/multiple ethnic groups	In-line	In-line
	Asian/Asian British	In-line	Above average

	Black/African/Caribbean/Black British	Below average	In-line
	Other ethnic group	In-line	In-line
Religion and belief	Christian	Below average	Below average
	Minority religions	In line	In line
	No religion/not stated	Above average	Above average
Sex	Female	Below average	Below average
	Male	Above average	Above average
Sexual orientation		No data available	No data available

Source: Mott MacDonald, 2020

5 Impact Assessment

5.1 Overview

This section of the report presents the impacts that have been identified in relation to protected characteristic groups. Wherever possible, findings from wider literature have been included to provide supporting evidence. Impacts that have been identified for the proposed options for Huguenot House include those that relate to relocation, redevelopment and stakeholder consultation.

Where no impacts are specified, no impact has been identified through the assessment that would disproportionately or differentially impact the protected characteristic group in question.

5.2 Assessment of effects on equality groups

Table 5.1 Impact assessment

Potential impacts associated with home relocation				
Impact	Protected characteristic groups affected	Supporting evidence	Options where impacts may arise	Council mitigation and enhancement measures
Access to social infrastructure	<ul style="list-style-type: none"> Older people Disabled people BAME groups Minority faith groups 	<p>For older people, research by Age UK has highlighted that physical isolation, a lack of social resources and a removal of familiarity, all of which can be associated with moving home, can contribute to feelings of isolation and loneliness.¹⁶</p> <p>With disabled people (particularly those with autism and mental health problems), relocation may cause disruption to social networks which many rely on to maintain their standard of living.⁹ Research shows that people on the autism spectrum tend to prefer set routines (such as</p>	<p>Conversion from office to residential use: could have a negative impact on current access to social infrastructure, as both leaseholders and secure tenants would be required to move out and relocate for six months.</p> <p>Retain and extend existing building: could have a negative impact on current access to social infrastructure, as both leaseholders and secure tenants</p>	<p>Leaseholders: The Council would make every reasonable effort to offer a property which meets leaseholders' preferences and requirements, including their support networks, employment and schools and the needs of any disabled household members.</p> <p>Free, independent advice would be available to leaseholders to help them come to a conclusion on the best option.</p> <p>Tenants: Would be given sufficient time to choose their rehusing option and they would</p>

⁹ National Autism Society. (2017): 'Moving house'. Available at: <https://www.autism.org.uk/movinghouse>

traveling via the same routes) and more rigid structures (such as preferences for room layouts or objects) as they can help to bring order to their daily life.¹⁰ Similarly, for those with dementia or Alzheimer's, learning about and interpreting new environments can be difficult, and relocation can create feelings of dissonance, confusion and discomfort.¹¹

The loss of community resources may also have a disproportionate impact on **disabled people**, should they use local community resources as a means of social interaction. 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.¹²

In addition, the loss of social networks and access to cultural and religious facilities can be a particular concern for people from **BAME** and **minority faith** communities, as well as fears of isolation in new locations.¹³

The groups mentioned above may therefore be disproportionately negatively impacted by relocation, should appropriate mitigation measures not be put in place.

would be required to ***move out and relocate for 30 months***.

Refurbishment: could have a negative impact on current access to social infrastructure, as both leaseholders and secure tenants would be required to ***move out and relocate for 30 months***.

Sale: could have a negative impact on current access to social infrastructure as there is no control over the intentions of the purchaser and residents may be required to relocate.

Redevelopment: could have a negative impact on current access to social infrastructure, as both leaseholders and secure tenants would be required to ***move out and relocate for 30 months***.

Mixed use redevelopment: could have a negative impact on current access to social infrastructure, as both leaseholders and secure tenants would be required to ***move out and relocate for 30 months***. Furthermore, ***11 households would not be able to return***.

be supported throughout the process of moving.

Named council officer/s and also an independent Housing Advisor would be available to offer advice to tenants.

Homeless households: All those that have been placed in temporary accommodation by the Council would generally be offered alternative temporary accommodation.

Additional assistance would be provided where residents have needs which make them vulnerable.

¹⁰ National Autistic Society (2016) 'Obsessions, repetitive behaviour and routines'. Available at: <https://www.autism.org.uk/about/behaviour/obsessions-repetitive-routines.aspx>

¹¹ Leonard Cheshire Disability (2014): 'The hidden housing crisis'. Available at: https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/Hidden_Housing_Crisis_July_14_1.pdf

¹² 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/>

¹³ I Cole & J. Flint, (2007): 'Joseph Rowntree Foundation, Demolition, Relocation and affordable rehousing; lessons from the housing market renewal pathfinders'. Available at: <https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/demolition-relocation-affordable-rehousing.pdf>

<p>Access to services</p>	<ul style="list-style-type: none"> • Children • Young people • Older people • BAME groups • Minority faith groups • Pregnant women 	<p>The instability generated by involuntary relocation has the potential to be particularly disruptive to services used by children and young people. Such disruption includes dealing with changing schools, or a longer journey travelling to school. In terms of educational attainment, only 27% of students who move secondary schools three times or more achieve five A* to C grade GCSEs, which is significantly lower than the 60% national average.¹⁴ Other research has indicated that two or more home moves before the age of two can lead to behavioural problems later in childhood.¹⁵ Further, children with autism may find the new routines, social relationships and new school environment particularly challenging, further impacting both educational attainment and wellbeing.¹⁶ The removal of local amenities and services may have a disproportionately negative effect on older people, who may find it challenging to travel to new services outside of the area.¹⁷</p> <p>Removal of local amenities and services may have a disproportionately negative effect on older people, who may find it challenging to travel to new services outside of the area.²⁷</p> <p>Relocation can create a barrier to access of cultural and religious facilities. This can be a particular concern for BAME and minority faith communities, as well as fears of isolation in new locations.¹⁸ For example, in the area near</p>	<p>Conversion from office to residential use: could have a negative impact on current access to services, as both leaseholders and secure tenants would be required to move out and relocate for six months.</p> <p>Retain and extend existing building: could have a negative impact on current access to services, as both leaseholders and secure tenants would be required to move out and relocate for 30 months.</p> <p>Refurbishment: could have a negative impact on current access to services, as both leaseholders and secure tenants would be required to move out and relocate for 30 months.</p> <p>Sale: could have a negative impact on current access to services as there is no control over the intentions of the purchaser and residents may be required to relocate.</p> <p>Redevelopment: could have a negative impact on current access to services, as both leaseholders</p>	<p>Leaseholders: The Council would make every reasonable effort to offer a property which meets leaseholders' preferences and requirements, including their support networks, employment and schools and the needs of any disabled household members.</p> <p>Free, independent advice would be available to leaseholders to help come to a conclusion on the best option.</p> <p>Tenants: Tenants would be given sufficient time to choose their rehousing option and they would be supported throughout the process of moving.</p> <p>Named council officer/s and also an independent Housing Advisor would be available to contact to offer advice to tenants.</p> <p>Homeless households: All those that have been placed in temporary accommodation by the Council would generally be offered alternative temporary accommodation. Additional assistance would be provided where residents have needs which make them vulnerable.</p>
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¹⁴ The Centre for Social Justice (2016): 'Home Improvements, a social justice approach to housing policy'. Available at: <https://www.centreforsocialjustice.org.uk/library/home-improvements-social-justice-approach-housing-policy>

¹⁵ The Centre for Social Justice (2016): 'Home Improvements, a social justice approach to housing policy'. Available at: <https://www.centreforsocialjustice.org.uk/library/home-improvements-social-justice-approach-housing-policy>

¹⁶ 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>

¹⁷ A. Power (2008): 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability'. Energy Policy Vol 12 Issue 12, pp4487-4501.

¹⁸ I Cole & J. Flint, (2007): 'Joseph Rowntree Foundation, Demolition, Relocation and affordable rehousing; lessons from the housing market renewal pathfinders'. Available at: <https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/demolition-relocation-affordable-rehousing.pdf>

Huguenot House is the Chinese Community Centre (2 Leicester Ct, London) which offers a meeting place for the Chinese community, hosts community lunches, provides help, support and guidance and more informal social activities such as a youth club football team. Other facilities likely to be used by BAME and faith communities in the local area include the London Buddhist Centre (8 Hop Gardens, London) and a Quaker meeting house (52 St Martin's Ln, London). In addition, people from BAME communities tend to experience more challenges accessing healthcare when compared the rest of the population.¹⁹ Rehousing members of these communities may exacerbate the issue.

Relocation can result in adverse health effects on those who are **pregnant**. Throughout pregnancy, evidence suggests that receiving pre and antenatal care from the same midwife produces more positive healthcare outcomes.²⁰ Should relocation result in the need to make changes to preestablished antenatal services and relationships, this could negatively impact pregnant individuals.

The groups mentioned above may therefore be disproportionately negatively impacted by relocation, should appropriate mitigation measures not be put in place.

and secure tenants would be required to **move out and relocate for 30 months**.

Mixed use redevelopment: could have a negative impact on current access to services, as both leaseholders and secure tenants would be required to **move out and relocate for 30 months**. Furthermore, **11 households would not be able to return**.

<p>Access to finance</p>	<ul style="list-style-type: none"> • Young people • Older people • BAME groups 	<p>Access to finance is made increasingly difficult when individuals are at risk of experiencing financial exclusion. Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, certain groups are</p>	<p>Conversion from office to residential use: could have a negative impact on residents as both leaseholders and secure tenants would be required to move out and relocate for six</p>	<p>Leaseholders: The Council would offer to resident leaseholders who are required to relocate:</p> <ul style="list-style-type: none"> • free of charge independent financial advice if it is wanted
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¹⁹ Journal of Psychological Issues in Organizational Culture, Volume 3, Number S1, 'Mental Health Inequalities Facing U.K. Minority Ethnic Populations Causal Factors and Solutions'. Available at: <https://onlinelibrary.wiley.com/doi/pdf/10.1002/jpoc.21080>

²⁰ Care Quality Commission (2015): '2015 survey of women's experiences of maternity care'.

particularly vulnerable to financial exclusion. These include, **young people** not in employment, **older people** and people from **BAME** groups.²¹

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. Research suggests that approximately 35% of people living in deprived areas do not have a bank account.²²

Young people, particularly those not in employment, tend to have a lower basic income and fewer savings than the general population and are therefore vulnerable to financial exclusion.²³ Acting as the sole provider for children, with no spouse to turn to for monetary support, can create a number of financial challenges for **single parents**.²⁴ The rising cost of housing and deposits is also problematic for many young people and single parents due to the gap between income and house prices. This means that they may be adversely impacted by the financial implications of relocation.

Research also shows that **older people** (particularly those who have paid off a previous mortgage or those with no recent experience of moving home) are more reluctant to move.²⁵ Older people are more likely to lack the financial

months, resulting in the potential need to access finances associated with moving home.

Retain and extend existing building: could have a negative impact on residents as both leaseholders and secure tenants would be required to **move out and relocate for 30 months**, resulting in the potential need to access finances associated with moving home.

Refurbishment: could have a negative impact on residents as both leaseholders and secure tenants would be required to **move out and relocate for up to 18 months**, resulting in the potential need to access finances associated with moving home.

Sale: could have a negative impact on residents as there is no control over the intentions of the purchaser and residents may be required to relocate, resulting in the potential need to access finances associated with moving home.

- assistance to find another property or with the whole process of buying
- the option to become a social or an intermediate tenant on the Huguenot House site
- a Home Loss Payment which is 10% of the market value of the property being sold subject to a cap which is set by the Government
- a Disturbance Payment to cover all reasonable expenses associated with the sale of the property, moving, and in connection with the purchase of a replacement property

Non-resident leaseholders may sell their property to the Council and are entitled to financial compensation.

Also, they are entitled to receive:

- a basic Loss Payment (7.5% of the market value of the property, but currently capped by the government at £75,000);

a Disturbance Payment in relation to costs incurred in acquiring a replacement property, within one year.

Tenants: The Council would offer to those who are required to relocate:

²¹ 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>

²² Resolution Foundation (2007): 'In brief: Financial exclusion' Available at: <https://www.resolutionfoundation.org/app/uploads/2014/08/Financial-exclusion.pdf>

²³ Joseph Rowntree Foundation (2007) 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'. <https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/demolition-relocation-affordable-rehousing.pdf>

²⁴ The Impact of Financial Hardship on Single Parents: An Exploration of the Journey From Social Distress to Seeking Help (2018) Available at: <https://link.springer.com/article/10.1007%2Fs10834-017-9551-6#Sec5>

²⁵ I Cole & J. Flint, (2007): 'Joseph Rowntree Foundation, Demolition, Relocation and affordable rehousing; lessons from the housing market renewal pathfinders'. Available at: <https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/demolition-relocation-affordable-rehousing.pdf>

	<p>means and income flexibility afforded to younger age groups and those in full time employment the widest range of home ownership options. Relocation may also require older people who have savings and investments to use them in order to secure ownership of a new property.</p> <p>Those from BAME groups often have limited experience of institutional loan finance.²⁶ Further, they may have less access to commercial loans due to a poor credit rating or their location in 'high risk' postcodes. In terms of housing affordability, in 2017 it was reported that rents are less affordable for most BAME groups when compared to White British households.²⁷ Two-fifths of people from a BAME background live in low-income households,²⁸ further suggesting the cost of relocating has the potential to be problematic.</p> <p>The groups mentioned above may therefore be disproportionately negatively impacted by challenges faced accessing finance, should appropriate mitigation measures not be put in place.</p>	<p>Redevelopment: could have a negative impact on residents as both leaseholders and secure tenants would be required to move out and relocate for 30 months, resulting in the potential need to access finances associated with moving home.</p> <p>Mixed use redevelopment: could have a negative impact on residents as both leaseholders and secure tenants would be required to move out and relocate for 30 months, resulting in the potential need to access finances associated with moving home.</p>	<ul style="list-style-type: none"> • a Home Loss Payment –amount set and review each year by government, as of January 2021 it was £6,300 • a Disturbance Payment – to cover the reasonable costs of moving (as removal costs, redirection of mail, disconnection and reconnection of appliances and the refitting of curtains and carpets)
<p>Access to appropriate and accessible housing</p>	<ul style="list-style-type: none"> • Children • Older people • Disabled people • BAME groups <p>There is an established link between reduced availability of housing and poor living conditions for children. In the UK, it is estimated that 3.6 million children are affected by poor quality housing, a higher number proportionally than any other equality group.²⁹ Overcrowded accommodation has been associated with an</p>	<p>Conversion from office to residential use: could have a negative impact on residents as both leaseholders and secure tenants would be required to move out and relocate for six months, meaning the provision of</p>	<p>Leaseholders: The Council would make every reasonable effort to offer a property which meets leaseholders' preferences and requirements, including the needs of any disabled household members.</p> <p>Any disabled adaptations present in a leaseholder's existing property would be</p>

²⁶ 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>

²⁷ 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/>

²⁸ The Poverty Site (2017). See: <http://www.poverty.org.uk/06/index.html>

²⁹ 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>

increased risk of developing respiratory conditions, infections and psychological problems in children.³⁰ Children who live in overcrowded accommodation also have an increased 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). Overall, overcrowded, poor living conditions have the potential to cause stress and negatively impact a child's emotional and physical health in the long term.³¹

Older people are more likely to require specialist housing which meets their needs.³² National estimates of specialist retirement housing indicate there is a demand which cannot be met by current stock, highlighting the potential issues that older people relocating may have with finding appropriate housing.³³

Disabled people, particularly those with a mobility impairment, may be disproportionately disadvantaged when finding new housing. When relocating, only 4% of those with mobility impairments found suitable accommodation with ease. Additionally, some disabled people have also experienced difficulty with local authorities being reluctant to fund adaptations that would enable them to live independently.³⁴ Research from the Equality and Human Rights

appropriate and accessible housing is important. However, depending on housing stock, residents may be required to relocate to housing which does not suit their needs.

Retain and extend existing building: could have a negative impact on residents as both leaseholders and secure tenants would be required to **move out and relocate for up to 30 months**, meaning the provision of appropriate and accessible housing is important. However, depending on housing stock, residents may be required to relocate to housing which does not suit their needs.

Refurbishment: could have a negative impact on residents as both leaseholders and secure tenants would be required to **move out** for a short period meaning the provision of appropriate and accessible housing is important. However, depending on housing stock,

reinstated in the temporary housing at no cost to the leaseholder.

Tenants: Additional assistance would be provided to vulnerable tenants to identify and address any special needs.

Private tenants who are identified as being at risk of homelessness would be referred to the Council's Early Intervention Trailblazer Service (which offers support to those at risk of homelessness at an early stage) for as long as the service is running.

³⁰ 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>

³¹ 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>

³² Age UK (2014): 'Housing in later life'. Housing Age UK (2014): 'Housing in later life'. Available at: <https://www.ageuk.org.uk/Documents/EN-GB/Political/Age%20UK%20ID201813%20Housing%20Later%20Life%20Report%20-%20final.pdf?dtrk=true>

³³ Age UK (2014): 'Housing in later life'. Housing Age UK (2014): 'Housing in later life'. Available at: <https://www.ageuk.org.uk/Documents/EN-GB/Political/Age%20UK%20ID201813%20Housing%20Later%20Life%20Report%20-%20final.pdf?dtrk=true>

³⁴ Leonard Cheshire Disability. (2014): 'The hidden housing crisis'. Available at: https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/Hidden_Housing_Crisis_July_14_1.pdf

Commission found a serious lack of accessible housing in the UK, with only 7% of UK homes offering the basic four accessibility features to make a home fully liveable; level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level.³⁵

Research by the Race Equality Foundation showed that overcrowding is most commonly experienced by **BAME** groups in the UK. Black African Households are 75% more likely than white British households to live with housing deprivation, while this figure is 63% for Bangladeshi households.³⁶ Asian households also make up 21.2% of households with a multi-generational family with dependent children, despite making up only 7.5% of the general population.³⁷ In comparison, Black ethnic groups make up 8.1% of households with multi-generational households with dependent children, compared with being only 3.3% of the general population.³⁸

The groups mentioned above may therefore be disproportionately negatively impacted by any changes to existing housing arrangements, should the appropriate mitigation measures not be put in place. This is particularly the case if there is a lack of appropriate housing stock available to meet their specific needs.

residents may relocate to housing which does not suit their needs.

Sale: could have a negative impact on residents as there is no control over the intentions of the purchaser, residents may be required to relocate, meaning the provision of appropriate and accessible housing is important. However, depending on housing stock, residents may relocate to housing which does not suit their needs.

Redevelopment: could have a negative impact on residents as both leaseholders and secure tenants would be required to **move out and relocate for up to 30 months**, the provision of appropriate and accessible housing is important. However, depending on housing stock, residents may relocate to housing which does not suit their needs.

Mixed use redevelopment: could have a negative impact on residents as both leaseholders and secure tenants would be required to **move out and relocate for up to 30 months**, the provision of appropriate and accessible housing is important.

³⁵ Department for Communities and Local Government (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

³⁶ Institute of Race Relations (2020): 'Inequality, housing and employment statistics' Available at: <http://www.irr.org.uk/research/statistics/poverty/>

³⁷ Office of National Statistics (2019): 'Ethnicity facts and figures: families and households' Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/demographics/families-and-households/latest>

³⁸ Office of National Statistics (2019): 'Ethnicity facts and figures: families and households' Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/demographics/families-and-households/latest>

			However, depending on housing stock, residents may relocate to housing which does not suit their needs.	
Direct and indirect effects on health and well-being	<ul style="list-style-type: none"> • Children • Young people • Older people • Disabled people • Pregnant women 	<p>Relocation can have a negative impact on an individual's mental health and well-being, as measured by the SF-12 Mental Health Composite Score³⁹ and Warwick-Edinburgh Mental Wellbeing Scale test.⁴⁰ These tests have shown that relocation can create increased levels of depression and anxiety.⁴¹ The associated impacts have been found to be more severe when there is a lack or perceived lack of control over the decision.⁴² This stress has been attributed to the anticipation of disruption, extra costs for residents and undermining of community stability and support networks.</p> <p>Relocation can create a great deal of stress and anxiety amongst children and young people due to the need to adapt to new routines, facilities and surroundings.⁴³</p> <p>There is also evidence that involuntary relocation can have a significant impact on older people. For example, it has been shown that mortality rates for those moved involuntarily due to urban renewal (either temporarily or permanently) can</p>	<p>Conversion from office to residential use: could have a negative impact on the health of both leaseholders and secure tenants, as it is likely they would be required to move out and relocate for six months.</p> <p>Retain and extend existing building: could have a negative impact on the health of both leaseholders and secure tenants, as it is likely they would be required to move out and relocate for up to 30 months.</p> <p>Refurbishment: could have a negative impact on the health of both leaseholders and secure tenants, as it is likely they would be required to move out and relocate for up to 18 months.</p> <p>Sale: could have a negative impact on the health of both</p>	<p>The Council would give sufficient time to choose rehousing option and would offer support throughout the process of moving, in order to minimise the stress induced by this process.</p> <p>The Council would make every reasonable effort to offer a property which meets leaseholders' preferences and requirements, including their support networks, employment and schools and the needs of any disabled household members.</p> <p>Additional support would be offered to vulnerable households where it is needed.</p>

³⁹ The SF-12 is a multipurpose short form survey with 12 questions, all selected from the SF-36 Health Survey (Ware, Kosinski, and Keller, 1996). The questions are combined, scored, and weighted to create scales that provide glimpses into mental and physical functioning and overall health-related-quality of life.

⁴⁰ The Warwick-Edinburgh Mental Well-being scale was developed to enable the monitoring of mental wellbeing in the general population and the evaluation of projects, programmes and policies which aim to improve mental wellbeing. WEMWBS is a 14 item scale with 5 response categories, summed to provide a single score ranging from 14-70. The items are all worded positively and cover both feeling and functioning aspects of mental wellbeing.

⁴¹ Cleland, C., Kearns, A., Tannahill, C. and Ellaway, A. (2016). The impact of life events on adult physical and mental health and well-being: longitudinal analysis using the GoWell health and well-being survey. Available at: <https://bmccresnotes.biomedcentral.com/articles/10.1186/s13104-016-2278-x>

⁴² Thomson H, Petticrew M, Douglas M. (2003): 'Health impact assessment of housing improvements: Incorporating research evidence'. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1732281/pdf/v057p00011.pdf>

⁴³ 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>

be higher than non-movers and those who move voluntary.⁴⁴

Stress caused as a result of relocation with **pregnant women** can lead to a reduction of birth weight in unborn babies.⁴⁵ As the project might involve both demolition and relocation, it is possible that this adverse impact may arise.

The groups mentioned above may therefore be disproportionately negatively impacted by the impact of relocation on their health, should appropriate mitigation measures not be put in place.

leaseholders and secure tenants as there is no control over the intentions of the purchaser and residents may be required to relocate.

Redevelopment: could have a negative impact on the health of both leaseholders and secure tenants, as it is likely they would be required to **move out and relocate for up to 30 months.**

Mixed use redevelopment: could have a negative impact on the health of both leaseholders and secure tenants, as it is likely they would be required to **move out and relocate for up to 30 months.**

Potential impacts associated with redevelopment

Impact	Protected characteristic groups affected	Supporting evidence	Options where impacts may arise	Council mitigation and enhancement measures
New social infrastructure	<ul style="list-style-type: none"> Older people Disabled people 	Aging and being disabled can lead to a decline in physical or cognitive functions, resulting in decreased social activity and narrowing of social networks. ⁴⁶ Leisure activities are considered to be effective mediators between social relationships and wellbeing of older people and disabled people . This is because leisure is scientifically proven to help people overcome their stress resulting from a chronic condition or	Redevelopment: A cinema, 75 car parking spaces and four shops would be delivered under this option. There is therefore the opportunity to improve access to social infrastructure for both residents and the wider local community.	n/a

⁴⁴ Danermark BD, Ekstrom ME and Bodin LL (1996): 'Effects of residential relocation on mortality and morbidity among elderly people'. Available at: https://www.academia.edu/19474641/Effects_of_residential_relocation_on_mortality_and_morbidity_among_elderly_people

⁴⁵ 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>

⁴⁶ Wray et al. (2014): 'Social relationships, leisure activity and health in older adults' Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4467537/>

		<p>negative life event. Leisure activities provide disabled and old people with social support, and further mediate their stress-health relationship. Availability of leisure services and facilities could therefore benefit older and disabled people, who are in a greater need for social interaction than the general population.⁴⁷</p> <p>The above groups are therefore likely to benefit from improved access to social infrastructure as a result of changes made to Huguenot House.</p>	<p>Mixed use redevelopment: New office accommodation, a cinema, a hotel and a casino would be delivered under this option. There is therefore the opportunity to improve access to social infrastructure for both residents and the wider local community.</p>	
<p>Housing provision</p>	<ul style="list-style-type: none"> • Children • Older people • BAME groups • Disabled people 	<p>Research shows that well insulated homes are important as cold housing can be particularly detrimental to the physical and mental health of children.⁴⁸ Compared to children living in appropriately heated homes, those living in cold homes are twice as likely to suffer from respiratory illnesses.⁴⁹ Further, children living in cold houses are more likely to suffer reduced emotional resilience and educational attainment.⁵⁰</p> <p>Older people are particularly vulnerable to the effects of cold housing as they spend 80% of their time in their home, considerably more when compared to the general population.⁵¹ Conditions such as arthritis and rheumatism disproportionately effect older people and are also exacerbated by cold living conditions.⁵² In winter, cold damp conditions can contribute to</p>	<p>Conversion from office to residential use: 10 new homes would be created. The new homes could not fully comply with modern standards. Therefore, they would not be fully adaptable for disabled residents, creating a potential negative effect to disabled people.</p> <p>Retain and extend existing building: 14 new homes would be created. The new homes could not fully comply with modern standards. Therefore, they would not be fully adaptable for disabled residents, creating a potential negative effect to disabled people.</p>	<p>Under the refurbishment, conversion from office to residential use and retain and extend existing building options, there would be an option for leaseholders to opt-in for new bathrooms and kitchens at an added cost. option, minor improvements to energy</p> <p>Under the redevelopment and mixed use redevelopment options there would be brand new housing built following substantial structural demolition. New homes would be adaptable for disabled residents.</p>

⁴⁷ Liu et al. (2018): 'Social interaction patterns of the disabled people in asymmetric social dilemmas' Available at: <https://www.frontiersin.org/articles/10.3389/fpsyg.2018.01683/full>

⁴⁸ Marmot Review Team (2011): 'The Health Impacts of Cold Homes and Fuel Poverty'. London: Department of Epidemiology and Public Health, University College London. Available at: <http://www.instituteofhealthequity.org/resources-reports/the-health-impacts-of-cold-homes-and-fuel-poverty/the-health-impacts-of-cold-homes-and-fuel-poverty.pdf>

⁴⁹ Marmot Review Team (2011): 'The Health Impacts of Cold Homes and Fuel Poverty'. London: Department of Epidemiology and Public Health, University College London. Available at: <http://www.instituteofhealthequity.org/resources-reports/the-health-impacts-of-cold-homes-and-fuel-poverty/the-health-impacts-of-cold-homes-and-fuel-poverty.pdf>

⁵⁰ Poverty and Social Exclusion (2014): 'Impact of fuel poverty on children' Available at: <https://www.poverty.ac.uk/editorial/impact-fuel-poverty-children>

⁵¹ The Housing and Ageing Alliance (2013): 'Policy Paper: Health, Housing and Ageing'

⁵² The Housing and Ageing Alliance (2013): 'Policy Paper: Health, Housing and Ageing'

illnesses such as flu and cold, potentially impacting health outcomes.⁵³ Consequently, cold housing can increase the likelihood of illness, negative mental health outcomes and ultimately an increased mortality rate.⁵⁴ Improved housing provision may therefore improve quality of housing for older people, should this currently be an issue.

In 2016, 17% of **BAME** households in England were living in fuel poverty compared to 10% of White households (including White ethnic minorities).⁵⁵ Research conducted by the Race Equality Foundation has also demonstrated that fuel poverty is worse in London where basic housing costs are expensive even before the cost of heating a home is taken into consideration.⁵⁶ Improved housing provision may therefore benefit this group.

Research has highlighted that over a third of **disabled people** think that their impairment or condition has an impact on the amount of energy that they consume and pay for. For example, those with reduced mobility may be required to use the heating more to stay warm. Overall, households with a disabled person make up 38% of all households in England that are considered to be fuel poor.⁵⁷

The above groups are therefore likely to benefit from improved housing provision as a result of changes made to Huguenot House.

Redevelopment: 50 new homes would be created. New homes would be designed to be adaptable for disabled residents, creating a potential positive effect.

Mixed use redevelopment: 24 new homes would be created. All new homes would be designed to be adaptable for disabled residents, creating a potential positive effect.

⁵³ Age UK (2014): 'Housing in later life'

⁵⁴ Marmot Review Team (2011): 'The Health Impacts of Cold Homes and Fuel Poverty'

⁵⁵ Department for Business, Energy and Industrial Strategy (2018): 'Fuel Poverty'. Available at:

⁵⁶ Race Equality Foundation (2014): 'The Housing Conditions of Minority Ethnic Households in England'. Available at: https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/housing_briefing_24-final.pdf

⁵⁷ Scope (2018): 'Out in the cold'. Available at: <https://www.barrowcadbury.org.uk/wp-content/uploads/2018/03/Out-in-the-cold-Scope-report.pdf>

Affordable housing provision	<ul style="list-style-type: none"> • Young people • BAME groups 	<p>A study published by Joseph Rowntree Foundation states that throughout 2020 competition for the limited supply of social housing would increase. It is predicted that more young people would stay at home for longer, while others would live in lower-end accommodation as a result of low incomes. Therefore, low-income and vulnerable young people would benefit from improved access to affordable housing.⁵⁸</p> <p>BAME households may also be impacted by the availability of affordable housing. In 2017, it was reported that rents were less affordable for most BAME groups when compared to White British households. Two-fifths of people from a BAME background lived in low-income households, and 52% of Black African, Black Caribbean, and Black British households lived in Council accommodation compared to 24 per cent of White British households.⁵⁹</p> <p>The above groups are therefore likely to benefit from new, affordable housing as a result of changes made to Huguenot House.</p>	<p>Conversion from office to residential use: could have a positive effect due to five of the 10 new homes would be affordable (50%).</p> <p>Retain and extend existing building: could have a positive effect due to seven of the 14 new homes would be affordable (50%).</p> <p>Redevelopment: could have a positive effect due to 25 of the 50 new homes would be affordable (50%).</p> <p>Mixed use redevelopment: could have a positive effect due to 12 of the 24 new homes would be affordable (50%).</p>	n/a
Access to high quality public realm	<ul style="list-style-type: none"> • Older people • Disabled people • BAME groups 	<p>The ability to access and use the public realm is seen as 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.⁶⁰</p> <p>A 2016 report by TfL has suggested that unmaintained public thoroughfares and areas, such as poor upkeep of streets, steep slopes and</p>	<p>Redevelopment: The public realm would be improved with the introduction of some green space. There is also likely to be a reduction of anti-social behaviour.</p> <p>Mixed use redevelopment: The public realm would be improved with the introduction of some green space. There is also likely</p>	n/a

⁵⁸ Joseph Rowntree Foundation (2012): 'Housing options and solutions for young people in 2020'. Available at: <https://www.jrf.org.uk/report/housing-options-and-solutions-young-people-2020>

⁵⁹ The Poverty Site (2017): Available at: <http://www.poverty.org.uk/06/index.html>

⁶⁰ House of Commons Women and Equalities Committee (2017): 'Building for Equality: Disability and the Built Environment'. Available at: <https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/631/631.pdf>

		<p>a lack of rest areas increase the difficulty that older people face when walking through public areas and may lead to associated travel anxiety.⁶¹ Further research has highlighted other physical barriers, such as high kerbs and holes in pavements, as challenges faced by older people in accessing the public realm.⁶²</p> <p>For disabled people, public spaces can often be inaccessible. 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, impacting the ability of disabled people to interact socially within their communities.⁶³</p> <p>Research shows that individuals from BAME communities in urban areas can perceive themselves as vulnerable due to their previous experience of victimization or harassment,⁶⁴ highlighting a differential need for this demographic.</p> <p>As a result, an appropriately managed and maintained public realm can help to ensure all its users, especially older people, disabled people and BAME groups, feel and are safe.</p>	to be a reduction of anti-social behaviour.	
Property affordability	<ul style="list-style-type: none"> • Young people • Older people 	<p>The affordability of new housing is likely to impact those who may experiences challenges in accessing mortgages.</p> <p>Young people aged 18-24 are more likely to have faced mortgage rejection when compared to other applicants, according to research carried</p>	<p>Conversion from office to residential use, retain and extend existing building, maintenance and refurbishment: all of these options could involve an increase in financial outgoings, as</p>	<p>Leaseholders: The Council may offer the opportunity to buy another property locally with an equity loan or on a shared equity basis.</p> <p>The Council would work with each leaseholder individually taking into account their personal circumstances, preferences and their level of</p>

⁶¹ TfL (2016): 'Older Londoners' perceptions of London streets and the public realm: Final report' Available at: <http://content.tfl.gov.uk/older-people-walking-report.pdf>

⁶² Wennberg, H. Phillips, J. and Stahl, A. (2017): 'How older people as pedestrians perceive the outdoor environment: Methodological issues derived from studies in two European countries' Available at: <https://www.cambridge.org/core/journals/ageing-and-society/article/how-older-people-as-pedestrians-perceive-the-outdoor-environment-methodological-issues-derived-from-studies-in-two-european-countries/6CE4668C92C51D24FBE440B0D6D43D5F/core-reader#>

⁶³ House of Commons Women and Equalities Committee (2017): 'Building for Equality: Disability and the Built Environment'. Available at: <https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/631/631.pdf>

⁶⁴ WHO (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

out by Which?. Statistics show that 41% of this age group have had an unsuccessful mortgage application in the past, compared to 27% of those ages 25-34, 15% of those aged 35-44, 8% of those aged 45-50, 6% of those aged 51-59 and 4% of those aged between 60 and 69. Of all places, London is the area young people are most likely to experience difficulty obtaining a mortgage.⁶⁵

While some **older people** may have sufficient equity in their home to purchase a new property outright, others would be required to take out a mortgage in order to do so (should the new property be more expensive). Although only a small proportion of older people take out a mortgage beyond retirement, the numbers are increasing. For example, in 2012, the proportion of later life mortgage sales to those aged over 70 was 10%. This figure had almost doubled by 2016 to 18%. However, some lenders can be reluctant to lend to older people. The complexity of mortgage cases with older people can mean that key mortgage lenders are unable to feed information through the standardised computerised systems, resulting in potentially unsuccessful mortgage applications.⁶⁶

The groups mentioned above are likely to be disproportionately negatively impacted by any changes to existing housing arrangements and the financial contributions required towards the cost of works or new housing at Huguenot House, should appropriate mitigation measures not be put in place.

leaseholders would be required to contribute towards the cost of the works (between £25,000 - £45,000). There is therefore potential for a negative effect on residents under all of these options.

Sale: could involve an increase in financial outgoings as there is no control over the intentions of the purchaser, therefore residents may be required to contribute towards the cost of the works. There is therefore potential for a negative effect on residents.

ownership, some of them having the option to become a shared owner at a new property, as long as sufficient finance to buy at least a 25% share can be raised.

Direct and indirect effects on health and well-being

- Children
- Older people

Increased noise exposure has been linked to several negative health outcomes for **children, older people** and **disabled people** as they are

Maintenance: both leaseholders and secure tenants can remain in the building whilst some

Leaseholders: The Council would make every reasonable effort to offer a property which meets leaseholders' preferences and

⁶⁵ Which? (2019): 'Four in 10 young homeowners had a mortgage application rejected'. Available at: <https://www.which.co.uk/news/2019/01/four-in-10-young-homeowners-had-a-mortgage-application-rejected/>

⁶⁶ Parliament UK (2018): 'Housing for Older People: Moving home'. Available at: <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/370/37008.htm>

<ul style="list-style-type: none"> • Disabled people • Pregnant women 	<p>more vulnerable to the negative healthcare outcomes which occur as a result.</p> <p>Noise levels due to construction works can negatively impact children, affecting their concentration and long-term cognitive development.⁶⁷ Also, health impacts of increased noise exposure on older people include cardiovascular disease, sleep deprivation, stress and anxiety.⁶⁸</p> <p>Changes to noise levels can impact those with learning disabilities by creating challenging behaviours. Likewise, noise can discourage disabled people from participating in activities outside the home, leading to social isolation.⁶⁹ Also, during the works, should levels of air quality be reduced, negative impacts may arise. This is particularly likely to impact children, older people, disabled people and pregnant women.</p> <p>Children can be negatively affected by reduced air quality, as they have faster breathing rates, their lungs are still developing and thus are more susceptible to changes in air quality.⁷⁰</p> <p>Older people are more likely to have respiratory or cardiovascular illness when compared to most other age groups, making them more susceptible to the effects of reduced air quality. Those with COPD (Chronic Obstructive Pulmonary Disorder) are particularly at risk.⁷¹ COPD occurs most often</p>	<p>construction works are taking place, potentially negatively impacting the health of residents.</p> <p>All other options: as residents may relocate to housing which does not suit their needs or has inappropriate living standards, creating the potential for a negative effect.</p>	<p>requirements, including their support networks, employment and schools and the needs of any disabled household members.</p> <p>Free, independent advice would be available to leaseholders to help come to a conclusion on the best option.</p>
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⁶⁷ World Health Organisation (2011): 'Burden of disease from environmental noise Quantification of healthy life years lost in Europe'. Available at http://www.euro.who.int/data/assets/pdf_file/0008/136466/e94888.pdf

⁶⁸ World Health Organisation (2011): 'Burden of disease from environmental noise Quantification of healthy life years lost in Europe'. Available at: https://www.who.int/quantifying_ehimpacts/publications/e94888.pdf?ua=1

⁶⁹ Scope (no date): 'Challenging behaviour', Available at <https://www.scope.org.uk/support/parents/challenging-behaviour/reasons>

⁷⁰ Asthma UK (no date): 'Pollution'. Available at: <https://www.asthma.org.uk/advice/triggers/pollution/>

⁷¹ British Heart Foundation (no date): 'Air pollution and cardiovascular disease'. Available at: <https://www.bhf.org.uk/about-us/our-policies/preventing-heart-disease/air-pollution>

in older adults and can also affect people in their middle ages.⁷²

Pregnant women living in areas with poor air quality are at risk of giving birth to a baby with a low birthweight, which can lead to an increased risk of the child developing a chronic disease in later life. Research conducted by the Royal College of Physicians indicates that air pollution may negatively impact upon the growth, intelligence and weight of babies in the womb.⁷³

Should residents remain in the building whilst construction works are taking place, leading to a significant reduction of air quality levels, or an increase in noise levels, these groups may be disproportionately negatively impacted, should appropriate mitigation measures not be put in place.

Potential impacts on businesses				
Impact	Protected characteristic groups affected	Supporting evidence	Options where impacts may arise	Council mitigation and enhancement measures
Creation of new business and employment opportunities	<ul style="list-style-type: none"> • Young people • BAME groups 	Research shows that youth unemployment has consistently been an issue in the UK for around a decade. The unemployment rate for 16-24-year olds is proportionally higher when compared to other age groups. ⁷⁴ An increase in employment opportunities is therefore likely to positively impact younger people .	Conversion from office to residential use: could have a positive effect due to a small number of new jobs and apprenticeships for local people being created during the works.	n/a

⁷² Medically reviewed by Daniel Murrell, MD on December 7, 2018 — Written by Kristeen Cherney Available at: <https://www.healthline.com/health/copd/age-of-onset>

⁷³ 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>

⁷⁴ EY Foundation (2016): 'The employment landscape for young people in the UK'. Available at: [https://www.ey.com/Publication/vwLUAssets/Employment_landscape_for_young_people_in_the_UK/\\$FILE/Employment%20landscape%20for%20young%20people%20in%20the%20UK%20-%20final%20report.pdf](https://www.ey.com/Publication/vwLUAssets/Employment_landscape_for_young_people_in_the_UK/$FILE/Employment%20landscape%20for%20young%20people%20in%20the%20UK%20-%20final%20report.pdf)

Research has found that **BAME** groups are at a disadvantage compared to the White British population, with such inequalities persisting over time. Unemployment rates are particularly high among the African, White Gypsy/Irish Traveller, Pakistani and Bangladeshi ethnic groups.⁷⁵

Temporary employment generated through the need to provide construction and non-construction support throughout the construction period would benefit young people and BAME groups.

Likewise, an increase in employment opportunities as a result of new business and retail units located on the development is therefore likely to positively impact younger people and BAME groups.

Retain and extend existing building: could have a positive effect due to a small number of new jobs and apprenticeships for local people being created during the works.

Refurbishment: could have a positive effect due to a small number of new jobs and apprenticeships for local people being created during the works. Offices would also be refurbished to a higher standard, making them attractive for businesses to rent, bringing more economic activity to the area.

Redevelopment: likely to have a positive effect due to construction works offering significant employment opportunities and apprenticeships for local people. More office, shops and a cinema could also attract more businesses and jobs to the area.

Mixed use redevelopment: could have a positive effect due to a small number of new jobs and apprenticeships for local people being created during the works. More office and additional commercial spaces could also attract more businesses and jobs to the area.

⁷⁵ Joseph Rowntree Foundation (2015): 'Ethnic Minority Disadvantage in The Labour Market'.

Loss of existing business and employment

- Older working age people

Research suggests that those who are **older** when they are made redundant experience additional barriers in returning to employment, potentially facing challenges in securing interviews for new positions.⁷⁶ 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).⁷⁷ This group may therefore experience disproportionate negative impacts regarding the loss of existing businesses and employment.

As **older people** find it harder to access employment, they may be more likely to own their own business. According to ONS data there were 4.6 million self-employed people in the UK at the end of 2015, which was an increase from 3.8 million in 2008; 43% of those were over 50.⁷⁸ After the 2008 recession, many older people were made redundant and there was a lack of jobs suitable for people over the age of 50.⁷⁹ This meant it was difficult for them to find a new employer. Many took this as an opportunity to start-up their own businesses. Therefore, older businesses owners may be more likely to be disproportionately affected by relocation.

Older people may therefore be disproportionately negatively impacted by any changes to existing business or employment arrangements as a result of the options for Huguenot House, should appropriate mitigation measures not be put in place.

Conversion from office to residential use: leaseholders and secure tenants would be required to **move out and relocate for six months**.

Secure tenants would be able to return to current accommodation upon completion. As a result, existing employment opportunities may be negatively impacted.

By removing the office space, businesses would also be required to move and employment may be lost under this option.

Retain and extend existing building: leaseholders and secure tenants would be required to **move out for up to 30 months**. Secure tenants would be able to return to current accommodation upon completion. As a result, existing employment opportunities may be negatively impacted.

Refurbishment: leaseholders and secure tenants would be required to **move out for 18 months** but would be able to return to current accommodation upon completion. As a result,

Leaseholders: Free, independent advice would be available to leaseholders to help come to a conclusion on the best option regarding loss of existing business and employment, should this be necessary.

⁷⁶ 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/>

⁷⁷ ONS (2016): 'Trends in self-employment in the UK: 2001 to 2015'. Available at:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/trendsinselfemploymentintheuk/2001to2015>

⁷⁸ Chartered Institute of Personnel and Development (2018): Megatrends

⁷⁹ Chartered Institute of Personnel and Development (2018): Megatrends

		<p>existing employment opportunities may be negatively impacted.</p> <p>Sale: could potentially negatively impact business and employment as there is no control over the intentions of the purchaser and residents may be required to relocate.</p> <p>Redevelopment: leaseholders and secure tenants would not be permitted to remain in the building as part of the development, but they would be offered the right to return to new dwellings. Residents would be required to move out of the building for 30 months before there is the option of returning. As a result, existing employment opportunities may be negatively impacted.</p> <p>Mixed use redevelopment: leaseholders and secure tenants would be required to move out and relocate for up to 30 months, but they would be offered the right to return to new dwellings. Furthermore, 11 households currently living in the building would not be able to return. As a result, existing employment opportunities may be negatively impacted.</p>	
<p>Effects on the children of employees</p>	<ul style="list-style-type: none"> • Children Associated impacts with redevelopment and relocation may include changes to businesses and employment, which in turn may have a knock-on effect for employees and their families. The impact of relocation can be different for children at different times in their education. For school age children it may impact their education 	<p>Conversion from office to residential use: leaseholders and secure tenants would be required to move out and relocate for six months. Secure tenants would be able to return to current accommodation</p>	<p>Leaseholders: The Council would make every reasonable effort to offer a property which meets leaseholders' preferences and requirements, including their support networks, employment and schools and the needs of any disabled household members.</p>

and for older children relocation may pose a challenge as research suggest friendships at this formative stage help to support social development.⁸⁰ There are two schools close to Huguenot House including Soho Parish Primary School and Normanhurst School.

Therefore, is possible that children would be disproportionately negatively impacted by any changes to their parent or guardian's employment arrangements, should appropriate mitigation measures not be put in place.

upon completion. During this period of relocation, children's education and friendship networks could be negatively impacted.

Retain and extend existing building: leaseholders and secure tenants would be required to **move out for up to 30 months**. Secure tenants would be able to return to current accommodation upon completion. During this period of relocation, children's education and friendship networks could be negatively impacted.

Refurbishment: leaseholders and secure tenants would be required to **move out** of the building for **18 months** before there is the option of returning. During this period of relocation, children's education and friendship networks could be negatively impacted.

Sale: could potentially impact children's education and friendship networks is no control over the intentions of the purchaser, therefore residents may be required to relocate.

Redevelopment: leaseholders and secure tenants would not be permitted to remain in the building as part of the development, but they would be offered the right to return to new dwellings.

Free, independent advice would be available to leaseholders to help come to a conclusion on the best option.

⁸⁰ Urban Institute (2013): 'The negative effects of instability on child development: a research synthesis'

			<p>Residents would be required to move out of the building for 30 months before there is the option of returning. During this period of relocation, children's education and friendship networks could be negatively impacted.</p> <p>Mixed use redevelopment: leaseholders and secure tenants would not be permitted to remain in the building as part of the development, but they would be offered the right to return to new dwellings. Residents would be required to move out of the building for 30 months before there is the option of returning. During this period of relocation, children's education and friendship networks could be negatively impacted. Furthermore, 11 households currently living in the building would not be able to return. As a result, their children's education and friendship networks could be permanently negatively impacted.</p>	
<p>Increased commuting distance</p>	<ul style="list-style-type: none"> • Men • Women 	<p>Associated impacts of the options may include relocating businesses which may increase commuting distances for employees. In all age groups men make more commuting trips than women. Men aged 30-39 make the most commuting trips (290 trips per person per year) and men aged 50-59 make the most business trips (69 trips). 35% of all trips made by men aged 21- 29 and 30-39 are for commuting or business purposes.⁸¹ Research has suggested</p>	<p>Conversion from office to residential use: could create a negative effect as leaseholders and secure tenants would be required to move out and relocate for six months. Secure tenants would be able to return to current accommodation upon completion. During this period of relocation, residents</p>	<p>Leaseholders: The Council would make every reasonable effort to offer a property which meets leaseholders' preferences and requirements, including their support networks, employment and schools and the needs of any disabled household members. Free, independent advice would be available to leaseholders to help come to a conclusion on the best option.</p>

⁸¹ JRF (2003): 'The effects on families of job relocations' Available at: <https://www.jrf.org.uk/report/effects-families-job-relocations>

that time spent commuting can affect life satisfaction and levels of happiness and anxiety.⁸²

In addition to this, evidence has found that an increase in commuting time could impact job satisfaction. Job satisfaction is higher for **women** than it is for men. However, job satisfaction for women decreases when commute time is longer. This is likely to be related to greater household and family responsibilities.⁸³

The groups mentioned above may therefore be disproportionately negatively impacted by any changes to existing employment arrangements, should a change in travel pattern be required, should appropriate mitigation measures not be put in place.

could potentially have a longer commuting distance depending on the relocation destination.

Retain and extend existing building: could create a negative effect as leaseholders and secure tenants would be required to **move out for up to 30 months**. Secure tenants would be able to return to current accommodation upon completion. During this period of relocation, residents could potentially have a longer commuting distance depending on the relocation destination.

Refurbishment: could create a negative effect as leaseholders and secure tenants would be required to **move out and relocate for 18 months** before being able to return. During this period of relocation, residents could potentially have a longer commuting distance depending on the relocation destination.

Sale: could potentially cause a longer commuting distance as there is no control over the intentions of the purchaser, therefore residents may be required to relocate.

Redevelopment: could create a negative effect as leaseholders and secure tenants would not be

⁸² ONS (2014): 'Commuting and Personal Well-being'. Available at: <http://webarchive.nationalarchives.gov.uk/20160105231823/http://www.ons.gov.uk/ons/rel/wellbeing/measuring-national-well-being/commuting-and-personal-well-being--2014/art-commuting-and-personal-well-being.html>

⁸³ University of the West of England (2017): 'The Commuting and Wellbeing Study: Understanding the Impact of Commuting on People's Lives'. Available at: <https://travelbehaviour.files.wordpress.com/2017/10/caw-summaryreport-onlineedition.pdf>

permitted to remain in the **building** as part of the development, but they would be offered the right to return to new dwellings. Residents would be required to **move out** of the building for **30 months** before there is the option of returning. During this period of relocation, residents could potentially have a longer commuting distance depending on the relocation destination.

Mixed use redevelopment:
could create a negative effect as leaseholders and secure tenants would not be permitted to remain in the building as part of the development, but they would be offered the right to return to new dwellings. Residents would be required to **move out** of the building for **30 months** before there is the option of returning. Furthermore, **11 households currently living in the building would not be able to return.** As a result, the commuting distance of residents could be negatively impacted both temporarily or permanently (should residents currently live in one of the 11 households unable to return).

Potential impacts associated with an extension to the consultation period

Benefits of stakeholder engagement and an	<ul style="list-style-type: none"> Older people Disabled people 	There is a consistent pattern of civil engagement and participation amongst older people , however this tends to decrease with people in their eighties. Evidence also shows that 12% of	All options	n/a
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extended public consultation process	<ul style="list-style-type: none"> • BAME groups • Women 	<p>people who are 65 or above and either disabled or from a BAME group want to be more connected with their society.⁸⁴ It has been acknowledged that those who are disabled and from BAME groups are less likely to take part in public life than other sections of the population.⁸⁵ An extended consultation period could therefore benefit these groups, helping them to feel more connected.</p> <p>Women can also experience barriers in openly expressing their opinions in public consultation. Achieving gender equality and inclusion in decision-making processes is a major policy challenge for the Government. This means an extended public consultation process could help in improving women's access to formal decision-making processes and community facilitation.⁸⁶</p> <p>Any extension in the consultation process would also provide the opportunity of direct involvement and to influence the decision-making process when considering a range of options for the best future of Hughenot House.</p>		
Adverse effects associated with stakeholder engagement and an extended public consultation process	<ul style="list-style-type: none"> • Older people • Disabled people • BAME groups • Women 	<p>Although an extended period of public consultation might mean increased opportunity to engage with hard-to-reach groups, it might extend the period of uncertainty for the future of the site.</p> <p>As mentioned previously, relocation (or the potential to relocate) can create a great deal of stress and anxiety amongst children and young</p>	All options	n/a

⁸⁴ House of Lords (2018): 'The Ties that Bind: Citizenship and Civic Engagement in the 21st Century'. Available at: <https://publications.parliament.uk/pa/ld201719/ldselect/ldcitizen/118/118.pdf>

⁸⁵ Greater London Authority (2017): 'The Mayor's vision for a diverse and inclusive city: Draft for consultation' Available at: https://www.london.gov.uk/sites/default/files/microsoft_word_-_final_diversity_and_inclusion_vision_for_publication_lo.pdf

⁸⁶ Women's Resource and Development Agency (2018): 'Women at the Heart of Public Consultation'. Available at: https://wrda.net/wp-content/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf

people,⁸⁷ older people and pregnant women.⁸⁸

Such stress is also likely to be exacerbated should the individual have a mental health problem.

Research also shows that local planning and consultation periods in the UK are generally too long in the housing sector, producing further barriers to effective community involvement.⁸⁹ Focused community engagement is therefore hard to maintain in extended consultation periods, which can reduce the overall effectiveness of consultation with regards to protected characteristic groups.

⁸⁷ 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>

⁸⁸ 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>

⁸⁹ Norton, P. and Hughes, M (2018): 'Public consultation and community Involvement in planning: a twenty-first century guide'. Available at: <https://books.google.co.uk/books?id=qkwrDwAAQBAJ&printsec=frontcover#v=onepage&q&f=false>

6 Conclusion 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 seven options for Huguenot House.

The positive and negative impacts have been summarised in the tables below with Table 6.1 demonstrating the positive impacts of each option and Table 6.2 highlighting the negative impacts of each option, alongside the groups likely to be impacted.

Table 6.1: Summary of identified potential positive impacts

Potential Impact	Associated options	Protected characteristics	Demographic comparison of the study area	
			London	National
New social infrastructure	<ul style="list-style-type: none"> Redevelopment Mixed use redevelopment 	Older people	In-line	Above average
		Disabled people	In-line	In-line
Housing provision	<ul style="list-style-type: none"> Conversion from office to residential use Retain and extend existing building Redevelopment Mixed use redevelopment 	Children	Below average	Below average
		Older people	In-line	Below average
		Chinese (BAME)	Above average	Above average
		Other white (BAME)	Above average	Above average
Affordable housing provision	<ul style="list-style-type: none"> Conversion from office to residential use Retain and extend existing building Redevelopment Mixed use redevelopment 	Young people	Below average	Below average
		Chinese (BAME)	Above average	Above average
		Other white (BAME)	Above average	Above average
Access to high quality public realm	<ul style="list-style-type: none"> Redevelopment Mixed use redevelopment 	Older people	In-line	Below average
		Disabled people	In-line	In-line
		Chinese (BAME)	Above average	Above average
		Other white (BAME)	Above average	Above average
Creation of new business and employment opportunities	<ul style="list-style-type: none"> Conversion from office to residential use Retain and extend existing building Refurbishment Redevelopment Mixed use redevelopment 	Young people	Below average	Below average
		Chinese (BAME)	Above average	Above average
		Other white (BAME)	Above average	Above average
Benefits of stakeholder engagement and an extended public consultation	<ul style="list-style-type: none"> All options 	Older people	In-line	Below average
		Disabled people	In-line	In-line
		Chinese (BAME)	Above average	Above average
		Other white (BAME)	Above average	Above average

Potential Impact	Associated options	Protected characteristics	Demographic comparison of the study area	
			London	National
		Women	Below average	Below average

Table 6.2: Summary of identified potential negative impacts

Potential impact	Associated options	Protected Characteristics	Demographic comparison of Westminster 18A LSOA		Summary of mitigation measures
			London	National	
Access to social infrastructure	<ul style="list-style-type: none"> Conversion from office to residential use 	Older people	In-line	Below average	Support and advice with rehousing options
		Disabled people	In-line	In-line	
	<ul style="list-style-type: none"> Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 	Chinese (BAME)	Above average	Above average	
		Other white (BAME)	Above average	Above average	
		Buddhist communities (Minority Faith)	Above average	Above average	
Access to services	<ul style="list-style-type: none"> Conversion from office to residential use 	Children	Below average	Below average	Support and advice with rehousing options
		Young people	Below average	Below average	
	<ul style="list-style-type: none"> Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 	Older people	In-line	Below average	
		Chinese (BAME)	Above average	Above average	
		Other white (BAME)	Above average	Above average	
		Pregnant Women	Below average	Below average	
Access to finance	<ul style="list-style-type: none"> Conversion from office to residential use 	Young people	Below average	Below average	Financial assistance and entitlements
		Older people	In-line	Below average	
	<ul style="list-style-type: none"> Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 				
Property affordability	<ul style="list-style-type: none"> Conversion from office to residential use 	Young people	Below average	Below average	Financial assistance and entitlements
		Older people	In-line	Below average	
	<ul style="list-style-type: none"> Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 				
Housing provision (lack of disability)	<ul style="list-style-type: none"> Conversion from office to residential use 	Disabled people	In-line	In-line	n/a

Potential impact	Associated options	Protected Characteristics	Demographic comparison of Westminster 18A LSOA		Summary of mitigation measures
			London	National	
adaptable new homes)	<ul style="list-style-type: none"> Retain and extend existing building 				
Access to appropriate and accessible housing	<ul style="list-style-type: none"> Conversion from office to residential use Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 	Children	Below average	Below average	Support with rehousing and consideration of specific needs and requirements
		Older people	In-line	Below average	
		Disabled people	In-line	In-line	
		Chinese (BAME)	Above average	Above average	
		Other white (BAME)	Above average	Above average	
Direct and indirect effects on health and wellbeing	<ul style="list-style-type: none"> Conversion from office to residential use Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 	Children	Below average	Below average	Support and advice throughout the rehousing process
		Young people	Below average	Below average	
		Older people	In-line	Below average	
		Disabled people	In-line	In-line	
		Pregnant women	Below average	Below average	
Loss of existing business and employment	<ul style="list-style-type: none"> Conversion from office to residential use Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 	Older people	In-line	Below average	n/a
Impact on employees' children's education and friendship networks	<ul style="list-style-type: none"> Conversion from office to residential use Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 	Children	Below average	Below average	Free, independent advice and support throughout the process
Increased commuting distance	<ul style="list-style-type: none"> Conversion from office to residential use Retain and extend existing building Refurbishment Sale Redevelopment Mixed use redevelopment 	Men	Above average	Above average	Free, independent advice and support throughout the process
		Women	Below average	Below average	

Potential impact	Associated options	Protected Characteristics	Demographic comparison of Westminster 18A LSOA		Summary of mitigation measures
			London	National	
Adverse effects associated with stakeholder engagement and extended public consultation process	• All options	Older people	In-line	Below average	n/a
		Disabled people	In-line	In-line	
		Chinese (BAME)	Above average	Above average	
		Other white (BAME)	Above average	Above average	
		Women	Below average	Below average	

6.2 Action Plan

The following action plan seeks to establish activities and responsibilities to continue to identify and address equality issues if and when they arise.

Table 6.3: Action Plan

Action	Responsibility	Implementation
<p>Ensure that any continued engagement with residents (tenants and leaseholders), non-resident leaseholders, businesses and local community includes:</p> <ul style="list-style-type: none"> Information around the additional options, as and when this information becomes available Development updates and consultation events Information sessions on specific topics affecting local community stakeholders <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. Consideration should also be given to creating a designated website to share information and updates.</p>	Westminster City Council	<p>Programme of future engagement events to be kept under review by the Council.</p> <p>Continued maintenance of the consultation website, where planning and development progress is kept. All information should be shared in a transparent manner.</p> <p>Marginalised groups should be brought into decision-making processes as early as possible, and throughout the entirety of the consultation process. The results of the extended public consultation process must ensure delivery of proper feedback to local communities and use evidence-based community engagement initiatives.⁹⁰</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>
<p>Engage with residents (tenants and leaseholders), non-resident leaseholders and businesses, and keep them informed of the rehousing/relocation options, how they express interest of returning to the site once redeveloped (should an option including this process be progressed) the financial entitlements and the support available.</p> <p>Consideration should be given to ensuring all information is provided in appropriate formats and languages to suit different needs.</p>	Westminster City Council	<p>Regular sessions of engagement with residents (tenants and leaseholders), non-resident leaseholders and businesses should continue to take place at different stages of the development.</p> <p>Marginalised groups should be brought into decision-making processes as early as possible, and throughout the entirety of the consultation process. The results of the extended public consultation process must therefore ensure delivery of proper feedback to local communities and use evidence-based community engagement initiatives.⁹¹</p> <p>A responsible party should be assigned.</p>

⁹⁰ House of Lords (2018) 'The Ties that Bind: Citizenship and Civic Engagement in the 21st Century' Available at: <https://publications.parliament.uk/pa/ld201719/ldselect/ldcitizen/118/118.pdf>

⁹¹ House of Lords (2018) 'The Ties that Bind: Citizenship and Civic Engagement in the 21st Century' Available at: <https://publications.parliament.uk/pa/ld201719/ldselect/ldcitizen/118/118.pdf>

<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 both residents, non-resident leaseholders and commercial premises within Huguenot House.</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's nature, are flagged. The circumstances of all stakeholders should be kept on record by the Council.</p> <p>A responsible party should be assigned.</p>
<p>Create a strategy to inform stakeholders of the Council's policies for shared ownership schemes and shared equity loans. Consideration should be given to ensuring all information is provided in appropriate formats and languages to suit different needs.</p>	<p>Westminster City Council</p>	<p>The Council should ensure that the Government's policies for shared ownership schemes and shared equity schemes are continued to be clearly explained and the eligibility criteria are emphasised, as per the Huguenot House website. It should be ensured that those who do not have access to the internet can access this information.</p> <p>The Council should put in place policies to ensure that shared ownership comes with the same rights as full ownership (sub-letting, passing on the property to next of kin etc.)</p> <p>A responsible party should be assigned.</p>
<p>Create an inventory of affordable properties available locally for the temporary or permanent rehousing / relocation of the residents, should an option including this process be progressed.</p>	<p>Westminster City Council</p>	<p>It will be important to explore ways in which the Council can help to ensure a supply of alternative properties that are affordable for residents who would be required to relocate, in order to avoid displacement.</p> <p>A responsible party is to be assigned.</p>
<p>Create a strategy to effectively manage the noise and air pollution impacts that may arise during potential construction works.</p>	<p>Westminster City Council</p>	<p>Before and during any potential construction period, measures should be implemented to limit the negative impacts on noise exposure and air quality.</p> <p>This could include the development and adoption of a Construction Environmental Management Plan (CEMP), which should be made publicly available and accessible to all.</p> <p>A responsible party is to be assigned.</p>
<p>Develop a strategy that highlights the responsible parties' commitment to supporting employment in the local area as a result of the redevelopment.</p>	<p>Westminster City Council</p>	<p>Following the submission of the planning application for the selected option, the responsible parties should develop a range of suitable proposals that maximise the employment, apprenticeship and training opportunities created by the preferred option, for local residents and from neighbourhood area.</p> <p>A responsible party is to be assigned.</p>
<p>Should an option be taken forward that requires office space and existing businesses to relocate, it should be ensured that a business relocation and support strategy is formally implemented to assist businesses in the relocation process and ensure minimum business disruption and to prevent the loss of business. The strategy should consider including the following to support affected businesses:</p> <ul style="list-style-type: none"> - Capture the available options for premises to relocate to within the borough and neighbouring boroughs, deeming whether these may be suitable (taking into account current/proposed 	<p>Westminster City Council</p>	<p>A business relocation and support strategy should be implemented as soon as possible, prior to further phases of site clearance and construction (should an option that requires this be taken forward). This would ensure affected parties have sufficient time to explore all options available to them before the works commence.</p> <p>Affected parties should be made aware of the support available to them, with details of how to access such support.</p>

tenure type, transportation requirements, and future business plans).

The approach to relocation should include any staff appointed to be a point of liaison with the affected businesses, roles and responsibilities of the wider project team in relation to support, support available with locating alternate business premises, business analysis support to identify future potential growth and direction, and any financial support available.

Ensure that improvements to the public realm (should an option including public realm improvements be taken forward) appropriately consider best practice in accessible design, benefitting older and disabled people, including those with mobility and sensory impairments.

Westminster City Council

The responsible parties should develop an accessibility strategy to implement reasonable adjustments in the design of the pedestrian environment. This should be complete prior to further phases of site clearance and construction (should this be necessary).

6.2.1 Conclusions and recommendations

All seven current options put forward by the Council have been outlined and their potential positive and negative effects assessed. Although the redevelopment and mixed use redevelopment options still carry some negative impacts, by the Council's 'City for All' criteria, these options are judged to be the most sustainable. Both options would create temporary disruption and disturbance to residents in terms of relocation, however the overall outcome for this option is likely to be the most beneficial for residents (particularly if they should return to the site), and for the local community. This option would generate new and affordable housing stock, as well as new and modernised commercial and leisure facilities and improvements to the public realm. Both options would also have no cost implications for leaseholders. Overall, the redevelopment may be considered more beneficial than the mixed use redevelopment option as all residents would be able to return.

The Council have set out policies to mitigate most of the negative impacts associated with a redevelopment option, helping to minimise the negative impact on protected characteristic groups. However, specific mitigation measures for impacts associated with businesses have not been identified. These impacts are likely to be felt by a number of protected characteristic groups and should be considered by the Council going forward.

