

Queen's Park Court Development

Equality Impact Assessment

Westminster City Council

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Quality information

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1. Introduction

1.1 Purpose

AECOM has been commissioned by Westminster City Council ('the Council') to undertake an Equality Impact Assessment (EIA) of the three sites that form 'Package B' of the Council's infill programme. These are as follows:

- Adpar Street Car Park in Little Venice Ward;
- Torridon House Car Park in Maida Vale Ward; and
- **Queens Park Court Car Park in Queens Park Ward.**

As a public sector organisation, the Council has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that the development does not lead to unlawful discrimination (direct and indirect), and that it advances equality of opportunity and fosters good relations between those with a protected characteristic¹ and all others. An EIA is often used by public sector organisations to demonstrate how this duty has been discharged. It is the Council's policy that EIAs are undertaken and updated for projects throughout their development.

An EIA is a systematic assessment of the effects of plans, policies, or proposals on groups with protected characteristics as defined by the Equality Act 2010 as well as low income households. The purpose of this EIA is to consider how the development of the **Queen's Park Court development** contributes to the realisation of equality effects on residents and the community affected and will support the Council to fulfil its equality duties in relation to the PSED for the development proposal.

This EIA provides a consideration of potential direct and indirect equality impacts (both adverse and beneficial) associated with the construction and operational phases of the Queen's Park Court development. The approach draws on evidence from secondary data sources as well as feedback from consultation and engagement processes and information from construction planning undertaken for the project.

1.2 Context

As part of the Council's Housing Revenue Account (HRA) Development Programme, the Council has identified a series of small-scale infill sites for redevelopment. These sites will contribute towards the programme objectives of:

- Increasing the supply of affordable housing; optimising value from its assets;
- Increasing the quality of HRA Portfolio; and
- Ensuring the portfolio meets local housing need.²

Queen's Park Court Car Park is one of three sites which comprise 'Package B'³. The site is located within Queen's Park Estate, a post-war estate within Queen's Park Ward composed

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

² City of Westminster (2022). Development Infills: Package B Main Contract Award. Available at: [Decision - Development Infills: Package B Main Contract Award | Westminster City Council \(moderngov.co.uk\)](#)

³ Package B comprises of three development sites, including Adpar Street Car Park, Torridon House Car Park and Queen's Park Court Car Park.

of 7 mid-rise residential blocks, a two-storey Community Centre and a single storey nursery. The estate previously provided 35 car parking spaces and external storage sheds.

In October 2019, the Council submitted a planning application (19/07659/COFUL)⁴ to redevelop the existing western car park of Queen's Park Court estate in line with the Council's ambition to transform unused non-residential spaces across the borough into homes for local residents. The proposals plans to construct a five-storey residential block delivering 19 affordable apartments and 4 three-storey affordable houses. The development would contain a total of 23 units with a mixture of sizes (5 x 1 bed, 9 x 2 bed, 9 x 3 bed) at 100% social rent. The development will also re-configure the existing central car park to provide 25 car parking spaces, and additional turning space for emergency vehicles in the northern section of the car park, new public landscaped space and external upgrades to the existing nursery. The site is situated within the administrative boundary of Westminster and received planning consent in July 2020.

The development was granted planning permission in July 2020 and the Council is now going through the appropriation process. This EIA reports demonstrates how the Council has paid due regard to the PSED in the design and delivery of the development and will support the Council in supporting decision making related to the appropriation of the land.

1.3 Report structure

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

- **Section 2: Methodology** – setting out the approach to collecting evidence and assessment of impacts;
- **Section 3: Policy and legislation review** – providing context through review of relevant national, regional and local policy and legislation associated with equalities and housing regeneration;
- **Section 4: Summary of the development** – an overview of the development;
- **Section 5: Equalities baseline** – using secondary data sources such as Census data to form an understanding of residents living within the area;
- **Section 6: Assessment of potential equality effects** – an appraisal of impacts and equality effects of the proposals using the evidence gathered; and
- **Section 7: Conclusions and next steps**– conclusion of equality impacts and the Council's due regard to the PSED. This section also contains continued actions recommended for enhancing positive equality impacts and minimising potential negative impacts based on available evidence to date.

⁴ City of Westminster (2019). Planning – Application Summary. Available at: [19/07659/COFUL | Development of existing western car park for the erection of a five storey block providing nineteen Class C3 residential units, demolition of existing storage sheds to west of site to provide four three storey Class C3 dwellings, amenity space, refuse storage, cycle parking, and estate works including the realignment of Droop Street, reconfiguration of the existing central car park, and erection of a replacement boundary wall to the existing nursery. | Queens Park Court Ilbert Street London W10 4QA \(westminster.gov.uk\)](#)

2. Methodology

2.1 Introduction

This section sets out the approach to assessing the equality impacts of the development proposals for Queen's Park Court Car Park. The assessment considers how the proposals could impact (both positively and negatively) current residents who share protected characteristics within and surrounding the site of the proposed development as well as new residents moving into the new development. In considering the direct impacts of the development proposals, this EIA takes a 'worst case scenario'.

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

1. Desk-based review - including review of relevant national, regional and local policies and legislation, the proposal documents and secondary datasets relating to groups with protected characteristics;
2. Appraisal of potential impacts - informed by a consideration of the policy context, consultation responses, equalities baseline data; and
3. Providing recommendations and conclusions.

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

2.2 Desk-based review

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

- Review of all relevant documentation regarding the planning application including design information, relevant assessment work and construction management plan information;
- Review of national and local datasets to develop an equalities baseline profile of groups with protected characteristics within and surrounding the site including Census data; and
- Review of the consultation and engagement activities to date in relation to the proposals undertaken by the Council to identify any issues of relevance to this EIA.

2.3 Assessment of impacts

The assessment of equality impacts takes into account the information gathered through the above activities. A judgement is made as to how the development would contribute to the realisation of effects for people with protected characteristics as defined in the Equality Act 2010. These protected characteristics are:

- **Age:** this refers to persons defined by either a particular age or a range of ages. This can include children (aged under 16), young people (aged 16-25), older people or pensioners (i.e., those aged 65+), the elderly/very old (i.e., those aged 85+);
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. It can also include people who have progressive conditions such as HIV, cancer, or multiple sclerosis (MS) - even where someone is able to carry out day to day activities;

- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- **Marriage and civil partnership:** marriage or civil partnership can be between a man and a woman or between two people of the same sex;
- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.

Although income is not classed as a protected characteristic under the Equality Act 2010, the assessment also considers equality implications from the perspective of low income households.

The assessment considers both disproportionate and differential impacts on groups with protected characteristics. A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on the general population overall at a particular location. For the purposes of this EIA, disproportionality arises:

- where an impact is predicted for the study area, where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in Westminster or London; or
- where an impact is predicted on a community resource which is predominantly or heavily used by protected characteristic groups (e.g., primary schools attended by children; care homes catering for elderly people).

A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability associated with their protected characteristic.

In some cases, protected characteristic groups are subject to both disproportionate *and* differential equality effects. The EIA considers impacts on groups of people and not those on specific individuals.

The criteria used to determine disproportionate or differential impacts with respect to protected characteristics groups include:

- People who share a protected characteristic form a disproportionately large number of those adversely affected by the proposals;
- Amongst the population affected by the proposals, people who share protected characteristics are particularly vulnerable or sensitive to a possible impact in relation to their possessing a specific protected characteristic;

- The proposals may either worsen or improve existing disadvantage (e.g., housing deprivation or economic disadvantage) affecting people who share a protected characteristic;
- People with shared protected characteristics amongst the affected population may not have an equal share in the benefits arising from the proposals. This can be either due to direct or indirect discrimination or where the groups experience particular barriers to realising such benefits, unless suitable mitigations are proposed to overcome those barriers; and
- The proposals may worsen existing community cohesion amongst the affected local population or exacerbate conflicts with community cohesion policy objectives.

2.4 Conclusion and next steps

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

3. Policy and legislative context

3.1 Legislation

Equality Act 2010 and the Public Sector Equality Duty (PSED)

The Equality Act 2010 is a major piece of UK legislation which provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 of the Equality Act sets out the PSED to which Westminster City Council, as a public body, is subject to in carrying out all its functions.

Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected characteristics groups to participate in public life or in other activities where their participation is disproportionately low.

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

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

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

3.2 National policy

National Planning Policy Framework (July 2021)

The National Planning Policy Framework (NPPF)⁵ was originally published in March 2012, with revisions in July 2018, February 2019 and most recently in July 2021. The NPPF reconsolidates the economic, social and environmental objectives of the Government's planning system. While the NPPF does not contain specific guidance on equalities, it does

⁵ Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:

- The economic role contributes to building “*a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*”;
- The social role supports strong, vibrant and healthy communities by “*ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being*”; and
- The environmental role contributes to protecting and enhancing the “*natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy*”.

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

- Local strategies to improve health, social and cultural wellbeing for all;
- The delivery of sufficient community and cultural facilities and services to meet local needs; and
- The requirement to plan for the needs of different groups within communities, including how the size, type and tenure of housing should be assessed and reflected in planning policies.

In Chapter 5, the NPPF outlines how planning policy should deliver a sufficient supply of homes that meets the needs of groups with specific housing requirements. Local housing need assessments should inform the minimum number of homes needed and the size, type and tenure of housing should be assessed and reflected in local planning policies to accommodate different groups in the community, such as those who require affordable housing, families with children, older people and people with disabilities.

3.3 Regional policy

The London Plan 2021

The London Plan 2021⁶ is a new plan aiming to be more ambitious and focused than previous London Plans. It is underpinned by the concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable. As the overall strategic policy framework for London, it sets out integrated economic, environmental, transport and social goals for the development of the capital over the next 20-25 years. A number of policies outlined in the Plan are relevant to the proposed redevelopment, including tackling deprivation, promoting equality and inclusivity, and enabling different groups to share in the benefits of development, specifically:

- GG1 ‘Building strong and inclusive communities’ requires early engagement with stakeholders and local communities in the development of proposals, ensuring London continues to generate economic and other opportunities that are beneficial to everyone. Continue to support and promote the creation of a London where all Londoners including children and young people, older people, disabled people and people with

⁶ GLA (2021). The London Plan. The Spatial Development Strategy for Greater London. Available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

other protected characteristics, can move around with ease and enjoy the opportunities the city has to provide.

- GG4 'Delivering the homes Londoners need' understands that for many Londoners the type of home they want, and should reasonably be able to expect, is out of reach – and this consequently has implications for the makeup and diversity of the city. Creating a new housing market in which all those involved in planning and development must: support the delivery of the strategic target of 50% of all new homes being genuinely affordable, and create inclusive communities where houses meet high standards of design and provide for identified needs.
- Policy SD10 'Strategic and local regeneration' requires Boroughs to identify Strategic areas for Regeneration in Local Plans and develop policies that are based on a thorough understanding of the demographic of the communities, their needs and local circumstances. In order for regeneration initiatives to contribute to Good Growth it is important they tackle poverty, disadvantage, inequality and the causes of deprivation, address social, economic and environmental barriers and they benefit existing residents and businesses in an area. Regeneration initiatives must be undertaken in collaboration with local communities, involving a broad spectrum of groups, people and businesses to develop a shared vision of the area.
- Policy D4 'Inclusive design' requires Boroughs to support the creation of inclusive neighbourhoods by embedding inclusive design and collaborating with local communities to ascertain needs. An inclusive design approach helps to ensure the diverse needs of all Londoners are integrated into Development plans and proposals from the outset.
- Policy H1 'Increasing housing supply' sets out Boroughs ten-year housing targets which must be included in their Development Plan Documents (Westminster's ten year target for net housing completion is 9,850).
- Policy H4 'Delivering affordable housing' outlines the strategic target for 50% of all new homes delivered across London to be genuinely affordable. The London SHMA (Strategic Housing Market Assessment) identified that 65% of London's need is for affordable housing; this policy therefore aims to maintain and advance the opportunity for all members of society to access
- Policy H8 'Loss of existing housing and estate development' requires that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Boroughs, housing associations and their partners must also consider alternatives before considering the demolition and replacement of affordable homes. Regardless of whether an estate regeneration project includes the demolition and replacement of affordable homes, it is important that all such schemes are delivered with existing and new residents in mind.
- Policy H15 'Specialist older persons housing' sets out a commitment between Boroughs and care providers to identify sites suitable for specialist older persons housing, taking account of local type and tenure of demand, creating inclusive neighbourhoods and the increasing need for accommodation suitable for people with dementia.

Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2022)

The Mayor's Equality, Diversity and Inclusion Strategy⁷ (EDIS) was published in May 2018. It sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality.

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

The strategy presents 39 equality, diversity and inclusion strategic objectives. These were replaced in November 2022 by the Mayor who published a new set of 14 equality objectives⁸. These include working with councils and other partners to:

- Increase the provision of genuinely affordable homes for the benefit of those groups and communities that are most likely to live in overcrowded, poor quality or unaffordable housing.
- Increase the number of homes that meet Londoners' diverse housing needs including, year-on-year, the pace of provision of affordable specialist and supported housing.
- Address the specific barriers that prevent some rough sleepers exiting rough sleeping and rebuilding their lives.
- Improve Londoners' air quality and access to green space and lower the city's carbon emissions so that inequalities in exposure to harmful pollution and climate risks are reduced.
- Address the specific barriers faced by those groups of Londoners most likely to experience financial hardship, helping them understand and access their entitlements and available support.

Objectives also include working with employers, education and skills providers, and voluntary and community organisations, so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London. This includes providing employability and skills support for those who are disadvantaged in London's enterprise and jobs market and increasing the diversity of the workforces in vital sectors in London. These include the digital, construction, creative and built environment sectors.

The strategy aims to encourage inclusive growth in London through better planning and provision of business support, including access to finance for people from ethnic minority groups, women, and disabled-led businesses, and to help save and sustain diverse cultural places and spaces by promoting good growth. Finally, the EDIS includes widening access to youth services, addressing health inequalities, and closing the digital exclusion gap.

London Housing Strategy (2018)

This strategy's central priority is to build many more homes for Londoners - particularly genuinely affordable homes. This includes policies for:

- Identifying and bringing forward more land for housing;
- Improving the skills, capacity and building methods of the industry;
- Ensuring homes are genuinely affordable;
- Working towards half of new homes built being affordable;
- Protecting London's existing social housing;
- Well-designed, safe, good quality, and environmentally sustainable homes; and
- Meeting London's diverse housing needs.

⁸ GLA (2022). Mayor's Equality, Diversity and Inclusion Strategy. Available at: <https://www.london.gov.uk/programmes-strategies/communities-and-social-justice/mayors-strategy-equality-diversity-and-inclusion/mayors-equality-diversity-and-inclusion-strategy-objectives-2022>

3.4 Local policy

City Plan 2019 – 2040 (2021)

The City Plan 2019 – 2040 was adopted in April 2021 and contains a number of policies which are relevant to promoting equality and tackling existing disadvantage, and to the renewal of Westminster, including:

- **Objective 1** of the City Plan is to “increase the stock of high-quality housing and provide variety in terms of size, type and tenure to meet need and promote mixed and inclusive communities, with a clear focus on affordability and family homes.”
- **Objective 2** of the City Plan is to “ensure those from disadvantaged backgrounds benefit from the opportunities [job growth] presents.”
- **Objective 8** of the City Plan is to “promote quality in the design of buildings and public spaces ensuring that Westminster is attractive and welcoming”
- **Policy 1 Westminster’s spatial strategy** sets out the ambition for the Borough to grow, thrive and inspire by:
 - Supporting intensification and optimising densities in high quality new developments that showcase the best of modern architecture and integrate with their surroundings, to make the most efficient use of land.
 - Delivering at least 20,685 homes with 35% of new homes affordable.
- **Policy 7 Managing development for Westminster’s people** requires development to be ‘neighbourly’: considering daylight, sense of enclosure and privacy, protecting and enhancing the local natural and historic environment, not overburdening local infrastructure, contributing to greening, improving sustainable infrastructure and making appropriate waste management arrangements.
- **Policy 8 Stepping up housing delivery** requires the number of new homes to be built in Westminster to exceed 20,685 over the plan period. Existing housing will be protected, except where redevelopment or affordable housing would better meet need.
- **Policy 9 Affordable housing** requires that the affordable housing provision will be divided between ‘intermediate’ affordable housing for rent and sale (60%) and social and affordable rent (40%). The Council will maximise the provision of additional affordable housing in designated housing renewal areas.
- **Policy 11 Housing for specific needs** sets out that residential development will provide a housing mix to secure mixed and inclusive communities and contribute towards meeting Westminster’s housing needs for different groups.
- **Policy 12 Housing quality** proposes that all new homes be designed to a standard that ensures the safety, health and well-being of its occupants.

The EIA for the City Plan outlines some measures for helping to mitigate the impact of intermediate housing affordability criteria:

- Households on the council’s social housing register have high priority for intermediate housing.
- Targets will be set to ensure a proportion of new intermediate housing is affordable to households on the register with lower quartile incomes – and so may be affordable to households also registered for social housing.
- Westminster Employment Service also helps homeless households into employment which will help homeless households to be eligible for intermediate housing. (Currently c50% of homeless households are in some form of employment).

Westminster Housing Renewal Strategy (2010)

In 2010, the Council published a Housing Renewal Strategy⁹ that set out plans for housing renewal over a number of years and a number of programmes are underway. The key objectives of the strategy are to:

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

Housing Strategy: Direction of Travel Statement (2015)

In 2015, a Housing Strategy Direction of Travel Statement was published, which set out the Council's intentions to deliver existing housing renewal programmes and to work towards housing renewal becoming business as usual. The strategy built on the draft Housing Strategy that was consulted on in June and July 2015. It sets out the direction that the Council intends to take with regards to new affordable housing, intermediate housing, disposal of affordable properties, reviewing CityWest¹⁰ homes, the private rented sector and energy efficient homes.

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

Our Strategy For a Fairer Westminster 2022-26¹¹

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

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

Fairer Housing:

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

⁹ Westminster Council (2010). Westminster Housing Renewal Strategy. Available at: http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf

¹⁰ CityWest Homes provides housing services for over 12,000 social housing tenants and 9,000 leaseholders for Westminster City Council. It was set up as an arms-length management organisation (ALMO) in 2002 and returned to Council control in September 2018.

¹¹ City of Westminster (2022). Fairer Westminster strategy. Available at: <https://www.westminster.gov.uk/our-new-strategy-build-fairer-westminster>

- Private rented sector properties are well managed.
- Our tenants and lessees are consistently satisfied with our housing services, and the improved condition and energy efficiency of our housing stock.

Fairer Communities:

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

4. Summary of the development

4.1 Current site

The Queen's Park Court Car Park site (outlined in Figure 4-1) is located on the northwest edge of the Queen's Park Ward in the City of Westminster, in close proximity to the border of the London Borough of Brent. The proposed site boundary sits within Queen's Park Court estate, bound by Ilbert Street to the north, rear gardens of residential properties on Sixth Street to the east, Bales College and the Parish Church of St John the Evangelist to the south and the rear gardens of Kilburn Lane (B450) properties to the west.

Queen's Park Court currently comprises seven residential blocks ranging from 4-7 storeys delivering 119 homes (34% leasehold and 66% tenanted). The existing site provided 35 car parking spaces, 9 in the central car park and 26 in the western car park. Licences held for this site are managed by the Westminster City Council Housing team and are only eligible for 'off-street' parking¹². Droop Street forms a narrow road network throughout the estate connecting Ilbert Street to the western car park and storage sheds, central car park and Queen's Park Court Community Gardens. Westminster City Council owns the freehold of the site and is currently undergoing the appropriation process.

Figure 4-1 Site location plan



The B450 runs along the western edge of the site to provide a connection to the wider highway network. The site is also equidistant to Queen's Park Station (0.7 miles) and Kensal

¹² Car park licences and resident's parking permits are not interchangeable. Car park licences are managed by the Westminster City Council Housing team and are only eligible within 'off-street' parking facilities such as car parks. Whereas resident's permits are obtained through Westminster City Council directly and are only eligible for 'on-street' parking in resident parking zones, such as resident bays and paid-for bays. Further details are available here: [Where you can park with a resident permit | Westminster City Council](#)

Green Station (0.9 miles), providing frequent and direct Bakerloo line underground and overground services to key destinations across London including Euston, Paddington, Marylebone and Waterloo. The nearest National Rail services are provided from London Paddington just 3km away. While a bus service runs 320m walking distance to the south (Fifth Avenue) and east (Kilburn Lane/Harrow Road) serving a total of five services linking to Euston Station, Trafalgar Square and Hammersmith.

The surrounding roads are considered safe for cyclists and pedestrians. The surrounding cycle network provides advanced cycle stop lines along all arms of the A5. While wide pedestrian footways, tactile pathing and dropped kerbs support pedestrian safety.

The site is located 1.2 miles south of Paddington Recreation Ground (23-minute walk), which provides a 27-acre park with a café, outdoor sports equipment and children's play area.

The site does not directly intersect with a Conservation Area; however, the estate borders the boundary of the Queen's Park Conservation Area.

Table 4-1 below outlines distances to key local amenities surrounding the proposed site.

Table 4-1 Local amenities

Key Local Amenities	Distance	Walking Time (mins)	Cycling Time (mins)
Primary School – Barlby Primary School	1.0km	11	4
Secondary School – All Saints Catholic College	1.3km	16	6
College – Kensington and Chelsea College	1.3km	15	5
National Railway Station - Paddington	3.0km	38	15
Supermarket – Sainsbury's	0.5km	6	2
Park and Green Space – Queen's Park	0.8km	11	3
Health Care Centre – St Charles Centre for Health and Wellbeing	1.3km	14	5
Hospital – Hammersmith Hospital	2.9km	34	15
Restaurant – Parlour Kensal	0.3km	4	2

4.2 Planning application

The approved planning application includes the following:

- Development of existing western car park for the erection of a five storey block providing 19 no. Use Class C3 residential units, and demolition of existing storage sheds to provide a further 4 no. three storey Use Class C3 dwellings, amenity space, refuse storage, cycle parking, and estate works including the realignment of Droop Street; reconfiguration of the existing central car park, and erection of a replacement boundary wall to the existing nursery;
- This provides a total of 23 new affordable units available for social rent, including 2 wheelchair accessible units on the ground floor of the apartment block;

- No new car parking spaces will be provided for the proposed development, except for two disabled parking spaces for the wheelchair accessible units within the central car park;
- Reconfiguration of the existing central car park to provide an increased total of 25 spaces for existing residents;
- An additional turning point for emergency vehicles is to be provided in the northern section of the central car park;
- Proposals include a new shared landscaped communal space, provided between the existing and proposed flat block to the east, to provide further outdoor amenity space for existing and future residents; and
- Droop Street will be realigned and widened in the west of the site to run along the proposed dwellings and residential block.

The mixture of dwelling sizes remains the same as per the accommodation schedule seen in Table 4-2 below.

Table 4-2 Accommodation schedule

	1B 2P	2B 3P	2B4P	3B 4P	3B 5P	Total number of units
Apartment mix						
Level 00	1	-	2 ¹³	-	-	3
Level 01	1	2	-	2	-	5
Level 02	1	2	-	2	-	5
Level 03	2	-	-	2	-	4
Level 04	-	-	-	-	2	2
Total	5	4	2	6	2	19
House mix						
Terrace House	-	-	3	-	1	4
Total	-	-	3	-	1	4
Total number of units	5	4	5	6	3	23

Source: City of Westminster (2020)

4.3 Affordable housing for social rent

Social housing is provided by local councils to local residents who register to the social housing waitlist, typically low income families and vulnerable individuals.

¹³ Two 2B4P wheelchair accessible dwelling

In Westminster, the shortage of available homes has limited the number of applicants who are offered a home and has accumulated a long waiting time. As of November 2021, there were over 4,100 households waiting: 2,300 homeless households, 1,300 tenants awaiting transfer and 490 households in other priority groups.¹⁴ The waiting time for re-housing varies dependent on the property size required, from over two years for a studio or 1 bed to 19 years for 4 or more beds.

The redevelopment of Queen's Park Court Car Park will deliver 23 social rent residential units. These will be:

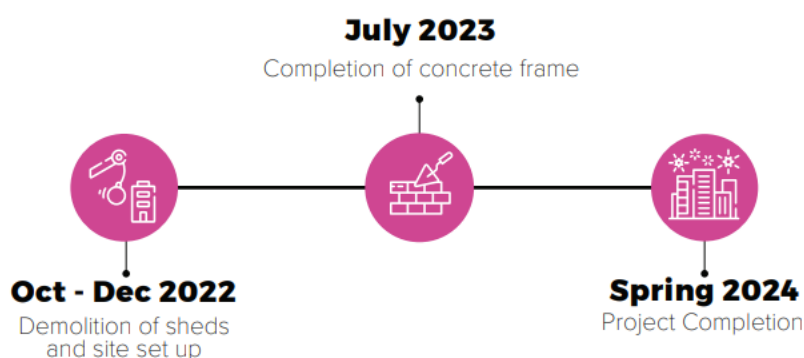
- Retained by the Council and available for social rent;
- Comprised of 5 1 bedroom apartments, 6 2 bedroom apartments, 8 3 bedroom apartments, 3 2 bedroom houses and 1 3 bedroom house; and
- Allocated through a Local Lettings Plan (LLP) which will ensure that households in the Queens Park area have top priority.

4.4 Construction works

Construction work consists of demolishing the existing storage sheds and constructing a new residential building with 19 apartments across five-storeys and 4 three-storey houses.

As shown in Figure 4-2 below, site mobilisation was undertaken between October and December 2022 and commencement of the main contract works shortly after. This will deliver the concrete frame in July 2023 with project completion estimated for Spring 2024.

Figure 4-2 Key construction dates



The construction site will operate between:

- 8:00 – 18:00 Monday to Friday
- 8:00 – 13:00 Saturdays
- No works will be carried out on Sundays, bank holidays or public holidays

Should construction activities need to be undertaken out of these hours, Osborne will seek formal permission from the Code of Construction practice team and residents will be notified ahead of the work taking place. WCC have also made a commitment that site deliveries will only take place after 10am to cause minimum disruption.

¹⁴ City of Westminster (2023). How to apply for social housing. Available at: [How to apply for social housing | Westminster City Council](#)

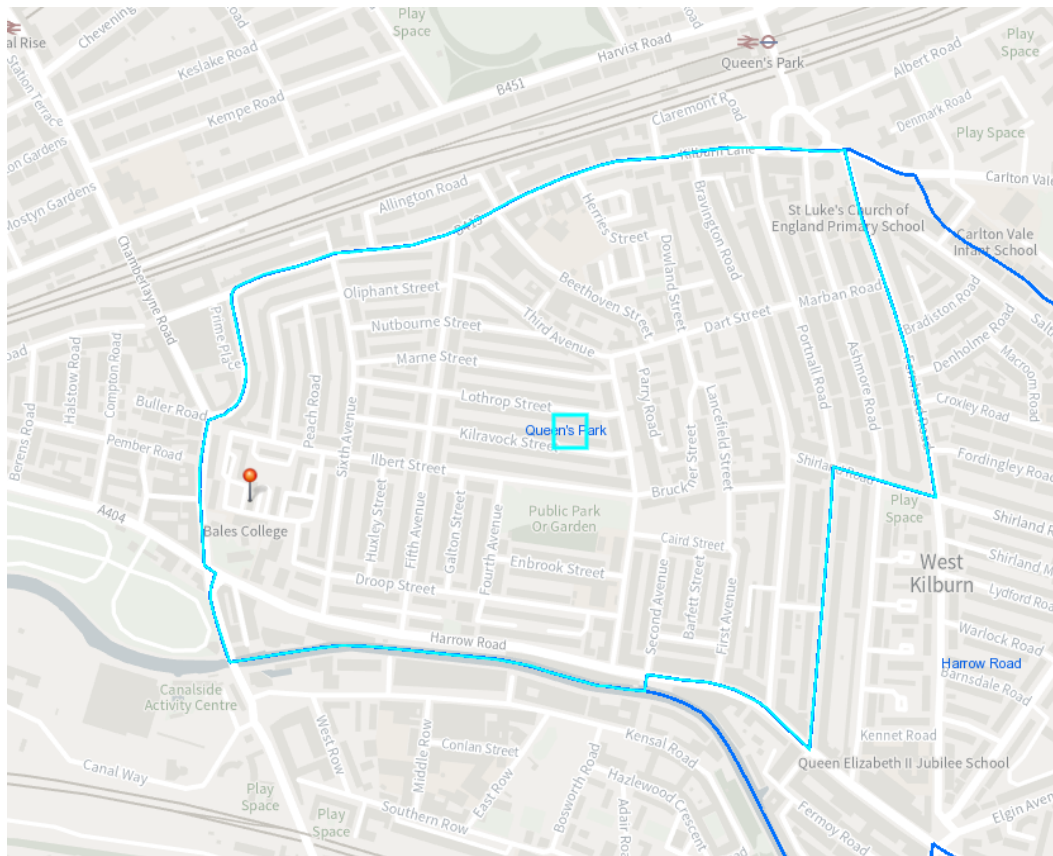
5. Equalities baseline

5.1 Introduction

A baseline profile of the population living around the site is necessary to enable an assessment of the potential impacts the development may have on groups with protected characteristics.

This section outlines the equalities baseline relevant to the proposals. This includes analysis of Census 2021 data and other datasets from the Office for National Statistics (ONS). Where possible, the most recently available data is presented at four geographical levels relevant to the study area. These are, in increasing size, Westminster Lower Super Output Area (LSOA Westminster 004C, E01004720), the Queen's Park Ward (E05013804), Westminster Borough, and London.

Figure 5-1 Queen's Park ward boundary, with pin marking location of the proposed development



Source: City of Westminster (2023)¹⁵

5.2 Protected characteristics

5.2.1 Population

According to the most recent data available, the Westminster 004C LSOA is home to 2,274 people, while Queen's Park is home to 12,576 people. As Table 5-1 shows, both areas have experienced a population increase between 2001 and 2021, (by 44.8% and 39.0% respectively). Whilst the remaining geographies have also experienced population growth, the increase in the LSOA is significantly higher than in Westminster Borough (44.8%

¹⁵ City of Westminster (2023). Ward finder. Available at: <https://lbhf.maps.arcgis.com/apps/webappviewer/index.html?id=968c0f263cc241d4934638b4d7e81c6b>

compared to 12.7%). A growing population indicates the demand for housing is continually rising.

Table 5-1 Population size and change (%) by geographical area from 2001 to 2021¹⁶

Year	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
2001	1,570	9,179	181,286	7,322,400
2011	2,000	12,563	219,396	8,204,400
2021	2,274	12,756	204,236	8,799,728
Percentage Change	+44.8%	+39.0%	+12.7%	+20.2%

5.2.2 Age

Table 5-2 provides the population age breakdown in 2021 across the four relevant geographical areas. The Westminster LSOA has the highest proportion of children aged 0-15 (23.6%) compared to Queen's Park ward (17.5%) and Westminster (13.2%). The Westminster LSOA also has a higher proportion of elderly residents than the other geographies, with 13.8% of residents being aged over 65, compared to 11.0% in Queen's Park, 12.1% in Westminster, and 11.9% in London.

Table 5-2 Age breakdown (%) by geographical area, 2021¹⁷

Age range (years)	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
0-15	23.6	17.5	13.2	19.2
16-64	62.5	71.6	74.8	68.8
65 and over	13.8	11.0	12.1	11.9

Greater London Authority population projections estimate that by 2040 the greatest population increase is expected in the 65 and over age group. In Queen's Park the projected increase in the elderly population is 106%, compared to 35% in Westminster Borough. In contrast, child populations are expected to decrease at both Ward and Borough level; projections estimate a 16% decrease at Ward level, compared to only 7% decrease in Westminster generally.¹⁸

The current high proportion of children and elderly residents is significant here, as those groups can be disproportionately affected by environmental impacts during site construction. For example, evidence shows that traffic-related noise causes increased health risks for older people¹⁹ and lowers health-related quality of life in children²⁰. Both groups are also more vulnerable to the effects of poor air quality compared to the overall population. Elderly people are also more vulnerable to the environmental, safety and accessibility impacts of construction activities associated with construction projects.

¹⁶ ONS: Census 2001: Usual resident population (KS001); Census 2011: Population Density 2011 (QS102UK); Census 2021: Number of usual residents in households and communal establishments (TS001). All available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp>

¹⁷ ONS (2021) Age by single year (TS007); ¹⁷ ONS: 2020 Population estimates – small area based by single year of age – England and Wales. All available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp>

¹⁸ GLA (2017) Population projections change between 2021 and 2040. Ward population projections; Housing-led population projection. Both available at: [GLA Population Projections - Custom Age Tables - London Datastore](https://www.gla.gov.uk/population-projections-custom-age-tables-london-datastore)

¹⁹ Halonen, J. et al (2015). Road Traffic noise is associated with increased cardiovascular morbidity and mortality in London. *European Heart Journal*. 36(39), 2653-2661

²⁰ Hjortebjerg, D. et al (2016). Exposure to road traffic noise and behavioural problems in 7-year-old children: a cohort study. *Environmental health perspectives*, 124(2), 228-234.

5.2.3 Disability

According to data gathered in Census 2021 (see Table 5-3), 18% of the LSOA population has a disability that limits their day-to-day activities by some degree, compared to 17.7% at the Ward level. Figures for both Westminster and London are slightly lower (13.8% and 13.2% respectively).

Queen's Park and the LSOA had a significantly higher proportion of residents whose day-to-day activities are limited a lot, at 9.2% and 8.6% respectively, compared to 6.5% in Westminster and 5.7% in London.

Table 5-3 Limiting long-term illness or disability (%) by geographical area, 2021²¹

Level of disability	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Day-to-day activities limited a lot	8.6	9.2	6.5	5.7
Day-to-day activities limited a little	9.4	8.5	7.3	7.5
Long-term physical or mental health conditions but day-to-day activities not limited	4.4	4.0	4.7	5.2
No long-term physical or mental health conditions	77.7	78.3	81.5	81.5

Disabled people, including those with weak respiratory systems, or people who suffer from other health problems associated with weaker lungs, may be disproportionately impacted by emissions and dust, both traffic-related and as a result of construction of the infrastructure.²² Additionally, in cases where disability causes people's daily activities to be significantly limited, construction can impose further limitations in terms of disruption of accessibility.

5.2.4 Gender reassignment

Until the 2021 Census, there were no official statistics relating to gender reassignment; the data collected was only relating to sex (gender assigned at birth). The 2021 Census included the optional question "Is the gender you identify with the same as your sex registered at birth?", for which the findings are presented at the Borough and London geographies in Table 5- 4 below.

Of those who responded, the majority (90%) of Westminster's population identified with the same gender as their sex registered at birth, while 0.7% identified with a different gender. Similarly, in London 91.2% of the population identified with their gender assigned at birth, while 1% identified with an alternative gender.

²¹ ONS (2021): Disability (TS038). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2056>

²² Font, A. et al (2014). Degradation in urban air quality from construction activity and increased traffic arising from a road widening scheme. *Science of the Total Environment*, 497, 123-132.

Table 5-4 Gender identity (%) in Westminster and London, 2021²³

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

5.2.5 Marriage and civil partnership

Across all four geographies the majority of residents aged 16 and over have never married. The LSOA (52.3%), Ward (54.2%) and Borough (54.4%) all sit above the London average of never married residents (46.2%).

According to the 2021 Census, the proportion of the population who are married to someone of the opposite sex is highest in London (39.3%) compared to the other geographies; particularly at the LSOA and Borough level where married population was estimated at 31.4% and 30.0% respectively. The LSOA had the highest proportion of widowed residents, at 4.4%, compared to 3.9% in Queen's Park, 3.4% in Westminster and 4.2% in London.

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

Legal partnership status	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Never married	52.3	54.2	54.4	46.2
Married: opposite sex	31.4	30.0	31.1	39.3
Married: same sex	0.1	0.4	0.6	0.4
In a registered civil partnership: opposite sex	0.0	0.0	0.1	0.1
In a registered civil partnership: same sex	0.1	0.1	0.4	0.2
Separated	3.8	3.1	2.4	2.3
Divorced	7.9	8.3	7.6	7.3
Widowed	4.4	3.9	3.4	4.2

5.2.6 Pregnancy and maternity

Census 2011 data shows that 20.5% of households within Queen's Park were lone-parent households, of which 12.8% had dependent children. In comparison, 21.8% of households in the Westminster LSOA were lone parent households, of which 11.7% had dependent children.²⁵ The 2021 Census reported a slight increase in the proportion of lone parent

²³ ONS (2021). Gender identity (detailed) (TS070). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2087>

²⁴ ONS (2021). Legal partnership status (TS002). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2022>

²⁵ ONS (2011). Household composition (KS105EW). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=605>

households in Queen's Park, at 20.7%, of which a slightly lower proportion had dependent children at 10.4%. There was also a slight decrease in the proportion of lone parent households in the LSOA at 21.7%, and a more significant decrease in the proportion of those with dependent children at 8.5%.

Pregnant women are more vulnerable to the adverse effects of air pollution as a result of construction activities, including an increasing risk of miscarriage, as well as premature births and low birth weights.²⁶

5.2.7 Race

Table 5-6 shows the percentage breakdown of ethnic groups by geographical area. The White ethnic group makes up the majority of the population in the Westminster LSOA (49.8% overall, 32.6% being English, Welsh, Scottish, Northern Irish or British), 14.4% belonging to the Other White ethnic group, compared to 14.3% in Queen's Park, 24.6% in Westminster and 14.7% in London.

Of the non-white ethnic groups, Bangladeshi residents make up the single greatest proportion in the LSOA at 9.1%, compared to 7.4% in Queen's Park, and 3.7% in both Westminster and London. Caribbean residents also make up a significant proportion of residents in the LSOA, at 7.2%, this is higher than all other geographies – 2.3% in Queen's Park, 2.1% in Westminster and 3.9% in London. African residents (6.2%) and Arab residents (6.1%) also make up significant proportions in the LSOA, however, are still lower when compared to 9.5% and 9.7% respectively in Queen's Park.

Table 5-6 Ethnic group (%) by geographical area, 2021²⁷

Ethnic group		Westminster 004C LSOA	Queen's Park Ward	Westminster	London
White	English, Welsh, Scottish, Northern Irish or British	32.6	23.8	28.0	36.8
	Irish	2.6	2.5	1.8	1.8
	Gypsy or Traveller	0.0	0.0	0.0	0.1
	Roma	0.2	0.4	0.7	0.4
	Other	14.4	14.3	24.6	14.7
Mixed/ Multiple Ethnic Groups	White/ Black Caribbean	1.8	2.3	1.0	1.5
	White and Black African	0.8	1.6	1.0	0.9
	White and Asian	1.0	1.0	1.8	1.4
	Other	4.4	3.5	2.7	1.9
Asian/ Asian British	Indian	0.8	1.6	3.9	7.5
	Pakistani	0.7	0.9	1.2	3.3
	Bangladeshi	9.1	7.4	3.7	3.7
	Chinese	0.7	0.8	3.2	1.7
	Other Asian	3.3	4.9	4.7	4.6
	African	6.2	9.5	8.1	7.9

²⁶ Leiser, C. et al. (2019). Acute effects of air pollutants on spontaneous pregnancy loss: a case-crossover study. *Fertility and sterility*, 111(2), 341-347

²⁷ ONS (2021). Ethnic group (TS021). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

Ethnic group		Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Black/ African/ Caribbean/ Black British	Caribbean	7.2	2.3	2.1	3.9
	Other Black	2.5	2.1	0.8	1.7
Other Ethnic Group	Arab	6.1	9.7	7.6	1.6
	Other	5.7	6.8	5.9	4.7

5.2.8 Religion or belief

According to Census 2021, Christian residents make up the majority of residents across all four geographies, the greatest proportion being in the Westminster LSOA at 44.4%. Muslim residents also make up a significant proportion, at 22.7% in the LSOA, 30.2% in Queen's Park, 20.0% in Westminster and 15.0% in London.

Table 5-7 Religion or belief (%) by geographical area, 2021²⁸

Religion	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Christian	44.4	38.3	37.3	40.7
Buddhist	0.7	0.8	1.3	0.9
Hindu	0.5	0.6	2.2	5.1
Jewish	0.7	0.7	2.8	1.7
Muslim	22.7	30.2	20.0	15.0
Sikh	0.1	0.1	0.3	1.6
Other religion	0.4	0.6	0.9	1.0
No religion	23.5	21.1	25.9	27.1
Religion not stated	7.1	7.7	9.4	7.0

5.2.9 Sex

Table 5-8 highlights that the LSOA and Queen's Park Ward have higher proportions of female residents, both 52.9%, than the wider geographies.

Table 5-8 Proportion (%) of residents by sex and geographical area, 2021²⁹

Sex	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Female	52.9	52.9	51.6	51.5
Male	47.1	47.1	48.4	48.5

According to 2021 estimates, life expectancy in the Queen's Park Ward is 79.9 years for males and 89.2 years for females.³⁰ Contrastingly, females live less long on average at the

²⁸ ONS (2021). Religion (TS030). Available at:
<https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

²⁹ ONS (2021). Sex (TS008). Available at:
<https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

³⁰ ONS (2021). Life expectancy by census ward. Male and Female. Available at:
<https://www.ons.gov.uk/visualisations/dvc479/map/index.html>

wider geographies, at 87 years in Westminster Borough and 84 years in London, whilst males live longer on average, at 85 in the Borough and 80 years in London.³¹

5.2.10 Sexual orientation

Table 5-9 presents the breakdown of adults by their identified sexual orientation for Westminster Borough and London. Westminster Borough had a higher proportion of adults identifying as Gay or Lesbian (3.5%) compared to London (2.2%). London has a marginally higher proportion of adults identifying as Pansexual (0.4%) and Queer (0.1%), than Westminster Borough (0.3% and 0.0% respectively).

No sexual orientation data was available at the LSOA and Ward level.

Table 5-9 Sexual orientation (%) in Westminster and London, 2021³²

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

5.3 Socio-economic profile

The socio-economic profile of the area considers several factors including levels of deprivation, employment, education, health, housing, transport, and connectivity; as well as access to services and facilities; public realm and open space; safety, security and well-being; and community cohesion.

These factors are pertinent to those with protected characteristics and inequality and, as such, provide additional baseline information relevant to the assessment of equality effects.

5.3.1 Deprivation

According to the English Indices of Deprivation 2019, the proposed Queens Park development is located in one of the 30% most deprived LSOAs of England and Wales.³³

Supplementary indices for deprivation also rank the area:

- In the top 20% most deprived areas nationally for Income Deprivation Affecting Older People Index (IDAOPI) which measures the proportion of those aged 60+ who experience income deprivation; and

³¹ ONS (2021). Life expectancy estimates, all ages, UK. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyestimatesallagesuk>

³² ONS (2021). Sexual orientation (detailed) (TS079). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2086>

³³ Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 002D LSOA. Index of Multiple Deprivation. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

- In the top 20% most deprived areas nationally for Income Deprivation Affecting Children Index (IDACI) which measures the proportion of all children aged 0 to 15 living in income deprived families.

5.3.2 Employment

The Queen's Park Court development is located within the top 20% most deprived areas in terms of employment deprivation which measures the proportion of the working age population involuntarily excluded from the labour market.³⁴

Table 5-10 below indicates both economic activity and inactivity levels of the population at varying geographical levels. Of those who are economically active in the LSOA, 51.9% are in employment whilst 8.6% are unemployed. This is the highest percentage of unemployment across all geographies. Additionally, the LSOA has the third highest percentage of economic inactivity (37.8%) compared to the Queen's Park Ward (39.9%), Westminster (37.9%) and London (33.8%) levels.

Table 5-10 Economic activity status (%) by geographical area, 2021³⁵

Economic activity status	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Economically active: in employment	51.9	51.4	55.6	59.4
Economically active: unemployed	8.6	6.1	4.0	4.1
Economically inactive	37.8	39.9	37.9	33.8

Table 5-11 presents a detailed breakdown of employment sectors by geographical area for 2021. At the LSOA level, the majority (53.7%) of residents work as managers, directors, senior officials, or in professional occupations, or associate professional & technical occupations compared to 51.5% at the Ward level. Notably, the LSOA has a higher proportion of residents in Sales and customer service occupations (12.6%), compared to Queen's Park (9.4%), Westminster (5.1%), and London (6.3%).

Table 5-11 Employee jobs by broad sector group (%) across different geographical areas, 2021³⁶

Occupation	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Managers, directors, senior officials	13.4	12.7	22.5	14.6
Professional occupations	22.9	21.9	30.6	25.8
Associate professional & technical occupations	17.4	16.9	17.3	15.3
Administrative & secretarial occupations	7.2	8.2	6.6	8.5
Skilled trades occupations	5.5	6.4	3.4	7.5

³⁴ Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 002D LSOA. Employment Deprivation Domain. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

³⁵ ONS (2021). Economic Activity status (TS066). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

³⁶ ONS (2021). Occupation (TS063). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

Occupation	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Caring, leisure & other service occupations	8.6	10.0	6.1	7.7
Sales & customer service occupations	12.6	9.4	5.1	6.3
Process plant / machine operatives	4.7	4.9	2.7	5.0
Elementary occupations	7.9	9.5	5.7	9.2

The Queen's Park redevelopment sits within the top 20% most deprived LSOAs in England in terms of income deprivation.³⁷ In 2017, the median household income in Queen's Park Ward was £28,500, which is significantly lower than the Westminster average of £42,800.³⁸

In September 2020, the claimant rate in the Westminster Borough was 5.5% (estimated 2% increase since 2019), where men and those aged 50 and over being groups claiming the most benefits.³⁹

5.3.3 Education

Table 5-12 below presents levels of educational attainment at the various relevant geographies according to Census 2021. Queen's Park Ward had the highest proportion of residents with no qualifications (20.2%), followed by the LSOA (18.9%), London (16.2%), and Westminster (12.9%).

Table 5-12 Educational attainment (%) by different geographical area, 2021⁴⁰

Educational attainment	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
No qualifications	18.9	20.2	12.9	16.2
Level 1 qualifications	8.6	7.9	4.9	7.7
Level 2 qualifications	9.9	10.4	6.9	10.0
Apprenticeship	2.2	2.4	2.1	3.2
Level 3 qualifications	15.8	14.4	12.4	13.2
Level 4 qualifications and above	41.4	41.3	57.7	46.7
Other qualifications	3.1	3.3	3.2	3.1

There is one school in the immediate vicinity of the site, Bales College independent secondary school located directly to the south, this is highlighted by the marker in Figure 5-2. There is also LEYF – Katharine Bruce Nursery & Pre-School, indicated by the red dot in Figure 5-2, within the vicinity of the site.

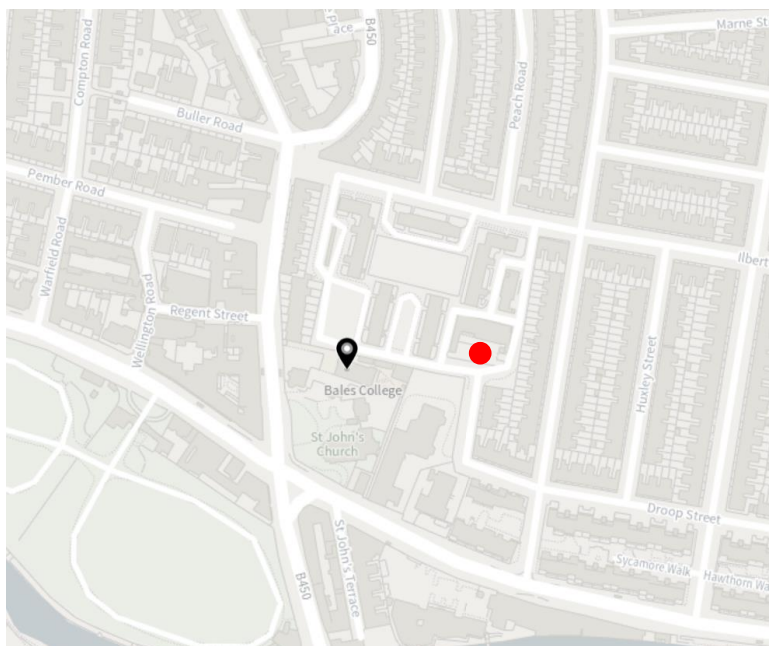
³⁷ Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 004C LSOA. Income Deprivation Domain. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

³⁸ City of Westminster (2018). Queen's Park Ward profile. Available at: <https://www.westminster.gov.uk/media/document/queens-park-ward-profile>

³⁹ City of Westminster (2020). Westminster Employment Service. Background Information for Scrutiny Committee. Available at: <https://committees.westminster.gov.uk/documents/s39523/WES%20Presentation%20091120.pdf>

⁴⁰ ONS (2021). Highest level of qualification (TS067). Available at: [Westminster Employment Services](https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=)

Figure 5-2 Location of schools in Queen's Park Ward



Source: London Datastore. (2023)⁴¹

5.3.4 Health

Compared with the national average, the health of people in Westminster is varied. Westminster is in the 20% most deprived local authorities in England and Wales in the health deprivation and disability domain, and about 27% (6,900) of children live in low-income families.⁴² Moreover, the LSOA ranks in the 50% least deprived neighbourhoods in the health deprivation and disability domain.⁴³ Life expectancy for men and women is higher than the national average. Despite this, life expectancy in Westminster can vary drastically depending on the exact dwelling location. Men living in the least deprived areas live 13.5 years longer than men living in the most deprived areas, while for women this gap is 7.4 years.⁴⁴

In terms of health issues within the Borough, rates of childhood obesity, incidence of tuberculosis and sexually transmitted infections among adults, are all worse than the national average. High rates of childhood obesity are especially important here, as there is access to Paddington Recreation Ground and other green open spaces near the site. It provides children with opportunities for physical exercise, which may be reduced if it is negatively impacted during construction. Conversely, health indicators such as excess weight in adults, the rate for alcohol-specific hospital admission among those under 18, teenage pregnancy, and rates of self-harm, are all lower than the England average.

5.3.5 Housing

In 2017, there were 5,225 residential properties in the Queen's Park Ward, with the median price being £585,000 which is 53% lower than the Westminster median price.⁴⁵ According to Census 2021, there was a significantly higher proportion of social rented households in both the LSOA (53.4%), and Queen's Park (54.3%) compared to Westminster (28.3%) and

⁴¹ Mayor of London (2023). School Atlas. Filter: State-funded schools. LSOAs. Available at: <https://apps.london.gov.uk/schools/>

⁴² Public Health England (2020). Local Authority Health Profile 2019. Westminster. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E09000033.html?area-name=Westminster>

⁴³ Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 009E LSOA. Health Deprivation and Disability Domain. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁴⁴ Public Health England (2020). Local Authority Health Profile 2019. Westminster. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E09000033.html?area-name=Westminster>

⁴⁵ City of Westminster (2018). Queen's Park Ward profile. Available at: <https://www.westminster.gov.uk/media/document/queens-park-ward-profile>

London (23.1%). Consequently, these geographies also had the lowest proportions of private rented households. Moreover, the LSOA had a higher proportion of owned households (29.1%), compared to Queen's Park (20.7%) and Westminster (27.4%), however, still a lower share than London (45.2%).

Table 5-13 Tenure (%) by geographical area, 2021⁴⁶

Tenure	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
Owned	29.1	20.7	27.4	45.2
Social rented	53.4	54.3	28.3	23.1
Private rented	16.2	23.6	43.3	30.0

Table 5-14 highlights the occupancy ratings of houses across the relevant geographies (based on the ONS definition – number of bedrooms occupied)⁴⁷ according to Census 2021. Notably there is a significantly higher proportion of overcrowded households at the Ward (19.7%) and LSOA level (18.2%) compared to the Borough (10.3%) and London (11.1%) levels.

Table 5-14 Household overcrowding and under-occupation (%) by geographical area, 2021⁴⁸

Overcrowding (bedrooms)	Westminster 004C LSOA	Queen's Park Ward	Westminster	London
+2 above standard	10.4	7.7	12.2	21.8
1 above standard	34.2	24.1	26.5	27.1
Standard	37.2	48.6	51.1	40.0
1 below standard	13.3	14.8	8.1	8.9
2+ below standard	4.9	4.9	2.2	2.2

5.3.6 Transport and connectivity

Queen's Park Ward has very good public transport accessibility compared to other areas of London. There are several underground and overground tube stations nearby to the site: Kensal Green (11-minute walk), Kensal Rise (8-minute walk) and Queen's Park (16-minute walk). Kensal Green and Queen's Park connect via overground to Euston, as well as via the Bakerloo line through central London to Waterloo; Kensal Rise connects via overground across north London to Stratford.

Banister Road bus stops KS and KM are located within a 5-minute walk of the site, these stops are served by three day buses; the 28 (between Station Terrace and Mapleton Crescent), the 52 (between Victoria and Pound Lane), and the 316 (between Mora Road and White City).

⁴⁶ ONS (2021). Tenure (TS054). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

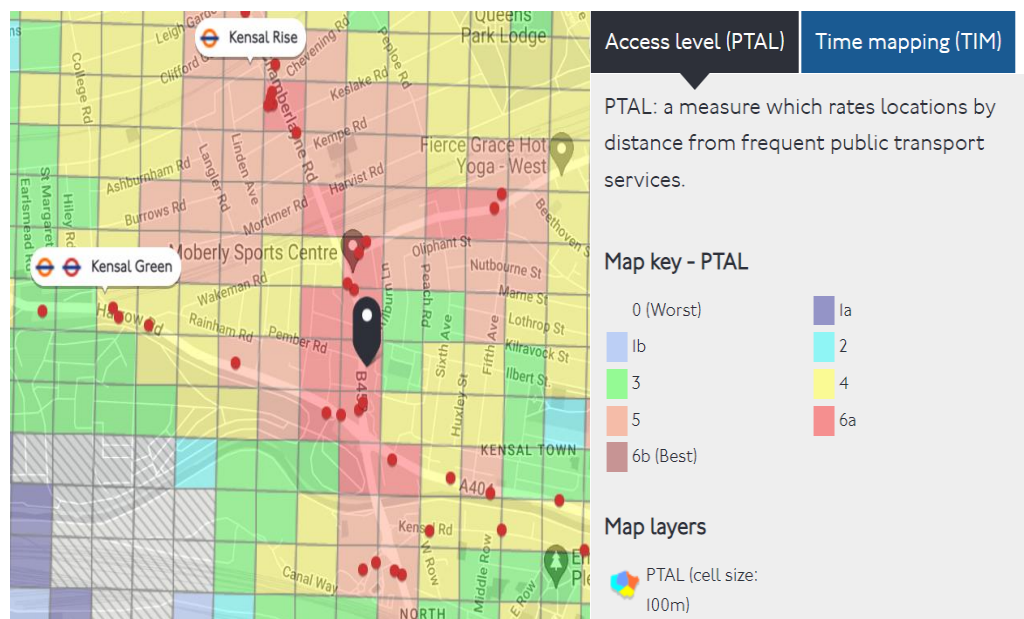
⁴⁷ This analysis uses the 'bedroom standard' measure of overcrowding, which determines how many bedrooms households need based on the ages, genders and relationships of members. Households are overcrowded if they have fewer bedrooms than they need. They are under-occupied if they have more bedrooms than they need.

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

<https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

As outlined in Figure 5-3, the project site has a high Public Transport Accessibility Level (PTAL) rating of 5, on a scale of 0-6. This high rating is due to the plethora of nearby public transport options.

Figure 5-3: PTAL access levels



Source: Transport for London (2023)⁴⁹

5.3.7 Public realm and open space

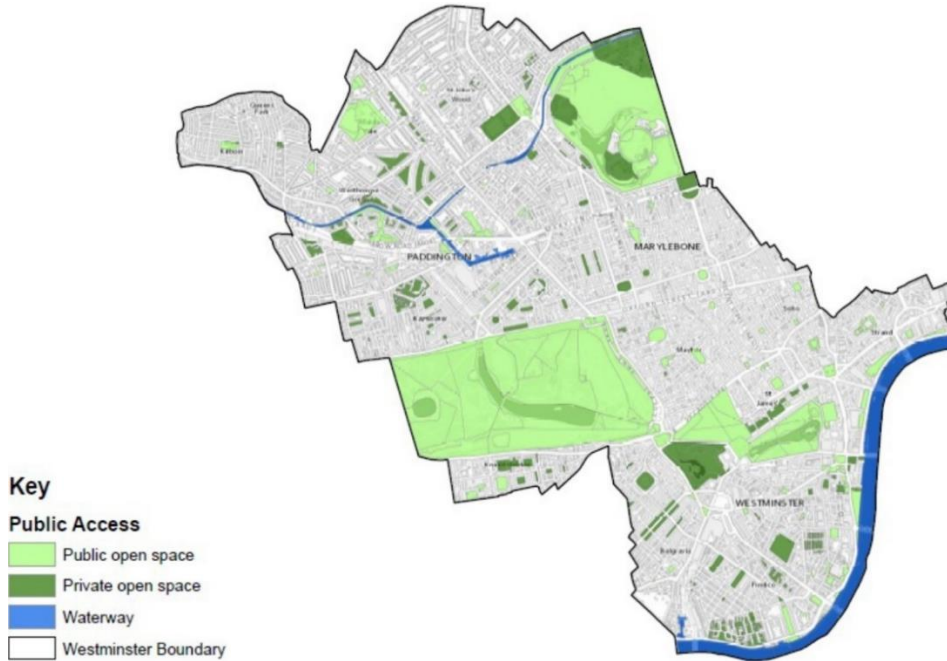
Queen's Park Court Community Garden is within the immediate vicinity of the site, and Queen's Park Gardens within a 2-minute walk. Queen's Park Gardens is a community garden that aims to 'encourage residents to work together on ideas and projects' and offers volunteering sessions from Spring to Autumn.⁵⁰

The open and green spaces in Westminster Borough are reproduced below in Figure 5-4.

⁴⁹ Transport for London (2023). Public Transport Accessibility Level. Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

⁵⁰ Friends of Queen's Park Gardens (2022) About US. Available online at: <https://www.queenspark.org/about-us/>

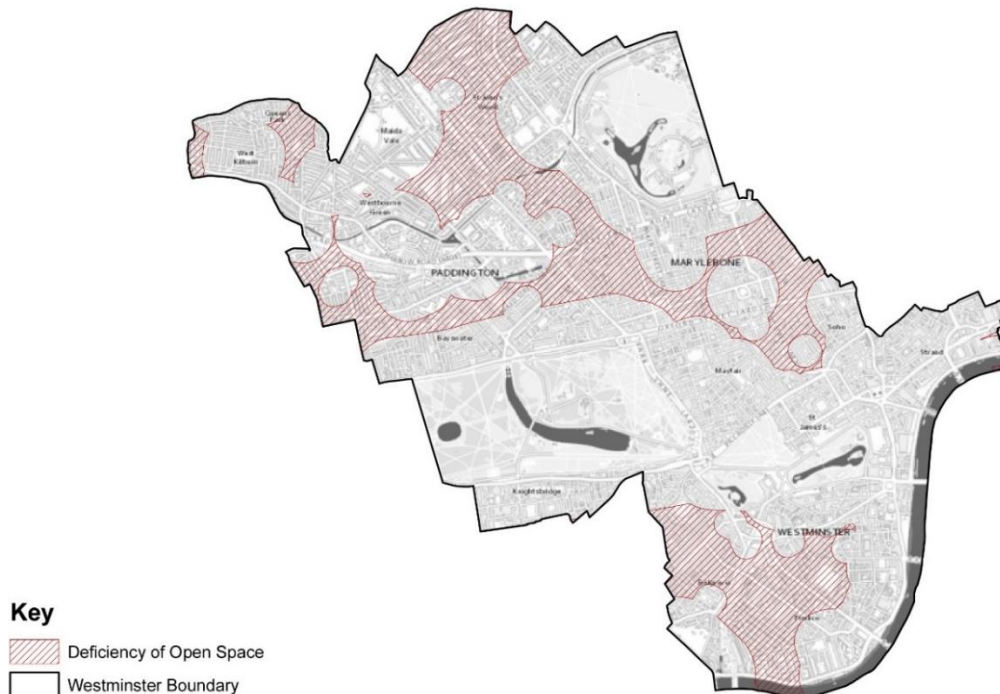
Figure 5-4: Westminster Map of Open and Green Spaces



Source: City of Westminster (2019)⁵¹

Figure 5-5 shows areas in Westminster Borough that are deficient of open and green spaces. According to the Partnership Approach to Open Spaces and Biodiversity data, parts of Queen's Park are classed as an open space-deficient area.

Figure 5-5: Westminster map of open space deficiency areas



Source: City of Westminster (2019)⁵²

⁵¹ City of Westminster (2019). Partnership Approach to Open Spaces and Biodiversity. Available at: <https://www.westminster.gov.uk/media/document/ev-env-007---a-partnership-approach-to-open-spaces-and-biodiversity>

⁵² City of Westminster (2019). Partnership Approach to Open Spaces and Biodiversity. Available at: <https://www.westminster.gov.uk/media/document/ev-env-007---a-partnership-approach-to-open-spaces-and-biodiversity>

5.3.8 Safety and security

In February 2023, the top three reported crimes within the Queen's Park Ward were violence and sexual offences (30 instances), anti-social behaviour (20 instances), and other theft (10 instances).⁵³ In the same period, the Ward had a crime rate of 7.6 per 1,000 population, compared to 27.2 across the Borough.⁵⁴ Between March 2021 and March 2023, there were 2,500 recorded offences in the Ward, the majority of which were violence against the person (736 instances), other accepted crime (379 instances) and theft (301 instances).

5.3.9 Community cohesion

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

According to the 2017 City Survey, 95.52% of residents responded that they definitely agree or tend to agree with the statement 'people from different backgrounds get on well', with 17.77% of respondents stating they spend either a great deal or fair amount of time helping to improve the community.⁵⁵

⁵³ Metropolitan Police (2023) Queen's Park. Top reported crimes. Available online at: <https://www.met.police.uk/area/your-area/met/westminster/queens-park/about-us/top-reported-crimes-in-this-area>

⁵⁴ Metropolitan Police Service. Overview of Crimes. Filters: start date and end date = February 2023; Geographical level = Borough; Area name = Westminster. Available at: <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>

⁵⁵ City of Westminster (2018). Queen's Park Ward profile. Available at: <https://www.westminster.gov.uk/media/document/queens-park-ward-profile>

6. Assessment of impacts

6.1 Introduction

The assessment of equality impacts considers the potential impacts on affected people sharing protected characteristics arising from the Queens Park Court development. It considers both direct and indirect impacts associated with:

- Construction and operation impacts on residents living in the area surrounding the site; and
- Operational impacts on future residents of the site.

The assessment is based on the development as set out in the planning application (2020) and considers both beneficial and adverse impacts. This is a high-level assessment based on the legislation and policies in action, information and data sources available for review in this report and addresses impacts relevant to the key equality themes set out in the framework in Table 6-1.

Table 6-1 EIA assessment framework

Theme	EIA objectives
Housing	<ul style="list-style-type: none">• Enable older people to live independent lives• High-quality housing meeting the needs of residents• Increase in affordable housing for local people
Neighbourhood and Community	<ul style="list-style-type: none">• Clear, transparent, inclusive and meaningful engagement with local residents, stakeholders and the local community• Mitigation of potential negative environmental and safety impacts of construction on local residents
Wider impacts	<ul style="list-style-type: none">• Provide employment and educational opportunities, for disadvantaged and underrepresented groups• Maximising social value for local communities

6.2 Housing

Net increase in social housing in Westminster

The planning application proposes the development of the existing western car park for the erection of a five-storey block providing 19 residential units and demolition of existing storage sheds to provide a further 4 dwellings. The provision of an amenity space, refuse storage, cycle parking, and estate works including the realignment of Droop Street will also be carried out.

As such, the Queens Park Court Car Park development will provide a total of 23 new affordable units available for social rent, including 2 wheelchair accessible units on the ground floor of the apartment block.

These homes will be retained by the Council and made available through a local lettings plan that ensures households on the social housing waiting list are prioritised. The latest wait list figures (from November 2021) reveal that there are currently over 4,100 households in Westminster on the social housing waiting list.⁵⁶ The Supply and Allocation of Social Housing 2022/23 Cabinet Report identifies that the demand for social housing will continue to exceed

⁵⁶ City of Westminster (2022) How to apply for social housing. Available online at: <https://www.westminster.gov.uk/housing/register-social-housing/how-apply-social-housing>

estimated supply during 2022/23 and consequently identifies priority groups to receive projected lettings. This includes homeless households (45% of projected social housing lettings 2022/23), existing WCC tenants (32%) including those that are overcrowded and need to move on medical grounds, and those on the housing register (23%) including people moving from supported housing and on medical grounds.

Specific groups with high needs for access to social housing and high representation amongst those living in the project area include people from Asian and Middle Eastern households, economically inactive people, those aged 25-44 and 45-65, and households with children and lone parents.⁵⁷ It is therefore likely these groups will benefit significantly from the redevelopment.

Increased affordable housing provision for local residents

The Council will allocate the social housing through a Local Lettings Plan (LLP). The purpose of an LLP is to prioritise meeting local housing need in line with the Council's Housing Allocations Policy. The Westminster Housing Allocation Scheme⁵⁸ (as of March 2020) requires applicants to be a permanent resident of Westminster for three years at the date of application and prioritises groups as identified within section 167 of the Housing Act 1996.

The Allocation Scheme also reveals a high demand for, and insufficient supply of, affordable housing in the Borough. Evidence reveals a high take-up of affordable housing in the local area surrounding Queens Park Court Car Park. Affordable social rent currently composes over half (53.4%) of the tenure split in the LSOA compared to 28% at the Borough level. Thereby, this development is meeting the housing needs of the local population including those identified above as having high needs for access to social housing including Asian and Middle Eastern households, economically inactive people, those aged 25-44 and 45-65, and households with children and lone parents.⁵⁹

The Supply and Allocation of Social Housing 2022/23 Cabinet Report⁶⁰ identifies that the demand for social housing will continue to exceed estimated supply during 2022/23 and consequently identifies priority groups to receive projected lettings.

Net increase in wheelchair accessible housing in Westminster

The design contains provision of two new fully accessible flats that are designed to Part M4(3) Wheelchair User standards. These are both located on the ground floor to provide ease for wheelchair users with level access into the building. This provision meets London Local Plan Policy 3.8 commitments that 10% of all dwellings provided must be accessible.

The provision of wheelchair accessible housing could enable disabled people or older and elderly people with limited mobility to remain at home living independently. This benefit is likely to be felt acutely if residents are allocated the new accessible flats, as the LSOA has a higher proportion of disabled residents whose day-to-day activities are limited to some extent (18%), in comparison to Queens Park (17.7%), Westminster (13.8%), and London (13.2%).

Net increase in family housing - resulting in potential for reduced household overcrowding in Westminster

Around 18% of households in the project area LSOA are classified as overcrowded according to Census 2021, for comparison, the proportion of households classified as

⁵⁷ Westminster Council (2018) Cabinet Report: Supply and Allocation of Social Housing 2022-23 <https://committees.westminster.gov.uk/ieDecisionDetails.aspx?ID=1721>

⁵⁸ City of Westminster (2020). Housing Allocation Scheme March 2020. Available at: [Allocations scheme | Westminster City Council](#)

⁵⁹ Westminster Council (2018) Cabinet Report: Supply and Allocation of Social Housing 2022-23 <https://committees.westminster.gov.uk/ieDecisionDetails.aspx?ID=1721>

⁶⁰ Westminster Council (2018). Cabinet Report: Supply and Allocation of Social Housing 2022-2023. Available at: [Decision - Supply & Allocation of Social Housing Report 2022-2023 | Westminster City Council](#)

overcrowded is 10.3% in Westminster and 11.1% in London. Overcrowding disproportionately affects low-income households, ethnic minority groups, and children,⁶¹⁶² with the impacts of living in an overcrowded household including increased likelihood of close-contact infectious diseases, psychological stress, and sleep disturbance.⁶³ The provision of new 2-bed and 3-bed homes could potentially help to reduce overcrowding in the area, in particular for households with dependent children where there is greater chance of room-sharing.

6.3 Neighbourhood and Community

6.3.1 Potential beneficial impacts

Community engagement and consultation

Equality legislation emphasises the importance of supporting positive relations between different groups, whilst local community cohesion policy supports group interaction, fair treatment, equal opportunity, and a sense of common belonging, including empowering local communities to shape decisions affecting their lives.

The proposed Queens Park Court development is in one of the 30% most deprived LSOAs nationally, creating a complex and nuanced range of community needs. The extent to which benefits of the proposals are shared amongst all members of the community, including people with protected characteristics, will depend in part on engagement efforts to reflect their views in the planning process.

The redevelopment is situated in a demographically diverse neighbourhood, with a number of affected stakeholders being from different backgrounds and having different perspectives of the project. Of particular note, given their close proximity to and historical use of the car park and sheds, are:

- The Queens Park Court residents, located directly next to the site;
- Users of the parking spaces and sheds at the site;
- Users of the sheds at the site
- Katharine Bruce Community Nursery/London Early Years Foundation (the management organisation of the nursery which sits on the Queens Park Court estates);

WCC has carried out two sets of engagement session with the aim of gathering the views of the local community about the proposed development at Queens Park Court car park.

The first of these took place on 28th May 2019 and 4th June 2019 when the project team held drop-in sessions at the Queens Park Court Community Hall. In advance of the session, invitations were sent to;

- Site Ward Councillors;
- Queens Park Community Council;
- London Early Years Foundation;
- Users of the parking spaces and sheds at the site;
- Queens Park Court Estate Residents;

⁶¹ UK Parliament (2021) Overcrowded housing (England). Available online at: <https://commonslibrary.parliament.uk/research-briefings/sn01013/>

⁶² Mayor of London (2022) London needs an overcrowding action plan from the Mayor. Available online at: <https://www.london.gov.uk/press-releases/assembly/london-needs-an-overcrowding-action-plan>

⁶³ WHO (2018) WHO Housing and Health Guidelines. Available online at: <https://www.ncbi.nlm.nih.gov/books/NBK535289/#:~:text=close%2Dcontact%20infectious%20diseases,sleep%20disturbance.>

- Local residents and businesses (the letters were sent to over 600 other addresses in the local area);
- General Community Groups;
- Queens Park Court Community Hall; and
- Neighbouring Brent ward councillors.

Forty-one people attended the sessions, a majority of whom were Queen's Park Court residents. A number of boards were provided at the sessions, containing information relating to the project background, information about the site, provision of affordable housing, early proposals and ideas for the design. Comment forms were provided in order to receive feedback.

Feedback from attendees was broadly positive while constructive feedback was given on issues such as car parking, traffic management and potential loss of green space.

Following this initial session, WCC issued invitations to further sessions on 16th July 2019 and 17th July 2019 at the Queens Park Court Community Hall to present detailed design proposals for the site. These sessions gave stakeholders the opportunity to view and comment on the revised design proposals, following changes after the sessions in May and June. In advance of the sessions, the same stakeholders were invited to attend.

25 people attended these sessions, a majority of whom were Queens Park Court residents again. In addition to residents, one of the site's local ward councillors, a representative of the Katharine Bruce Community Nursery, a representative from the Queen's Park Community Council and the Reverend from St John's Vicarage attended.

Feedback from attendees raised further positive feedback, with some concerns around parking provision, impact on open space and sunlight and anti-social behaviour.

Following receipt of feedback from the two sessions, some key issues were mitigated or clarified. The re-provision of 23 car parking spaces was confirmed, along with a proposal for WCC to pay for lifetime car club membership for residents to remove the need for private car ownership and related car parking issues. During the engagement programme several stakeholders expressed a clear desire to see the amount of green, open and play space in their local community safeguarded from any development proposals. The project team is aware that this is an important issue for residents, which is why it is committed to providing new shared outdoor space next to the proposed new apartment block and landscaping by the townhouses.

The project team has also held stakeholder meetings with other high priority stakeholders in the local area, including the London Early Years Foundation (due to the implications of the scheme for the Katharine Bruce Community Nursery) and Otherwise Living. The meetings included in depth discussions on the design proposals, particularly on the improvements to the Katharine Bruce Community Nursery and housing to be provided as part of the scheme, with positive feedback on these matters.

A Resident Liaison Officer has also been appointed to safeguard and support local residents during the construction stage of the development. The Liaison Officer will have a specific phone number and email contact for resident queries to be filtered directly to the contractor.

The Council is undertaking ongoing engagement with local residents through the publication of the quarterly newsletter – the first issue was sent out in October 2022, and the second in February 2023. The purpose of this newsletter is to inform local residents on current and upcoming stages of the development, as well as providing contact details of the Osborne Project Manager and Resident Liaison Officer. The Council has also committed to hand delivered any future communications, including the newsletter, to neighbouring residences.

To ensure good relations are fostered between groups involved and/or affected with the project, WCC should continue to ensure that all feedback received during consultation and engagement activities is properly documented and archived. This will ensure that should objections arise from stakeholders; the Council are well placed to evidence the reasoning behind their decisions.

Increased social interaction and cohesion in the area

The nature of the social housing development provides an opportunity for increased social interaction and cohesion. Through the LLP, new residents from similar backgrounds, or who share similar housing experiences in Westminster, are likely to find mutual bonds that provide opportunity for social interaction. Furthermore, issues around social isolation, particularly amongst elderly people, serve to be mitigated through the provision of modern, affordable and accessible housing that can boost confidence and quality of life.

Furthermore, the ongoing stakeholder engagement and consultation activities, alongside providing an opportunity for issues or queries to be raised, also act as a platform for people in the local community to meet, interact, and gain a better understanding of each other's perspectives on the project, as well as wider topics.

6.3.2 Potential adverse impacts and mitigation

The Queen's Park Court development could potentially result in adverse impacts affecting protected characteristic groups living in the local community during demolition, construction and operation. The following sections summarise these potential impacts including how the Council has implemented mitigation against these as a fulfilment of their PSED outlined in the Equality Act 2010.

Loss of car parking facilities

The site is well served by public transport services, with the nearest underground service being Kilburn Park, the nearest national railway station being London Paddington and a several bus stops close to the site providing a high frequency of services. The site has a good level of accessibility with a PTAL rating of 6a, 4 and 3. Despite this, the loss of car parking spaces was an issue that was raised on multiple occasions throughout the community consultations.

No new car parking spaces will be provided for the proposed development, except two disabled parking spaces for the wheelchair accessible units within the central car park. However, reconfiguration of the existing central car park to provide an increased total of 25 spaces for existing residents. An additional turning point for emergency vehicles is to be provided in the northern section of the central car park.

While the proposal is that 23 of the 25 new spaces are provided to existing residents, this is likely to be a contentious issue given the multitude of concerns raised about parking during stakeholder consultation. To mitigate tension between license holders, it is crucial that an unbiased approach to parking allocation is adopted. Thorough consultation with license holders should be undertaken, taking into account the individual needs for a car parking space. For example, where license holders depend on a car for work purposes, such as delivery drivers, taxi drivers and carers and therefore need to be able to park nearby, or where license holders have mobility issues that mean they would be unable to walk a long distance to a new car parking space.

However, the Council has proposed that new residents in the development are provided with lifetime car club membership to provide access to a car without the need for private car ownership. This should contribute to a reduced need for car ownership and therefore reduce parking stress on the area.

Construction impacts on local residents

Local residents surrounding Queens Park Court are likely to experience construction impacts as a result of the development, including adverse noise and air quality impacts.

Construction impacts could disproportionately impact protected characteristic groups who spend more time at home, including older people, people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children.

In the case of poor air quality, as a result of construction-related emissions, children, older people, and disabled people are more vulnerable to adverse health effects. Especially in the case of disabled people, those with weak respiratory systems, or suffering from health problems more generally associated with weaker lungs, may be disproportionately impacted by emissions and dust created through construction and maintenance activities. Pregnant women are also more vulnerable to the adverse effects of air pollution including an increasing risk of miscarriage as well premature births and low birth weights.⁶⁴

The Air Quality Impact Assessment submitted alongside the planning application in 2019 confirmed that mitigation measures are in place to minimise the risk of adverse dust effects including dust suppression, the types of vehicles and machines used and waste management strategies. The assessment identifies dust and fine particulate matter as the most important consideration during construction activities. The production of dust can cause temporary soiling of surfaces, in particular the windows of neighbouring properties and cars of residents. However, the magnitude of dust emissions during construction is not deemed to be 'significant'.

Air quality for future residents during the operation of the residences will be acceptable without the need for mitigation.

Evaluation of the proposed energy strategy also confirmed that due to limited roof space for PV the proposed development achieves a 11% reduction in CO2 emissions through the use of on-site renewable energy generation which is below the City of Westminster target of 20 %.

The construction works are also likely to result in increased noise levels in the surrounding area. Some residents will be more sensitive to the effects of these construction impacts than others. For example, those who spend more time at home will be subjected to longer periods of adverse noise impacts including older people, people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children. Some groups with protected characteristics also have differential sensitivity to noise. For example, people with dementia have an increased sensitivity to noise and light.⁶⁵ Children are also susceptible to increased noise levels in some instances particularly with regards to cognitive impairment.⁶⁶ Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise.

Right to light impacts on neighbouring properties

Given the close proximity of neighbouring developments and the proposed scheme, the Queens Park Court Car Park development is likely to generate right to light (RtL) impacts on neighbouring residential properties. For properties, particularly residential properties, which do experience a loss of light, equality effects may arise for residents who share protected

⁶⁴ Leiser, C, Hanson, H, Sawyer, K, Steenblik, J, Al-Dulaimi, R, Madsen, T, Gibbins, K, Hotaling, J, Oluseye Ibrahim, Y, VanDerslice, J & Fuller, M (2019) Acute effects of air pollutants on spontaneous pregnancy loss: a case-crossover study, *Fertility and Sterility*, Volume 111, Issue 2, 2019, Pages 341-347.

⁶⁵ Social Care Institute for Excellence – Dementia Friendly Environments <https://www.scie.org.uk/dementia/supporting-people-with-dementia/dementia-friendly-environments/noise.asp>

⁶⁶ World Health Organisation Children and Noise <https://www.who.int/ceh/capacity/noise.pdf>

characteristics. This may arise where a resident is more sensitive than other people, due to a protected characteristic, for example a disability.

The surrounding area has a mix of building heights ranging from terraced houses on Kilburn Lane, backing onto Droop Street, and the various storey buildings of the Queens Park Court estate.

The Council commissioned a Daylight and Sunlight Statement which was published in March 2020 to calculate the change in light levels of the proposed development on neighbouring buildings. The report ultimately concludes that the proposal is considered acceptable given the urban context and is broadly compliant with the Building Research Establishment's (BRE) targets. The report carried out a detailed assessment of 125 windows which include 63 windows in the elevation of the existing blocks within the estate (43-54 and 55-78 Queens Park Court, facing the new buildings and 62 windows in the rear of the buildings of 2-20 Kilburn Lane. Of the 125 windows assessed, 93 retained a VSC of 0.8 or greater of the current level. Of the 32 windows which were below 0.8 of the existing value, 27 retained a VSC level of 18% or above.

The remaining 5 windows which have a retained VSC level of between 15% and 18% are located on the ground floor level of block 43-54 Queens Park Court, which is directly west of the proposed five storey block of flats. These windows are recorded in the report as window numbers 72, 75, 78, 81 and 84. Window 72, a bathroom with obscure glazing and windows 75 and 84, which appear to serve kitchens are not habitable rooms. Windows 78 and 81 are habitable rooms although it is unclear as to what they serve.

The report includes a No Sky Line (NSL) assessment for these five windows which demonstrates that all of the windows would retain an NSL factor of 0.8 of their previous value in accordance with BRE guidance. Overall, the majority of windows assessed would retain an acceptable level of light following the development, and whilst there would be losses for 5 windows which would result in a degree of harm from a reduction in VSC which is greater than considered acceptable in the BRE guidance, these losses must be considered against the 23 new socially rented units that are being delivered. In light of the social benefits of the new social housing offered it is considered that

All the proposed habitable rooms in the new development will receive daylight levels in excess of the targets in line with BS8206:2.

Traffic impacts for neighbouring properties during construction

During the construction phase, access to properties may be impacted for residents due to the closure of the Western side of Droop Street, the Western Car Park and the main car park for resurfacing and realignment. This could impact on residents whose vehicles may need to be parked further away from their properties, with this impact being felt more acutely by those with mobility issues such as older or disabled residents or those residents who are pregnant or with children.

Refuse collections for Queens Park Court estate residents could be impacted by the closure of part of Droop Street and the main car park, depending on where refuse vehicles can access. While the Queens Park newsletter provided to residents explains that refuse collections will continue from the road side, this may have impacts on those having to move heavy bins for longer distances.

As Queens Park Court is an enclosed estate, separate from main roadways, the impact on wider traffic should be limited throughout construction other than when construction vehicles are arriving at or leaving the site.

During operation, the development should have no traffic impacts on neighbouring properties. The reconfigured Droop Street will provide an appropriate access route for refuse collection and emergency vehicles for surrounding properties.

6.4 Wider impacts

Creation of new construction-related employment opportunities

The construction of the new development is likely to create an opportunity for construction-related jobs and there is potential for those seeking work in the local area to benefit from this employment, particularly as the area experiences low levels of educational attainment and high levels of unemployment compared to the Ward level.

Those likely to benefit from these job opportunities include young people, especially those from ethnic minority backgrounds who suffer from disproportionately higher rates of unemployment.⁶⁷ However, equality effects may arise where employment or training is not available to groups with protected characteristics, for example where recruitment criteria or policies make it harder for some groups to access opportunities.

The Council has developed a Responsible Procurement Delivery Plan identifying areas in which the Council could deliver social value to local residents, businesses and communities across the three Package B sites – Adpar Street Car Park, Torridon House and Queen's Park Court. The plan outlines a priority area of supporting unemployed residents into meaningful employment as a means of improving life chances and preventing the mental and physical consequences of unemployment. The on-site architects (David Miller Architects) have committed to recruiting one Westminster resident in an Apprentice Studio Assistant (Level 3) role with training provided through the City of Westminster College and offering two 16 weeklong work placements to local Westminster students and residents. In addition, all job opportunities that arise from this development project will be shared with Recruit London, the Council's in house employability service, two weeks in advance of the wider general market.

Creation of opportunities for City of Westminster College

The City of Westminster College sits 2 miles East of Queens Park Court and has been identified as a key stakeholder in the delivery of Social Value opportunities within the Responsible Procurement Delivery Plan.

The Council plans to build its relationship with Westminster College throughout the construction process through the delivery of talks and presentations on aspects of project management, cost planning, health and safety and the sustainability of development projects. To achieve this, the on-site architects (David Miller Architects) will offer the opportunity for construction students at the City of Westminster College to participate in an educational school visit focused on the built environment and specifics of WCC's infill programmes. The Council has also made a commitment to provide site tours of another infill programme within Package B, Torridon House, for City of Westminster College students. These opportunities could enrich student's curriculum and target the knowledge and skills of specific courses including construction.

6.5 Summary of potential impacts

Table 6-2 provides a summary of the potential construction and operational impacts of the proposals. This provides an assessment of groups with protected characteristics who are likely to be disproportionately or differentially affected by each of the impacts. As defined in section 2 of this report:

- A *disproportionate* equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on the general population overall at a particular location.

⁶⁷ ONS (2022) Annual Population Survey: Unemployment. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest>

- A *differential* equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability associated with their protected characteristic.

In some cases, protected characteristic groups are subject to both disproportionate *and* differential equality effects.

The table also provides a brief overview of planned mitigation to minimise adverse impacts as well as activities in place to enhance opportunities resulting from beneficial impacts.

It is envisaged that this table can be used to monitor equality effects as the development progresses.

Table 6-2 Summary of potential equality impacts of Queen's Park Court development proposals

Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ⁶⁸												Overview of potential impacts	Planned mitigation/ EIA recommendations
	Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Low Income Households			
	Children	Young People	Older People											
Housing														
Beneficial	Net increase of 23 social housing units			✓		✓						✓	The provision of social housing could support the local population into finding housing that meets their needs, in particular for elderly people, some ethnic minority groups, and those on low incomes who are overrepresented in housing waiting list statistics.	Planning Mitigation: Local Lettings Plan to be developed to prioritise people in Queens Park who are on the social housing waiting list.
	Increased affordable housing provision for local residents	✓		✓		✓						✓	A Local Lettings Plan (LLP) for the allocation of affordable housing is likely to meet the housing needs of local residents. Key priority groups identified include those who are homeless, overcrowded households and those who require relocation based on medical grounds.	Planning Mitigation: Local Lettings Plan to be developed to prioritise people in Queens Park who are on the social housing waiting list.
	Net increase in wheelchair accessible housing			✓				✓						Provision of wheelchair accessible homes considers the accessibility requirements of disabled and elderly residents. The availability of these units as social rent assists the cost of living for disabled people who face additional living costs.
Neighbourhood and community														
Beneficial	Effective consultation and community engagement with affected groups to contribute to sharing benefits of the proposals.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Local residents and Residents Associations, including those with protected characteristics living in adjacent social and sheltered housing, have been provided an opportunity to engage with WCC throughout the design development of the proposal.	Planned Mitigation: Resident Liaison Officer on site who can be by email and phone with any resident enquiries and will hand deliver future correspondence from WCC to local residents.

⁶⁸ As there are no disproportionate or differential effects identified for marriage/civil partnership this protected characteristic has not been included in the table. Low income is not a protected characteristic but is considered as part of the EIA process by the Council.

Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ⁶⁸											Overview of potential impacts	Planned mitigation/ EIA recommendations
	Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Low Income Households		
	Children	Young People	Older People										
													Quarterly newsletter updating residents on current and upcoming works. EIA Recommendation: Produce a document log of stakeholder feedback and any actions taken by the Council in response.
Adverse with mitigation	Loss of car parking facilities.			✓			✓			✓			The scheme will result in the loss of car parking spaces and increased parking stress in the local area. In particular, protected characteristic groups who rely on private vehicles for access to services could experience disproportionate impacts. Planned Mitigation: Reprovision of 25 parking spaces within the newly resurfaced and realigned central car park. 2 disabled parking spaces provided for new residents of the wheelchair accessible housing units. Lifetime car club memberships provided to new residents.
	Right to light impacts on neighbouring residential properties.			x									A Daylight and Sunlight Assessment was undertaken and identified a small number of windows that may experience impact on their RtL. EIA Recommendation: Residents who can expect RtL impact are entitled to compensation for any reduction in the value of their property or standard of living.
Wider impacts													
Beneficial	Creation of new construction-related employment opportunities		✓		✓		✓						Local residents seeking employment are likely to benefit from the creation of construction-related jobs, particularly young people and ethnic minorities who are overrepresented in unemployment. Planned Mitigation: Commitments made by the on-site architects (David Miller Architects) in the Responsible Procurement Delivery Plan to offer an Apprentice Studio Assistant (Level 3) role and two 16 weeklong work placements.

Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ⁶⁸											Overview of potential impacts	Planned mitigation/ EIA recommendations
	Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Low Income Households		
	Children	Young People	Older People										
Creation of opportunities for City of Westminster College.		✓										Young people of the City of Westminster College could benefit from educational opportunities of the construction project.	Planned Mitigation: Commitments made by the on-site architects (David Miller Architects) in the Responsible Procurement Delivery Plan to offer College students the opportunity to engage in a school visit and site tour of Torrion House Car Park.

7. Conclusions and next steps

7.1 Conclusions

This EIA has identified potential positive impacts on many protected characteristic groups and how the Adpar Street development could contribute to an increase in affordable housing which meets the needs of local residents. The EIA has identified potential beneficial equality effects of the proposed development as follows:

- A net increase in social rent units. The Council has committed to a Local Lettings Plan to prioritise the provision of affordable homes to local elderly residents in the most need.
- 2 of the 23 units will be wheelchair accessible, with disabled parking spaces provided for these units, enabling elderly residents with limited mobility to remain at home living independently and maintain positive mental and physical wellbeing.
- Improved public realm for the wider local community through integrating landscaping improvements to the immediate area to soften boundaries and minimise crime.
- Construction could provide direct employment opportunities which can be shared by groups with protected characteristics as outlined in the Responsible Procurement Delivery Plan.
- Construction could also provide educational opportunities to local young people studying at the City of Westminster College as outlined in the Responsible Procurement Delivery Plan.

Westminster City Council has demonstrated due regard to the PSED through a series of mitigation activities throughout the planning application stage. These include:

- Extensive community engagement with local residents, including affected properties and car park licence holders. Two public exhibitions were supported by consultation meetings with key stakeholders to address any concerns and inform the design process.
- A Transport Statement was produced as a means of exploring the issue of parking stress in the local area as a result of the proposal and identifies management strategies such as existing street capacity, car clubs and levels of car ownership.
- An Air Quality Assessment was published alongside the planning application in 2020. These considered the potential environmental impacts of construction and confirmed that the proposal did not exceed any national or local regulations.
- A Daylight and Sunlight Statement was produced and identified that neighbouring properties may experience RtL injuries. A high-density scheme in a close urban setting which is redevelops a building will result in impacts on neighbouring properties which cannot realistically be avoided. However, residents will be entitled to compensation for any reduction in the value of their property or standard of living caused by the development.
- The Contractor has appointed a dedicated Resident Liaison Officer who can be contacted by residents via email and phone.

7.2 Next steps

The key issues identified through this EIA for different groups with protected characteristics are summarised alongside provisional high-level recommendations in Table 6-2. This identifies priority groups for which there are differential and disproportionate impacts.

Monitoring of equality impacts should be included as part of a Monitoring and Evaluation Plan for the proposed development. This should use Table 6-2 of this report as a basis on which to track and update impacts throughout continued design, development and construction. The Monitoring and Evaluation Plan should also seek to review how the proposed benefits of the scheme will be realised by groups with protected characteristics. This could draw on the experience of local residents with regards to their involvement in identifying limitations of the application and their experience of the new housing. It is recommended that a member of the project team is given responsibility for tracking and updating the equalities actions within the monitoring plan.

The proposals will require the continued procurement of services for the construction of the new housing and landscaping improvements. The PSED will apply to the procurement process because it is a non-delegable duty and procurement is a 'function' of the Council. Therefore, in circumstances where the Council chooses to "contract out" part or all of a function (for example construction of the housing) to another entity (for example a contractor), the Council cannot absolve itself from its responsibility to fulfil the PSED.

The Council should ensure that compliance with PSED is factored in throughout any further procurement, for example;

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

Guidance on embedding the PSED into the procurement process from the Equality and Human Rights Commission⁶⁹ states will be that the Council will be able to factor in a potential contractor's ability to fulfil contractual obligations related to the PSED in its evaluation of tenders and has the right not to award the contract to the most economically advantageous tender where the Council has established that the tender would not comply with current obligations in environmental, social or employment law.

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

This EIA should be considered as a live document, and should be updated, refreshed and the actions within it monitored on a regular basis. This should include a monitoring update on the status of identified potential impacts and associated mitigation. This may result in updates both to assessment of the impacts and to the recommendations relating to the proposed mitigation measures.

⁶⁹ Equality and Human Rights Commission (2013) Buying Better Outcomes: Mainstreaming equality considerations in procurement - A guide for public authorities in England
https://www.equalityhumanrights.com/sites/default/files/buying_better_outcomes_final.pdf

