

Carlton Dene Development

Equality Impact Assessment

Westminster City Council

May 2023

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 Carlton Dene Development.

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 Carlton Dene site 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.

The EIA provides a consideration of potential direct and indirect equality impacts (both adverse and beneficial) associated with the construction and operational phases of the 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

Carlton Dene residential care home was built in the early 1970's and no longer meets modern design standards for care and layout to support dementia care. The site was previously a 42 bedroom Residential Care Home housing residents aged 65 and over, the majority of which had dementia and required specialist support. In Summer 2020, the residents were offered alternative accommodation in the Beachcroft Development located in Maida Vale. This Extra Care facility was built specifically to rehouse Carlton Dene residents and other Care Home residents affected by redevelopment proposals.

Peebles House was built in the early 1970's and no longer meets modern design standards for support in terms of resident accommodation. The Council-owned building is located next to Carlton Dene and previously provided 8 social rent units and one vacant unit. The previous tenants agreed to relocate following a period of consultation in 2018 and will have the opportunity to return to their homes post-construction.

In December 2020, a planning application (20/08040/FULL) was submitted for the demolition of the existing Carlton Dene building and Peebles House and the construction of two 6-storey buildings to provide 65 affordable extra care dwellings (Use Class C3) and 22 affordable general needs dwellings (Use Class C3) with associated landscaping, refuse storage, car and cycle parking. This site is situated within the administrative boundary of Westminster and comprises a site area of approximately 0.44ha. This application received planning consent in March 2022.

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.

The Carlton Dene development scheme forms part of Westminster's wider 'Specialist Housing Strategy for Older People'² dating back to 2007. This identified Carlton Dene as a site with development potential in meeting the needs of a growing elderly population with complex care needs. In line with this, Westminster City Council published a 'City for All'³ strategy in 2020 which outlines a commitment to improve the lives of all residents, prioritising those in need the most. The vision for 'Vibrant Communities' seeks to provide access to support through all stages of life, including a renewed focus on delivering supported living and care home services for the elderly and most vulnerable.

In October 2022, WCC published their 'Truly Affordable Housing Strategy'⁴ which outlines a commitment for the affordable housing provision on all future schemes to be mainly social rented family homes. In line with this, the Council is in the process of applying to the planning authority for a minor material amendment to the consented scheme of a change in tenure, for the 7 intermediate rent units to become available for social rent. This EIA will be updated accordingly once a final decision has been agreed.

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 2021 data to form an understanding of residents living within the area;
- **Section 6: Assessment of potential equality effects** – an assessment 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.

² Westminster City Council (2014). Specialist Housing Strategy for Older People. Available at: [Decision - Specialist Housing Strategy for Older People | Westminster City Council](#)

³ Westminster City Council (2020). City for All: Vision and Strategy. Available at: [City for All Vision and Strategy 2020-21.pdf \(westminster.gov.uk\)](#)

⁴ City of Westminster (2022). Cabinet Report: Truly Affordable Housing. Available at: [Truly Affordable Housing -Cabinet Paper.pdf \(westminster.gov.uk\)](#)

2. Methodology

2.1 Introduction

This section sets out the approach to assessing the equality impacts of the development proposals for Carlton Dene. 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. 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 2021 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 2.3 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 disabled people.

3.3 Regional policy

The London Plan 2021

The London Plan 2021⁶ aims 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.

Better homes for local people - The Mayor's Good Practice Guide to Estate Regeneration (February 2018)

The Mayor's Good Practice Guide to Estate Regeneration sets out the expectations for how local authorities and housing associations should engage with residents as part of all estate

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>

regeneration schemes, whether or not they include the demolition of homes. The guide outlines the Mayor's three Better Homes for Local People principles, specifically:

- **An increase in affordable housing** - Local authorities should consider alternative options for demolition. Should demolition be pursued then like-for-like provision of floorspace for affordable housing on estate regeneration projects should be provided. Gap funding is available through GLA housing grants to ensure financial viability of affordable housing provision if required. Where possible, local authorities should also endeavour to increase the density of estates to maximise potential for an increase in affordable homes. Landlords should adopt local lettings policies for new affordable homes for rent to help ensure that local people benefit from the additional homes being built.
- **Full rights to return or remain for social tenants** - Where estate regeneration plans involve the demolition of existing homes, councils and housing associations should seek to phase projects wherever possible, with the aim of ensuring that households can remain on the estate by moving no more than once. Social tenants who have to move as a result of estate regeneration plans, either through a single move or a temporary move off the estate, should be:
 - provided with a full right to a property on the regenerated estate of a suitable size, at the same or a similar level of rent, and with the same security of tenure. Households who are currently overcrowded should be offered homes large enough for their needs. Households who under-occupy their current homes should not automatically qualify for a new home with the same number of bedrooms. For example, landlords may choose to limit the number of bedrooms offered to under-occupiers to a maximum of one greater than their need.
 - awarded high priority in the local allocations policy should they need to move into a new home temporarily as a result of estate regeneration. Any offer of alternative accommodation should be reasonable, in that it meets the needs of the household in terms of the number of bedrooms and any special requirements (such as wheelchair accessibility or adaptations).
 - offered the maximum home loss compensation permitted by legislation by landlords if they meet the statutory criteria and are displaced from their homes due to estate regeneration.
 - awarded 'disturbance costs' of moving home by the landlord. This means paying the reasonable costs of moving, such as removal costs, telephone and utility connection and installation costs, and the provision of new carpets and curtains. Tenants who must move more than once should receive home loss payments for each move.

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

Where councils or housing associations propose to let homes on short-term tenancies, they should ensure that new tenants are fully informed about any plans to regenerate the estate and are aware of their rights, including how they differ from those on secure tenancies. Short-term tenants should be reminded of these differences to avoid confusion at a later

stage. They should also be given as much advance notice as possible of planned regeneration, so that alternative accommodation can be found if necessary.

3.4 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.

Policy for Tenants in Housing Renewal Areas (August 2019)

The Council's Policy for Tenants in Housing Renewal Areas¹¹ sets out the rehousing options, headline financial compensation and the general processes that will be followed when homes occupied by council tenants need to be acquired. It also sets out the general approach to be taken when homes occupied by other tenants (including private and temporary accommodation) need to be acquired.

The policy states that all tenants will be supported by a named officer and have access to an independent advisor. Additional assistance will be provided to vulnerable tenants and the Council may work with third parties, including family members, social services and health practitioners to identify and address any special needs. Tenants will be entitled to claim two sorts of financial payment:

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

- **A home loss payment** – a statutory payment amount set by the Government to compensate them for having to move at a time which is not of their choosing; and
- **A disturbance payment** – to cover all the reasonable costs of moving. If a tenant has opted to return to the Housing Renewal Area but needs to move away temporarily while the new homes are built, they will be entitled to two disturbance payments.

Council tenants, including secure¹² or flexible¹³ or those in community supportive housing (sheltered housing), have the right to a new social home in the Housing Renewal Area. They have the following options:

- Option 1: Move straight into one of the new social homes, if this is possible; or
- Option 2: Move into another social home in Westminster for a temporary period, but then move into one of the new social homes in the Housing Renewal Area once these are ready.
- Tenants that don't want to move into one of the new homes can also take the following option:
- Option 3: Move into another social home in Westminster, this might be in the same general area, or in another part of Westminster. They could also move into community supportive housing if they are eligible and 60 or over.

For tenants that want to become homeowners:

- Option 4: Tenants will have high priority for any new intermediate homes built in the housing Renewal Area and which are for sale, so they can get on the housing ladder. To qualify for this option, tenants will need to be eligible for 'intermediate housing'¹⁴ and be able to afford to buy the new intermediate homes.

The policy sets out the rehousing process for tenants as follows:

- Stage 1: The Housing Needs Survey – at this stage the tenant considers their options and the Council finds out about who is in the household, the type of new home needed and any particular needs the tenant has.
- Stage 2: The Assessment – at this stage a detailed assessment is undertaken of the size and type of new home needed.
- Stage 3: Rehousing begins – at this stage the option chosen is confirmed in writing and generally cannot be changed. Rehousing will then start.

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

¹² A tenancy that can only be bought to an end by the landlord by a court order and an order will only be granted by the court if one of the statutory grounds for possession is made out and other statutory tests are met.

¹³ A flexible tenancy is a form of secure tenancy with a fixed term.

¹⁴ Intermediate housing refers to housing for working people that aren't eligible for social housing but can't afford market housing. This is let through the Council's intermediate housing service called Homeownership Westminster.

The policy states that every effort to communicate will be made by the Council with private tenants as early as possible to explain what is happening and when. All private tenants will be visited at least once and informed as to where they can get further advice, particularly if they are at risk of being homeless as a result of housing renewal. Those at risk of homelessness will be referred to the Council's Early Intervention Trailblazer Service¹⁵. Additional support will be offered to vulnerable households where it is needed.

The policy was consulted on in January and February 2019 and was also subject to an EIA.

City for All: Vision and Strategy 2020/21

Westminster's City For All Vision and Strategy¹⁶ sets out key commitments to improve residents' lives. It seeks to ensure 'a healthy, sustainable and safe environment' and 'access to high quality, affordable homes' where people can 'retire into the community with dignity and pride'. The strategy is underpinned by three pillars:

- **Greener and Cleaner:** Tackling the climate emergency to create a better place now and to safeguard our city for future generations
- **Vibrant Communities:** Making the most of the incredible opportunities in our city and building much needed housing for our residents
- **Smart City:** Using cutting edge technology to transform council services and improve peoples' lives

The Council commits to building homes for all residents regardless of their background, income level and age, in order to transform its housing services and provide for existing social tenants and leaseholders. In addition, it will focus on designing and delivering services for those most vulnerable, including supported living and care homes for the elderly, so that people can stay in Westminster as their care needs increase. The new buildings are to be designed in line with best practice and make use of assistive technologies to promote independence amongst the most vulnerable residents. Additionally, upgraded council houses will be designed as dementia-friendly, contributing to Westminster's ambition to become a leading "dementia-friendly city".

Furthermore, the city sets out to improve air quality in key areas by setting up zero emission zones, prioritising schools, healthcare centres and other places that are frequented by those most vulnerable people. It also pledges to maintain open spaces in the Borough, making them accessible for all.

Specialist Housing Strategy for Older People

The Specialist Housing Strategy for Older People (SHSOP)¹⁷ identifies that the proportion of older people in Westminster's population is set to rise considerably. Consequently, conditions related to older age, such as dementia, will be more prevalent in the community and there will be a large rise in demand for care services in the Borough. In order to address these current and future needs, existing service provision must improve.

The SHSOP started in 2010 with two key phases. Phase One entailed commissioning Sanctuary as a single service provider to manage existing care home services in the Borough, including Carlton Dene, in partnership with Westminster City Council and the

¹⁵ <https://www.crisis.org.uk/ending-homelessness/resources-for-practitioners/prs-database/westminster-city-council-housing-solutions-trailblazer-service/>

¹⁶ City of Westminster (2020). City for All: Vision and Strategy 2020/21. Available at: <https://www.westminster.gov.uk/sites/default/files/media/documents/City%20for%20All%20Vision%20and%20Strategy%202020-21.pdf>

¹⁷ Westminster City Council (2014). Statement of Decision on Specialist Housing Strategy for Older People. Available at: <https://committees.westminster.gov.uk/documents/d204/Printed%20decision%20Specialist%20Housing%20Strategy%20for%20Older%20People.pdf?T=5>

Central London Clinical Commissioning Group. While Phase Two, the redevelopment phase, sets out to achieve the following objectives:

- Increase the level of nursing care and extra care supported housing provision within the Borough;
- Improve the service models and quality of provision within the Borough; and
- Develop services that are more aligned to the principle of 'home for life' (i.e. flexible services that can meet the needs of residents as they evolve).

4. Summary of the development

4.1 Current site

The Carlton Dene site (outlined in Figure 4-1) is 0.44 hectares and sits within the Maida Vale Ward of Westminster borough. The site is located on the northern side of Carlton Vale and eastern side of Kilburn Park Road. The boundary between Westminster City Council and the London Borough of Brent runs along Kilburn Park Road. The site contains two existing buildings:

- Carlton Dene Residential Care Home: a two-storey building accommodating a 42-bedroom care home facility with two internal courtyards and an off-street parking and servicing area; and
- Peebles House: a three-storey residential block accommodating 9 units.

The surrounding area consists of Westminster Council owned residential blocks, including two six-storey blocks at Melrose House and Keith House to the south and a four-storey residence at Strome House to the east. Hornbill House, a Borough of Brent redevelopment project, sit to the west. St Augustine's Church is situated to the north of the site and is a Grade 1 listed building holding local significance as 'the Cathedral of North London'.

Figure 4-1: Site Location Plan



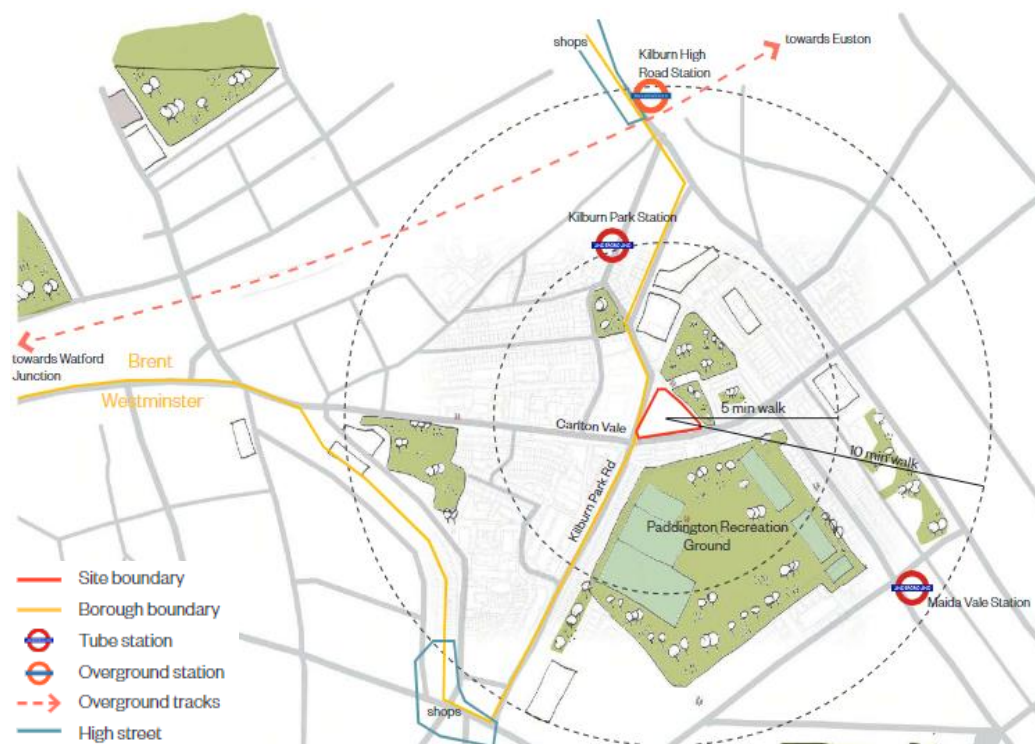
A public footpath runs between the site and Strome House to the east, connecting Carlton Vale and Kilburn Park Road. This forms a link between Paddington Recreation Ground to the south and the Kilburn Master Plan area to the northwest. There is also a landscaped area to the east associated with Strome House and St Augustine's Church.

As shown in Figure 4-2, the site is close to Kilburn Park Underground Station (3-minute walk), Kilburn High Road Overground Station (7-minute walk) and Maida Vale Underground Station (10-minute walk), providing frequent and direct services to Paddington, Oxford Circus and Waterloo. A bus service also runs adjacent to the site along Kilburn Road,

including three day and two night services to destinations in Camden, White City, Fulham and West Hampstead.

The site does not directly intersect with a conservation area. However, it is visible from the South Kilburn Conservation Area to the north and Maida Vale Conservation Area to the south.

Figure 4-2: Local transport connections



4.2 Planning application

The approved planning application includes the following:

- The demolition of Carlton Dene Care Home (42 bedroom residential Care Home) and construction of an Extra Care residential facility (Use Class C3) ranging between 3-6 storeys to provide 65 flats (1bed and 1bed+)
- The demolition of Peebles House (9 residential flats) and construction of a building ranging between 2-6 storeys to provide 22 residential dwellings (Use Class C3);
- The provision of associated communal facilities including café and hairdressers, podium level car parking and landscaping;
- The two components of the development will be linked at ground floor level through a living roofed podium accommodating an internal car parking area below accessed via Carlton Vale Road;
- Eight on-site car parking spaces exclusively for the Extra Care facility, including one blue badge holder space;
- Relocation of on-street car parking spaces to provide new site access for vehicles on Carlton Vale Road;
- 66 long-stay cycle spaces and six short stay cycle spaces for the Extra Care facility; and

- 40 long-stay cycle spaces and four short-stay cycle spaces for the General Needs residential units.

The accommodation schedule split by tenure is shown below in Table 4-1.

Table 4-1: Accommodation schedule¹⁸

| | Extra Care | | | General Needs (social and intermediate rent housing) | | | | | | |
|----------------------------------|------------|--------------|-----------|--|-----------|-----------|-----------|-----------|-----------|-----------|
| | 1B2P (C2) | 1B plus (C2) | 1B2P (C3) | 1B2P (C2) | 1B2P (C3) | 2B4P (C2) | 2B3P (C3) | 3B4P (C2) | 3B5P (C2) | 3B5P (C2) |
| Minimum Area (sqm) | 54 | 59 | 65 | 50 | 72 | 70 | 77 | 84 | 86 | 103 |
| GF | 3 | 1 | 3 | 1 | 1 | - | 1 | - | - | 1 |
| 1F | 3 | 9 | 1 | - | - | 2 | - | 1 | 1 | - |
| 2F | 3 | 11 | - | - | - | 2 | - | 1 | 1 | - |
| 3F | - | 9 | 2 | - | - | 2 | - | 1 | 1 | - |
| 4F | 9 | 1 | - | 1 | - | 1 | - | 1 | - | - |
| 5F | 9 | 1 | - | 1 | - | 1 | - | 1 | - | - |
| % | 31.0 | 36.8 | 6.9 | 3.4 | 1.1 | 9.2 | 1.1 | 5.7 | 3.4 | 1.1 |
| Total dwellings | 27 | 32 | 6 | 3 | 1 | 8 | 1 | 5 | 3 | 1 |
| Total dwellings by tenure | 65 | | | 22 | | | | | | |
| Grand total dwellings | 87 | | | | | | | | | |

4.3 Extra Care units for social rent

Extra Care is self-contained residential accommodation and associated facilities provided as an alternative to residential care for elderly people who prefer more independence despite their frailty. The facilities are designed to meet the needs of older people and provide 24-hour access to emergency support, as residents tend to be older and frailer at the point of entry compared to traditional retirement housing. The range of facilities typically available include a residents' lounge, laundry room, a restaurant or meal provision facilities, classes, and a base for health care workers.

The Carlton Dene Extra Care scheme plans to be 100% social rent, delivering 65 one-bed and one-bed plus¹⁹ apartments. Although it is anticipated that two-thirds of Carlton Dene residents will be eligible for local authority funded care at the time of opening. Local elderly residents will be able to apply first for the extra care housing should they wish and the

¹⁸ Westminster City Council (2020). Design and Access Statement – November 2020. Available at: [20/08040/FULL | Redevelopment of site to provide 'Extra Care' residential facility \(Use Class C3\) ranging between 3-6 storeys with terraces and courtyard and a building ranging between 2-6 storeys to provide residential dwellings \(Use Class C3\); together with the provision of associated communal facilities including cafe and hairdressers, podium level car parking and landscaping. | 45 Kilburn Park Road London NW6 5XD \(westminster.gov.uk\)](https://www.westminster.gov.uk/media/2020/08/2020-08-04-Redevelopment-of-site-to-provide-Extra-Care-residential-facility-Use-Class-C3-ranging-between-3-6-storeys-with-terraces-and-courtyard-and-a-building-ranging-between-2-6-storeys-to-provide-residential-dwellings-Use-Class-C3-together-with-the-provision-of-associated-communal-facilities-including-cafe-and-hairdressers-podium-level-car-parking-and-landscaping-145-Kilburn-Park-Road-London-NW6-5XD-westminster.gov.uk)

¹⁹ The one bed plus unit refers to flats that have an over-sized double bedroom that can be split to create an extra room should the occupier wish to do so.

Council will prioritise residents on the basis of frailty and risk of harm if care and support are absent.

There has been discussion about whether the level of care provided in Extra Care homes is sufficient to classify the use as Class C2²⁰, or whether the independent nature of living requires a C3 classification²¹. While the majority of units are considered Class C2, in the pre-application discussions with officers this application was designated as C3.

4.4 General Needs housing

Affordable housing for social rent

Social housing is provided by Councils to local residents who register to the social housing waitlist, typically low income families and vulnerable individuals. 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.²² 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 Peebles House will deliver 15 social rent residential units (68%). These will be:

- Retained by the Council and available for social rent;
- Comprised of four 1 bedroom units, two 2 bedroom units and nine 3 bedroom units; and
- Allocated to previous tenants first should they choose to return following construction.

Affordable housing for intermediate rent

Intermediate housing is a type of affordable housing targeted at individuals who already live and work in Westminster but struggle to afford market rent and do not qualify for social rent.²³ Residents in Westminster can apply for the intermediate housing waiting list through 'Home Ownership Westminster'.

The redevelopment of Peebles House plans to deliver seven intermediate rent units (32%)²⁴. These will be:

- Retained by the Council and available for intermediate rent;
- Comprised of seven 2 bedroom units; and
- Allocated to previous tenants first should they choose to return following construction.

²⁰ Category 2 accommodation for the elderly considers warden supported self-contained accommodation for the less active elderly, including a full range of communal facilities. Definition available at: [Types of accommodation | Department for Communities \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/types-of-accommodation)

²¹ Category 3 accommodation for the elderly considers supported extra care accommodation for the frail elderly, including a full range of communal facilities. Definition available at: [Types of accommodation | Department for Communities \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/types-of-accommodation)

²² City of Westminster (2023). How to apply for social housing. Available at: [How to apply for social housing | Westminster City Council](https://www.westminster.gov.uk/how-to-apply-for-social-housing)

²³ Westminster Community Homes (2023). Types of Accommodation. Available at: [Types of Accommodation | Westminster Community Homes \(westminstercommunityhomes.org.uk\)](https://www.westminstercommunityhomes.org.uk/types-of-accommodation)

²⁴ The Council is in the process of applying to the planning authority for a minor material amendment to the consented scheme of a change in tenure. If this application is approved, the seven intermediate rent units will become available for social rent. The EIA will be updated accordingly once a final decision has been agreed.

4.5 Construction works

Construction works consists of demolishing the existing 42-bed care home and nine unit residential block and constructing a new Extra Care facility and residential building with a total of 87 new dwellings across 6 storeys.

According to the most recent project programme, demolition of the current site began on 20th March 2023 and completion is expected in June 2023. Following this, mobilisation of the site is expected to take 36 weeks from July 2023 to March 2024. Finally, the main construction period is scheduled for 100 calendar weeks, starting in March 2024 for completion in February 2026.

The construction site will operate Monday to Friday between 08:00 – 18:00. No works will be carried out on Saturdays, Sundays, bank holidays or public holidays. Prior approval will be sought for any construction activities which require operation outside of these hours. Where appropriate, advanced notice of such activities will be provided to neighbouring properties through the Carlton Dene newsletter and website.

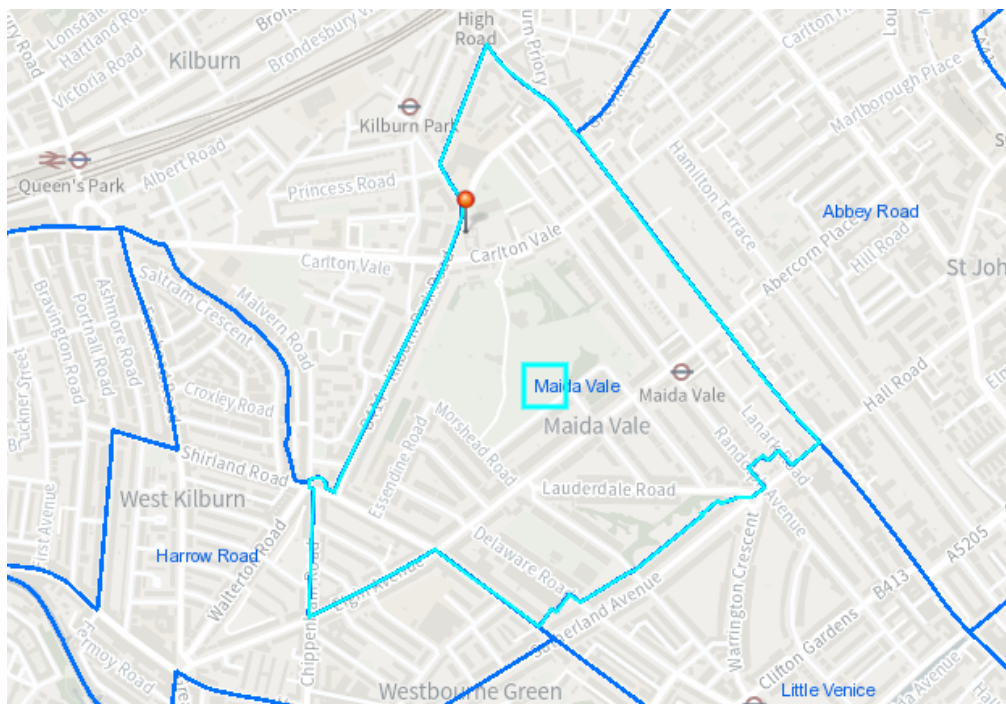
5. Equalities baseline

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, E01004710), the Maida Vale Ward (E05000640), Westminster Borough, and London.

Figure 5-1: Westminster ward boundary, with pin marking location of the proposed development



Source: City of Westminster (2023)²⁵

5.2 Protected characteristics

5.2.1 Population

According to the most recent data available, the Westminster LSOA is home to 1,953 people, while Maida Vale Ward is inhabited by 11,660 people. As Table 5-1 shows, both geographies show a population increase between 2001 and 2021 (by 30.3% and 20.9% respectively). While the remaining geographies also experience population growth, the increase in the LSOA is significantly higher than the increase in Westminster Borough (30.3% compared to 12.7%). A growing population indicates that the demand for housing is continually rising.

²⁵ City of Westminster (2023). Ward finder. Available at: <https://lbhf.maps.arcgis.com/apps/webappviewer/index.html?id=968c0f263cc241d4934638b4d7e81c6b>

Table 5-1 Population size and change (%) by geographical area from 2001 to 2021²⁶

| Year | LSOA | Maida Vale | Westminster | London |
|--------------------------|--------|------------|-------------|-----------|
| 2001 | 1,499 | 9,647 | 181,286 | 7,322,400 |
| 2011 | 1,648 | 10,210 | 219,396 | 8,204,400 |
| 2021 | 1,953 | 11,660 | 204,236 | 8,799,728 |
| Percentage Change | +30.3% | +20.9% | +12.7% | +20.2% |

5.2.2 Age

Table 5-2 provides the population age breakdown in 2021 across four geographical areas. Westminster LSOA has a higher proportion of children aged 0-15 (17.5%) than Maida Vale Ward (16.1%) and Westminster Borough (13.2%). While both Maida Vale and the LSOA have a lower proportion of people aged 65 and over (9.2%) compared to Westminster and London.

The proportion of children at all geographical levels has decreased between 2020 and 2021. The largest decrease can be observed at the LSOA and Ward level, where proportion of children went down from 20.2% to 16.1% in Maida Vale and from 21.6% to 17.5% in the LSOA.²⁷

Table 5-2 Age breakdown (%) by geographical area, 2021²⁸

| Age range (years) | LSOA | Maida Vale | Westminster | London |
|--------------------|------|------------|-------------|--------|
| 0-15 | 17.5 | 16.1 | 13.2 | 19.2 |
| 16-64 | 73.3 | 74.7 | 74.8 | 68.8 |
| 65 and over | 9.2 | 9.2 | 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 Maida Vale the projected increase in the elderly population is around 52%, compared to 35% in Westminster Borough. While child populations are expected to decrease at both the Ward and Borough level. Projections estimate a 53% decrease at the Ward level, compared to only 7% decrease in Westminster generally.²⁹ These population projects support the development of Extra Care homes through Carlton Dene to meet the needs of an ageing population.

The high proportion of children and elderly 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 people³⁰ and lowers health-related quality of life in children³¹. 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.

²⁶ 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>

²⁷ ONS: 2020 Population estimates – small area based by single year of age – England and Wales; 2021 Population estimates – local authority based by five-year age band. All available at:

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

²⁸ ONS (2021) Age by single year (TS007); Age by five-year age bands (TS007A). All available at:

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

²⁹ 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](#)

³⁰ 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

³¹ 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 the 2021 Census, 16.9% of the LSOA population has a disability that limits their day-to-day activities, compared to 14.0% of people at the Ward level. Figures for both Westminster and London are slightly lower (13.8% and 13.2% respectively).

At the LSOA level the proportion of people who reported their day-to-day activities are limited a lot is notably higher than that in other geographies (8.8% compared to 6.3% in Maida Vale, 6.5% in Westminster and 5.7% in London).

Table 5-3 Limiting long-term illness or disability (%) by geographical area, 2021³²

| Level of disability | LSOA | Maida Vale | Westminster | London |
|--|------|------------|-------------|--------|
| Day-to-day activities limited a lot | 8.8 | 6.3 | 6.5 | 5.7 |
| Day-to-day activities limited a little | 8.1 | 7.7 | 7.3 | 7.5 |
| Long-term physical or mental health conditions but day-to-day activities not limited | 3.2 | 4.4 | 4.7 | 5.2 |
| No long-term physical or mental health conditions | 79.9 | 81.6 | 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.³³ 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.

³² ONS (2021): Disability (TS038). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2056>

³³ 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, 2021³⁴

| 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 the population aged 16 and over have never married. The LSOA (54.6%), Ward (53.8%) and Borough (54.4%) level all sit above the London average of 46.2%.

According to the 2021 Census, the proportion of the population who are married is highest in London (39.3%) compared to the other geographies; particularly at the LSOA and Borough level where married population was estimated at 31.6% and 31.1% respectively. Additionally, the LSOA has the smallest divorced population at 6.9%, compared to the Ward (7.4%), Borough (7.6%) and London (7.3%) levels.

The proportion of people aged 16 and over and in a same-sex marriage was the highest in Maida Vale (0.8%) compared to the LSOA (0.5%), Westminster (0.6%) and London (0.4%) levels.

Table 5-5 Legal partnership status (%) by geographical area, 2021³⁵

| Legal partnership status | LSOA | Maida Vale | Westminster | London |
|--|------|------------|-------------|--------|
| Never married | 54.6 | 53.8 | 54.4 | 46.2 |
| Married: opposite sex | 31.6 | 32.6 | 31.1 | 39.3 |
| Married: same sex | 0.5 | 0.8 | 0.6 | 0.4 |
| In a registered civil partnership: opposite sex | 0.1 | 0.2 | 0.1 | 0.1 |
| In a registered civil partnership: same sex | 0.1 | 0.3 | 0.4 | 0.2 |
| Separated | 2.5 | 2.3 | 2.4 | 2.3 |
| Divorced | 6.9 | 7.4 | 7.6 | 7.3 |
| Widowed | 3.6 | 2.6 | 3.4 | 4.2 |

5.2.6 Pregnancy and maternity

Census 2011 data shows that 13.3% of households within the Maida Vale Ward were lone-parent households, of which 8.6% have dependent children. In comparison, lone parents represented 22% of households in the Westminster LSOA, of which 14.3% had dependent

³⁴ ONS (2021). Gender identity (detailed) (TS070). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2087>

³⁵ ONS (2021). Legal partnership status (TS002). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2022>

children.³⁶ The 2021 Census reported a slight decrease in lone-parent households across both geographies, to 12.5% long-parent households with 7% dependent children at the Ward level, and 17.3% long-parent households with 10% dependent children at the LSOA level.³⁷

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 premature births and low birth weights.³⁸

5.2.7 Race

Table 5-6 shows the percentage breakdown of ethnic groups by geographical area. Overall, non-white ethnic groups compose half of the LSOAs population (50.8%), compared to lower proportions in Maida Vale (41.7%), Westminster (44.9%) and London (46.2%).

The Arab population is the largest minority group at both LSOA and Ward level (13.9% and 9.2% respectively), compared to the Borough (7.6%) and London (1.6%) geographies. Black Africans are the second largest minority group in the Westminster LSOA (6.8%) and Maida Vale (4.3%).

Table 5-6 Ethnic group (%) by geographical area, 2021³⁹

| Ethnic group | | LSOA | Maida Vale | Westminster | London |
|---|---|------|------------|-------------|--------|
| White | English, Welsh, Scottish, Northern Irish or British | 20.8 | 29.5 | 28.0 | 36.8 |
| | Irish | 3.0 | 2.3 | 1.8 | 1.8 |
| | Gypsy or Traveller | 0.0 | 0.0 | 0.0 | 0.1 |
| | Roma | 0.6 | 0.9 | 0.7 | 0.4 |
| | Other | 25.8 | 25.6 | 24.6 | 14.7 |
| Mixed/ Multiple Ethnic Groups | White/ Black Caribbean | 0.7 | 0.9 | 1.0 | 1.5 |
| | White and Black African | 0.9 | 1.1 | 1.0 | 0.9 |
| | White and Asian | 1.3 | 2.1 | 1.8 | 1.4 |
| | Other | 2.2 | 3.2 | 2.7 | 1.9 |
| Asian/ Asian British | Indian | 1.8 | 3.0 | 3.9 | 7.5 |
| | Pakistani | 1.5 | 1.0 | 1.2 | 3.3 |
| | Bangladeshi | 3.8 | 2.8 | 3.7 | 3.7 |
| | Chinese | 1.5 | 1.6 | 3.2 | 1.7 |
| | Other Asian | 3.8 | 3.6 | 4.7 | 4.6 |
| Black/ African/ Caribbean/ Black British | African | 6.8 | 4.3 | 8.1 | 7.9 |
| | Caribbean | 2.4 | 1.8 | 2.1 | 3.9 |
| | Other Black | 1.2 | 0.8 | 0.8 | 1.7 |
| Other Ethnic Group | Arab | 13.9 | 9.2 | 7.6 | 1.6 |
| | Other | 7.9 | 6.5 | 5.9 | 4.7 |

³⁶ ONS (2011). Household composition (KS105EW). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=605>

³⁷ ONS (2021). Household composition (TS003). Available at: <https://www.nomisweb.co.uk/query/construct/submit.asp?forward=yes&menuopt=201&subcomp=>

³⁸ 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

³⁹ ONS (2021). Ethnic group (TS021). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

5.2.8 Religion or belief

Among those identifying with a religion, Christians are the majority at the Ward (36%), Borough (37.3%) and London (40.7%) levels. While at the LSOA level Muslims are the largest religious group (34.9%), composing a significantly higher proportion of the population compared to Maida Vale (20.8%), Westminster (20.0%) and London (15.0%). Consequently, the amount of people not identifying with any religion is significantly lower at the LSOA level than the other geographies: 16.5% compared to over 25%.

Table 5-7 Religion or belief (%) by geographical area, 2021⁴⁰

| Religion | LSOA | Maida Vale | Westminster | London |
|----------------------------|------|------------|-------------|--------|
| Christian | 31.2 | 36.0 | 37.3 | 40.7 |
| Buddhist | 0.7 | 0.9 | 1.3 | 0.9 |
| Hindu | 0.6 | 1.6 | 2.2 | 5.1 |
| Jewish | 0.6 | 2.7 | 2.8 | 1.7 |
| Muslim | 34.9 | 20.8 | 20.0 | 15.0 |
| Sikh | 0.1 | 0.3 | 0.3 | 1.6 |
| Other religion | 0.9 | 1.0 | 0.9 | 1.0 |
| No religion | 16.5 | 26.8 | 25.9 | 27.1 |
| Religion not stated | 14.6 | 9.9 | 9.4 | 7.0 |

5.2.9 Sex

Table 5-8 reveals that Westminster LSOA has slightly higher proportion of female residents (50.6%) compared to males (49.4%). This observation is consistent across all four geographies, although the Maida Vale Ward presents the largest proportion of females compared to males, at 52.0% and 48.0% respectively.

Table 5-8 Proportion (%) of residents by sex and geographical area, 2021⁴¹

| Sex | LSOA | Maida Vale | Westminster | London |
|---------------|------|------------|-------------|--------|
| Female | 50.6 | 52.0 | 51.6 | 51.5 |
| Male | 49.4 | 48.0 | 48.4 | 48.5 |

According to 2021 estimates, life expectancy in the Maida Vale Ward is 85.9 for females, and 80.8 for males.⁴² Although females tend to live longer than men across all these geographies, life expectancies are lower at the Ward level than in the Borough and slightly higher than in London. Females live an average of 87 years in Westminster Borough and 84 years in London, while males an average of 85 in the Borough and 80 years in London.⁴³

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

⁴⁰ ONS (2021). Religion (TS030). Available at:

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

⁴¹ ONS (2021). Sex (TS008). Available at:

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

⁴² ONS (2021). Life expectancy by census ward. Male and Female. Available at:

<https://www.ons.gov.uk/visualisations/dvc479/map/index.html>

⁴³ ONS (2021). Life expectancy estimates, all ages, UK. Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyestimatesallagesuk>

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, 2021⁴⁴

| 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 Carlton Dene housing development is in one of the 30% most deprived LSOAs of England and Wales.⁴⁵

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
- 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.

⁴⁴ ONS (2021). Sexual orientation (detailed) (TS079). Available at:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2086>

⁴⁵ 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>

5.3.2 Employment

The Carlton Dene development sits 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.⁴⁶

Table 5-10 below indicates both economic activity and inactivity levels of populations at varying geographical levels. Of those who are economically active in the LSOA, 52.1% are in employment while 5.8% are unemployed. This is the highest percentage of unemployment across all geographies. Additionally, the LSOA has the highest percentage of economic inactivity (40%) compared to the Ward (31.6%), Borough (37.9%) and London (33.8%) levels.

The Ward level has the highest percentage who are in employment (61.3%), compared to the LSOA (52.1%), Westminster (55.6%) and London (59.4%). The LSOA also has the highest percentage of economic inactivity (40%) compared to the Ward (31.6%), Borough (37.9%) and London (33.8%) levels.

Table 5-10 Economic activity status (%) by geographical area, 2021⁴⁷

| Economic activity status | LSOA | Maida Vale | Westminster | London |
|---|------|------------|-------------|--------|
| Economically active: in employment | 52.1 | 61.3 | 55.6 | 59.4 |
| Economically active: unemployed | 5.8 | 5.1 | 4.0 | 4.1 |
| Economically inactive | 40.0 | 31.6 | 37.9 | 33.8 |

Table 5-11 presents a detailed breakdown of employment sectors by geographical area for 2021. At the Ward level, the majority (70.4%) of residents work as managers, directors, senior officials, in professional occupations and associate professional & technical occupations compared to 57% at the LSOA level. Notably, the LSOA has a relatively higher proportion of people in caring, leisure & other service occupations (10%) compared to Maida Vale (6%), Westminster (6.1%) and London's (7.7%).

⁴⁶ 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>

⁴⁷ ONS (2021). Economic Activity status (TS066). Available at: <https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=>

Table 5-11 Employee jobs by broad sector group (%) across different geographical areas, 2021⁴⁸

| Occupation | LSOA | Maida Vale | Westminster | London |
|--|------|------------|-------------|--------|
| Managers, directors, senior officials | 18.4 | 20.1 | 22.5 | 14.6 |
| Professional occupations | 22.3 | 31.8 | 30.6 | 25.8 |
| Associate professional & technical occupations | 16.3 | 18.5 | 17.3 | 15.3 |
| Administrative & secretarial occupations | 6.9 | 6.7 | 6.6 | 8.5 |
| Skilled trades occupations | 5.4 | 3.7 | 3.4 | 7.5 |
| Caring, leisure & other service occupations | 10.0 | 6.0 | 6.1 | 7.7 |
| Sales & customer service occupations | 6.2 | 5.2 | 5.1 | 6.3 |
| Process plant / machine operatives | 5.2 | 2.7 | 2.7 | 5.0 |
| Elementary occupations | 9.2 | 5.5 | 5.7 | 9.2 |

The proposed Carlton Dene development sits within the top 20% most deprived LSOAs in England and Wales in terms of income deprivation.⁴⁹ In 2017, median household income in Maida Vale Ward was £42,600, which is only slightly lower than that of Westminster £42,800.⁵⁰ Additionally, in the same year, the average lower quartile income was £27,500.

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.⁵¹

5.3.3 Education

Table 5-12 below presents levels of educational attainment at various geographies. Westminster LSOA has the largest proportion of residents with no qualifications (18.2%), compared to the Ward (12.2%), Westminster (12.9%) and London (16.2%) geographies. While Maida Vale Ward has the highest proportion of residents with qualifications level 4 and above (59.2%), compared to 43.2% at the LSOA level.

⁴⁸ ONS (2021). Occupation (TS063). Available at:

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

⁴⁹ Ministry of Housing, Communities & Local Environment (2019). English indices of deprivation 2019. Search result: Westminster 002D LSOA. Income Deprivation Domain. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁵⁰ City of Westminster (2018). Maida Vale Ward profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster,providing%20sporting%20facilities%20and%20open%20space%20for%20all.>

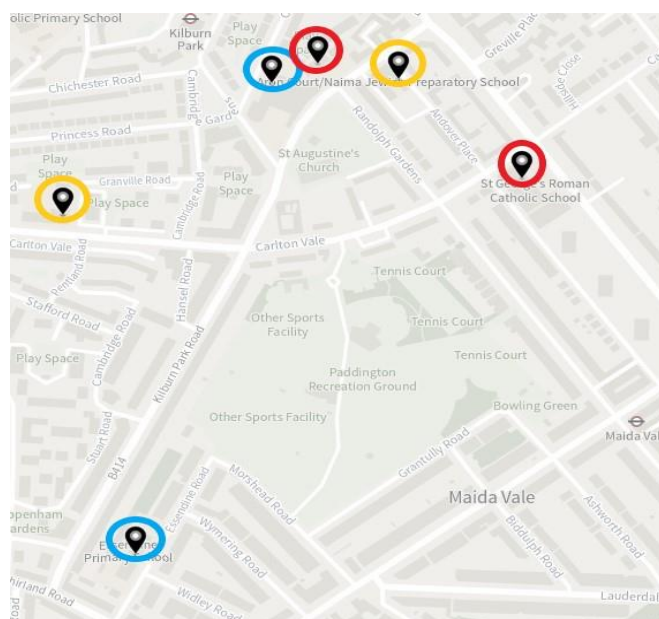
⁵¹ City of Westminster (2020). Westminster Employment Service. Background Information for Scrutiny Committee. Available at: <https://committees.westminster.gov.uk/documents/s39523/WES%20Presentation%20091120.pdf>

Table 5-12 Educational attainment (%) by different geographical area, 2021⁵²

| Educational attainment | LSOA | Maida Vale | Westminster | London |
|----------------------------------|------|------------|-------------|--------|
| No qualifications | 18.2 | 12.2 | 12.9 | 16.2 |
| Level 1 qualifications | 7.5 | 5.7 | 4.9 | 7.7 |
| Level 2 qualifications | 10.4 | 7.6 | 6.9 | 10.0 |
| Apprenticeship | 2.7 | 1.8 | 2.1 | 3.2 |
| Level 3 qualifications | 13.2 | 10.8 | 12.4 | 13.2 |
| Level 4 qualifications and above | 43.2 | 59.2 | 57.7 | 46.7 |
| Other qualifications | 4.8 | 2.7 | 3.2 | 3.1 |

There are no schools within the immediate site. However, as indicated in Figure 5-2, there are two primary schools (in blue) within the Westminster LSOA: St Augustine's CofE Primary and Essendine Primary. There are also two secondary schools (in red): St Augustine's CofE Highschool and St George's Roman Catholic Secondary School in the neighbouring LSOA, within Maida Vale Ward bounds. In addition, there are two independent schools in the area (in yellow): Naima Jewish Preparatory School and the School of the Islamic Republic of Iran.

Figure 5-2: Location of schools in Maida Vale Ward



Source: London Datastore. (2023)⁵³

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.⁵⁴ On the other hand, life expectancy for men and women is higher than the national average. Despite this, life expectancy in Westminster can vary drastically depending on the

⁵² ONS (2021). Highest level of qualification (TS067). Available at: [Westminster Employment Services](https://www.nomisweb.co.uk/query/construct/summary.asp?menuopt=200&subcomp=)

⁵³ Mayor of London (2023). School Atlas. Filter: State-funded schools. LSOAs. Available at: <https://apps.london.gov.uk/schools/>

⁵⁴ 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>

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.⁵⁵

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.

In terms of health facilities in the Ward, there are two general practices observable on Google Maps⁵⁶: Third Floor Medical Centre and Maida Vale Medical Centre. Additionally, Kilburn Park Medical Centre located on Albert Road⁵⁷, which while outside the Ward bounds, is relatively close to the site and the proposed Carlton Dene development sits within the practice’s catchment area.⁵⁸ There are no opticians in the Ward, but there are two dental practices: The Dental Design Studio and Elgin Dental Care and Implant Clinic.⁵⁹

5.3.5 Housing

In 2017, there were approximately 4,663 residential properties in Maida Vale Ward.⁶⁰ According to the 2021 Census, as shown in Table 5-13, the majority (45.9%) of households in Westminster LSOA were socially rented, while 29.8% were privately rented. The proportion of socially rented houses in the LSOA is significantly higher than that of Maida Vale (27%), Westminster (28.3%) and London (23.1%), and consequently the lowest proportions of private rented. The data also indicates that at the LSOA level 23.5% of houses are owned, compared to 29.6% at the Ward level. This is significantly lower than the London proportion of 45.2% households being owned.

Table 5-13 Tenure (%) by geographical area, 2021⁶¹

| Tenure | LSOA | Maida Vale | Westminster | London |
|----------------|------|------------|-------------|--------|
| Owned | 23.5 | 29.6 | 27.4 | 45.2 |
| Social rented | 45.9 | 27.0 | 28.3 | 23.1 |
| Private rented | 29.8 | 42.6 | 43.3 | 30.0 |

The median property price for Maida Vale Ward was £807,000 in 2017, which is 24% less than the median price in Westminster by 24%.⁶²

Table 5-14 shows occupancy rates (based on the ONS definition – number of bedrooms occupied)⁶³ derived from 2021 Census. Notably, there is a significantly higher proportion of

⁵⁵ ibid

⁵⁶ Google Maps (2023). Accessed in April 2023.

⁵⁷ Kilburn Park Medical Centre. Practice Boundary Area. Available at: <https://kilburnparkmedicalcentre.co.uk/new-patients/catchment-area/>

⁵⁸ Primary Care NHS. (2023). Practice Boundary Area. Available at: <https://www.primarycare.nhs.uk/publicfn/catchment.aspx?oc=E84042&h=400&w=600&if=0>

⁵⁹ Google Maps (2023). Accessed in April 2023.

⁶⁰ City of Westminster (2018). Maida Vale Ward profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster,providing%20sporting%20facilities%20and%20open%20space%20for%20all>

⁶¹ ONS (2021). Tenure (TS054). Available at:

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

⁶² City of Westminster (2018). Maida Vale Ward profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster,providing%20sporting%20facilities%20and%20open%20space%20for%20all>

⁶³ 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.

overcrowded households at the LSOA level (19.1%), compared to the Ward (11.2%), Borough (10.3%) and London (11.1%) levels.

Table 5-14 Household overcrowding and under-occupation (%) by geographical area, 2021⁶⁴

| Overcrowding (bedrooms) | LSOA | Maida Vale | Westminster | London |
|-------------------------|------|------------|-------------|--------|
| +2 above standard | 8.7 | 10.8 | 12.2 | 21.8 |
| 1 above standard | 18.9 | 30.3 | 26.5 | 27.1 |
| Standard | 53.3 | 47.8 | 51.1 | 40.0 |
| 1 below standard | 13.6 | 9.0 | 8.1 | 8.9 |
| 2+ below standard | 5.5 | 2.2 | 2.2 | 2.2 |

5.3.6 Transport and connectivity

Maida Vale Ward has very good public transport accessibility compared to other areas of London.

There are several underground tube stations nearby: Kilburn Park (3-minute walk) and Kilburn High Road Overground Station (7-minute walk) which lie north of the Ward; and Maida Vale (10-minute walk) southeast of the site. The stations provide access to the Bakerloo line linking the area directly with Paddington, Oxford Circus and Waterloo, as well as to the London Overground which provides a service to London Euston. The nearest major rail station is Paddington to the south, about 30-minute walk from the site. Paddington rail station provides access to various tube lines and serves as a link to Heathrow Airport and Great Western Railway.

There is a bus stop within the immediate site (1 minute walk) which is served by several day services: 31 (Camden to White City), 328 (Golders Green to Chelsea Worlds End) and 316 (Mora Road to White City), as well as night services: N28 (Bayham St to Mapleton Crescent) and N31 (Bayham St to Clapham Junction).⁶⁵

There is also a public footpath between the site and Strome House, which provides a connection between Carlton Vale and Kilburn Park Road, as well as between the site and Paddington Recreation Ground.

The site has a Public Transport Accessibility Level (PTAL) output of 6a, which is very high considering the 0-6 scale.⁶⁶ Figure 5-3 indicates that the proposed Carlton Dene development has high levels of accessibility compared to the surrounding area, due to several underground stations nearby, as well as immediate access to both day and night bus service.

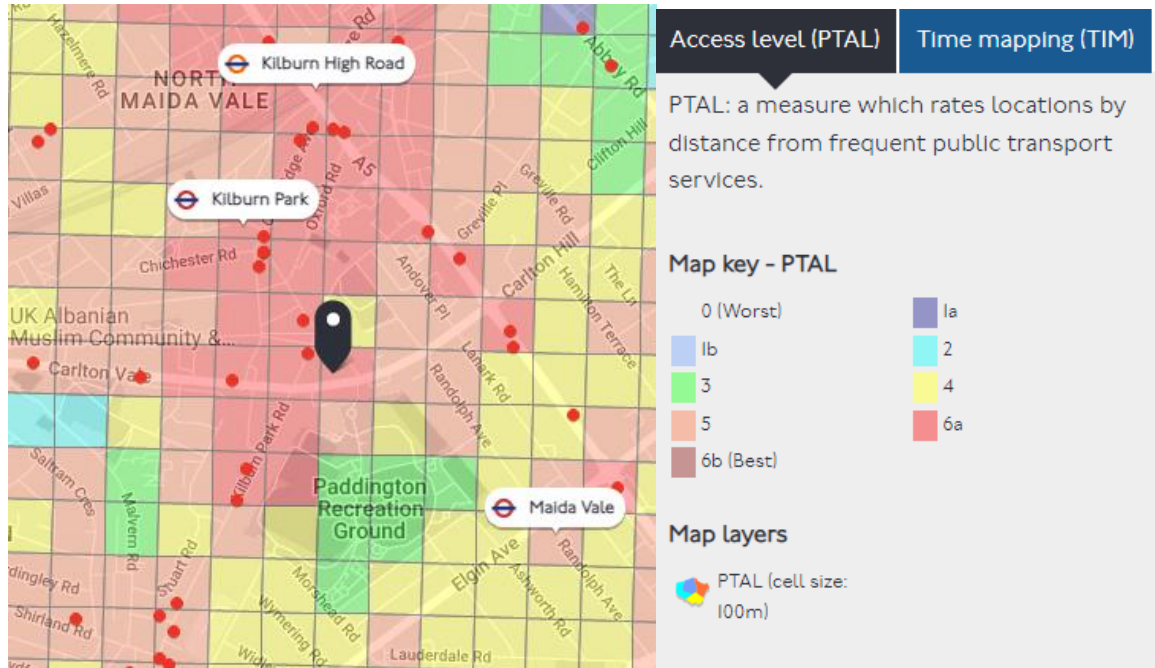
⁶⁴ ONS (2021). Occupancy rating for bedrooms (TS052). Available at:

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

⁶⁵ Transport for London (2023). Stations, stops & piers. Search result: Carlton Vale. Available at: [Stations, stops & piers - Transport for London \(tfl, https://tfl.gov.uk/travel-information/stations-stops-and-piers/gov.uk\)](https://tfl.gov.uk/travel-information/stations-stops-and-piers/gov.uk)

⁶⁶ Transport for London (2023). Public Transport Accessibility Level. Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

Figure 5-3: PTAL access levels



Source: Transport for London (2023)⁶⁷

The proposed development plan includes over 100 long-term cycle spaces, which may encourage physical activity and commuting by cycling and therefore have a positive impact on the health of tenants, particularly given that the site is relatively accessible by cycling.

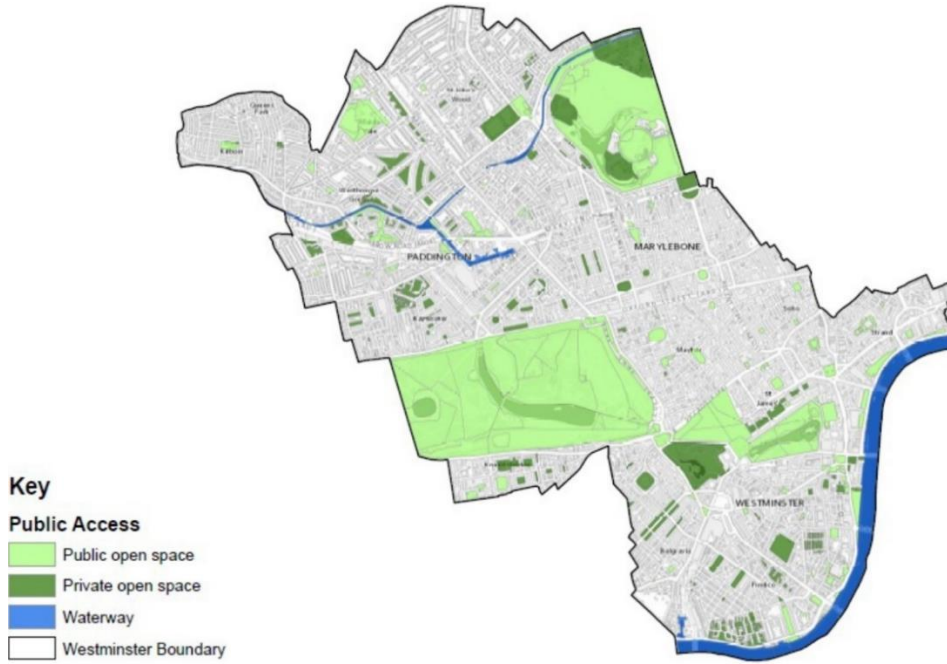
5.3.7 Public realm and open space

Paddington Recreation Ground is the closest open space, located off Carlton Vale and accessible via a public footpath running between the site and Strome House. The park has a variety of sports facilities, walking paths and a playground. In addition, the site is near Randolph Gardens Open Space (less than 0.1 mile north) as well as another playground and open area to the west along Carlton Vale (0.2 miles away).

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

⁶⁷ ibid

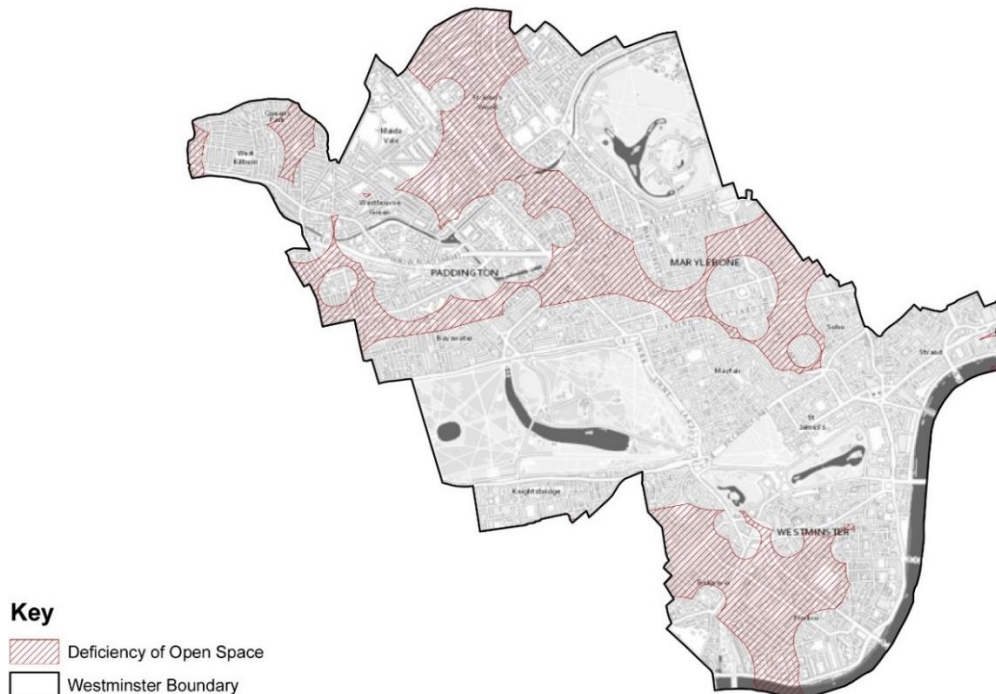
Figure 5-4: Westminster Map of Open and Green Spaces



Source: City of Westminster (2019)⁶⁸

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, Maida Vale Ward is not an open space-deficient area.

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



Source: City of Westminster (2019)⁶⁹

⁶⁸ 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>
⁶⁹ ibid

5.3.8 Safety and security

In February 2023, the top three reported crimes within Maida Vale Ward were violence and sexual offences (21 instances), followed by anti-social behaviour (16 instances) and other theft (10 instances).⁷⁰ The Ward had a rate of 5.4 crimes per 1,000 residents for this monthly period, compared to 27.2 across the Borough.⁷¹

Over the last two years, from 1st April 2021 to 31st March 2023, the Metropolitan Police Service recorded 360 crimes in the Westminster LSOA, majority of which were violence against a person without injury (78 instances), followed by violence against a person with injury (53 instances), other theft (48 instances) and public fear alarm or distress (30 instances). Violence without injury was also recorded amongst the top three most frequent crimes in the Ward and Borough geographical levels within the same period.⁷² The 2021 City Survey showed that 83% of the Ward residents feel “very safe” in the area and 14% feel “fairly safe”.⁷³

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 City Survey 2017, 88.14% of the community within Maida Vale Ward agree that people from different backgrounds get on well.⁷⁴ In 2021 City Survey, 94% thought that “People showing hostility or prejudice based on disability, race, religion, transgender identity or sexual orientation” is not a problem in the area.⁷⁵

In terms of civic engagement, in the City Survey 2017 about 16.2% of the residents spend “a great deal” or “a fair amount” of time helping to improve the community, while further almost 30% declare they are “very” or “fairly” interested in helping to improve the community.⁷⁶ No data was available for the 2021 City Survey.

⁷⁰ Metropolitan Police (2023). Maida Vale. Top reported crimes in this area. Available at: <https://www.met.police.uk/area/your-area/met/westminster/maida-vale/about-us/top-reported-crimes-in-this-area>

⁷¹ 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>

⁷² Metropolitan Police (2023). Recorded Crime: Geographic Breakdown. MPS LSOA Level Crime; MPS Ward Level Crime; MPS Borough Level Crime. Available at: <https://data.london.gov.uk/dataset/recorded-crime-summary>

⁷³ City of Westminster (2021). Maida Vale profile. Available at: https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjG_LGszbP-AhW8RkEAHf1SBQgQFnoECACQAQ&url=https%3A%2F%2Fwww.westminster.gov.uk%2Fmedia%2Fdocument%2Fmaida-vale-ward-profile---2022&usq=AOvVaw34b6_frGx-RjuEJWp7DqHd

⁷⁴ City of Westminster (2018). Maida Vale profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster.providing%20sporting%20facilities%20and%20open%20space%20for%20all>

⁷⁵ City of Westminster (2021). Maida Vale profile. Available at: https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjG_LGszbP-AhW8RkEAHf1SBQgQFnoECACQAQ&url=https%3A%2F%2Fwww.westminster.gov.uk%2Fmedia%2Fdocument%2Fmaida-vale-ward-profile---2022&usq=AOvVaw34b6_frGx-RjuEJWp7DqHd

⁷⁶ City of Westminster (2018). Maida Vale profile. Available at: <https://www.westminster.gov.uk/sites/default/files/maida-vale-ward-profile.pdf#:~:text=Maida%20Vale%20ward%2C%20in%20the%20north-west%20of%20Westminster.providing%20sporting%20facilities%20and%20open%20space%20for%20all>

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 Carlton Dene Housing development. It considers:

- Beneficial and adverse operational impacts on future residents of the site; and
- Direct and indirect construction impacts on surrounding residents to the site.

The assessment is based on the development as set out in the planning application (2020). 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 • Increase in general needs housing for local people • High-quality housing meeting the needs of residents • Improvement in living conditions of previous tenants through relocation |
| 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 impacts of demolition and construction on local residents and businesses |
| Wider impacts | <ul style="list-style-type: none"> • Provide employment and educational opportunities, for disadvantaged and underrepresented groups |

6.2 Housing

6.2.1 Potential beneficial impacts

Net increase in Extra Care housing in Westminster

The development will result in a net increase of 65 Extra Care units. The provision of accommodation with 24/7 emergency care and support could enable elderly people who are frailer to remain independent and maintain positive mental wellbeing.

The Maida Vale Ward has an ageing population, with the percentage of over 65's expected to increase by 57% by 2040. This development responds to the predicted increase in demand for care provision and services responding to changing care needs in the future. The Council plan to prioritise local need through approaching the elderly population of Maida Vale when first assigning these Extra Care homes.

Further, these Extra Care units will be available for social rent should the residents not be eligible for local authority funded care. Evidence reveals that Maida Vale sits in the top 20% most deprived areas nationally for Income Deprivation Affecting Older People Index (IDAOPI). Therefore, this development could particularly benefit over 65's who would like to maintain independence however struggle to afford market rent.

Net increase in wheelchair accessible housing in Westminster

The development will result in a net increase of wheelchair accessible units. The provision of accessible housing could enable disabled older people or elderly people with limited mobility to remain at home living independently.

The London Plan Policy 3.8 states that 10% of all new developments should meet Building Regulation requirement M4(3) 'wheelchair user dwelling'. This means they must be wheelchair accessible or easily adaptable for wheelchair users. Consequently, 9.2% of flats in block 6 and 9.1% within block 2 have been designed in compliance with these accessibility requirements, which is as close to 10% as practicable.⁷⁷ These dwellings have wheelchair charging spaces at the entrance, wheelchair accessible shower rooms and private amenity space suitable for wheelchair users. This demonstrates WCC's consideration for accessibility and inclusivity when designing these homes to meet the mobility needs of the local population.

These homes will be available for social rent should the resident not be eligible for local authority funded care. The provision of affordable homes could also alleviate financial pressures of market rent for disabled elderly people who typically face additional living costs.

Net increase in social rent housing in Westminster

The application includes the provision of 22 new general needs units, of which 15 will be available for social rent.

The Westminster Supply and Allocation of Social Housing report⁷⁸ reveals a high demand for, and insufficient supply of, affordable housing in the Borough. 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. Specific groups with high needs for access to housing and high representation amongst those living in Westminster include people from Black, Asian and Middle Eastern households, women, and households with children and lone parents.⁷⁹

These homes will be retained by the Council and made available through the social housing waiting list. The Supply and Allocation of Social Housing 2022/23 Cabinet Report 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. 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. These projections should inform the LLP for the Carlton Dene development and prioritise local residents within these key groups, particularly the 2,300 homeless households on the housing register and 8.7% of homes that are overcrowded.

The addition of new social housing on the site will help to address supply needs and benefit those from protected groups who are highly represented on social housing waiting lists.

⁷⁷ City of Westminster (2020). Planning Statement. Available at: [20/08040/FULL | Redevelopment of site to provide 'Extra Care' residential facility \(Use Class C3\) ranging between 3-6 storeys with terraces and courtyard and a building ranging between 2-6 storeys to provide residential dwellings \(Use Class C3\); together with the provision of associated communal facilities including cafe and hairdressers, podium level car parking and landscaping. | 45 Kilburn Park Road London NW6 5XD \(westminster.gov.uk\)](#)

⁷⁸ Westminster Council (2018) Cabinet Report: Supply and Allocation of Social Housing 2022-23. Available at: [Decision - Supply & Allocation of Social Housing Report 2022-2023 | Westminster City Council](#)

⁷⁹ 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](#)

Net increase in intermediate rent housing

The application includes the provision of 22 new general needs units, of which 7 will be available for intermediate rent.⁸⁰

As above, specific groups with high needs for access to housing and high representation amongst those living in Westminster include people from Black, Asian and Middle Eastern households, women, people aged 25-44 and 45-65, households with children and lone parents.⁸¹ These groups could particularly benefit from new housing associated with the proposals, except where affordability barriers could limit these opportunities.⁸² While the median annual income in Maida Vale is only slightly below Westminster, at £42,600 and £42,800 respectively, those on a lower quartile income at the Ward level receive £27,500 and, as such, intermediate rent housing in the area may be beyond the means of many local residents who need it most. The Council is yet to determine the rent levels for the new housing and it is recommended that this should include a mix of lower rental quartile and London Living rent⁸³ to help to make it more affordable to local people.

Increased affordable housing provision for local residents

The Allocation Scheme reveals a high demand for, and insufficient supply of, affordable housing in the Borough. Evidence also reveals a high take-up of affordable housing in the local area surrounding Carlton Vale. Affordable social rent currently composes 45.9% of rent in the LSOA compared to 28.3% at the Borough level. Thereby, this development is meeting the housing needs of the local population.

The development could bring particular benefit to vulnerable groups within the local area. Protected characteristic groups are typically overrepresented across applications for the affordable housing register. Evidence reveals that specific groups with high needs for access to housing and a high representation amongst those living in the LSOA include disabled people, ethnic minorities, Muslims, overcrowded households and unemployed people.

The Council plan to first rehouse the 8 previous tenants in the new general needs units. For the remaining units, the Council should develop a Local Lettings Plan to prioritise meeting local housing need in line with the Council's Housing Allocations Policy. The Westminster Housing Allocation Scheme⁸⁴ (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.

Improved living conditions for new residents

Carlton Vale Residential Care Home and Peebles House no longer meets modern design standards and would require significant investment to maintain occupation. In particular, structural issues with the balconies have been identified at Carlton Vale, alongside major works required on the heating system.

⁸⁰ The Council is in the process of applying to the planning authority for a minor material amendment to the consented scheme of a change in tenure. If this application is approved, the seven intermediate rent units will become available for social rent. The EIA will be updated accordingly once a final decision has been agreed.

⁸¹ 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](#)

⁸² Human City Institute (2017). Forty Years of Struggle: A Window on Race and Housing, Disadvantage and Exclusion. Available at: [Content blocked by your organization \(wordpress.com\)](#)

⁸³ London Living Rent levels are derived from average local incomes and ward-level house prices using a multi-stage process. Broadly, the rent for a 2-bedroom property is based on one-third of the local median household income, and across London as a whole comes to around £1,030 a month, or two thirds of the median monthly market rent in London of £1,500 reported by the Valuation Office Agency for 2018/19. Rents for LLR homes vary according to their number of bedrooms. Using the twobedroom rents for each ward as a benchmark, the rent for a 1-bedroom home is 10% lower, for a 3-bedroom home 10% higher and for a 4-bedroom home 20% higher. As a final affordability safeguard, the rent for any individual unit must be at least 20% below its assessed market rent. [London Living Rent | London City Hall](#)

⁸⁴ City of Westminster (2020). Housing Allocation Scheme March 2020. Available at: [Allocations scheme | Westminster City Council](#)

Consequently, the new development has paid particular attention to the national and regional design standards during the design process. All apartments have been designed in line with the policies of the London Plan outlined in Chapter 3, and consequently meet the Nationally Described Space Standards⁸⁵. While all flats are compliant with the Part M Category 2 accessibility standards⁸⁶ and wheelchair accessible units are compliant with Part M Category 3 accessibility standards, representing ~10% of new homes in the development in line with the London Plan policy D7.

However, WCC have enhanced the design of extra care homes in accordance with recent guidance on the design of housing for older people in the 'Housing our Ageing Population: Panel for Innovation' report.⁸⁷ The enhanced design acknowledges that older residents are likely to spend more time indoors and provides circulation spaces to encourage interaction and mutual interdependence. The development also reflects best practice in dementia design through simple logical layouts and enables residents to age in place through the provision of adaptable spaces for mobility and cognition needs. Further, enhanced public realm delivers accessible recreation, gathering and positive aesthetics for the less mobile elderly. Thereby, WCC have demonstrated their PSED through going above and beyond the national design standards and tailoring Carlton Vale to the needs of older residents.

Improved living conditions for previous residents

The site was previously known as Carlton Dene Residential Care Home and provided specialist care for 42 elderly residents, the majority of which had dementia. In Summer 2020, these residents were relocated to Beachcroft House, a brand-new care home facility, as a result of Carlton Dene no longer meeting modern design standards and requiring significant investment to maintain occupation.

The new development is located in North Westminster in Maida Vale, 0.6 miles from Carlton Vale, and was specifically developed for the relocation of Carlton Dene residents and other residents of care homes undergoing redevelopment. Beachcroft House comprises an 84-bed residential care home for elderly patients with disabilities and dementia as part of Westminster's Specialist Housing Strategy for Older People. The development provides additional features to Carlton Dene including a shared community space with a library, lounge, cinema room, assisted bathrooms and outside space. There were no planning application objections submitted against Beachcroft House. Therefore, indirect positive impacts of this project include an increased standard of living of the previous care home residents.

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 Carlton Dene housing 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,

⁸⁵ Gov.uk (2015). Technical Housing Standards – nationally described space standard. Available at: [Technical housing standards – nationally described space standard - GOV.UK \(www.gov.uk\)](https://www.gov.uk/technical-housing-standards-nationally-described-space-standard)

⁸⁶ HM Government (2015). Access to and use of buildings: approved document M. Available at: [BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/44444/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf)

⁸⁷ Housing our Ageing Population Panel (2009). Housing our Ageing Population: Panel for Innovation'. Available at: [Happi_Final_Report.pdf \(housinglin.org.uk\)](https://www.housinglin.org.uk/Happi_Final_Report.pdf)

including people with protected characteristics, will depend in part on engagement efforts to reflect their views in the planning process.

As part of the development of the proposals, regular and effective engagement and consultation has been undertaken with affected parties. WCC have undertaken three rounds of consultation at different stages of the design process to enable the input of local residents to influence change. Consequently, the Council have balanced the priorities of residents with a commitment to delivering extra care and general needs housing in the Borough. The majority of comments received during consultation were supportive of the Carlton Dene development, while any outstanding comments seeking clarification were addressed through further rounds of consultation.

In particular, the Council held an engagement activity exclusively for current residents of Carlton Dene and Peebles House to consult on two development options.⁸⁸ This enabled the population most affected by the proposals to be approached first and inform the decision making process. Residents of Carlton Dene and their families were supportive of relocation to the modern and dementia friendly Beachcroft development. While residents of Peebles House were mostly supportive of the decision to redevelop their block as a result of it no longer meeting modern design standards. As a result of the majority in support, in April 2019 the Council made the decision to close Carlton Dene and redevelop Peebles House.

The Council extended their engagement to local stakeholders through five formal meetings held across two consultation periods between July and October 2020. These stakeholders had a particular interest in the proposals and included local residents, local businesses, Ward Councillors and St Augustine Church stakeholders. These formal meetings established an open dialogue between local stakeholders and the Council which informed stakeholder-led design changes. For example, following concerns regarding the height of the new building, the Council stepped the new development back on the South side to ensure minimal light impact on residents of Thurso House and Strome House, as well as commissioning images setting the proposals in context to demonstrate how visual impacts on St Augustine's Church have been minimised.

To facilitate an inclusive and far-reaching consultation period, the Council used both digital and traditional approaches to communication. The digital approach engaged with stakeholders through a consultation website and online feedback form, alternatively a dedicated email inbox was set up to collect feedback and questions. The Council also sent 173 emails directly to residents in adjacent council homes who sit in closest proximity to the development site. While the traditional approach was used to reach local stakeholders who were otherwise technologically excluded, especially elderly, disabled and low income individuals. The Council sent over 4,700 letters and 183 booklets to local households so all residents who may experience direct impacts could engage with the proposals during the design stage. A dedicated phone line and postal address were also set up for feedback and WCC proactively called 121 (out of 174) adjacent council block homes. Across both consultation periods, the majority of responses expressed positive support for the proposals (76% in the first round and 75% in the second). Therefore, through informing and engaging with the population most affected by the proposals, the Council have further fulfilled their equality duty.

The Council is undertaking ongoing engagement with local residents through the publication of the monthly newsletter 'Carlton Vale News'⁸⁹. The purpose of this newsletter is to inform local residents on current and upcoming stages of the development.

Once the contractor has been appointed in April 2023, continual engagement will also be undertaken by a Resident Liaison Officer. The Liaison Officer will have a specific phone

⁸⁸ The Council proposed two options for consultation. Option one planned to close Carlton Dene for extensive refurbishment and Peebles House would remain as it is, and option two proposed the closure of Carlton Dene for redevelopment into a new Extra Care home and to demolish Peebles House for redevelopment.

⁸⁹ City of Westminster (2023). Carlton Vale News. Available at: [Carlton Dene and Peebles House | Westminster City Council](#)

number and email contact for resident queries to be filtered directly to the contractor. This demonstrates that the Council recognise that the needs of local residents should be heard and safeguarded throughout the construction process.

6.3.2 Potential adverse impacts

The Carlton Dene 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 have implemented mitigation against these as a fulfilment of their PSED outlined in the Equality Act 2010.

Construction impacts on local residents

Local residents and businesses along Kilburn Park Road and Carlton Vale are likely to experience construction impacts as a result of the development including adverse noise and air quality impacts.

These impacts are likely to be exacerbated as a result of cumulative construction impacts associated with further Brent and Westminster redevelopment projects being undertaken in the local area. For example, Brent Council have recently constructed Hornbill House opposite the Carlton Dene site. This is a 6-storey 235 flat development in partnership with Telford Homes and their South Kilburn Regeneration Scheme.⁹⁰ Construction on this development took place from 2017 to late 2021. Brent Council completed another residential redevelopment scheme consisting of Franklin House and Hollister House in late 2019. Therefore, the council blocks situated along Carlton Vale, including Melrose House and Keith House, and St Augustine's Church are likely to experience cumulative impacts of construction projects.

Similarly, infill programmes are being undertaken in the local area which may exacerbate the construction impacts of Carlton Dene on local residents. An infill scheme has recently been completed behind Helmsdale House, set back from Carlton Vale, in addition to a planned infill development in Torridon House car park along Randolph Gardens which intersects with Carlton Vale.

Construction impacts could disproportionately impact protected characteristic groups who spend a larger proportion of time indoors and are less mobile, including elderly people, disabled populations and pregnant women on maternity leave.

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.⁹¹

⁹⁰ Brent Council (2023). Unity Place (Gloucester House and Durham Court). Available at: [Phase 3a - Gloucester House and Durham Court | Brent Council](#)

⁹¹ 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.

The Air Quality Assessment⁹² submitted alongside the planning application in 2020 confirmed that mitigation measures are in place to minimise the risk of adverse dust effects and the proposed development is not expected to generate additional vehicle movements or significant emissions to air. The assessment identifies dust as the most important consideration during demolition and construction activities. The production of dust can cause temporary soiling of surfaces, in particular the windows of neighbouring properties and cars of residents. St Augustine's Church raised an objection regarding the potential damage to the church pipe organ as a result of construction-based dust. Further, the St Augustine's Federated Schools expressed concern that dust pollution may negatively impact the health of children walking past the site to school and using playgrounds during recreation.

An Acoustic Statement⁹³ has been undertaken to identify the state risk category and best practice measures to mitigate noise and vibration impacts. The noise assessment undertaken by an acoustics team concluded that there is no reasoning why planning permission should not be granted for the proposed development based on noise impacts. The most dominant noise source is traffic travelling along Kilburn Park Road and Carlton Vale which cannot be reduced.

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.⁹⁴ Children are also susceptible to increased noise levels in some instances particularly with regards to cognitive impairment.⁹⁵ Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise. Noise disruption to the nearby St Augustine's CE High School, especially during exam season, should also be considered for mitigation.

To minimise the adverse cumulative construction impacts throughout the demolition phase of the development, the Council have produced a Demolition and Environmental Management Plan (DEMP). This plan is to be implemented upon taking possession of the site and complied with during any demolition works undertaken before the main contractor takes over. This includes a traffic and pedestrian management plan to limit unnecessary traffic movements; dust management plan; a series of environmental, noise and vibration monitoring and control measures; and communication and liaison commitments to surrounding residential and commercial buildings. Similarly, when undertaking the main construction works it is expected that the appointed contractor will produce a Construction Management Plan. This should also outline the approach to monitoring and minimising construction impacts through effective mitigation strategies. A Resident Liaison Officer will also be appointed Management Plan should outline techniques to mitigation any potential noise and vibration impacts such as halting activities should they exceed noise level standards and appointing as a contact for residents to report noise and air quality issues.

⁹² Westminster City Council (2020). Air Quality Assessment. Available at: [20/08040/FULL | Redevelopment of site to provide 'Extra Care' residential facility \(Use Class C3\) ranging between 3-6 storeys with terraces and courtyard and a building ranging between 2-6 storeys to provide residential dwellings \(Use Class C3\); together with the provision of associated communal facilities including cafe and hairdressers, podium level car parking and landscaping. | 45 Kilburn Park Road London NW6 5XD \(westminster.gov.uk\)](https://www.westminster.gov.uk/20/08040/FULL%20Redevelopment%20of%20site%20to%20provide%20Extra%20Care%20residential%20facility%20(Use%20Class%20C3)%20ranging%20between%203-6%20storeys%20with%20terraces%20and%20courtyard%20and%20a%20building%20ranging%20between%202-6%20storeys%20to%20provide%20residential%20dwellings%20(Use%20Class%20C3);%20together%20with%20the%20provision%20of%20associated%20communal%20facilities%20including%20cafe%20and%20hairdressers,%20podium%20level%20car%20parking%20and%20landscaping.%2045%20Kilburn%20Park%20Road%20London%20NW6%205XD)

⁹³ Westminster City Council (2020). Acoustic Statement. Available at: [20/08040/FULL | Redevelopment of site to provide 'Extra Care' residential facility \(Use Class C3\) ranging between 3-6 storeys with terraces and courtyard and a building ranging between 2-6 storeys to provide residential dwellings \(Use Class C3\); together with the provision of associated communal facilities including cafe and hairdressers, podium level car parking and landscaping. | 45 Kilburn Park Road London NW6 5XD \(westminster.gov.uk\)](https://www.westminster.gov.uk/20/08040/FULL%20Redevelopment%20of%20site%20to%20provide%20Extra%20Care%20residential%20facility%20(Use%20Class%20C3)%20ranging%20between%203-6%20storeys%20with%20terraces%20and%20courtyard%20and%20a%20building%20ranging%20between%202-6%20storeys%20to%20provide%20residential%20dwellings%20(Use%20Class%20C3);%20together%20with%20the%20provision%20of%20associated%20communal%20facilities%20including%20cafe%20and%20hairdressers,%20podium%20level%20car%20parking%20and%20landscaping.%2045%20Kilburn%20Park%20Road%20London%20NW6%205XD)

⁹⁴ Social Care Institute for Excellence – Dementia Friendly Environments <https://www.scie.org.uk/dementia/supporting-people-with-dementia/dementia-friendly-environments/noise.asp>

⁹⁵ World Health Organisation Children and Noise <https://www.who.int/ceh/capacity/noise.pdf>

Thereby, WCC are taking the necessary precautions during all stages of the development to minimise any adverse impacts on the surrounding area and its residents.

Demolition and construction impacts on St Augustine's Church

St Augustine's Church is an Anglo-Catholic Parish of the Church of England located directly north of the site. The Church was founded in 1870 and consecrated in 1880, becoming known as 'The Cathedral of North London'. The Church holds regular mass services every Saturday and Sunday, remaining open on Saturdays for visits and prayers, and offers baptism, wedding and funeral services. The Church also has well-established affiliation with two local schools unified within St Augustine's Federated Schools. Further, the Grade 1 listed building holds huge architectural significance as one of the finest examples of Victorian Gothic Revival architecture, with the 77m high spire an identifying feature visible from afar.

The Council recognise that the close proximity of a long-standing and significant religious building to the site has the potential to generate adverse impacts on those from religious groups as a result of the development. Consequently, WCC has established an ongoing dialogue with St Augustine's Church throughout the design process for the new development. The Council have been in communication with the Church since before the public consultation, but first met with the Resident Management Organisation in April 2020 and again in June.

While supportive of the principle behind the development, the Church submitted a formal objection based on the potential for negative construction impacts. The Church's main revenue stream is professional music recording, which would be significantly hindered through the noise produced from adjacent construction. Further construction impacts, based on previous experience with Brent Council, were picked up during the second consultation period. A nearby Brent Council housing development is believed to have caused several cracks to appear in the Church during construction.

Considering the architectural importance of St Augustine's, the DEMP outlines noise and vibration control measures to minimise potential adverse impacts on neighbouring buildings. In terms of noise, the demolition contractors will install acoustic screens where practicable and identify noisy working requirements and communicate timescales for this work with concerned parties. While the use of debris 'pads' and not letting debris fall from heights should mitigate unexpected vibration impacts on surrounding structures. Further, the appointed construction contractor should work closely with Church officials while producing the Construction Management Plan to mitigate any unexpected noise and vibration impacts during the construction phase.

Construction traffic and potential road closure could further obstruct the operation of Church services, especially weddings and funerals. During consultation, the Church officials stressed the importance of connections to the public realm to provide good access and parking during these events. While road closure is only likely for short periods of time, mitigation should be in place to manage traffic flows at peak times.

The Church also raised an objection regarding the potential presence of urns with ashes in the Carlton Dene Care Home grounds. WCC have undertaken an assessment of the grounds which identified that ashes were more likely to be present within the soil than in urns. This report will be used to raise awareness with the contractors while undertaking site mobilisation or excavation and will be under instruction that if any remains were to be found works would be halted immediately.

Post-construction impacts on St Augustine's Church

The architectural significance of St Augustine's Church has been a recurrent theme of stakeholder engagement and public consultation, as mentioned above. While mostly focused on the demolition and construction impacts, public objections have highlighted the potential for negative impacts once the new development has been opened.

The 77m church spire has become a heritage symbol associated with St Augustine's Church. Consequently, public objections indicate the potential for the view of the church spire to be obstructed within the local neighbourhood as a result of the development. Notably, the six-storey sections of the development could impair the view for populations walking east along Carlton Vale and from the entrance to Paddington Recreation Ground.

Further, the entrance to Carlton Dene Extra Care homes is situated on the northern side of the proposed building which sits opposite the western facing entrance to St Augustine's. Public objections expressed concern regarding conflicting movements when the church's entrance gate is in operation during mass services, weddings and funerals.

St Augustine's objection to the proposals also highlighted that the public realm benefits of the Carlton Dene development could be unfulfilled in practice. The consultation process included detailed discussions with the church Vicar relating to improvements of the public realm space at the church entrance in conjunction with other public realm developments, including the design of church railings and removal of trees. However, following consultation these commitments do not appear in the formal application commitments. Therefore, to deliver what the church perceives as a 'core benefit' of the proposals, the Council should seek to extend the public realm commitments to the church entrance.

Right to light impacts on neighbouring properties

Given the close proximity of neighbouring developments and the proposed scheme, the Carlton Dene development is likely to generate right to light (RtL) impacts on neighbouring residential properties.

WCC commissioned a Daylight and Sunlight Statement in October 2020⁹⁶ to calculate the change in light levels between the existing development and proposed development on neighbouring buildings. This report identifies properties on roads surrounding the development site (Strome House, Melrose House, The Carlton Tavern, Franklin House, Hollister House and Ex Gloucester House and Durham Court) where their Right to Light (RtL) may be affected. For properties, particularly residential properties, which do experience a loss of light, equality effects may arise for residents who share protected characteristics. This may arise where a resident is more sensitive than other people, due to a protected characteristic, for example a disability.

The assessment of light impacts concluded that while there will be an inevitable shift from the existing light levels if the proposed scheme is to deliver adequate housing, the proposals respond appropriately to the urban context with minimal effects to the majority of neighbours. Some residents of Franklin House, Hollister House, Melrose House and Keith House could experience deviations from the Building Research Establishment's (BRE) targets driven by the property design with balconies and deck access increasing sensitivity to developments. However, when the impact of these design features are taken into account, the scheme aligns with the guidance. While the Carlton Tavern and all residential rooms in Strome House meet BRE targets in respect to retaining daylight and sunlight levels as a result of the proposal. In order to minimise any shift in light levels and balance neighbours RtL while maximising housing delivery, the proposed design of Carlton Dene has limited building height, maximised separation distances and set back the tallest elements of the scheme.

While not covered in the Daylight and Sunlight Statement, St Augustine's Church could also experience RtL impacts as a result of the proposals. The upper stories of the proposed Carlton Dene development could restrict light reaching the west facing main entrance to the church. This has implications for the stained glass window, in particular the Rose Window, as part of the church's heritage design. Public objections suggest that a localised light study

⁹⁶ City of Westminster (2020). Daylight and Sunlight Report. Available at: [20/08040/FULL | Redevelopment of site to provide 'Extra Care' residential facility \(Use Class C3\) ranging between 3-6 storeys with terraces and courtyard and a building ranging between 2-6 storeys to provide residential dwellings \(Use Class C3\); together with the provision of associated communal facilities including cafe and hairdressers, podium level car parking and landscaping. | 45 Kilburn Park Road London NW6 5XD \(westminster.gov.uk\)](https://www.westminster.gov.uk/20/08040/FULL%20Redevelopment%20of%20site%20to%20provide%20'Extra%20Care'%20residential%20facility%20(Use%20Class%20C3)%20ranging%20between%203-6%20storeys%20with%20terraces%20and%20courtyard%20and%20a%20building%20ranging%20between%202-6%20storeys%20to%20provide%20residential%20dwellings%20(Use%20Class%20C3);%20together%20with%20the%20provision%20of%20associated%20communal%20facilities%20including%20cafe%20and%20hairdressers.%20podium%20level%20car%20parking%20and%20landscaping.%2045%20Kilburn%20Park%20Road%20London%20NW6%205XD)

should be undertaken to assess the RtL impacts on St Augustine's Church, especially considering the religious significance and unique architecture of the church.

Following these Daylight and Sunlight assessments, the Council should engage with properties that may experience impact on their RtL and inform residents of their entitlement to compensation for any reduction in the value of their property or standard of living as a result of the new residential development.

Traffic impacts for neighbouring properties during construction

Construction related traffic could result in adverse accessibility impacts for local residents and businesses during construction. This includes the potential obstruction of residences by construction vehicles and potential closure of surrounding roads.

The construction site entrance is currently located to the north of the site. While this entrance provides site access set back from the main road and a turning point for construction traffic, it has an interface with the Church which may cause obstruction. The Church has raised an objection against the location of the site entrance and has requested it be moved to Carlton Vale for the second phase of works in April 2023. Consequently, the Council are currently discussing the potential to comply with this request.

Similarly, the close proximity of St Augustine's CE High School to this site entrance also raises healthy and safety concerns should construction vehicles be arriving and leaving the site as children are walking to and from school. School 'drop off' and 'pick up' times sit within the hours of operation for construction, between 8:00-9:30 and 15:00-16:00. In order to mitigate these potential risks, the demolition contractor outlines a Traffic and Pedestrian Management Plan in the DEMP. This seeks to lessen the impact of site traffic especially in sensitive areas, such as schools, by avoiding any school starting and finishing times. During the construction phase, the Council also plan to appoint Site Traffic Marshals to control vehicle entry barriers to keep pedestrians, especially children, safe when walking near the site during operation hours.

There is still potential for large vehicles to require road closure for onloading and offloading construction materials, albeit for short periods of time on an irregular basis. This could have a disproportionate impact on those who are more dependent on private vehicles to access key services such as disabled people and older people or carers visiting vulnerable people in neighbouring properties.

It is expected that as a means of mitigating these impacts, residents will be informed in advance of any road closures or diversions. A Resident Liaison Officer will be employed during construction to engage with local residents and the monthly 'Carlton Vale News' newsletter could also communicate future road closures to local residents. This would help to further provide notice of potentially closed routes and the need for alternative parking at key times during the construction period.

6.4 Wider impacts

Potential 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 and Borough 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.⁹⁷ However, equality effects may arise where employment or training is not

⁹⁷ 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>

available to groups with protected characteristics, for example where recruitment criteria or policies make it harder for some groups to access opportunities.

It is recommended that, as part of the procurement process for a contractor for the works, that a commitment be made to developing an Employment, Education and Skills Plan setting out measures for working with schools and young people in the area. This should include recruiting new apprentices/ workers from the immediate area. The contractor should also provide evidence of their commitment to equal opportunities with regards to employment, for example as a Disability Confident Status employer.

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.
- 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 Carlton Dene Development proposals

| Impact | Disproportionately/Differentially Affected Protected Characteristic Groups ⁹⁸ | | | | | | | | | | | 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 65 self-contained Extra Care units. | | | ✓ | | | | | | | | | The provision of Extra Care homes could support the elderly population to live independently despite their reduced mobility and increased frailty. | Planned Mitigation: The elderly population within Maida Vale will be approached first to apply for Extra Care homes if they wish to. |
| | Net increase of 9.2% (block 6) and 9.1% (block 2) wheelchair accessible housing. | | | ✓ | | | ✓ | | | | | | Wheelchair accessible or easily adaptable homes considers accessibility requirements of disabled elderly residents and elderly residents who require mobility to live independently. The availability of these units as social rent, should residents not be eligible for local authority funded care, assists the cost of living for disabled people who face additional living costs. | Planned Mitigation: The elderly population within Maida Vale will be approached first to apply for Extra Care homes if they wish to. |
| | Net increase of 15 general needs housing units for social rent. | ✓ | | ✓ | | ✓ | ✓ | ✓ | | | | ✓ | Social rent housing is likely to benefit protected characteristic groups and low income households who are overrepresented on the social housing register. Key priority groups identified by projected lettings include those who are homeless, overcrowded households and those who require relocation based on medical grounds. | Planned Mitigation: The previous tenants of Peebles House will be approached first and rehoused in the Carlton Dene development should they wish to. EIA Recommendation: The Council should develop a LLP which prioritises (where criteria are met): protected characteristic groups, and housing register applicants from the local area including those who are homeless, existing WCC tenants and those on the housing register. |
| | Net increase of 7 general needs housing units for intermediate rent ⁹⁹ . | ✓ | ✓ | | | ✓ | | ✓ | | | | | | Intermediate rent housing is likely to benefit those on middle incomes. Groups who are highly represented on WCC's affordable housing waiting list include people from black ethnic backgrounds, |

⁹⁸ 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.

⁹⁹ The Council is in the process of applying to the planning authority for a minor material amendment to the consented scheme of a change in tenure. If this application is approved, the seven intermediate rent units will become available for social rent. The EIA will be updated accordingly once a final decision has been agreed.

| Impact | Disproportionately/Differentially Affected Protected Characteristic Groups ⁹⁸ | | | | | | | | | | | 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 | | | | | | | | | | |
| | | | | | | | | | | | | those aged 25-65 years old, households with children and lone parents. | <p>EIA Recommendation:</p> <p>The Council should develop a LLP which prioritises (where criteria are met): applicants from the Carlton Vale area including those who are homeless, residents from overcrowded households who cannot afford private rent and those who need moving due to medical or welfare grounds.</p> <p>The rent levels for the new housing should include a mix of lower rental quartile and London Living rent to help to make it more affordable to local people.</p> |
| General needs housing provision to local residents | ✓ | ✓ | ✓ | | ✓ | ✓ | ✓ | | | | ✓ | Affordable housing is likely to benefit protected characteristic groups who are overrepresented on the affordable housing register. The LSOA has high representation of disabled people, ethnic minorities, Muslims, overcrowded households and unemployed people who could particularly benefit. | <p>Planned Mitigation:</p> <p>The previous tenants of Peebles House will be approached first and rehoused in the Carlton Dene development should they wish to.</p> <p>EIA Recommendation:</p> <p>WCC should develop a LLP to prioritise (where criteria are met) protected characteristic groups and housing register applicants from the local area.</p> |
| Improved living conditions for new residents. | ✓ | ✓ | ✓ | | ✓ | ✓ | ✓ | | | | ✓ | As Carlton Dene Care Home and Peebles House have been identified as no longer meeting modern design standards, the new development design will provide larger rooms, circulation space, logical layouts and accessible recreation for its elderly residents. | <p>Planned Mitigation:</p> <p>All apartments in the new development will be compliant with design and accessibility standards. The design of Extra Care homes goes above and beyond these standards in line with the HAPPI report.</p> |
| Improved living conditions for previous residents | | | ✓ | | | | ✓ | | | | | Previous Carlton Dene Care Home residents were relocated to a brand-new care facility in Maida Vale with modern dementia-friendly services. | N/A |

| Impact | Disproportionately/Differentially Affected Protected Characteristic Groups ⁹⁸ | | | | | | | | | | | | 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 | | | | | | | | | | | |
| Neighbourhood and community | | | | | | | | | | | | | | |
| Beneficial | Inclusive consultation and community engagement with affected groups to contribute to sharing benefits of the proposals. | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | All local residents and businesses, including those living in adjacent social housing and St Augustine's Church, were engaged with using both digital and traditional methods. Feedback from key stakeholders was used to inform the design process. | <p>Planned Mitigation:</p> <p>Resident Liaison Officer on site who can be by email and phone with any resident enquiries.</p> <p>Monthly 'Carlton Vale News' newsletter updating residents on current and upcoming works.</p> |
| Adverse | Construction impacts on local residents | x | x | x | x | x | x | x | x | x | x | x | Protected groups are more vulnerable to the health, security, safety and accessibility adverse impact relating to construction. Recent Brent Council redevelopment projects and Westminster infill programmes surround the Carlton Dene development site, which exacerbates impacts on local residents and disruption in their local area. | <p>Planned Mitigation:</p> <p>DEMP produced to minimise the adverse disruption throughout the demolition phase of the development.</p> <p>Resident Liaison Officer on site who can be contacted by email and phone with any resident queries or complaints.</p> <p>EIA Recommendation:</p> <p>Development of a Construction Management Plan, once contractors have been appointed, outlining dust, noise and vibration mitigation strategies.</p> |

| Impact | Disproportionately/Differentially Affected Protected Characteristic Groups ⁹⁸ | | | | | | | | | | | 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 | | | | | | | | | | |
| Potential construction impacts on St. Augustine's Church | | | | | | x | | | | | | Ongoing engagement with St. Augustine's Church confirmed that construction noise may interrupt Church services and vibrations pose a risk to the building structure. | <p>Planned Mitigation:</p> <p>DEMP outlining noise and vibration control measures that demolition works will comply with.</p> <p>EIA Recommendation:</p> <p>Produce a Construction Management Plan once the contractor has been appointed to manage disruption impacts on the Church.</p> <p>As in the DEM, the Resident Liaison Officer to work alongside the Church and identify periods of construction where noise and vibration impacts may be highest.</p> |
| Post-construction impacts on St Augustine's Church | | | | | | x | | | | | | The architectural significance of St Augustine's Church was a recurrent theme of public objections, particularly the obstructed views of the church spire. | <p>EIA Recommendation:</p> <p>Explore potential to improve the public realm surrounding the Church entrance.</p> |
| Right to light impacts on neighbouring properties | | | x | | | x | x | | | x | | A RtL assessment has been undertaken which identified inevitable shift in existing light levels, however light levels are not expected to compromise BRE targets. | <p>EIA Recommendation:</p> <p>Residents who can expect RtL injury are entitled to compensation for any reduction in the value of their property or standard of living</p> <p>Undertake a RtL assessment for St Augustine's Church.</p> |

| Impact | Disproportionately/Differentially Affected Protected Characteristic Groups ⁹⁸ | | | | | | | | | | | 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 | | | | | | | | | | |
| Traffic impacts for neighbouring residents during construction | x | x | x | | | | x | | | | | <p>Construction traffic could obstruct Church access and pose a health and safety hazard to children of St Augustine's CE High School.</p> <p>There is also potential for large vehicles to require temporary road closure for onloading and offloading construction materials, which could adversely affect those who depend on their cars for access to services.</p> | <p>Planned Mitigation:</p> <p>WCC looking to relocate the site entrance to Carlton Vale to avoid obstruction to St Augustine's Church.</p> <p>Appointment of Site Traffic Marshals to control vehicle entry barriers and ensure the safety of pedestrians.</p> <p>Implementation of Traffic and Pedestrian Management Plan to minimise traffic impacts on the local schools in particular.</p> <p>The Resident Liaison Officer and monthly 'Carlton Vale News' newsletter communicate future road closures to local residents.</p> |
| Wider impacts | | | | | | | | | | | | | |
| Beneficial | Creation of construction-related employment opportunities | | | | | | | | | | | <p>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.</p> | <p>EIA recommendation:</p> <p>Develop an Employment, Education and Skills Plan setting out measures for working with schools and young people in the area.</p> |

7. Conclusions and next steps

This EIA has identified how the Carlton Dene development will result in benefits for the local area which in turn can be shared by protected characteristic groups. This includes through an increase in affordable housing and Extra Care housing on the site. The EIA has identified potential beneficial equality effects of the proposed development as follows:

- A new increase of 87 residential properties on-site. These include:
 - 65 Extra Care units. The net increase in Extra Care facilities will serve the ageing population of Maida Vale and enable residents to remain independent despite their frailty and reduced mobility;
 - 15 social rent units. The net increase in social rent should target protected characteristic groups and key groups identified through projected lettings for social housing in 2022/23; and
 - 7 intermediate rent units¹⁰⁰. The net increase in intermediate rent should benefit people with priority for affordable housing and who struggle to afford market rent. Affordability barriers may make it harder for certain groups, including ethnic minority groups to access the intermediate rent units.
- A net increase of 9.1% and 9.2% wheelchair accessible households, in block 6 and block 2 respectively, enabling those with limited mobility to remain at home living independently and maintain positive mental and physical wellbeing;
- Improved living conditions for the future residents of the Carlton Dene Housing Development through compliance with, and going above and beyond, national and regional design standard;
- Improved living conditions for the previous residents of Carlton Dene Care Home. These residents were relocated to a brand-new care facility (Beachcroft House) in Maida Vale in late 2019/ early 2020. Whilst the Carlton Dene care home no longer met modern design standards, Beachcroft House offers new improved living accommodation as well as additional facilities such as shared community space; and
- Construction could provide direct employment opportunities which can be shared by groups with protected characteristics.

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

- Extensive community engagement with local residents and affected properties, including St. Augustine's Church. Three rounds of consultation were held to clarify any concerns and inform the design process. While ongoing engagement with St Augustine's Church seeks to mitigate negative heritage impacts and adverse impacts associated with demolition and construction;
- Production of a Demolition and Environment Management Plan outlining an approach to minimising any adverse community or environmental impacts throughout the demolition phase of the development.

¹⁰⁰ The Council is in the process of applying to the planning authority for a minor material amendment to the consented scheme of a change in tenure. If this application is approved, the seven intermediate rent units will become available for social rent. The EIA will be updated accordingly once a final decision has been agreed.

- An Air Quality Assessment and Acoustic Design Statement were published alongside the planning application in 2020. These considered the potential environmental impacts of construction and identified mitigation measures during demolition and construction; and
- 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 to report on any issues relating to construction issues.

7.1 Next Steps

The key issues identified through this initial 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 as a result of the proposals including older people, disabled people and people from ethnic minority groups.

The following paragraphs provide a summary of suggested recommendations and continued actions for enhancing the benefits and minimising adverse equality effects of the development.

- A Construction Management Plan should be developed for construction works associated with the proposals and consider site logistics, environmental mitigation and construction control measures which demonstrate the minimal environmental impact construction is expected to have on the local area. This should be developed with ongoing engagement from local residents throughout the construction phase.
- A Local Lettings Plan (LLP) should be developed for the letting of general needs homes on the site. Priority is being given to those living in the local area including people with protected characteristic;
- Jobseekers in the area should be able to share in newly created employment opportunities in the construction of the development and be supported to ensure that they aware of job opportunities in the area. A carefully designed procurement process would help to ensure that recruitment involving contractors during the construction stage is inclusive and that opportunities are available to all groups with protected characteristics. This should include a requirement for contractors to adhere to national or local schemes to promote employment amongst under-represented equality groups, e.g. Disability Confident accreditation and Fairness, Inclusion and Respect criteria;
- The development of a contractor-led local Employment, Education and Skills Plan could help to provide some benefits to local groups including children and young people. Examples of how contractors could support the plan include:
 - Providing a guaranteed apprenticeship(s)/roles for jobseekers from the Westminster LSOA or Maida Vale Ward; and
 - Volunteering at local schools to provide 'expert talks' in assemblies, STEM clubs and/or online learning materials etc; and
- 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 mixed tenure 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 the procurement process, for example;

- In PIN 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 Commission¹⁰¹ 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.

¹⁰¹ 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

