MOTT MACDONALD

Ebury Bridge Renewal

Detailed Equality Impact Assessment

July 2020

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Issue and Revision Record

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

Information class: Standard

Contents

Executive summary

Overview of the commission

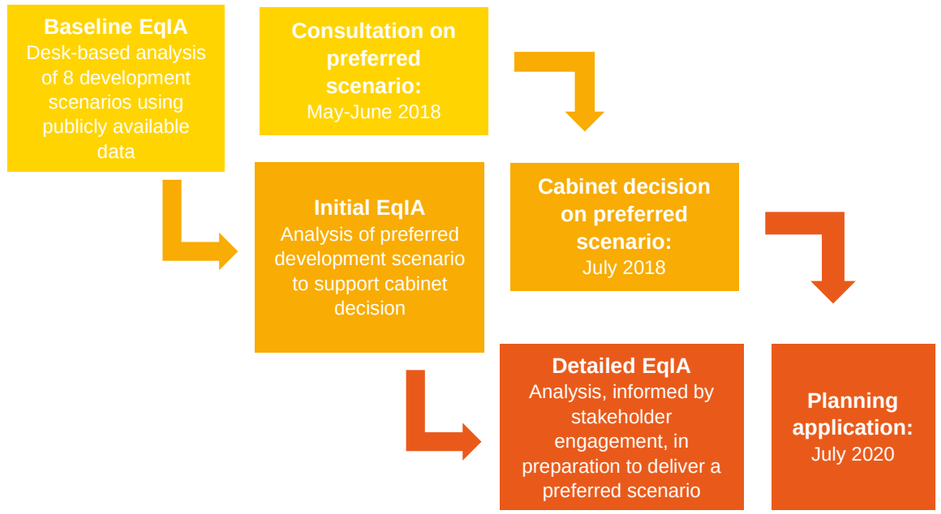
Mott MacDonald were commissioned by Westminster City Council ('the Council') to undertake an Equality Impact Assessment (EqIA) of the redevelopment of the Ebury Bridge Estate between Pimlico and Belgravia in the City of Westminster.

Summary of the EqIA

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

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

Figure 1: EqIA phases



Source: Mott MacDonald

1.1 Findings

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

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

[1] Arup (2020) 'Ebury Bridge Renewal Planning Statement'.
Westminster City Council (2018) 'Decision – Ebury Bridge: Estate Renewal' Available at : https://committees.westminster.gov.uk/ieDecisionDetails.aspx?ID=910

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

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

Impact on residents during redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
Social infrastructure and access to services: The renewal process involves temporary and permanent resettlement of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. It can increase residents' distances from facilities or places of social connection located on or near their neighbourhood. This can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and pregnant women may also experience negative health impacts from this, including increased stress and anxiety. Within 500m of the Estate there are the following community resources: 15 health care services, one care / nursing home, two children's nurseries, five churches, four community services, eight educational facilities, one leisure facility, one playground, two police stations, five public / village hall / other community facilities, one public convenience and nine public parks or gardens. The loss of social connections may result in disproportionate effects on certain groups on the Estate due to increased distances to community resources such as local schools (e.g. St Barnanbas Primary school, St Gabriel's School, Churchill Gardens Primary Academy and Pimlico Academy) or cultural and religious facilities (e.g. St Barnabas' Church Pimlico and St Mary's Church). Local shops, such as those on Ebury Bridge Road, may also decide to close as a result of the redevelopment.	• Children • Older people • People from BAME backgrounds • Disabled people • Pregnant women • Religion and belief	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • **Religion and belief:** Publicly available data shows that there is a higher proportion of Christian residents on the Estate compared to the rest of the borough.	To mitigate these effects, the Council has set out the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas (as summarised in section 2.3) to provide information on housing options, financial compensation and practical support for residents. The key mitigation in this policy that responds to maintaining social connections within the Estate is that all existing Council tenants and resident leaseholders will have a right to return to a new home on the redeveloped Estate. Within the policy, the Council recognises that many tenants and leaseholders have connections to their local area and will want to remain there. A range of rehousing options (including replacement affordable housing options such as social rent and intermediate ownership) are available for tenants and leaseholders who want to stay in or close to the Estate to suit different circumstances. This should help residents to ultimately able to return to the Estate, and therefore continue to access the social infrastructure that is important to them. Where households are rehoused temporarily or permanently, their housing needs will be considered. • The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems – where a resident leaseholder cannot return as an owner the Council will offer a Council tenancy. • All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. • Private tenants have been offered rehousing support through the Trailblazers service based on their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. • Temporary Accommodation (TA) tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere There is also dedicated support available to residents who need to access it, for ongoing information around the redevelopment. In terms of enhancement measures, the redevelopment consists of new community infrastructure.	This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended that the Council: • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to-date records of changing needs and circumstances– particularly those who are most affected by relocation; • continue to hold community meetings and events during the process of redevelopment, including events for residents who have relocated in order to remediate feelings of social isolation; • continue to work with local businesses to prevent business closures and ensure residents in the area can continue to access their services; • continue to communicate rehousing options to residents, including processes for accessing Council housing and affordable housing being built as part of the redevelopment; • continue to offer support to those in private accommodation through the Trailblazer service; • ensure that access to community resources is maintained throughout the renewal process where possible; and • for families with school-aged children, temporary or permanent housing off the Estate should not be at such a distance as to necessitate and involuntary school change.

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Access to finance and affordable housing: Where renewal schemes require residents to resettle, it can lead to an increase in financial outgoings due to costs associated with moving and obtaining new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who have trouble accessing appropriate and mainstream financial services, such as bank accounts, loans and mortgages.	• Young people • Older people • People from BAME backgrounds • Disabled people • Women	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	Housing options are available within the HRA, which include replacement of housing for existing Council tenants and leaseholders on the Estate, A mix of housing options will be available to provide a ladder of housing opportunity. At least 50% will be affordable for social and intermediate rent, including the homes set aside for those residents with a right to return to the Estate. For resident leaseholders, an equity loan scheme is available to help with buying one of the new properties which will be of a higher value but will have similar costs to their existing home. As set out above, there is also support for vulnerable private tenants and TA tenants to source suitable housing. The Council has developed strategies to ensure that residents are able to access finance in order to relieve some of the financial burden associated with relocation. These include the following compensation measures: • Compensation equal to the open market value of the property (for leaseholders); • Home loss payments, a sum in recognition of the inconvenience of having to move out of an existing property, which is set at a minimum of £6,400 (as of April 2020); and • Disturbance payments for reasonable expenses arising as a direct consequence of the Council purchase of a property. These payments may include costs such as costs of removals (including additional support for vulnerable residents), disconnections and reconnections, redirection of mail, fitting of existing curtains and carpets, early mortgage redemption fees or mortgage and tender fees arising from the purchase of a new property, stamp duty land tax and other fees arising from the purchase of a replacement property and costs of new school uniforms. This compensation and availability of affordable housing options will serve to manage the main financial effects of rehousing.	This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended the Council: • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to date records of changing needs and circumstances– particularly those who are most affected by financial exclusion, who may be experiencing increased financial insecurity due to Covid-19; • continue to communicate rehousing options available to residents, including information for private tenants, Temporary Accommodation tenants and leaseholders on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby; • ensure homes built on the Estate provide a mix affordable housing options e.g. social rent and shared ownership/equity options. As of July 2020, the current planned housing mix provides this range of options; and • explore service charge levels in detail to determine whether there are mechanisms to maximise affordability for those wishing to return to the Estate.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
Appropriate and accessible housing: Certain groups who currently reside on the Estate may experience adverse effects if temporary or permanent rehousing is not adequate for their needs. Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children and people requiring adaptable and accessible housing.	• Children • Disabled people • People from BAME backgrounds	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	As set out above, the Council has developed policies to ensure that there is support available for finding appropriate and accessible housing. Where households are rehoused temporarily or permanently, their housing needs will be considered. • The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems. • All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. • Private tenants have been offered rehousing support through the Trailblazers service on the basis of their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. • Temporary Accommodation tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere. Those with special accessibility requirements are prioritised through the rehousing process. Where possible they are relocated in the HRA, otherwise housing that suits their needs is sourced in the local area. Adapted and accessible housing has been found for all current tenants requiring it, which meets mobility and housing needs as assessed through the Housing Needs Assessment process. Adaptations may also be funded through disturbance payments. Housing for families will be provided as part of the redevelopment, including replacement housing for families based on the number of bedrooms required, to prevent any overcrowding. The overall housing provision on the Estate will be enhanced by re-providing homes to a higher standard with lower energy and maintenance costs, ensuring housing on the Estate meets residents' needs and involving residents in the design of the new homes.	This effect is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended that the Council: • when re-providing any accessible or adaptable housing as part of the redeveloped Estate, the new housing should ensure there is adequate specialised housing for disabled people including homes for wheelchair users; • when re-providing housing as part of the redeveloped Estate, ensure there is adequate housing to suit the needs of families; this includes providing a enough homes with more than two bedrooms within the total number of units provided, to prevent any overcrowding; • ensure that work begins as early as possible on sites where a large increase in the provision of affordable homes is possible; • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to date records of changing needs and circumstances – particularly those who are most affected by a loss of affordable and appropriate housing; and • continue to provide information on rehousing options available to residents, including information for private tenants, Temporary Accommodation tenants and leaseholders on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby.
Health effects: Evidence has suggested health effects related to housing demolition, such as changes to air quality and noise pollution and effects related to housing displacement, such as social isolation, can arise for particular groups that are represented within the Estate and local area. Some groups, such as older and disabled people can differentially experience both isolation and	• Children • Older people • Disabled people • Pregnant women	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line	In order to manage health effects related to stress due to relocating, the Council will be providing rehousing support (as outlined above). To manage health effects related to noise and air quality, demolition works will be monitored closely and disruption will be minimised as much as possible.[2] This would typically be managed through the creation of a Construction Environmental Management Plan (CEMP), which would be implemented by the contractor carrying out the works.	This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • continue to provide ongoing support to residents through the rehousing process; • identify and work with vulnerable people whose protected characteristics may make them more vulnerable to adverse health effects; and • develop a CEMP as part of the demolition and construction works.

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

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construction effects, which can create more severe health impacts on these groups.		with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).		
Safety and security In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime. It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and BAME people.	• Young people • Older people • BAME people • Disabled people • LBGT people • Men • Women	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	Effects on personal security will be managed through security that is in place seven days a week between 7PM and 5AM as well as hoardings used to secure empty blocks and additional lighting. There is also a process in place for reporting and addressing any incidents of Anti-Social Behaviour (ASB) within the Estate. This process has been publicised through the Ebury Bridge newsletter.[3]	This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • consider the use of Property Guardians, people who will reside in and oversee the property for a short term, to secure the vacant Estate properties; and • continue to monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with remaining residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.
Accessibility and mobility in the area: Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. Construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.	• Older people • Disabled people	• There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	The Council is engaging with residents on an ongoing basis around parking and access requirements. Accessibility of the Estate will be considered through the process of construction planning (e.g. ensuring hoarding does not sever the Estate).	The consultation process highlighted that some stakeholders are particularly concerned around parking. There are concerns that the scheme will have a negative impact on existing parking spaces on surrounding local roads. This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • ensure any blue badge / accessible parking is retained for homes requiring it; • ensure that accessibility of the Estate is planned for and monitored through the construction process through the development of a CEMP.

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

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Information and communication: The process of regeneration often requires two-way communication between residents and the council and or housing authorities for residents to understand the options available to them. The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication	• Older people • Disabled people • BAME people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	The Council has developed a robust engagement approach that has been ongoing since the early stages of the project. Engagement has been undertaken through a variety of mechanisms to ensure residents are kept informed of rehousing information, updates around the wider redevelopment and opportunities to provide feedback on the process. The consultation process has taken several forms to encourage participation and ensure that emerging designs were formed in collaboration with residents. Such processes included: • Community Futures Group: the steering committee has continued to play a key role in the delivery of the scheme during consultation. • Dedicated consultation space: a vacant shop at No 9 Ebury Bridge Road has been used to provide a welcoming and accessible space for residents to visit. • Resident drop-ins: the designated redevelopment architects have provided themed sessions for residents to provide feedback. Subjects such as public realm, placemaking, re-housing and phasing have been covered. • Ebury Bridge website: a website has been created to provide an accessible platform for up to date scheme information. • Online consultation tool: for those unable to attend consultation events in person, or wanting to provide anonymous feedback, an online tool has been developed. • Newsletters: 26 editions of the Ebury Bridge Newsletter have been distributed over the last 18 months. Each copy provides details on how to give feedback. • Leaflet drops: all residents within a 1000m radius of the Estate have received leaflets and booklets with the option to provide feedback. • Targeted consultation meetings: the project team have met with 15 different amenity and resident groups in the area on a one-to-one basis. • Exhibition: a public exhibition was held over a two-week period. Three events took place on Saturday's and in the evenings to ensure participation.[4] • Mail out information packs: A printed pack has been distributed to all households with final design information, with a feedback form and link to provide feedback online. • Phone calls: Follow up phone calls have been made to suit different communication needs, to enable those who may find using online methods more difficult to provide feedback • Face to face meetings: In exceptional situations where it is required and the resident is not presenting symptoms, arrangements can be made to meet face to face using social distancing guidelines.	This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • monitor the reach and impact of online engagement (in particular, for the duration of the Covid-19 crisis) to ensure older people, disabled people and BAME people continue to be reached and can provide input to the redevelopment process; • continue to advise residents on ways they can meaningfully engage in decision making and understand options available to them; • continue to provide services such as language interpretation and face to face engagement; and • continue to publish information and seek feedback through a variety of mediums and different formats.

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

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Impact on businesses during redevelopment

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Loss of business and/or employment: The renewal process may result in the temporary or permanent closure and/or relocation of businesses. These changes may create redundancies or result in current business owners and staff being unable to access employment, due to several reasons. These could include: relocation of the business to a location that is difficult to access for staff (those that cannot afford to or are otherwise unable to travel long distances); businesses that are only viable as they serve a specific local need or community (such as BAME communities), or older people who lack the time or resources to re-establish a business . Groups that are most likely to face barriers to employment are most likely to be affected by loss of employment.	• Older people • Disabled people • BAME people • Young people • Women	• Publicly available data is not available for businesses as it is based on place of residence.	Although there is no statutory obligation to relocate impacted businesses, in order to prevent businesses from facing closure, and their staff facing redundancy, the Council has developed support for businesses. There is no formal Council policy for businesses, however businesses will be offered the first right of refusal on the new units available within the redevelopment. As businesses will need to relocate temporarily, the Council will work with them on a phased rent increase over the next three years, to help mitigate financial impacts of moving to a higher value property. Those who wish to sell their business have also been offered the chance to do so. One business has indicated they wish to pursue this, and the Council has provided a figure based on their rateable value to extinguish their lease. One business, a pharmacy, was identified by the Council as providing essential services to those living on the Estate. The Council is currently looking into ways to maintain the pharmacy throughout the redevelopment. Existing businesses have also been offered bespoke business development support in order to ensure they are equipped to maximise the opportunity that the regeneration will bring and deal with the	In 2019, feedback from businesses showed that they felt they had not been as engaged as residents in the redevelopment process. Following this, further actions were taken by the Council to improve their business response (see column, left). This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, is recommended that the Council: • continue to work proactively through face to face engagement with vulnerable business owners and employees; • continue to provide business development support to help businesses deal with periods of inactivity and change; • maintain businesses in place for as long as possible, if they plan to return to premises on the Estate; • ensure businesses are fully informed of the timescales that would affect them as soon as possible, including when they would need to vacate the premises and the period of time they would be inactive for before being able to reopen on the redeveloped Estate; • consider providing financial support to businesses to facilitate relocation after Council takes possession of a property; and • signpost to resources for finding employment or other support if an owner or employee is facing redundancy.
Impact of redundancy on health and wellbeing: Involuntary job loss due to redevelopment and renewal can have differential health and well-being effects for certain groups. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions. Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.	• Children • Older people	• Publicly available data is not available for businesses as it is based on place of residence.		

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Difficulty accessing commercial finance For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises, which can be more difficult for particular groups.	• People from BAME backgrounds	• Publicly available data is not available for businesses as it is based on place of residence.	challenges of temporary relocation, such as information on how they might diversify their business.	
Reduced job satisfaction: Redevelopment may result in the relocation of businesses. This may increase commuting distances for owners and employees, which studies have shown as having a greater impact on job satisfaction for women over men.	• Women	• Publicly available data is not available for businesses as it is based on place of residence.		

Impact on community following redevelopment

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Improved housing provision: Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption. Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home	• Children • Older people • Disabled people • BAME people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	The regenerated Estate will provide improved housing, with respect to appropriateness, accessibility and affordability. In order to further enhance measures: • ensure final housing mix that is delivered meets the needs of current and future residents (e.g. ensuring at least 10% of homes are accessible); and • where possible, provide new housing that exceeds current minimum building standards e.g. Decent Homes Standard.
Provision of community resources and improved social cohesion Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation. An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.	• Children • Older people • Disabled people • BAME people • Pregnant women • LGBT	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	The regenerated Estate will provide new community resources including a community space that will provide a mix of uses. In order to further enhance measures: • continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements; and • monitor effects of increased population on community resources (such as schools and health care) and ensure these are mitigated.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
Improved public realm and green space Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition, the opening up of green space has been shown to impact positively on both physical and mental health. Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.	• Children • Older people • Disabled people • BAME people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	The regenerated Estate will provide additional green space and new play space. In order to further enhance measures: • enable ongoing involvement of the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people; and • ensure that inclusive design principles are followed in the design of public spaces.
Tackling crime and disorder Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.	• Young people • Disabled people • BAME people • LGBT people • Men • Older people • Women • Children	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	The regenerated Estate will provide an opportunity to incorporate new security measures. This can be enhanced by: • following Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm; [5] • applying recommendations for safety and security in design where relevant (e.g. CCTV, lighting, active frontages that generate passive surveillance, design that avoids vandalism).
Improved access, mobility and navigation: Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are several equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.	• Children • Older people • Disabled people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	The regenerated Estate will improve connectivity and accessibility across the Estate. To enhance this, it is recommended to: • ensure the design of movement networks specifically addresses the mobility and user needs of different groups. This can be achieved by applying principles of inclusive design;[6] and • apply design that creates a safer environment for all transport users by managing potential conflicts between modes.
New employment opportunities: Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access	• Older people • Disabled people • BAME people • Women • Young people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate	The regenerated Estate will provide new retail space and opportunities for employment through construction jobs, meanwhile use spaces and apprenticeships secured via social value commitments. Where possible, current businesses are receiving support (as outlines above) to relocate to the new Estate. Beyond improving outcomes for existing businesses, there are also opportunities to improve equality of outcomes by:

[5] Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications
Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf

[6] Design Council (2006) 'The Principles of Inclusive Design'. Available at: https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf
Department for Transport (2005) 'Inclusive mobility' Available at: https://www.gov.uk/government/publications/inclusive-mobility
Department for Transport (2007) 'Manual for Streets'. Available at: https://www.gov.uk/government/publications/manual-for-streets

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
employment and education can serve to help address issues of inequality and improve social mobility.		(17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	• working with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. BAME people, disabled people, young people.

1. Introduction

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

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

1.2 Purpose of the EqIA

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

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

1.2.1 The Equality Act 2010 and Public Sector Equality Duty

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

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

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;

(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Source: Equality Act 2010

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

1.2.2 Protected characteristics

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

Table 1: Protected characteristic table and definitions

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

An EqIA does this through the following approaches:

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

1.2.3 Assessing equality impacts

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

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

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

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

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

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

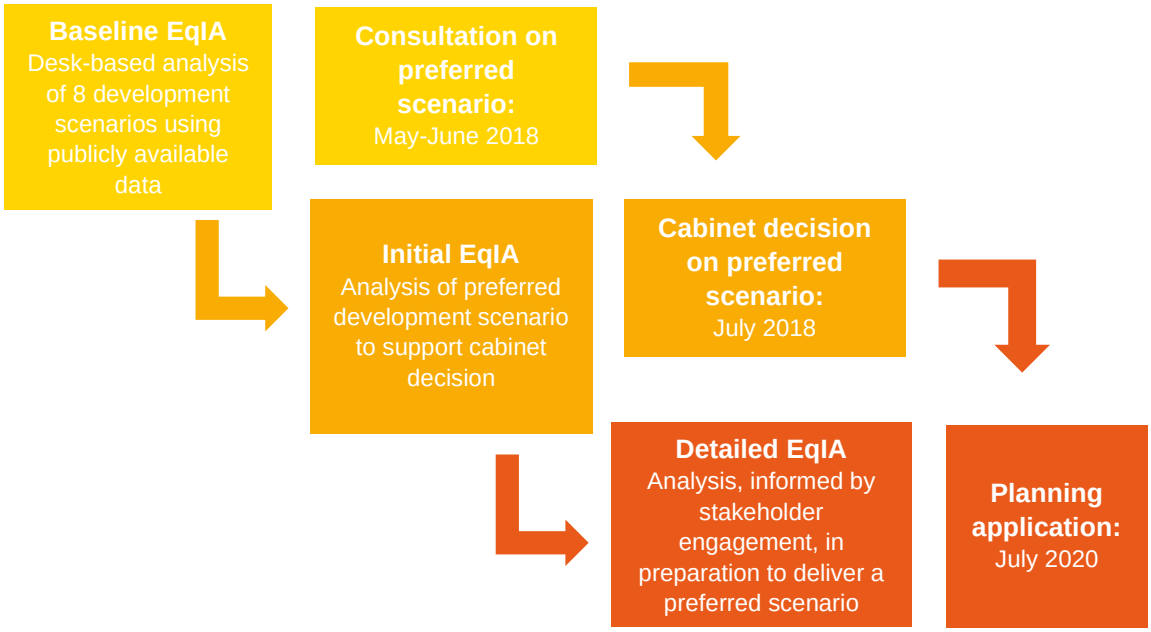
1.3 Overall approach to the EqIA

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

1.3.1 Stages of the EqIA

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

Figure 3: EqIA activity against development process



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

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

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

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

Understanding the project

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

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

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

Evidence, distribution and proportionality

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

Engagement and analysis

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

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

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

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

Impact assessment

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

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

Drawing conclusions and action planning

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

1.4 Methodology for identifying effects

1.4.1 Assessing equality effects

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

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

The assessment considers:

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

1.4.2 Differential effects

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

1.4.3 Disproportionate effects

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

2 The Ebury Bridge Estate: redevelopment context

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

2.1 Overview: Ebury Bridge Estate

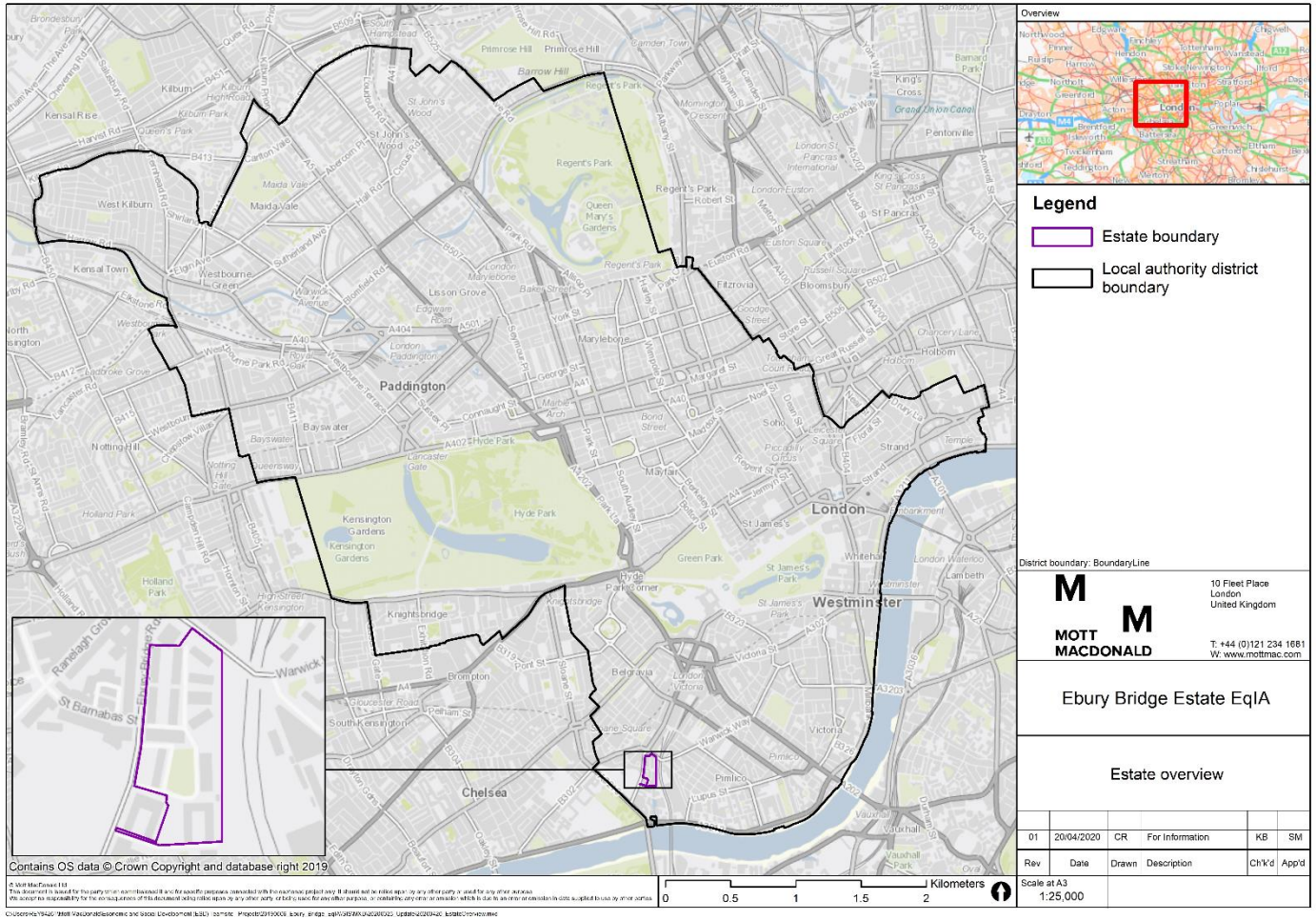
The Estate is located south of London Victoria and north of the River Thames, bordered by Ebury Bridge Road and Pimlico to the west, and railway lines running into Victoria station to the east. The surrounding area is of primarily residential in character in an urban setting, with some surrounding taller,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

Figure 4: Ebury Bridge Estate

Source: Mott MacDonald, 2018

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

Figure 5: Ebury Bridge Estate, City of Westminster



Source: Mott MacDonald, 2020

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

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

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

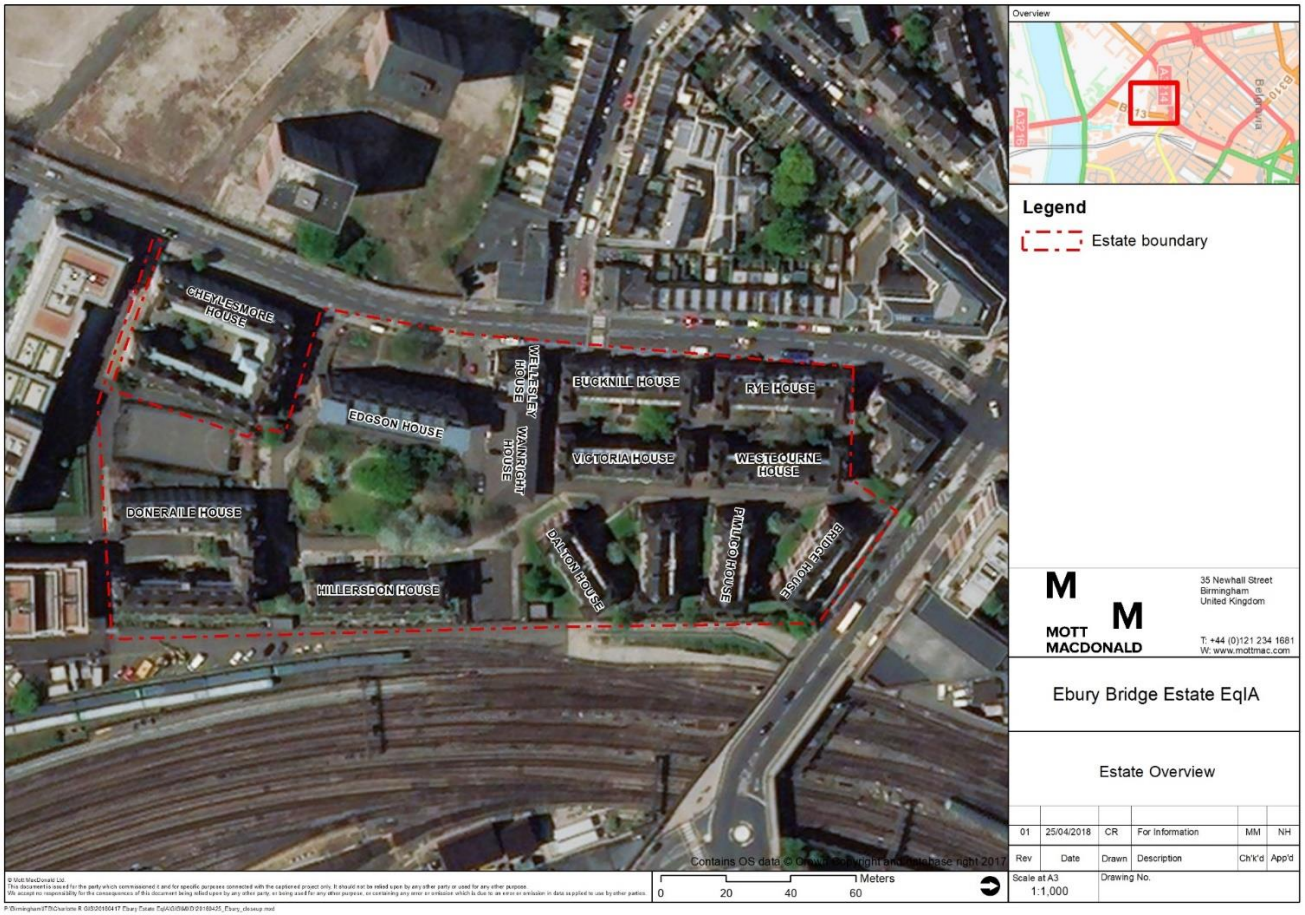
A walk-through site visit of the Ebury Bridge Estate found that though the buildings used similar material, they tended to differ in form, character and community feel. The visit identified several facilities on site including a children's playground, a number of small central green spaces, a fenced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

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

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

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

Figure 6: Ebury Bridge Estate map



Source: Mott MacDonald

2.2 Renewal of the Estate

2.2.1 Proposed redevelopment

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

2.2.2 Renewal scenarios

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

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

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

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

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

2.2.3 Announcement of preferred scenario

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

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

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

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

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

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

2.2.4 Current situation

2.2.4.1 Cabinet decisions

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

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

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

2.2.4.2 Phasing and design

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

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

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

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

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

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

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

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

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

2.3 Support for affected residential and business properties

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

2.3.1 Approach to acquisitions and engagement

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

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

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

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

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

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

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

2.3.2 Support available to leaseholders

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

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

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

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

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

Rehousing options

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

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

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

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

Option available	Description of option
	• has employment in, or in close proximity to, the HRA, and the travel time and/or costs to the employment site from elsewhere are unreasonable in the long term.[20]

Source: Westminster City Council, 2018

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

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

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

Financial compensation

Every resident leaseholder is entitled to the following statutory compensation:

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

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

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

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

property subject to levels set by Government of a minimum of £6,400 and maximum of £64,000.[23]

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

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

2.3.3 Support available to tenants

After undergoing a consultation process in 2018, the 'Policy for Tenants in Housing Renewal Areas' was approved by Council in 2019.[25] It provides guidance on the support offered to different types of tenants in HRAs. The details of support for different tenancy types are set out below.

2.3.3.1 Council tenants

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

Options available to Council tenants

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

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

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

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

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

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

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

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

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

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

Rehousing process

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

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

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

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

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

Financial compensation

Council tenants are entitled to the following statutory compensation:

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

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

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

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

Advice, support and information

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

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

2.3.3.2 Private tenants

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

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

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

2.3.4 Support available to businesses

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

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

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

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

3 Equality risks and opportunities

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

3.1 Summary

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

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

Table 3: Effects on residents during redevelopment

Effects on residents during redevelopment	Potentially affected groups	Risk or opportunity?
Social infrastructure and access to community resources The renewal process can involve temporary or permanent resettlement of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. In particular it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and pregnant women may also experience negative health impacts from this, including increased stress and anxiety.	• Children • Older people • Disabled people • BAME people • Minority faith groups • Pregnant women	Risk
Access to finance and affordable housing Where renewal schemes require residents to resettle, it can lead to an increase in financial outgoings due to costs associated with moving and obtaining new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who experience difficulty accessing appropriate and mainstream financial services, such as bank accounts, loans and mortgages.	• Young people • Older people • Disabled people • BAME people • Women	Risk
Appropriate and accessible housing Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable temporary and permanent housing that meets the needs of families with children, groups that are more likely to face overcrowded housing conditions and people requiring adaptable and accessible housing.	• Children • Disabled people • BAME people	Risk
Health effects Health effects may arise as a result of the environmental effects of demolition and construction processes, such as changes to air quality or noise pollution. Health effects may also result from social isolation due to housing relocation, such as poorer mental health, obesity, alcoholism, and a greater risk of hospitalisation.	• Older people • Disabled people • Pregnant women • Children	Risk
Safety and security In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime. It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and BAME people.	• Young people • Disabled people • BAME people • LGBT people • Men • Older people • Women • Children	Risk
Accessibility and mobility in the area: Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.	• Older people • Disabled people	Risk

Effects on residents during redevelopment	Potentially affected groups	Risk or opportunity?
Information and communication: The process of regeneration often requires two-way communication between residents and the council and or housing authorities in order for residents to understand the options available to them. The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication	• Older people • Disabled people • BAME people	Risk

Table 4 Effects on businesses during redevelopment

Effects on businesses during redevelopment	Potentially affected groups	Risk or opportunity?
Loss of employment The renewal process may result in the temporary or permanent closure and/or relocation of businesses. These changes may create redundancies or result in current business owners and staff being unable to access employment, due to relocation of the business to a difficult to access location for staff, businesses that are only viable as they serve a specific local need or community, or older people who lack the time or resources to re-establish a business ..	• BAME people • Older people • Disabled people • Young people • Women	Risk
Impact of redundancy on health and well-being Involuntary job loss due to redevelopment and renewal can have differential health and well-being effects for certain groups. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions. Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.	• Older people • Children	Risk
Difficulty accessing commercial finance For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises, which can be more difficult for particular groups.	• BAME people	Risk
Reduced job satisfaction Redevelopment may result in the relocation of businesses. This may increase commuting distances for owners and employees, which studies have shown as having a greater impact on job satisfaction for women over men.	• Women	Risk

Table 5 Effects on Ebury community following redevelopment

Effects following redevelopment	Potentially affected groups	Risk or opportunity?
Improved housing provision: Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption. Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home.	• Children • Older people • Disabled people • BAME people	Opportunity
Provision of community resources and improved social cohesion Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation. An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.	• Children • Older people • Disabled people • BAME people • Pregnant women • LGBT	Opportunity
Improved public realm and green space Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition the opening up of green space has been shown to impact positively on both physical and mental health. Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.	• Children • Older people • Disabled people • BAME people	Opportunity
Tackling crime and disorder Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.	• Young people • Disabled people • BAME people • LGBT people • Men • Older people • Women • Children	Opportunity
Improved access, mobility and navigation: Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.	• Children • Older people • Disabled people	Opportunity

Effects following redevelopment	Potentially affected groups	Risk or opportunity?
New employment opportunities: Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility.	• Older people • Disabled people • BAME people • Women • Young people	Opportunity

4 Estate profile and proportionality

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

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

4.1 Socio-demographic profile of the area

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

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

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

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

Table 6 Socio-demographic baseline

Protected Characteristic	Estate comparison with Westminster, Greater London and England[29]	Equality survey results[30]
Age	• **The proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%).**[31] • Population of young people (16-24) is consistent with other areas. • The percentage of working age people (aged between 16 and 64) (66%) is lower than Westminster (71%) but broadly in line with Greater London and England (65% and 64%, respectively).	• In both the resident surveys, a range of ages were represented across households. • Households with children (15), young people (16), working age people (65) and older people (33) were identified through the surveys. • Across the commercial properties which completed the survey, there is a spread in the ages of the reported owners. Older people were identified but no younger people (under 25) were highlighted. The same is also true across those employed

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

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

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

	• Population of older people (65+) living on the Estate (10%) is consistent with Greater London (12%) and lower than Westminster (13%) and England (18%). • The percentage of older people over 65 years within the Estate (10%) is broadly in line with Westminster and Greater London (13% and 12%, respectively) but lower than England (18%).	by the commercial properties who took part in the survey. • None of the commercial properties which completed the survey, reported having an owner or employing any staff with a long-term physical or mental health condition, disability or illness. However, two properties did not know or preferred not to disclose such information about their employees.
Disability[32]:	• **There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).**	• 39 households who responded to the surveys identified at least one disabled person in the household. • None of the commercial properties which completed the survey, reported having an owner or employing any staff with a long-term physical or mental health condition, disability or illness. However, two properties did not know or preferred not to disclose such information about their employees.
Gender reassignment	• No information is publicly available for the Estate.[33]	• No households who responded to the survey identified a household member as being trans. • None of the commercial properties which completed the survey reported having owners or employing staff who identify as trans. However, two properties did not know or preferred not to disclose such information about their employees.
Marriage and civil partnerships	• Population of those who are married or in a civil partnership is lower than or consistent with other areas.	• 30 households who responded to the surveys identified at least one person who is married or in a civil partnership in the household. • The commercial properties which took part in the survey identified some owners who are married. The same is also true for employees.
Pregnancy and maternity	• The general fertility rate (live births per 1000 women aged 16-44) and total fertility rate (avg. number of children born per woman) is lower than other areas.	• No respondents to the surveys identified anyone in their household as currently pregnant, however 3 households identified someone as being pregnant in the last 12 months. • None of the commercial properties which took part in the survey reported any of their owners or employees as being, or recently having been, pregnant. Two of the properties, did not know or preferred not to disclose such information about their employees.
Race	• **The Estate has a lower proportion of people from a Black, Asian or Minority**	• 61 households who responded to the surveys identified at least one person who

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

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

	Ethnic (BAME) background (43%) when compared to Westminster (61%) and Greater London (55%) but higher than England (20%). • **There is a higher percentage of Other White people in the Estate (19%) compared to London (13%) and England (5%), but this is broadly in line with Westminster (21%).** • The next largest minority ethnic group on the Estate is Irish, followed by Mixed - White and Black African.	was from a BAME background in the household. • The commercial properties which took part in survey reported having owners and employing staff who are from a BAME background. Two properties did not know or preferred not to disclose such information about their employees.
Religion	• **The Estate has a higher proportion of Christian residents in comparison to the City of Westminster and London but lower than England.** • Muslim is the next largest religious group represented on the Estate • Populations of people from other religious and faith groups are consistent with other areas.	• A range of religious beliefs were identified through the surveys. Of those who responded to the surveys, most households who identified as having a religion had at least one person who was Christian. The next most common religion was Muslim. • The commercial properties which took part in the survey reported having owners and employing staff who identified with a religion. Two properties did not know or preferred not to disclose such information about their employees.
Sex	• The population of men and women is consistent with other areas.	• Both men and women were identified through the household surveys. • The commercial properties who took part in the survey identified having male owners as well as female. The same is also true for those employed by the properties. Two of the properties preferred not to disclose or didn't know about their staff.
Sexual orientation	• No information is publicly available for the Estate.[34]	• Of the households who took part in the surveys, six households identified at least one person as having a sexual orientation other than straight. • Across those commercial properties which took part in the survey it was reported that there are those with an alternative sexual orientation to heterosexual. One property preferred not to say about the owner and two preferred not to disclose or didn't know about their staff.

4.2 Residential properties, business and community resources

4.2.1 Overview of residential properties on the Estate

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

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

Table 7: Residents by tenure type *[35]

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

Source: Westminster City Council, 2020

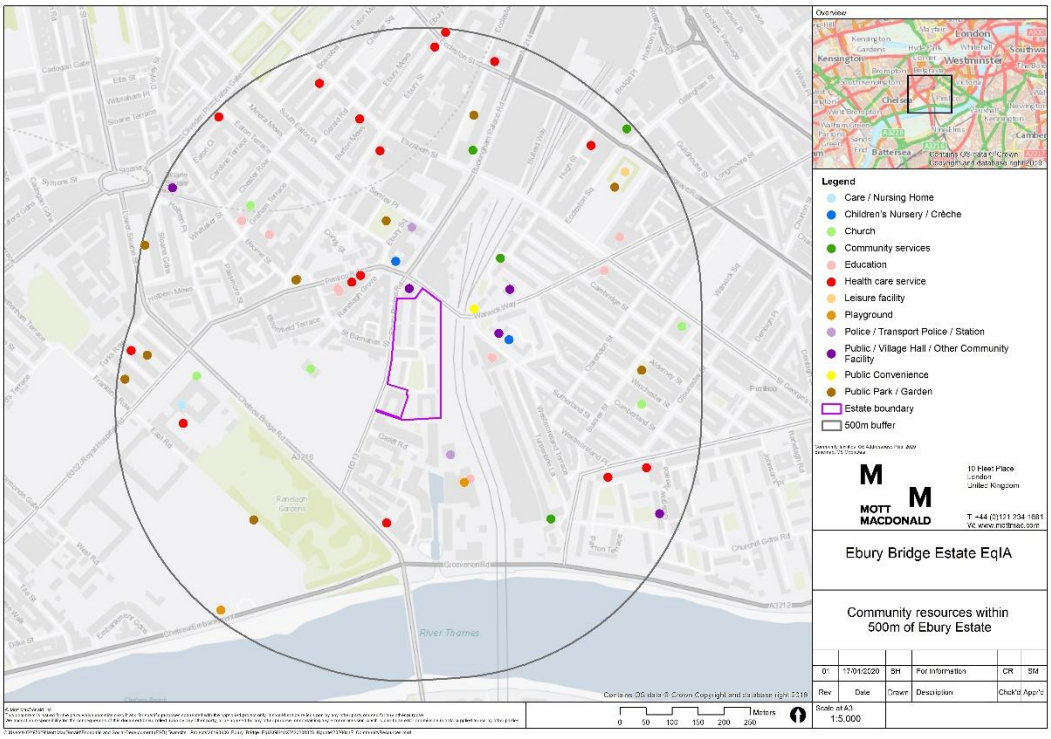
4.2.2 Overview of community resources on the Estate

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

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

[35] Correct as of May 2020

Figure 7: Community resources with 500m of the Estate



Source: AddressBase, 2020

4.2.3 Overview of businesses on the Estate

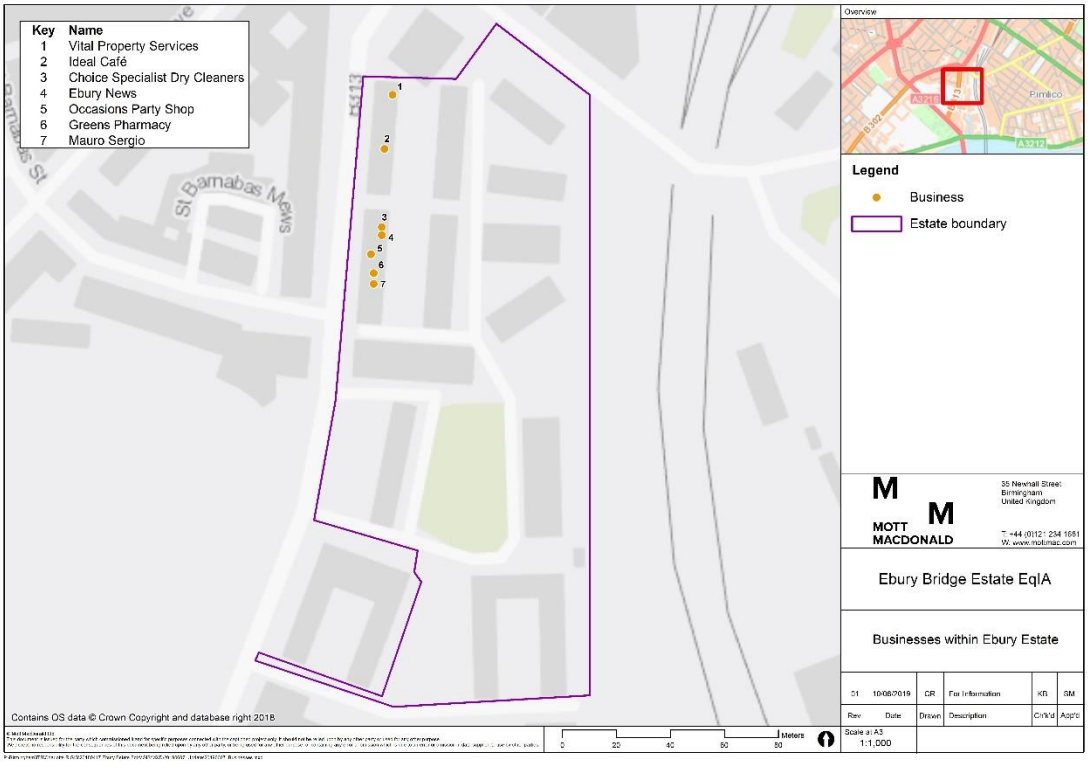
There are seven commercial properties which have been identified within the Estate that have been in occupation from the beginning of the redevelopment process. According to the equality survey results discussed later in this chapter, the businesses are microbusinesses – small in size, owned by one to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

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

Table 8 Businesses on the Estate

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

Figure 8: Businesses on the Estate



Source: Mott MacDonald 2020

4.3 Use of the Estate profile information in the EqIA

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

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

5 Impact assessment

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

5.1 Overview

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

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

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

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

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

Table 9 Impact on residents during redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
Social infrastructure and access to services: The renewal process involves temporary and permanent resettlement of residents and demolition of housing and community resources. This can lead to the risk of loss of social infrastructure and access to these resources. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and pregnant women may also experience negative health impacts from this, including increased stress and anxiety. Within 500m of the Estate there are the following community resources: 15 health care services, one care / nursing home, two children's nurseries, five churches, four community services, eight educational facilities, one leisure facility, one playground, two police stations, five public / village hall / other community facilities, one public convenience and nine public parks or gardens. The loss of social connections may result in disproportionate effects on certain groups on the Estate due to increased distances to community resources such as local schools (e.g. St Barnanbas Primary school, St Gabriel's School, Churchill Gardens Primary Academy and Pimlico Academy) or cultural and religious facilities (e.g. St Barnabas' Church Pimlico and St Mary's Church). Local shops, such as those on Ebury Bridge	• Children • Older people • People from BAME backgrounds • Disabled people • Pregnant women • Religion and belief	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • **Religion and belief:** Publicly available data shows that there is a higher proportion of Christian residents on the Estate compared to the rest of the borough.	To mitigate these effects, the Council has set out the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas (as summarised in section 2.3) to provide information on housing options, financial compensation and practical support for residents. The key mitigation in this policy that responds to maintaining social connections within the Estate is that all existing Council tenants and resident leaseholders will have a right to return to a new home on the redeveloped Estate. Within the policy, the Council recognises that many tenants and leaseholders have connections to their local area and will want to remain there. A range of rehousing options (including replacement affordable housing options such as social rent and intermediate ownership) are available for tenants and leaseholders who want to stay in or close to the Estate to suit different circumstances. This should help residents to ultimately able to return to the Estate, and therefore continue to access the social infrastructure that is important to them. Where households are rehoused temporarily or permanently, their housing needs will be considered. • The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems – where a resident leaseholder cannot return as an owner the Council will offer a Council tenancy. • All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. • Private tenants have been offered rehousing support through the Trailblazers service on the basis of their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. • Temporary Accommodation (TA) tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere There is also dedicated support available to residents who need to access it, for ongoing information around the redevelopment. In terms of enhancement measures, the redevelopment consists of new community infrastructure.	This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects it is recommended that the Council: • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to-date records of changing needs and circumstances– particularly those who are most affected by relocation; • continue to hold community meetings and events during the process of redevelopment, including events for residents who have relocated in order to remediate feelings of social isolation; • continue to work with local businesses to prevent business closures and ensure residents in the area can continue to access their services; • continue to communicate rehousing options to residents, including processes for accessing Council housing and affordable housing being built as part of the redevelopment; • continue to offer support to those in private accommodation through the Trailblazer service; • ensure that access to community resources is maintained throughout the renewal process where possible; and • for families with school-aged children, temporary or permanent housing off the Estate should not be at such a distance as to necessitate and involuntary school change.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
Road, may also decide to close as a result of the redevelopment.				
Access to finance and affordable housing: Where renewal schemes require residents to resettle, it can lead to an increase in financial outgoings due to costs associated with moving and obtaining new housing. Relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who experience difficulty accessing appropriate and mainstream financial services, such as bank accounts, loans and mortgages.	• Young people • Older people • People from BAME backgrounds • Disabled people • Women	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	Housing options are available within the HRA, which include replacement of housing for existing Council tenants and leaseholders on the Estate, A mix of housing options will be available to provide a ladder of housing opportunity. At least 50% will be affordable for social and intermediate rent, including the homes set aside for those residents with a right to return to the Estate. For resident leaseholders, an equity loan scheme is available to help with buying one of the new properties which will be of a higher value but will have similar costs to their existing home. As set out above, there is also support for vulnerable private tenants and TA tenants to source suitable housing. The Council has developed strategies to ensure that residents are able to access finance in order to relieve some of the financial burden associated with relocation. These include the following compensation measures: • Compensation equal to the open market value of the property (for leaseholders); • Home loss payments, a sum in recognition of the inconvenience of having to move out of an existing property, which is set at a minimum of £6,400 (as of April 2020); and • Disturbance payments for reasonable expenses arising as a direct consequence of the Council purchase of a property. These payments may include costs such as costs of removals (including additional support for vulnerable residents), disconnections and reconnections, redirection of mail, fitting of existing curtains and carpets, early	This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended the Council: • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to date records of changing needs and circumstances– particularly those who are most affected by financial exclusion, who may be experiencing increased financial insecurity due to Covid-19; • continue to communicate rehousing options available to residents, including information for private tenants, Temporary Accommodation tenants and leaseholders on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby; • ensure homes built on the Estate provide a mix affordable housing options e.g. social rent and shared ownership/equity options. As of July 2020, the current planned housing mix provides this range of options; and • explore service charge levels in detail to determine whether there are mechanisms to maximise affordability for those wishing to return to the Estate.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
			mortgage redemption fees or mortgage and tender fees arising from the purchase of a new property, stamp duty land tax and other fees arising from the purchase of a replacement property and costs of new school uniforms. This compensation and availability of affordable housing options will serve to manage the main financial effects of rehousing.	
Appropriate and accessible housing: Certain groups who currently reside on the Estate may experience adverse effects if temporary or permanent rehousing is not adequate for their needs. Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children and people requiring adaptable and accessible housing.	• Children • Disabled people • People from BAME backgrounds	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	As set out above, the Council has developed policies to ensure that there is support available for finding appropriate and accessible housing. Where households are rehoused temporarily or permanently, their housing needs will be considered. • The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems. • All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. • Private tenants have been offered rehousing support through the Trailblazers service on the basis of their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. • Temporary Accommodation tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere. Those with special accessibility requirements are prioritised through the rehousing process. Where possible they are relocated in the HRA, otherwise housing that suits their needs is sourced in the local area. Adapted and accessible housing has been found for all current tenants requiring it, which meets mobility and housing	This effect is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended that the Council: • when re-providing any accessible or adaptable housing as part of the redeveloped Estate, the new housing should ensure there is adequate specialised housing for disabled people including homes for wheelchair users; • when re-providing housing as part of the redeveloped Estate, ensure there is adequate housing to suit the needs of families; this includes providing a sufficient number of homes with more than two bedrooms within the total number of units provided, to prevent any overcrowding; • ensure that work begins as early as possible on sites where a large increase in the provision of affordable homes is possible; • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to date records of changing needs and circumstances – particularly those who are most affected by a loss of affordable and appropriate housing; and • continue to provide information on rehousing options available to residents, including information for private tenants, Temporary Accommodation tenants and leaseholders on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby.

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
			needs as assessed through the Housing Needs Assessment process. Adaptations may also be funded through disturbance payments. Housing for families will be provided as part of the redevelopment, including replacement housing for families based on the number of bedrooms required, to prevent any over crowding. The overall housing provision on the Estate will be enhanced by re-providing homes to a higher standard with lower energy and maintenance costs, ensuring housing on the Estate meets residents' needs and involving residents in the design of the new homes.	
Health effects: Evidence has suggested health effects related to housing demolition, such as changes to air quality and noise pollution and effects related to housing displacement, such as social isolation, can arise for particular groups that are represented within the Estate and local area. Some groups, such as older and disabled people can differentially experience both isolation and construction effects, which can create more severe health impacts on these groups.	• Children • Older people • Disabled people • Pregnant women	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	In order to manage health effects related to stress due to relocating, the Council will be providing rehousing support (as outlined above). To manage health effects related to noise and air quality, demolition works will be monitored closely and disruption will be minimised as much as possible.[36] This would typically be managed through the creation of a Construction Environmental Management Plan (CEMP), which would be implemented by the contractor carrying out the works.	This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • continue to provide ongoing support to residents through the rehousing process; • identify and work with vulnerable people whose protected characteristics may make them more vulnerable to adverse health effects; and • develop a CEMP as part of the demolition and construction works.

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

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
Safety and security In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime. It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and BAME people.	• Young people • Older people • BAME people • Disabled people • LBGT people • Men • Women	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	Effects on personal security will be managed through security that is in place seven days a week between 7PM and 5AM as well as hoardings used to secure empty blocks and additional lighting. There is also a process in place for reporting and addressing any incidents of Anti-Social Behaviour (ASB) within the Estate. This process has been publicised through the Ebury Bridge newsletter.[37]	This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • consider the use of Property Guardians, people who will reside in and oversee the property for a short term, to secure the vacant Estate properties; and • continue to monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with remaining residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.
Accessibility and mobility in the area: Evidence has indicated that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, reducing parking (construction vehicles and subcontractors in parking), the construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding.	• Older people • Disabled people	• There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	The Council is engaging with residents on an ongoing basis around parking and access requirements. Accessibility of the Estate will be considered through the process of construction planning (e.g. ensuring hoarding does not sever the Estate).	The consultation process highlighted that some stakeholders are particularly concerned around parking. There are concerns that the scheme will have a negative impact on existing parking spaces on surrounding local roads. This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • ensure any blue badge / accessible parking is retained for homes requiring it; • ensure that accessibility of the Estate is planned for and monitored through the construction process through the development of a CEMP.
Information and communication: The process of regeneration often requires two-way communication between residents and the council and or housing authorities in order for residents to understand the options available to them. The process of relocation itself also requires communication with a variety of organisations including the council, housing associations and removal companies. Such communication could be direct via the phone, face to face or over email, or could be indirect via websites, leaflets etc. Some	• Older people • Disabled people • BAME people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but	The Council has developed a robust engagement approach that has been ongoing since the early stages of the project. Engagement has been undertaken through a variety of mechanisms to ensure residents are kept informed of rehousing information, updates around the wider redevelopment and opportunities to provide feedback on the process. The consultation process has taken several forms to encourage participation and ensure that emerging designs were formed in collaboration with residents. Such processes included: • Community Futures Group: the steering committee has continued to play a key role in the delivery of the scheme during consultation. • Dedicated consultation space: a vacant shop at No 9 Ebury Bridge Road has been used to	This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • monitor the reach and impact of online engagement (in particular, for the duration of the Covid-19 crisis) to ensure older people, disabled people and BAME people continue to be reached and are able to provide input to the redevelopment process; • continue to advise residents on ways they can meaningfully engage in decision making and understand options available to them; • continue to provide services such as language interpretation and face to face engagement; and • continue to publish information and seek feedback through a variety of mediums and different formats.

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

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
groups of individuals may find communication more challenging than others and this is likely to depend upon the exact method and format of communication		lower than Westminster (61%) and Greater London (55%).	provide a welcoming and accessible space for residents to visit. • Resident drop-ins: the designated redevelopment architects have provided themed sessions for residents to provide feedback. Subjects such as public realm, placemaking, re-housing and phasing have been covered. • Ebury Bridge website: a website has been created to provide an accessible platform for up to date scheme information. • Online consultation tool: for those unable to attend consultation events in person, or wanting to provide anonymous feedback, an online tool has been developed. • Newsletters: 26 editions of the Ebury Bridge Newsletter have been distributed over the last 18 months. Each copy provides details on how to give feedback. • Leaflet drops: all residents within a 1000m radius of the Estate have received leaflets and booklets with the option to provide feedback. • Targeted consultation meetings: the project team have met with 15 different amenity and resident groups in the area on a one-to-one basis. • Exhibition: a public exhibition was held over a two-week period. Three events took place on Saturday's and in the evenings to ensure participation.[38] • Mail out information packs: A printed pack has been distributed to all households with final design information, with a feedback form and link to provide feedback online. • Phone calls: Follow up phone calls have been made to suit different communication needs, to enable those who may find using online methods more difficult to provide feedback • Face to face meetings: In exceptional situations where it is required and the resident is not presenting symptoms, arrangements can be made to meet face to face using social distancing guidelines.	

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

Table 10 Impact on businesses during redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Existing Westminster Council mitigations	Assessment and recommendations
Loss of business and/or employment: The renewal process may result in the temporary or permanent closure and/or relocation of businesses. These changes may create redundancies or result in current business owners and staff being unable to access employment, due to a number of reasons. These could include: relocation of the business to a location that is difficult to access for staff (those that cannot afford to or are otherwise unable to travel long distances); businesses that are only viable as they serve a specific local need or community (such as BAME communities), or older people who lack the time or resources to re-establish a business . Groups that are most likely to face barriers to employment are most likely to be affected by loss of employment.	• Older people • Disabled people • BAME people • Young people • Women	• Publicly available data is not available for businesses as it is based on place of residence.	Although there is no statutory obligation to relocate impacted businesses, in order to prevent businesses from facing closure, and their staff facing redundancy, the Council has developed support for businesses. There is no formal Council policy for businesses, however businesses will be offered the first right of refusal on the new units available within the redevelopment. As businesses will need to relocate temporarily, the Council will work with them on a phased rent increase over the next three years, to help mitigate financial impacts of moving to a higher value property. Those who wish to sell their business have also been offered the chance to do so. One business has indicated they wish to pursue this and the Council has provided a figure based on their rateable value to extinguish their lease. One business, a pharmacy, was identified by the Council as providing essential services to those living on the Estate. The Council is currently looking into ways to maintain the pharmacy throughout the redevelopment. Existing businesses have also been offered bespoke business development support in order to ensure they are equipped to maximise the opportunity that the regeneration will bring and deal with the challenges of temporary relocation, such as information on how they might diversify their business.	In 2019, feedback from businesses showed that they felt they had not been as engaged as residents in the redevelopment process. Following this, further actions were taken by the Council to improve their business response (see column, left). This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, is recommended that the Council: • continue to work proactively through face to face engagement with vulnerable business owners and employees; • continue to provide business development support to help businesses deal with periods of incontinuity and change; • maintain businesses in place for as long as possible, if they plan to return to premises on the Estate; • ensure businesses are fully informed of the timescales that would affect them as soon as possible, including when they would need to vacate the premises and the period of time they would be inactive for before being able to reopen on the redeveloped Estate; • consider providing financial support to businesses to facilitate relocation after Council takes possession of a property; and • signpost to resources for finding employment or other support if an owner or employee is facing redundancy.
Impact of redundancy on health and wellbeing: Involuntary job loss due to redevelopment and renewal can have differential health and well-being effects for certain groups. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions. Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.	• Children • Older people	• Publicly available data is not available for businesses as it is based on place of residence.		
Difficulty accessing commercial finance For businesses, redevelopment and renewal may result in relocation or closure. This may result in a need to access finance to secure new premises, which can be more difficult for particular groups.	• People from BAME backgrounds	• Publicly available data is not available for businesses as it is based on place of residence.		
Reduced job satisfaction: Redevelopment may result in the relocation of businesses. This may increase commuting distances for owners and employees, which studies have shown as having a greater impact on job satisfaction for women over men.	• Women	• Publicly available data is not available for businesses as it is based on place of residence.		

Table 11 Impact on community following redevelopment

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
Improved housing provision: Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption. Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home	• Children • Older people • Disabled people • BAME people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	The regenerated Estate will provide improved housing, with respect to appropriateness, accessibility and affordability. In order to further enhance measures: • ensure final housing mix that is delivered meets the needs of current and future residents (e.g. ensuring at least 10% of homes are accessible); and • where possible, provide new housing that exceeds current minimum building standards e.g. Decent Homes Standard.
Provision of community resources and improved social cohesion Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation. An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.	• Children • Older people • Disabled people • BAME people • Pregnant women • LGBT	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	The regenerated Estate will provide new community resources including a community space that will provide a mix of uses. In order to further enhance measures: • continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements; and • monitor effects of increased population on community resources (such as schools and health care) and ensure these are mitigated.
Improved public realm and green space Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition the opening up of green space has been shown to impact positively on both physical and mental health. Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.	• Children • Older people • Disabled people • BAME people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	The regenerated Estate will provide additional green space and new play space. In order to further enhance measures: • enable ongoing involvement of the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people; and • ensure that inclusive design principles are followed in the design of public spaces.
Tackling crime and disorder Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.	• Young people • Disabled people • BAME people • LGBT people • Men • Older people • Women	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both	The regenerated Estate will provide an opportunity to incorporate new security measures. This can be enhanced by:

Potential equality effects	Potentially affected groups	Potential disproportionate effects due to demographics	Assessment and recommendations
	• Children	14%), however this figure is in line with the proportion of disabled people in England (17%). • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%).	• following Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm; [39] • applying recommendations for safety and security in design where relevant (e.g. CCTV, lighting, active frontages that generate passive surveillance, design that avoids vandalism).
Improved access, mobility and navigation: Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.	• Children • Older people • Disabled people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • **Children**: the proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	The regenerated Estate will improve connectivity and accessibility across the Estate. To enhance this, it is recommended to: • ensure the design of movement networks specifically addresses the mobility and user needs of different groups. This can be achieved by applying principles of inclusive design;[40] and • apply design that creates a safer environment for all transport users by managing potential conflicts between modes.
New employment opportunities: Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility.	• Older people • Disabled people • BAME people • Women • Young people	Due to the following groups being over-represented on the Estate, the distribution of the effect is likely to be larger than comparable areas: • The Estate has a higher proportion of people from a **Black, Asian or Minority Ethnic (BAME)** background (43%) when compared to England (20%) but lower than Westminster (61%) and Greater London (55%). • There are higher proportions of **disabled people** (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).	The regenerated Estate will provide new retail space and opportunities for employment through construction jobs, meanwhile use spaces and apprenticeships secured via social value commitments. Where possible, current businesses are receiving support (as outlines above) to relocate to the new Estate. Beyond improving outcomes for existing businesses, there are also opportunities to improve equality of outcomes by: • working with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. BAME people, disabled people, young people.

[39] Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications
Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf

[40] Design Council (2006) 'The Principles of Inclusive Design'. Available at: https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf
Department for Transport (2005) 'Inclusive mobility' Available at: https://www.gov.uk/government/publications/inclusive-mobility
Department for Transport (2007) 'Manual for Streets'. Available at: https://www.gov.uk/government/publications/manual-for-streets

6 Conclusions and action plan

6.1 Conclusion

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

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

6.2 Action plan

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

Table 12 Action plan

Action	Responsibility	Implementation
Create a communications and engagement plan which focusses on outreach through and following the planning application process, including: • Closely monitoring the reach and impact of online engagement methods through the Covid-19 crisis; • continuation of engagement activities providing updates on designs, opportunities to provide feedback, and wider information on the development process Consideration should be given to ensuring all information is provided in appropriate formats and languages to suit different needs, ensuring all consultation information is available to everyone.	Westminster City Council	Programme of future engagement events to be kept under review by the Council. Planning and development progress to be kept updated on the dedicated website. All information should be shared in a transparent manner. Marginalised groups to be included in decision-making processes throughout the entirety of the consultation process. Any extended public consultation process must therefore ensure delivery of proper feedback to local communities and use evidence-based community engagement initiatives. Any new equality issues that arise as a result of the engagement that are not identified in this document are flagged. Each task should be assigned to an appropriate party.

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

Appendices

A. Area profile and proportionality

A.1 Socio-demographic profile of the area

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

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

A.1.1 Age

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

A.1.1.1 Children (under 16 years)

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

A.1: Children (under 16 years)

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

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

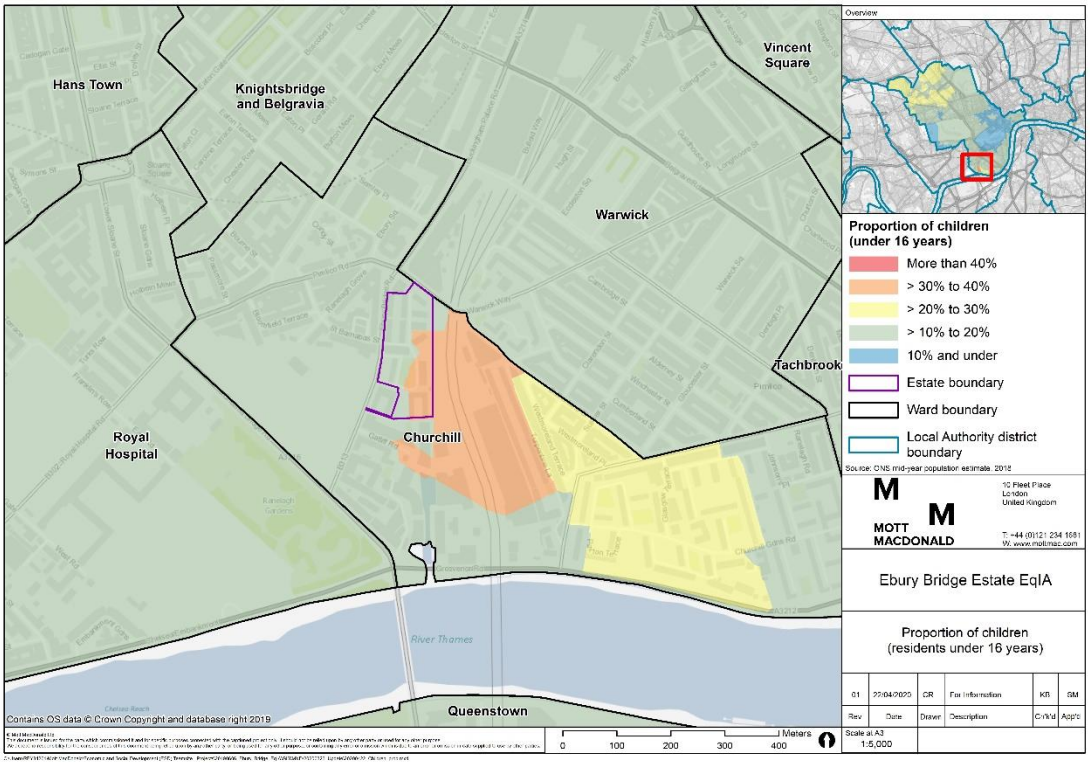
:

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

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

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

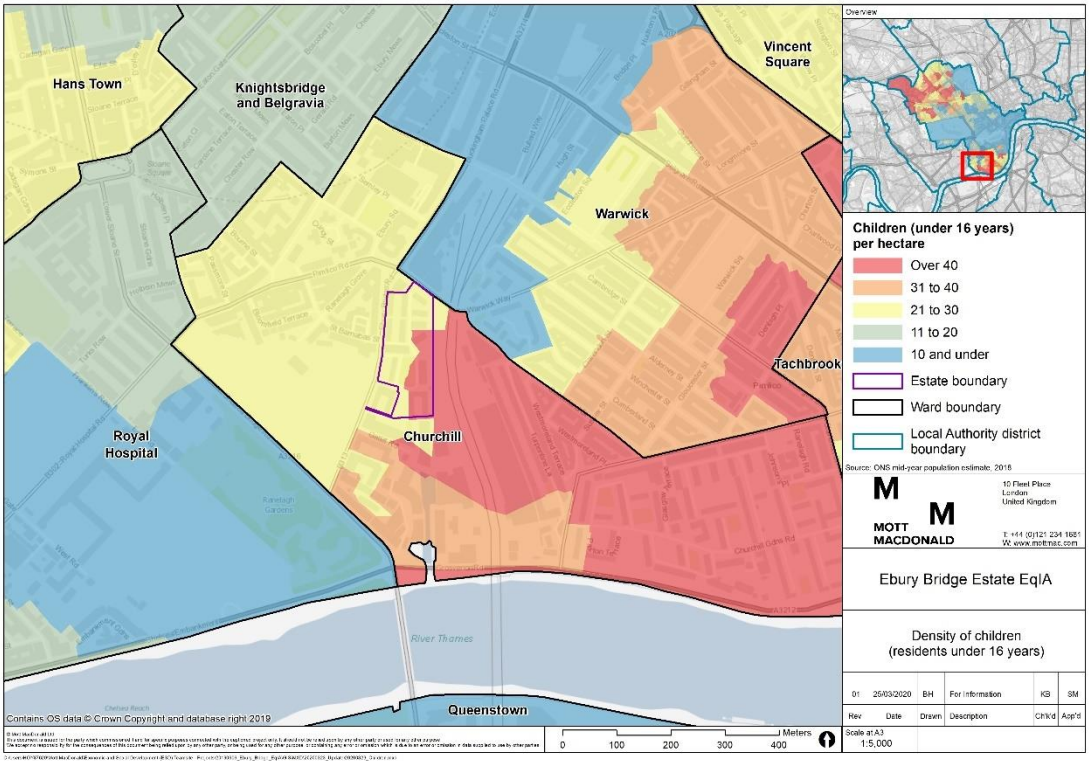
. **A.1: Proportion of children on Estate**



Source: Mott Macdonald, 2020

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

A.2: Density of children on the Estate



Source: Mott Macdonald, 2020

A.1.1.2 Young people (16-24 years)

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

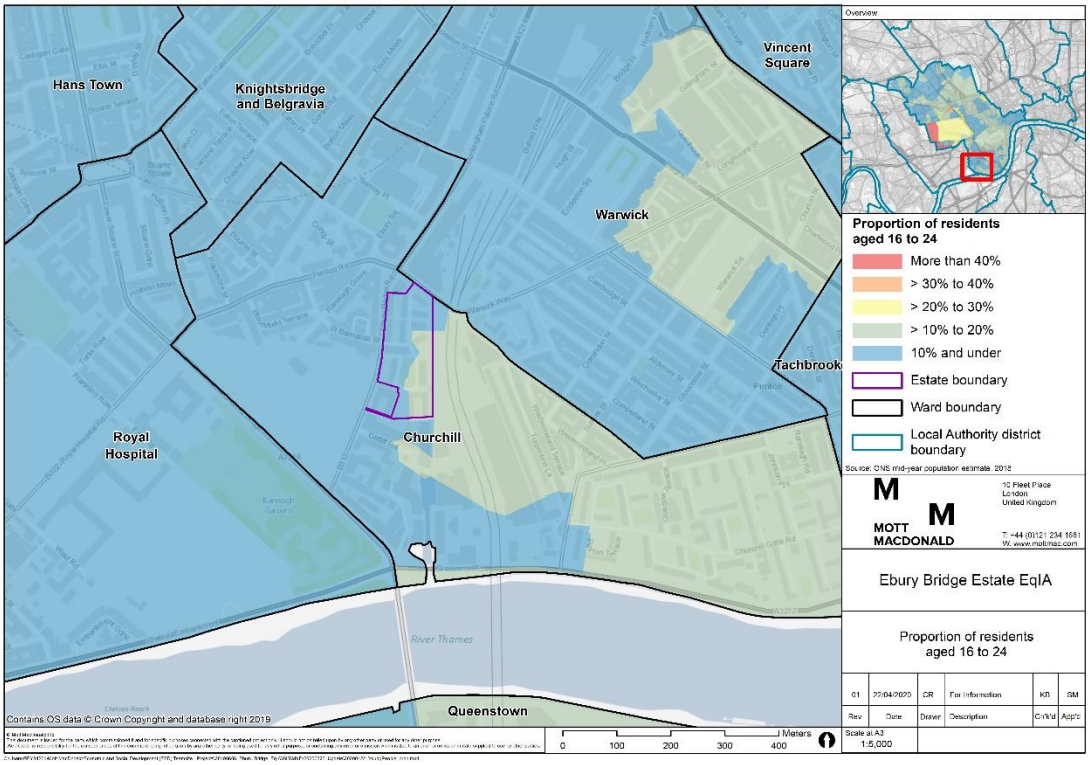
A.2: Young people (16-24 years)

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

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

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

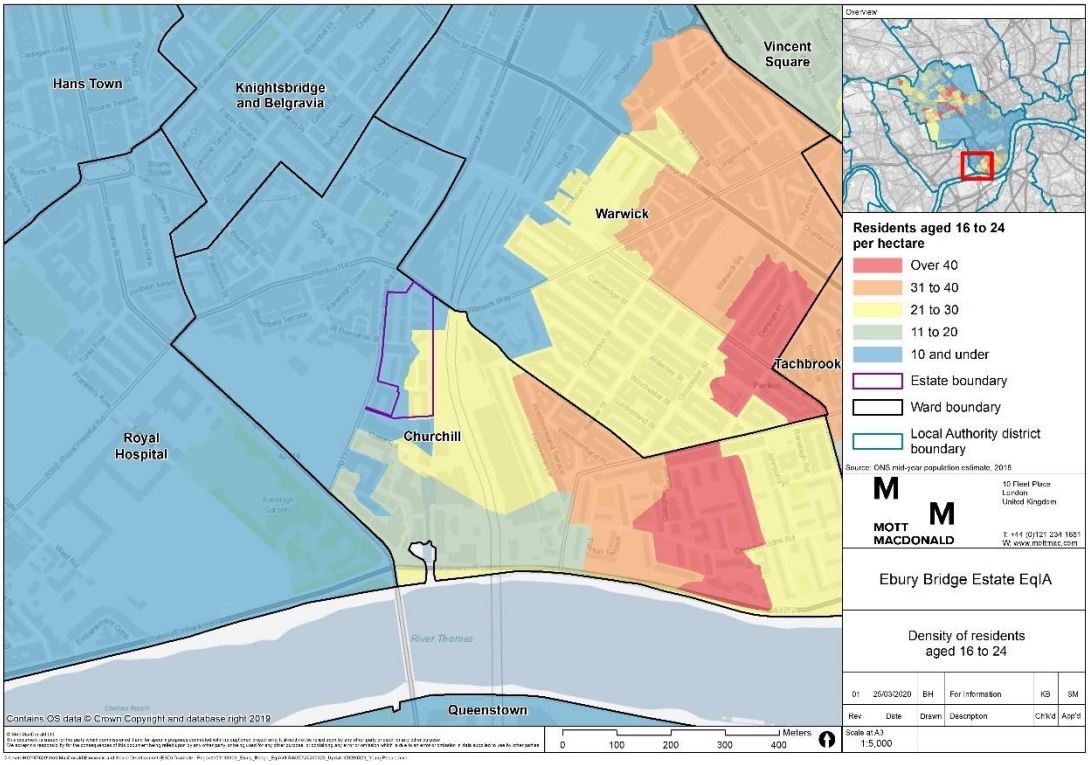
A.3: Proportion of young people on Estate



Source: Mott Macdonald, 2020

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

A.4: Density of young people on the Estate



Source: Mott Macdonald

A.1.1.3 Working age people (16- 64)

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

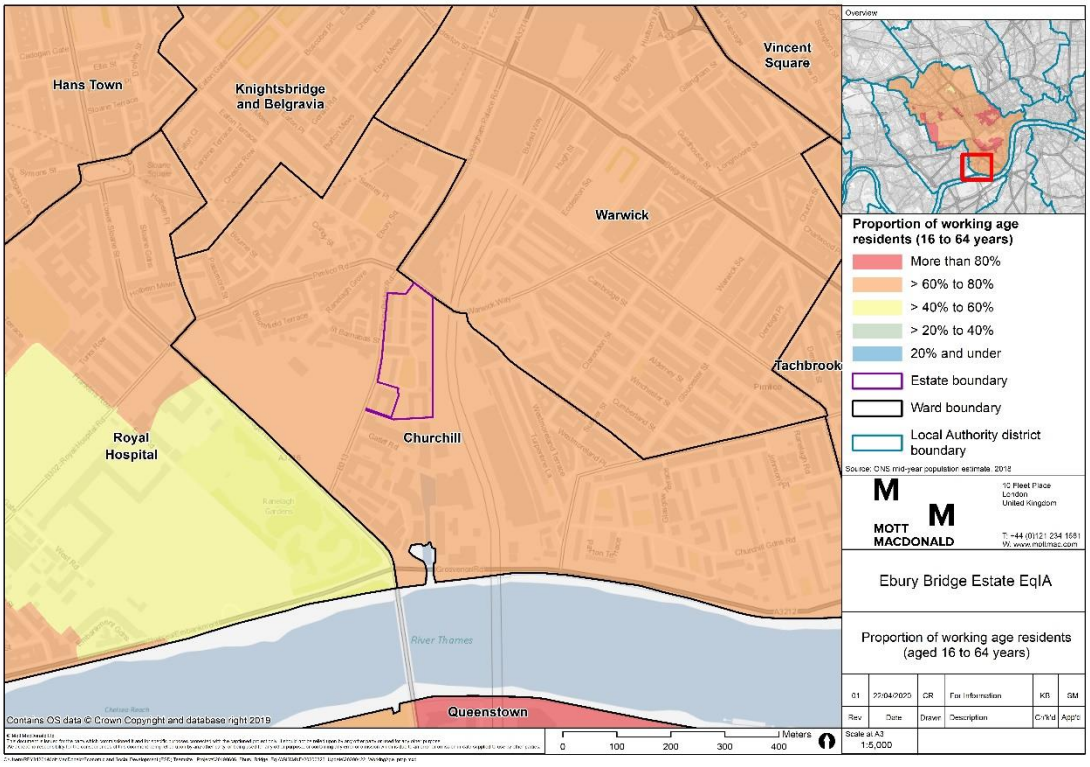
A.3: Working age people (16-64)

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

Source: ONS 2019 mid-year population estimates

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

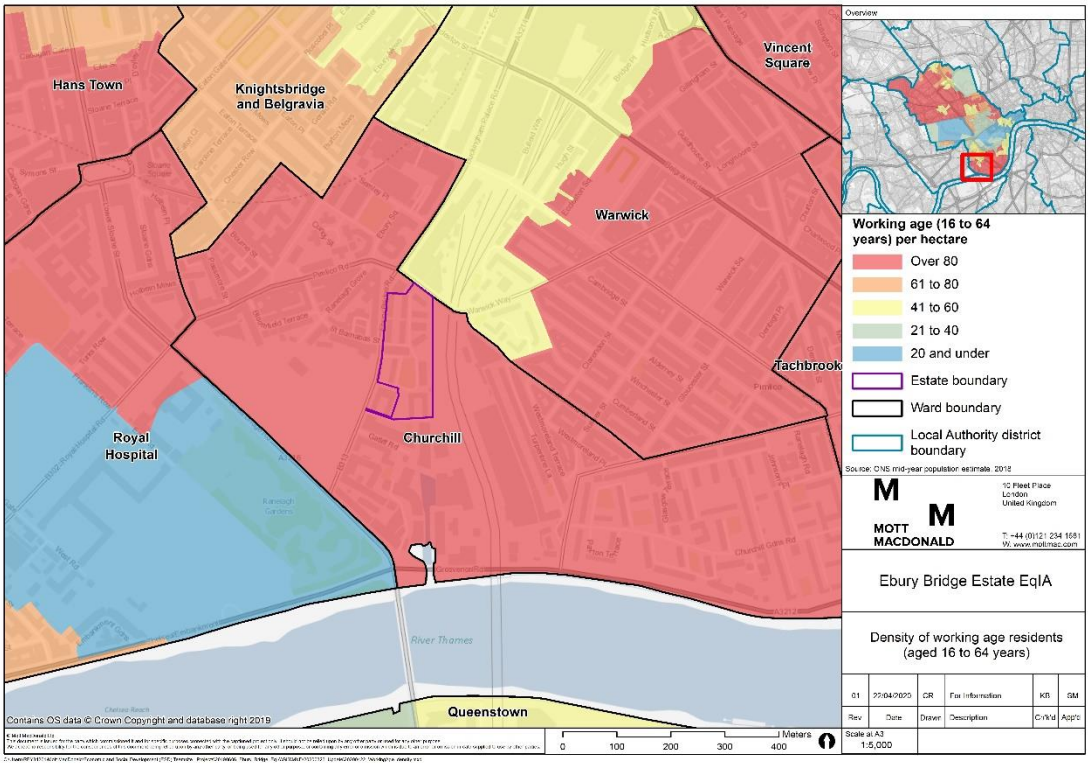
A.5: Proportion of working age residents on Estate.



Source: Mott Macdonald, 2020

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

A.6: Density of working age residents on Estate



Source: Mott Macdonald

A.1.1.4 Older people (over 65 years)

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

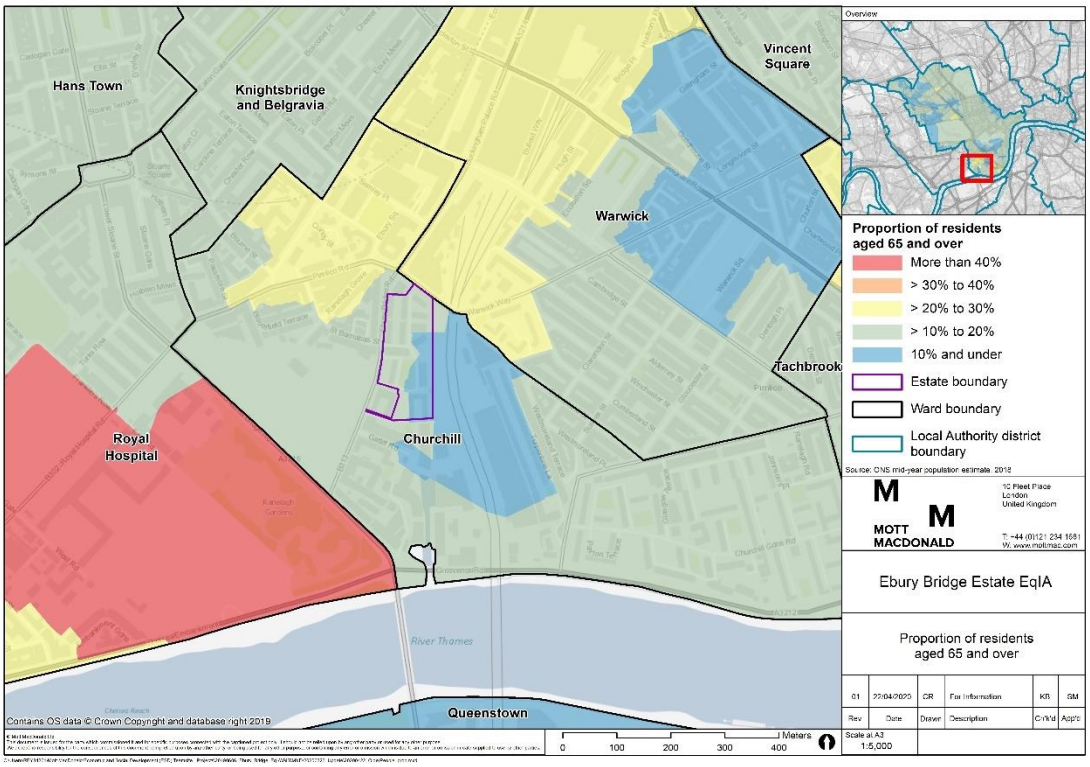
A.4: Older people (65+ years)

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

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

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

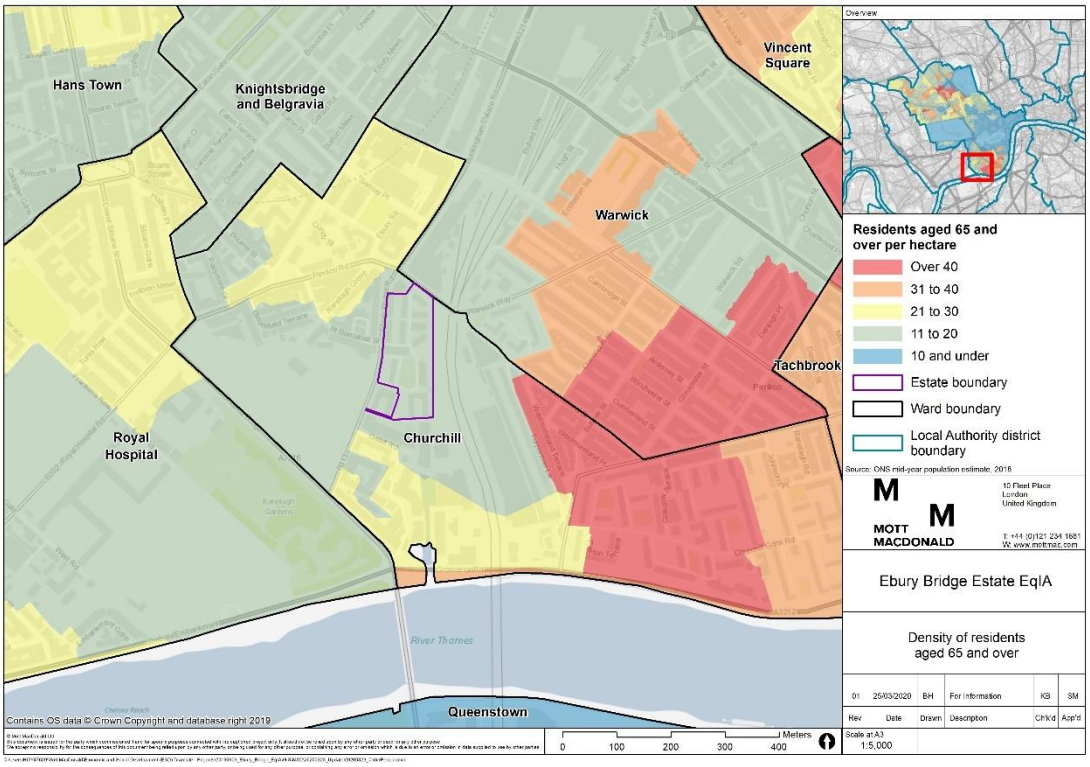
A.7: Proportion of older residents on estate



Source: Mott Macdonald, 2020

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

A.8: Density of older residents on Estate



Source: Mott MacDonald, 2020

A.1.2 Disabled people

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

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

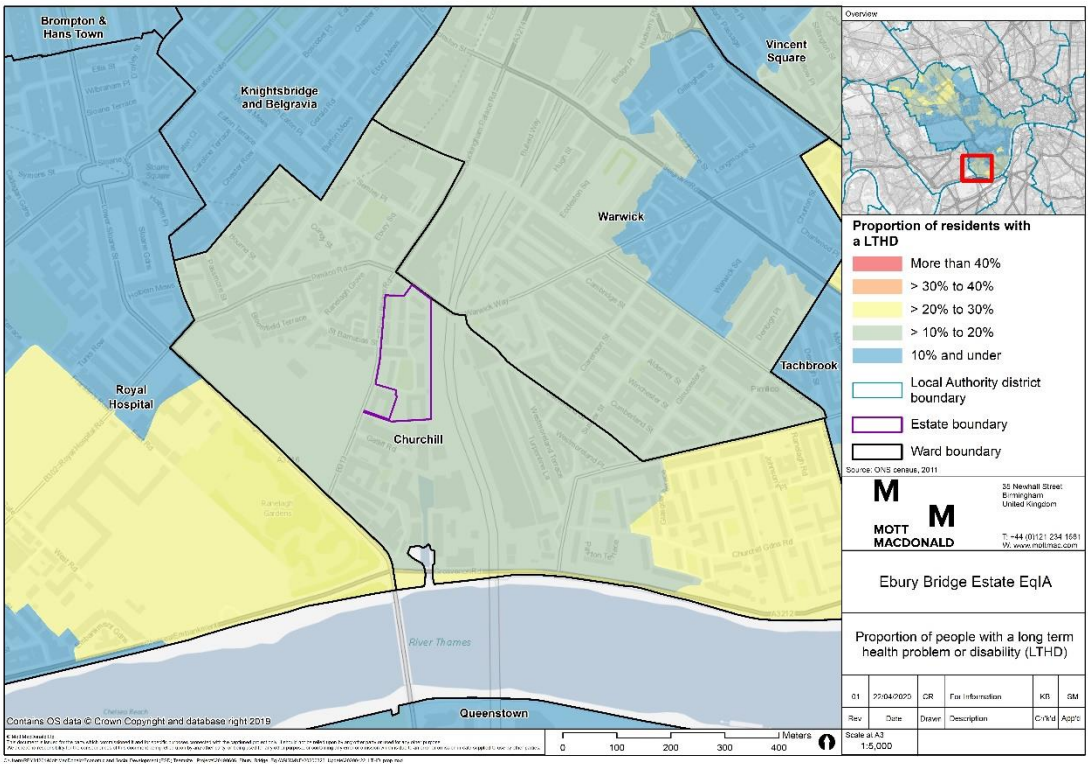
A.5: Population with a long- term health problem or disability limiting day- to- day activities

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

Source: Office for National Statistics, 2011 census

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

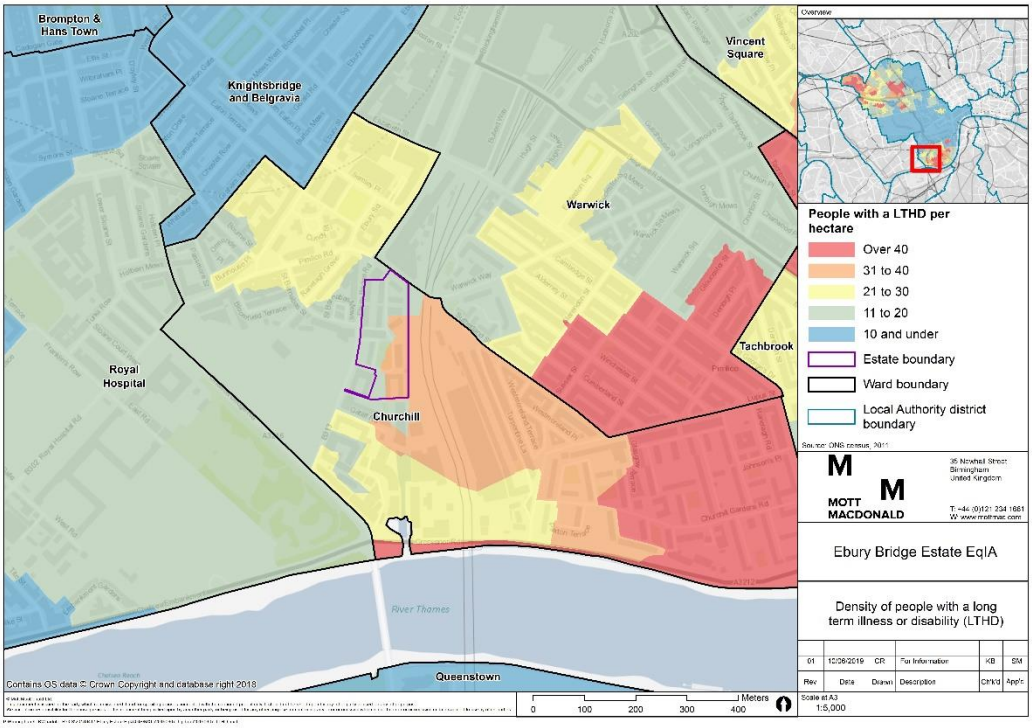
A.9: Proportion of residents with a long- term health problem or disability limiting day-to- day activities



Source: Mott MacDonald, 2020

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

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



Source: Mott Macdonald, 2020

A.1.3 Gender reassignment

There are no official or census data for the number of gender variant people in the study area, London or England. The ONS, though, has estimated that the size of the Trans community in the UK could range from 65,000 to 300,000.[43]

A.1.4 Marriage and civil partnerships

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

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

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

A.6: Population married or in a civil partnership

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

Source: Office for National Statistics, 2011 census

A.1.5 Pregnancy and maternity

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

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

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

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

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

A.8: General and total fertility rates

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

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

* number of live births per 1,000 women aged 15-44
** number of live children that a group of women would bear if they experienced the age-specific fertility rates of the calendar year in question throughout their childbearing lifespan

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

A.1.6 Race and ethnicity

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

A.9: Population by race and ethnicity

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

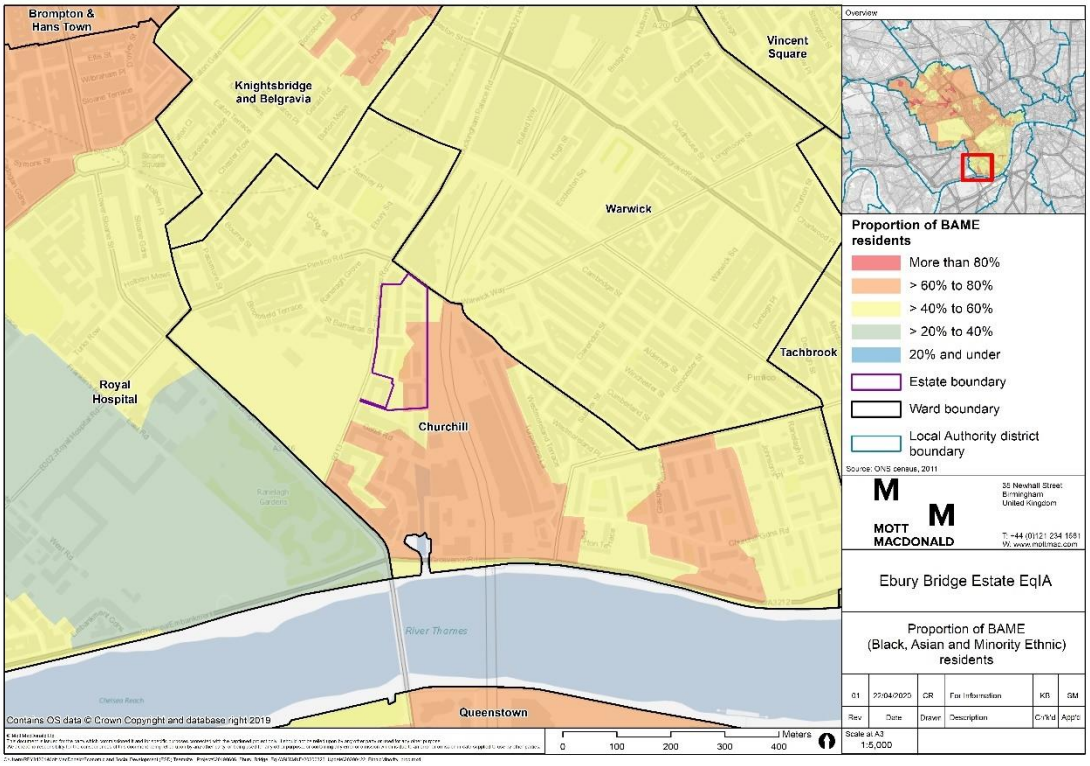
Source: Office for National Statistics (2011) National Census

The table shows the following patterns:

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

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

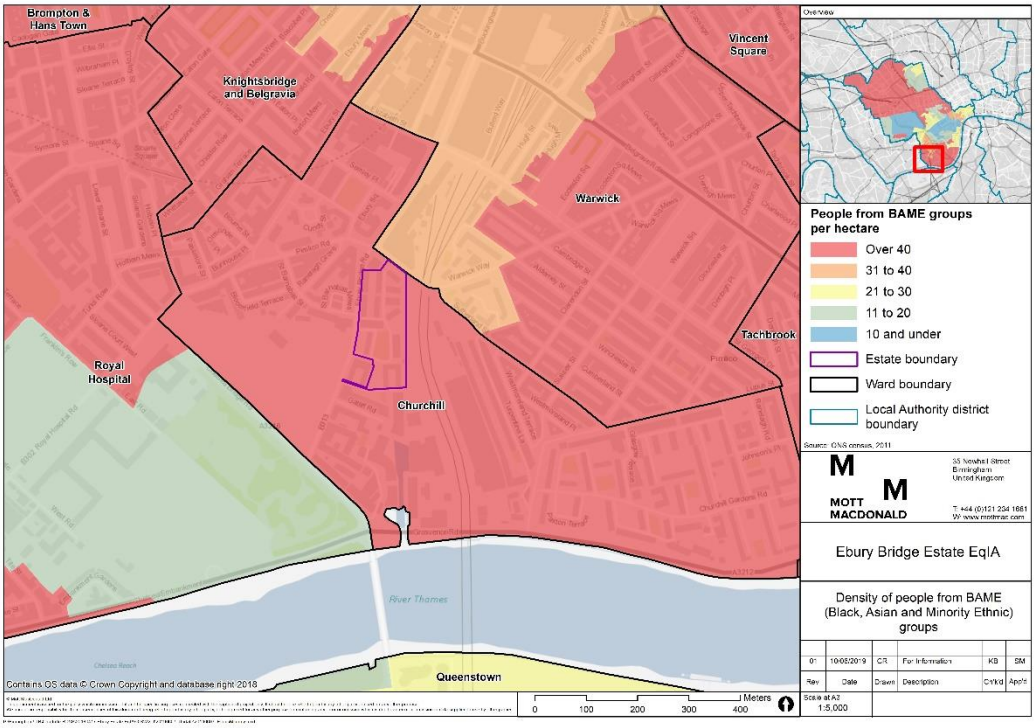
A.11: Proportion of residents from a BAME background



Source: Mott Macdonald

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

A.12: Density of residents from a BAME background



Source: Mott Macdonald, 2020

A.1.7 Religion and belief

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

A.10: Population by religion and belief

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

Source: Office for National Statistics (2011) National Census

The table shows the following:

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

A.1.8 Sex

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

Table 13: Population by sex

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

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

A.1.9 Sexual orientation

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

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

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

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

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

B. Analysis of existing evidence

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

Analysis of existing evidence

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

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

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

Children

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

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

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

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

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

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

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

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

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

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

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

Loss of relationships with peers and adults can cause anxiety and hinder both social development [53]and educational attainment. Children at key stage two experience an average of a twelve per cent drop in Maths and English attainment within a year of a changing schools.[54]

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

Older people

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

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

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

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

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

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

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

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

[57] Age UK (2015) '*Evidence Review: Loneliness in Later Life'*. Available at: https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health--wellbeing/rb_june15_lonelines_in_later_life_evidence_review.pdf .

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

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

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

As demolition for redevelopment proceeds, local amenities and services (such as shops, community centres and health facilities) may opt to close. Some community resources may be included in demolition or may themselves close. The loss of these resources can have a disproportionately negative effect on older people remaining in neighbouring areas, who may, in turn, find it more challenging to travel to new services outside of their neighbourhood.[61] Furthermore, for local businesses, changes to or even the loss of their traditional customer base following the relocation of residents can force closures, further reducing the choice of services available to people in the community, with older people among the most likely to be affected. Research from Age UK found that reduced access to community facilities can, have serious negative effects on mental health and wellbeing, and increase rates of cardiovascular disease in older people.[62]

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

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

Disabled people

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

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

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

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

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

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

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

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

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

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

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

The disruption of social networks caused by relocation may also cause negative health outcomes for people with mental health problems and autism, many of whom depend on social networks to maintain their standard of living[70]. People with mental health problems may be disproportionately impacted by stress and anxiety, especially if relocation is unexpected or accompanied by financial stress[71]. Research from Wilding (2017) found that increased rates of mental ill health are associated with residential relocation.[72]

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

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

Pregnancy and maternity

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

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

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

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

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

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

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

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

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

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

BAME and/or minority faith groups

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

B.1.2 Access to finance and affordable housing

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

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

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

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

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

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

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

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

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

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

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

Research by the Joseph Rowntree Foundation found that older people often lack the same financial means and income flexibility compared to other age groups, especially younger people and those in employment.[85]A lack of financial means can limit the range of ownership options available to older people and relocation may cause older people to use savings and investments in order to secure a new home. This can potentially affect their long-term financial independence and stability.[86] Research from the Council of Mortgage Lending[87] shows that older people only account for one per cent of all mortgage lending, which further indicates that they may experience difficulties in accessing finance to facilitate relocation.

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

Further, according to evidence presented to the House of Commons Communities and Local Government Committee, low income BAME households often have limited experience of institutional loan finance.[89] They may also be less able to access commercial loans due to poor credit-ratings or their location in 'high risk' postcodes. BAME households may also be impacted by the availability of affordable housing when relocating to new areas. Two-fifths of people from a BAME background live in low-income households[90] and a 2017 report highlights that rents are less affordable for most BAME people when compared to White British households.[91] Additionally, evidence from the Runnymede Trust suggests that BAME households could be more likely to experience difficulties in finding suitable housing that accommodates their needs

[82] Resolution Foundation (2007): 'In brief: Financial exclusion'.
[83] Joseph Rowntree Foundation (2008): '*Financial inclusion in the UK: Review of policy and practice'*. Available at: https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/2234.pdf
[84] Financial Conduct Authority (2016) 'Access to Financial Services in the UK' Available here: https://www.fca.org.uk/publication/occasional-papers/occasional-paper-17.pdf
[85] Joseph Rowntree Foundation. (2007): 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders.
[86] Joseph Rowntree Foundation. (2007): 'Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders'
[87] Council of Mortgage Lending. (2015): 'Pension tension: the challenges for older borrowers'
[88] Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. *Journal of Public Health*, *38*(2), 197-205.
[89] House of Commons Communities and Local Government Committee (2011) '*Regeneration Sixth Report of Session 2010–12*'. Available at: https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf
[90] The Poverty Site (2017). See: http://www.poverty.org.uk/06/index.html
[91] Shelter (2017) '*BAME homelessness matters and is disproportionately rising – time for the government to act'*. Available at: http://blog.shelter.org.uk/2017/10/bame-homelessness-matters-and-is-disproportionately-rising-time-for-the-government-to-act/

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

B.1.3 Appropriate and accessible housing

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

Children

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

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

Older people

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

Disabled people

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

[92] Runnymede Trust (2014) *'Black and Asian Britons more likely to be homeless or live in overcrowded houses'*. https://www.runnymedetrust.org/news/558/272/Black-and-Asian-Britons-more-likely-to-be-homeless-or-live-in-overcrowded-homes.html

[93] National Children's Bureau (2016): *'Housing and the health of young children: Policy and evidence briefing for the VCSE sector*'. Available at: https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf

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

[95] National Children's Bureau (2016): *'Housing and the health of young children: Policy and evidence briefing for the VCSE sector'*. Available at: https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf

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

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

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

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

BAME

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

B.1.4 Health effects

Children

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

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

Additionally, the WHO state that occupational noise, such as construction machinery and transportation noise, can have adverse effects on children.[104] Children exposed to such noise can experience adverse cognition,[105] and other psychological,[106] and physiological[107] effects.

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

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

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

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

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

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

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

[105] Including reading, concentration, memory and attention

[106] Including mental health, annoyance, isolation and disturbed sleep

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

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

Older people and disabled people

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

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

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

Pregnancy and maternity

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

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

B.1.5 Safety and security

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[117] Office for National Statistics (2018) 'The nature of violent crime in England and Wales: year ending March 2018' Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/thenatureofviolentcrimeinenglandandwales/yearendingmarch2018

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

[119] ibid

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

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

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

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

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

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

B.1.6 Accessibility and mobility in the surrounding area

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

Older people

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

Disabled people

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

B.1.7 Information and communication

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

Older people

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

Disabled people

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

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

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

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

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

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

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

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

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

People from BAME backgrounds

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

B.2 Impact on businesses during renewal

B.2.1 Loss of employment

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

Older people

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

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

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

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

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

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

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

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

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

Older people may also be disproportionately affected by the potential closure of small businesses, where self-employment is common. Research shows that part-time self-employment is highest among those over the age of 55, and that older people are the fastest growing age group of self-employed people, with those aged over 70 showing the greatest increase of those becoming self-employed out of the total UK workforce between 2001 and 2015.[140]

Disabled people

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

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

BAME people

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

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

[140] Institute of Directors (2017) '*The Age of the Older Entrepreneur*'. Available at: https://www.iod.com/Portals/0/PDFs/Campaigns%20and%20Reports/Start%20ups/Older-Entrepreneur-Report-IoD.pdf

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

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

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

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

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

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

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

Women and young people

Those that are more likely to face unemployment also include young people and women. Statistics released in 2018 have shown that for the first time since the 1980s, British women are more likely to be unemployed than men. For young people, amongst those aged 16-24, 11.2% are Not in Education, Employment or Training (NEET). Recent unemployment statistics for the UK show that young people are around four times more likely to be unemployed than their adult counterparts aged 25-64.[147]

B.2.2 Impact of redundancy on health and wellbeing

Children

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

Older people

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

B.2.3 Difficulty accessing commercial finance

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

BAME people

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

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

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

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

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

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

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

B.2.4 Reduced job satisfaction

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

Women

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

B.3 Impact on community following renewal projects

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

B.3.1 Tackling crime and disorder

Levels of crime have in part be attributed to the urban environment. Using theoretical approaches such as Rational Choice Theory[154] and Broken Windows Theory,[155] a strong argument has developed which links the design of neighbourhoods and towns to levels of crime and disorder.[156] It has been argued that the opportunity for some forms of crime can be reduced through better thought-out approaches to planning and design of neighbourhoods and towns. For example, concepts such as Crime Prevention Through Environmental Design (CPTED)[157] are more frequently used today to ensure buildings and public spaces are designed in a way that aims to reduce the occurrence of crime and alter the environmental factors that might encourage criminal behaviour. Indeed, evidence suggests that homes built to ‘Secured by Design’ principles can reduce burglary and crime rates by up to 75%.[158]

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

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

[152] Stoll et al (2012) Well-being evidence for policy: A review. New Economics Foundation (London). Available at: https://b.3cdn.net/nefoundation/10b8aabd90c5771ff9_a0m6bvv5a.pdf

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

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

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

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

[157] Jeffery (1971) ‘Crime Prevention Through Environmental Design’. Sage publications

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

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

B.3.2 Improved access, mobility and navigation

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

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

Children

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

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

Older people

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

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

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

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

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

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

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

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

Britain are among older people aged 60 and over. The risk of an accident crossing the road increases rapidly with age from the early 60s, very rapidly from 70 years old and substantially after the age of 79.[166]

Disabled people

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

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

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

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

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

B.3.3 Improved public realm and green space

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

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

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

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

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

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

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

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

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

Children

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

The presence of urban green space also presents an opportunity to incorporate play space into regeneration schemes. Research by Play England has highlighted the benefits of play to children, and how play is central to a child's physical, psychological and social wellbeing. Play space can enable children to form friendships, interact with others and feel part of a group, something that is important to levels of self-esteem. Play space can also encourage children to have familiarity with an area and identify as part of a community. Participating in outdoor activities with family can also help social bonding and positive relationships within family units[175]

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

Older people

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

BAME people

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

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

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

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

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

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

[177] NHS (2015): '*Overview: Obesity*'. Available at: https://www.nhs.uk/conditions/obesity/

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

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

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

Disabled people

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

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

B.3.4 Provision of community resources and improved social cohesion

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

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

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

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

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

[182] Gaudion and McGinley (2012) ‘*Green spaces- outdoor environments for adults with autism’.* Available at: https://www.rca.ac.uk/documents/331/GreenSpacesX.pdf

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

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

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

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

[187] NHS (2018) *‘Loneliness in older people’*. Available at: https://www.nhs.uk/conditions/stess-anxiety-depression/loneliness-in-older-people/

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

[189] Merton Council (2017) ‘*Tackling loneliness in Merton’.* Available at: https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwi2t83Bov7eAhXKIcAKHTb2CccQFjAAegQI

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

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

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

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

B.3.5 New employment opportunities

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

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

B.3.6 Improved housing provision

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

CRAC&url=https%3A%2F%2Fwww2.merton.gov.uk%2FLoneliness%2520Final%2520Report.docx&usg=AOvVaw13aJW-pUzt74X-CgpU3DiK

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

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

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

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

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

Children and older people

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

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

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

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

Disabled people

Improvements to the housing can help to reduce energy consumption and in turn reduce energy bills[200]. Research from disability charity Scope evidences that long term impairments or conditions have a significant impact on energy costs, with many disabled people consuming more energy because of their impairment or condition. Those with limited mobility report having to use more heating to stay warm.[201] Any improvements to energy consumption may disproportionately affect this group.

People from BAME backgrounds

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

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

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

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

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

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

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

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

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

B.3.7 Safety and security

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

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

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

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

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

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

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

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[202] This does not include White ethnic minority households.

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

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

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

[206] Office for National Statistics (2018) 'The nature of violent crime in England and Wales: year ending March 2018' Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/thenatureofviolentcrimeinenglandandwales/yearendingmarch2018

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

[208] ibid

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

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

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

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

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

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

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

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

C. Equality surveys

C.1 Findings from the survey

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

C.1.1 Demographics of residents on the Estate

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

Age

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

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

Disability

Across the households which took part in the resident surveys:

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

Gender reassignment

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

Marriage and civil partnerships

Across the households which took part in the resident surveys:

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

Pregnancy and maternity

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

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

Race and ethnicity

A range of ethnicities were reported across both resident surveys:

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

Religion and belief

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

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

Sexual orientation

Across the households which took part in the resident surveys:

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

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

Sex

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

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

C.1.2 Demographics of commercial properties

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

Age

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

Disability

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

Gender reassignment

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

Marriage and civil partnerships

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

Pregnancy and maternity

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

Race and ethnicity

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

Religion and belief

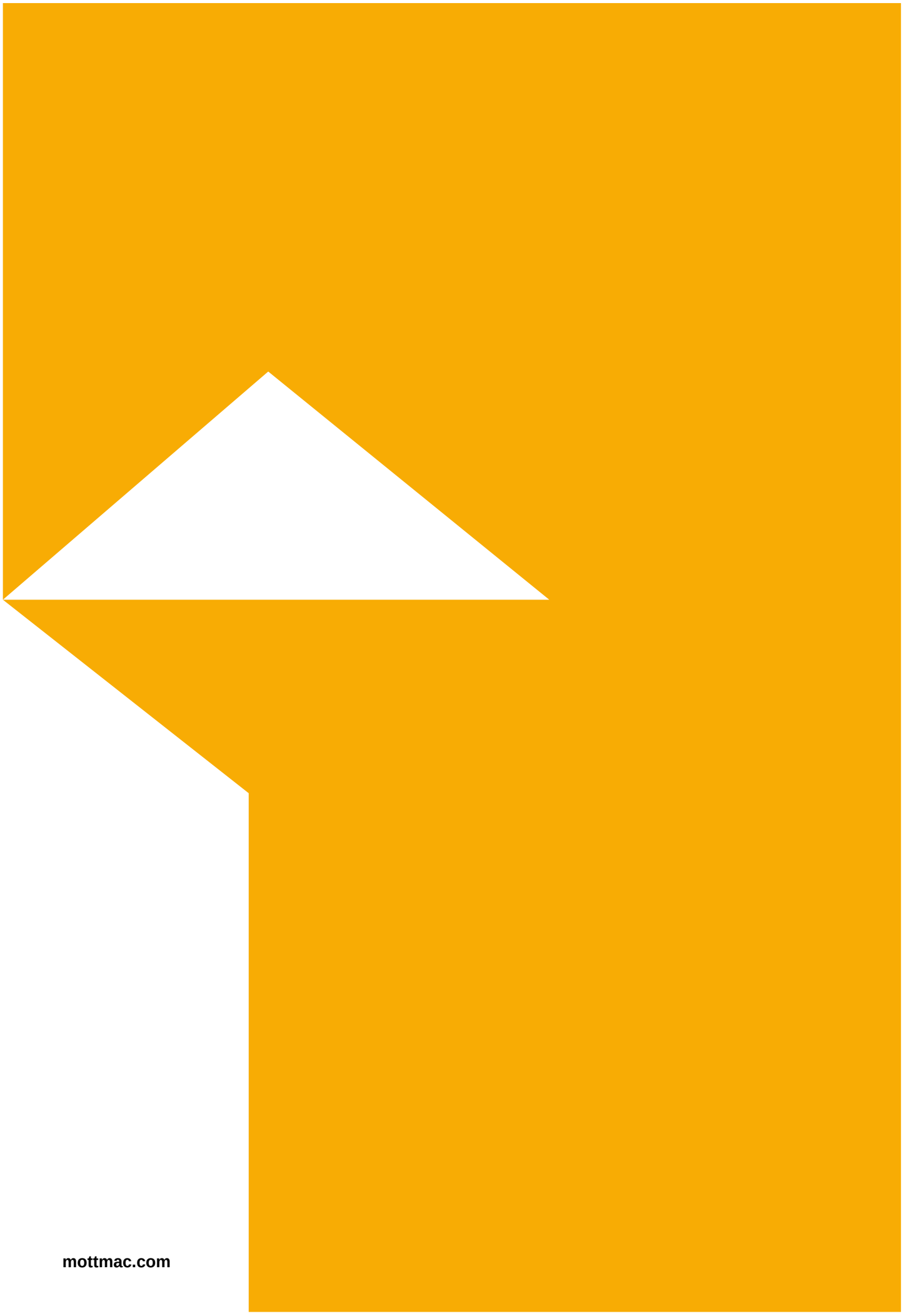
The commercial properties which took part in the survey reported having owners and employing staff who identified with a religion. Two properties did not know or preferred not to disclose such information about their employees.

Sex

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

Sexual orientation

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



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Equality Impact Assessment Addendum

Ebury Bridge Estate Redevelopment

August 2021

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Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
1	30/07//21	Emma Will	Sarah Marshall	James Beard	First Draft
2	10/08/21	Emma Will	Sarah Marshall	James Beard	Final For Issue

Document reference: 100418208-A-01

Information class: Standard

Contents

Executive summary

Overview of the commission

Mott MacDonald has been commissioned by Westminster City Council ('the Council') to provide an addendum to the Equality Impact Assessment (EqIA) of the redevelopment programme for Ebury Bridge Estate ('the Programme'), submitted as evidence for planning approval in 2020.

Summary of the EqIA addendum

The EqIA process is focussed on the potential effects likely to be experienced by those living and working in the community in light of their 'protected characteristics' under the Equality Act 2010. It identifies any differential or disproportionate effects (both positive and negative) on those with protected characteristics that may arise from the Programme and sets out potential mitigation or enhancement measures that the Council can put in place to address them.

The addendum provides an update to the previously submitted EqIA, specifically identifying any changes to equality impacts from updates to aspects of the redevelopment programme, arising since the previous submission.

Findings

The EqIA considers the equality impacts of the redevelopment process – particularly the impacts on **existing** residents, businesses and users of community resources on the Estate. The assessment also explores the impact of the delivery of the renewed Estate on the **current** and **future** Estate community. Assessment of equality effects has been undertaken in light of the characterisation of the effects – including sensitivity of the affected parties to the redevelopment, distribution of those groups on the Estate, nature of the effect and mitigation measures in place to address the effect. This includes reference to COVID-19 where relevant.

The EqIA has identified a number of potential equality impacts that could arise from the redevelopment. These have been split into three broad categories:

- potential impact on residents and users of community resources during redevelopment.
- potential impact on businesses during redevelopment; and
- potential impact on the community following the redevelopment process.

The assessment has found that, where any negotiations of property acquisition to facilitate the redevelopment is deemed to not be possible and compulsory purchase must be used as a last resort, equality risks have been addressed. There is, therefore, a case for the use of compulsory purchase powers, if it is required to facilitate the development. This must be weighed against the acknowledged potential risks set out above. In this case, the Council has sought to mitigate these through a range of reasonable and proportionate measures focused on engagement, compensation options, and the benefits of the redevelopment in order to improve the outcomes of the redevelopment for the current and future Estate community.

1 Overview

This addendum to the Equality Impact Assessment (EqIA) for the redevelopment of the Ebury Bridge Estate ('the Estate') has been undertaken by Mott MacDonald on behalf of Westminster Council ('the Council').

The chapter sets out the approach to EqIA and tasks undertaken throughout this process. It also sets out the context of the Estate and the proposed redevelopment. It provides an overview of the current situation, before outlining the details of the preferred scenario.

1.1 Introduction

1.1.1 Purpose of the EqIA addendum

The purpose of the EqIA is to help the Council understand the potential risks and opportunities of the proposal, focussing on people with characteristics protected under the Equality Act 2010 ('the Equality Act').

This EqIA addendum outlines a number of updates to the findings of the impact assessment for the preferred scenario, considering any impacts of a potential Compulsory Purchase Order (CPO) and providing recommendations for mitigation and further mitigation enhancement where appropriate.

1.1.2 Background to the EqIA

This EqIA has been undertaken in order to fulfil Council's obligations under current UK equality legislation, and in particular the Equality Act. The Equality Act sets out a Public Sector Equality Duty (PSED) at section 149, and is intended to support good decision-making by encouraging public authorities to understand how different people will be affected by their activities (see sections 1.2.1 and 1.2.3 of the Detailed EqIA for further information).

The Council must demonstrate that it has shown due regard to the aims of the PSED throughout the decision-making process for the Programme, by taking account of the nine protected characteristics set out in the Equality Act (see section 1.2.2 of the Detailed EqIA for a full breakdown of the protected characteristics). The EqIA provides a systemic assessment of the likely or actual effects of policies or proposals on social groups covered by the protected characteristics.

1.1.3 Overall approach to the EqIA

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

1.1.3.1 Stages of the EqIA

The EqIA addendum follows the third stage of the three-stage EqIA, aligned to the Council's decision-making process.The first stage, a baseline EqIA undertaken in January 2019, comprised a series of tasks undertaken to understand the equality effects of several scenarios for the redevelopment of the Estate. Once potential effects were identified, they were assessed against the redevelopment scenarios and mitigation measures proposed by the Council. The findings of the baseline assessment were then used to inform the selection of a preferred scenario for redevelopment.

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

A detailed EqIA was then produced in 2020 to provide further detail and analysis on the preferred scenario that is being taken forward by the Council, following Cabinet approval. The detailed EqIA is informed by engagement with residents and businesses on the basis of their protected characteristics. The EqIA was submitted with an application for planning permission in June 2020, which was subsequently approved.

This EqIA addendum is intended to update the EqIA with relevant new information as required, including any information relevant to the CPO, taking account of the current situation of the Estate and redevelopment process and other relevant evidence and detail.

A description of the tasks that were undertaken to prepare the EqIA addendum is provided below. Descriptions of the tasks undertaken in previous stages can be found in section 1.3.1 of the Detailed EqIA.

1.1.4 Understanding the project

Discussions with Council and external representatives: Discussions were undertaken with the Council throughout EqIA addendum stages to better understand any updates to the Estate redevelopment programme, proposed redevelopment process, and support plans for those who will be affected. [1]

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

Review of redevelopment programme: Documentation and information associated with the redevelopment programme was reviewed throughout the EqIA addendum stage, including newsletters and other engagement materials, reports, phasing plans, background and contextual information, presentations and online publications.

Review of redevelopment policies and other measures: Updated information on intended measures to support those affected by redevelopment and to mitigate and manage effects was reviewed throughout the EqIA addendum stage, including:

- Leaseholder Customer Journey
- Non-Residential Uses Strategy
- Retail Support Document
- Compulsory Purchase Order Report
- Ebury Social Value Proposal
- Ebury Finance Workshop- Social Rent Summary
- Statement of Community Involvement

1.1.5 Evidence, distribution, and proportionality

Desk-based evidence and literature review: In order to better understand the potential risks and opportunities arising from the redevelopment, and to help to identify possible mitigation measures and opportunities associated with the programme, relevant published literature from governmental, academic, third sector and other sources was updated for the EqIA addendum. This allowed for the characterisation of potential risks and opportunities typically associated regeneration projects, to understand whether they applied in this instance.

1.1.6 Engagement and analysis

Desk-based analysis of engagement undertaken on the project has been undertaken on an ongoing basis, to draw out equality themes and provide additional supporting evidence relating to potential impacts. Details below relate to any engagement and analysis work specifically undertaken during the EqIA addendum stage and more detail on the engagement and analysis tasks undertaken for the other stages can be found in section 1.3.1 of the Detailed EqIA.

Residents' equality survey: A third equality survey was completed in Spring 2021 with those residents remaining on the site, covering secure Council tenants and resident leaseholders. This third survey was conducted by post. Analysis of the findings of this survey has helped to build a demographic profile of businesses within the Estate and provided the Council with a better understanding of their needs based on their protected characteristics.

Engagement activity review: Supplementing the findings of the surveys, a desk-based engagement activity review was conducted during the EqIA addendum stage, to consider equality in recent engagement activities set out in the Statement of Community Involvement.

1.1.7 Impact assessment

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

Mitigation measures have been reviewed and updated at each stage of the EqIA and for the addendum.

1.1.8 Action planning

Making recommendations: A series of further recommendations were developed and updated at the EqIA addendum stage, to help manage the redevelopment in a way that minimises the potential for adverse effects where appropriate.

Developing an equality action plan: An action plan has been developed and updated which outlines the responsibilities to involved affected parties following submission of this detailed EqIA, including for the Council and for the Mott MacDonald EqIA team.

1.2 Estate context

For a detailed overview of the background to the redevelopment of the Estate, please refer to section 2.1 of the Detailed EqIA.

1.2.1 Renewal of the Estate

1.2.1.1 Current situation

The plans for the new Estate were approved by the Council's planning committee in April 2021, signing off the plans for 781 new homes on the site.[2] The development includes 239 new council homes and a total of 53% affordable homes on the site; as well as a new community hub, nursery, and fitness centre; and four new public squares.

Demolition work began on the site in February 2021, starting with the demolition of Pimlico House and Hillersden House. The first phase of demolition will see six blocks demolished, as they become vacant. This phase of demolition had been previously approved under a separate planning application, and the process of decanting residents began in 2020. The phasing plan gave residents the choice to either remain on the Estate or temporarily relocate off the Estate prior to the final move into the new buildings in late 2023. All residents who did not opt for a permanent move off the Estate will move homes twice.

Construction of the development is due to commence in mid-2021, with the construction of 200 homes over two main blocks. This will be followed by the demolition of the remaining buildings on site, and construction of the remainder of the new Estate between 2022 and 2027. The scheme is designed to be tenure blind, with a mix of social, affordable and market rent tenants and leaseholders across all blocks.

It is anticipated that all the residents who were decanted from the Estate and wish to return will be resettled in the first two blocks to be constructed upon completion of this first phase in winter 2023. Discussions with residents regarding the allocation of new homes are intended to begin over summer 2021.

[2] Westminster City Council (2021) Ebury Bridge Renewal. https://eburybridge.org/

2 Summary evidence review

This chapter sets out a summary of the existing and updated evidence of risks and opportunities associated with the redevelopment of the Estate and associated protected characteristic groups who may be differentially or disproportionately affected, as well as a summary of feedback from engagement.

2.1 Summary

The tables below summarise the existing evidence of potential risks and opportunities and associated protected characteristic groups who may be disproportionately or differentially affected, prior to consideration of any Council mitigation measures in place. Risks are defined as potential adverse effects resulting from the redevelopment, and opportunities are defined as potential benefits. For more information on protected characteristic groups, please see section 1.2.3 of the Detailed EqIA. Where the affected groups are **bolded**, there is a higher proportion of this group on the Estate.

The table also includes a summary of key resident feedback collected through the development and design of the new Estate in 2019; and then after the presentation of the final refined design proposal to residents in spring 2020. The feedback is collated in the Statement of Community Involvement. Some additional feedback provided via the Community Futures Group forum is also included.

The full literature review is appended to the Detailed EqIA. References for updated literature are included in the table below.

2.2 Effects on residents during redevelopment

Table 2.1: Effects on residents during redevelopment

Risks and opportunities	Affected groups	Risk or opportunity	Key resident feedback
Effects on residents during the renewal process			
Loss of social infrastructure and access to community resources: The renewal process can involve temporary or permanent resettlement of residents and demolition of housing and community resources. This can lead to a loss of access to these resources and knock on impacts on social cohesion. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can disproportionately impact ethnic minority communities, disabled people, older people and children. The ongoing COVID- 19 pandemic and regulations have had already had an impact on access to social cohesion and resources, and as such any further impacts may have cumulative negative effects, especially on older people and disabled people. Loss of social cohesion and access to community resources can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. [3] Disabled people and pregnant women may also experience negative health impacts, including increased stress and anxiety due to the loss of social cohesion and access to community resources. [4] Risks associated with relocation for these affected groups can be heightened if housed in temporary accommodation, due to the need to relocate more frequently. [5]	• **Children** • Older people • **Disabled people** • Pregnancy and maternity • Minority faith groups • Pregnancy and maternity • **Ethnic minority groups**	Risk	Key resident feedback delivered during the engagement period of the development of the preferred scenario showed that relocation was a source of concern for many residents, and senior residents in particular. Residents were concerned about a sense of being 'in limbo' and wanted to move only once. No further feedback on this topic has been received since the submission of the Detailed EqIA.
Costs associated with moving home Where renewal schemes require residents to resettle, it can lead to an increase in their financial outgoings due to costs associated with moving, particularly for single parent families (the vast majority of whom are led by women) and ethnic minority households. [6] Relocation costs could include removal services, the need to adapt a new home or buy new furniture.	• Young people • Older people • **Disabled people** • **Ethnic minority groups** • Women	Risk	No further feedback on this topic has been received since the submission of the Detailed EqIA.
Access to finance Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who may experience difficulty accessing appropriate and financial services, such as mortgages. [7]	• Young people • Older people • **Disabled people**	Risk	No further feedback on this topic has been received since the submission of the Detailed EqIA.

[3] Sandstrom, H and Huerta, S (2013) '*The Negative Effects of Instability on Child Development'* Available at: https://www.urban.org/sites/default/files/publication/32706/412899-The-Negative-Effects-of-Instability-on-Child-Development-A-Research-Synthesis.PDF ; Age UK (2015) '*Evidence Review: Loneliness in Later Life'*. Available at: https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health--wellbeing/rb_june15_lonelines_in_later_life_evidence_review.pdf .

[4] National Autism Society. (2017): 'Moving house' URL: https://www.autism.org.uk/movinghouse NHS (2016): *'Deep vein thrombosis'*; Royal College of Physicians and Faculty of Occupational Medicine (date unknown*): 'Advising women with a healthy, uncomplicated, singleton pregnancy on: heavy lifting and the risk of miscarriage, preterm delivery and small for gestational age'*

[5] Shelter (2004): 'Sick and tired: the impact of temporary accommodation on the health of homeless families' Available at: https://england.shelter.org.uk/__data/assets/pdf_file/0009/48465/Research_report_Sick_and_Tired_Dec_2004.pdf

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

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

Risks and opportunities	Affected groups	Risk or opportunity	Key resident feedback
	• **Ethnic minority groups** • Women		
Affordable housing Young people, older people, disabled people, ethnic minority groups and women all struggle with housing affordability issues. [8] [9] [10][11] Homeownership has become increasingly more unaffordable for certain groups; and intermediate housing schemes such as Shared Ownership are often still too expensive for many groups such as disabled people and single parent families, the vast majority of whom are led by women. [12] A lack of financial means can limit the range of ownership options, including intermediate options such as Shared Ownership, available to older people and relocation may cause older people to use savings and investments in order to secure a new home, potentially affecting their long-term financial independence and stability.[13]	• Young people • Older people • **Disabled people** • **Ethnic minority groups** • Women	Risk	Key resident feedback delivered during the engagement period of the development of the preferred scenario highlighted a desire for secure tenancies for all adult occupants No further feedback on this topic has been received since the submission of the Detailed EqIA.
Appropriate and accessible housing Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children as well as sourcing suitable housing that meets the needs of people requiring adaptable and accessible housing, such as people with mobility impairments. Accessible housing would include at least the basic four accessibility features (level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space and a toilet at entrance level). [14] A lack of suitable housing can lead to families living in overcrowded properties. Overcrowding can negatively impact the health of older people and children, putting them at increased risk of developing respiratory conditions. [15] Overcrowding can also contribute to infections, psychological problems, Sudden Infant Death Syndrome (SIDS), and stress among children. [16] Homes without access to outdoor space can negatively impact the emotional wellbeing of residents, particularly children. Black people are much less likely to have access to outdoor space at home than white people. [17]	• **Children** • Older people • **Disabled people** • **Ethnic minority groups**	Risk	Key resident feedback delivered during the engagement period of the development of the preferred scenario highlighted the need to solve the overcrowding problem, and for the new homes to have windows in the kitchens and bathrooms to improve ventilation. No further feedback on this topic has been received since the submission of the Detailed EqIA.
Health effects Relocation can create a great deal of stress and anxiety amongst children, young people and older people due to the need to adapt to new routines, facilities and surroundings.[18] Involuntary relocation can have important health impacts for older people, with evidence pointing towards an increased mortality rate for those moved for urban renewal projects.[19] The health effects of relocation can also be particularly heightened for temporary accommodation households, many of which are households with dependent children led by single mothers. Women and children in these circumstances may see increased levels of stress and anxiety exacerbated by the uncertainty and instability of their circumstances. Health impacts as a result of social isolation due to the COVID-19 pandemic, such as poorer mental health, obesity, alcoholism, and a greater risk of hospitalisation, may be exacerbated by the redevelopment process. Physical health effects may also arise as a result of the environmental effects of demolition and construction processes. Older people, disabled people, and children are also likely to be disproportionality affected by changes in air quality that may arise during any construction period as increased air pollution can impact upon underlying respiratory conditions.[20] Air pollution can contribute to health impacts in young children, including long term cognitive issues and neurodevelopment. Additionally, antenatal exposure to air pollution may alter the lung development of a baby whilst in the womb. If a baby is exposed to significant levels of air pollution, this can increase the risk of premature birth and low birth weight. [21] Noise pollution can also have adverse health impacts on older people including sleep disturbance and stress. [22]	• **Children** • Young people • Older people • **Disabled people** • Pregnancy and maternity	Risk	Key resident feedback delivered during the engagement period of the development of the preferred scenario showed that relocation was a source of concern for many residents, and senior residents in particular. No further feedback on this topic has been received since the submission of the Detailed EqIA.

[8] Institute for Fiscal Studies, 2018. 'Barriers to homeownership for young adults'. Available at: https://www.ifs.org.uk/publications/13475

[9] Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019

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

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

[12] Mayor of London (2020) '*Intermediate housing: Equality Impact Assessment*'. Available at: https://www.london.gov.uk/sites/default/files/intermediate_housing_-_equality_impact_assessment_for_part_1_consultation_response_report.pdf

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

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

[15] Housing Age UK (2014): 'Housing in later life'

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

[17] Office for National Statistics (2020). 'One in eight British households has no garden'. Available at: https://www.ons.gov.uk/economy/environmentalaccounts/articles/oneineightbritishhouseholdshasnogarden/2020-05-14#:~:text=One%20in%20eight%20households%20(12,Survey%20(OS)%20map%20data.&text=This%20is%20according%20to%20survey%20data%20from%20Natural%20England.

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

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

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

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

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

Risks and opportunities	Affected groups	Risk or opportunity	Key resident feedback
Safety and security: In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behaviour and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime. [23] It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and ethnic minority groups. [24]	• **Children** • Young people • Older people • **Disabled people** • **Ethnic minority groups** • Men • Women • LGBT people	Risk	Key resident feedback delivered during the engagement period of the development of the preferred scenario highlighted a need for improved security. No further feedback on this topic has been received since the submission of the Detailed EqIA.
Accessibility and mobility in the area: Evidence indicates that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, reduced parking (construction vehicles and subcontractors in parking), construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding. This may also limit the ability of children to move around the estate safely alone, limiting outdoor play opportunities. [25] For example, a reduction in parking bays, especially if they are spaces close to the estate or blue badge spaces, can particularly adversely affect parents with young children, and disabled people who rely on such parking facilities in order to access a range of services and facilities, including their home. This can lead to knock-on effects on parents and disabled people's independence, exacerbating issues such as loneliness and social isolation. [26]	• **Children and people using buggies or pushchairs** • Older people • **Disabled people**	Risk	Key resident feedback delivered during the engagement period of the development of the preferred scenario highlighted support for better parking facilities and better connections to the wider area. No further feedback on this topic has been received since the submission of the Detailed EqIA.
Information and communication: Complex material and information on the regeneration may present a challenge to those who have different information and communication needs. This includes but is not limited to people with cognitive or learning disabilities, people with low literacy levels, older people, people with visual or hearing impairments and people who use English as a second language. [27] Due to the COVID 19 pandemic, engagement and consultation has increasingly had to utilise digital tools, however this can exclude those who are less likely to be online, such as older people and disabled people. [28] Some groups, such as children and young people, disabled people, and people from ethnic minority backgrounds, are more likely to face barriers to engagement. Consultation should 'go the extra mile' to speak with these groups, including holding events in a variety of different venues and times (COVID-19 regulations permitting). [29]	• **Children** • Young people • Older people • **Disabled people** • **Ethnic minority groups**	Risk	At the final residents' consultation, in Spring 2020, 69% of respondents rated a 4 or 5 (out of 5) on how informed they felt about the renewal proposals.
Effects on businesses during the renewal process			
Potential loss of business Independent small businesses including shops, cafes and restaurants, play an important role in supporting the vitality and vibrancy of local communities and often operate from smaller premises, such as those that might be found on a housing estate. [30] Redevelopment can result in the permanent loss of such businesses, with the potential to affect self-employed business owners. Ethnic minority groups and older people may be particularly affected by the loss of small businesses. [31]	• Older people • **Ethnic minority groups**	Risk	Key resident feedback delivered during the engagement period of the development of the preferred scenario highlighted a desire to retain the existing retail units and cafes. Resident feedback delivered during the pre- planning consultation highlighted the need for retail services that can be used regularly by the local community, like pharmacies, convenience stores, etc. At the final residents' consultation, in Spring 2020 90% of respondents reported feeling mostly positive about the proposed new retail mix. Feedback from local businesses collated during the Retail Support Review in late 2020 highlighted the below concerns: • Concern that relocation of residents had had a negative impact on the business
Financial implications associated with business relocation The renewal process could result in the relocation of businesses. Should businesses relocate to new industrial or commercial premises elsewhere, it is likely that access to finance will be required to secure a new location. Ethnic minority groups and older people are more likely to experience difficulty accessing financial support, which could add further financial strain in securing alternative premises for business continuity following relocation. [32]	• Older people • **Ethnic minority groups**	Risk	
Potential redundancy of employees associated with business loss or relocation	• Older people • **Disabled people**	Risk	

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

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

[25] Hiscock, R. and Mitchell, R (2011) 'What is needed to deliver places that provide good health to children?' Available at: http://www.edphis.org.uk/Report_on_Place_and_Children.pdf

[26] Equality and Human Rights Commission (2017): 'Being disabled in Britain: a journey less equal'

[27] Change (2015): 'how to make information accessible: a guide to producing easy read documents' Available at: How-to-make-info-accessible-guide-2016-Final (changepeople.org) Department for Health and Social Care (2010): 'Making written information easier to understand for people with learning disabilities' Available at: Making written information easier to understand for people with learning disabilities - GOV.UK (www.gov.uk) MENCAP (date unknown): 'Making myself clear' Available at: Making-Myself-Clear.pdf (accessibleinfo.co.uk)

[28] Citizens Online (2020). 'Digital exclusion in population screening programmes'. Available at: https://www.citizensonline.org.uk/wp-content/uploads/2020/05/ScreeningEIAReportSummaryProofedSignedOff.pdf

[29] Scottish Government (2017). ' Barriers to community engagement in planning: a research study. Available at: https://www.gov.scot/binaries/content/documents/govscot/publications/factsheet/2017/05/barriers-to-community-engagement-in-planning-research/documents/barriers-community-engagement-planning-research-study-pdf/barriers-community-engagement-planning-research-study-pdf/govscot%3Adocument/Barriers%2Bto%2Bcommunity%2Bengagement%2Bin%2Bplanning%2B-%2Ba%2Bresearch%2Bstudy.pdf

[30] Mayor of London (2020), 'The London Plan: The Spatial Development Strategy for Greater London'. Available at: https://www.london.gov.uk/sites/default/files/the_publication_london_plan_2020_-_clean_version_0.pdf

[31] House of Commons (2020): 'Unequal impact? – Coronavirus and BAME people'

[32] Enterprise Research Centre (2020): 'Unlocking opportunity: the value of ethnic minority firms to UK economic activity and enterprise'

Risks and opportunities	Affected groups	Risk or opportunity	Key resident feedback
Estate renewals may require businesses to relocate and may result in extinguishment. These changes may create direct redundancies or result in indirect redundancies by current staff being unable to access future employment at a different location. This can affect groups who are more likely to face barriers to employment than others. [33]	• **Ethnic minority groups**		• All businesses had a well-established customer base in the local area and were not looking to move out of this area. • Businesses are keen to get further information on their new premises and costings.
Impact of redundancy on health and well-being Involuntary job loss due to redevelopment and renewal can have disproportionate health and well-being effects for certain groups. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions. [34] Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being. [35]	• Older people • **Children**	Risk	
Impacts on the existing customer base of businesses Estate renewal has the potential to result in relocation of local businesses and community facilities currently operating on the Estate. Depending on the geography of where affected parties relocate to, such relocation from the local area might disrupt local customer bases that have been developed over time, ultimately resulting in a loss in business. [36]	• **Ethnic minority groups**	Risk	
Impacts on local customers Estate renewal has the potential to require the closure or relocation of businesses and facilities used by the local community. Depending on the geography of where affected businesses relocate to, such relocation might make it harder for people to access local businesses and facilities they regularly use. It is also acknowledged that the total extinguishment of some businesses may be necessary, which might also result in the loss of service delivered to the local consumers. [37]	• Older people • Disabled people • **Ethnic minority groups**	Risk	
Effects on community following the renewal process			
Improved housing provision: Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption. [38] Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home. Children living in cold homes are more than twice as likely to suffer from a variety of respiratory problems than children living in warm homes. Cold housing can negatively affect children's educational attainment, emotional wellbeing and resilience. Effects of cold housing are also evident among older people in terms of higher mortality risk, physical health and mental health. [39]	• **Children** • Older people • **Disabled people** • **Ethnic minority groups**	Opportunity	Key resident feedback delivered during the engagement period of the development of the preferred scenario included a need for improved ventilation, sufficient storage, natural light, and sufficient space in the new homes. Resident feedback delivered during the pre- planning consultation welcomed plans for the modern design of the homes, improved sound insulation, spacious balconies, and improved energy efficiency. No further feedback on this topic has been received since the submission of the Detailed EqIA.
New employment opportunities: Renewal can act as a means of promoting economic growth and supporting job creation. [40] For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility.	• Young people • Older people • **Disabled people** • **Ethnic minority groups** • Women	Opportunity	Resident feedback delivered during the pre- planning consultation welcomed plans for the enhanced retail offer
Improved public realm and green space: Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. [41] In addition, the opening up of green space has been shown to impact positively on both physical and mental health. Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. [42] Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular. [43]	• **Children** • Older people • Disabled people • **Ethnic minority groups**	Opportunity	Key resident feedback delivered during the engagement period of the development of the preferred scenario in 2019 highlighted support for new green space for the community, and an upgraded football pitch and playground. Resident feedback delivered during the pre- planning consultation in 2019 welcomed plans for improved play equipment and space for play and activities for different age groups Residents welcomed plans for the improvement of green spaces Resident feedback delivered via the Community Futures Group in July 2021 was positive regarding the use of outdoor space for residents at the Ebury Edge meanwhile use space.

[33] Centre for Aging Better (2020): 'Supporting Over 50s back to work' Available at: supporting-over-50s-back-to-work.pdf (ageing-better.org.uk)

[34] Gallo, W.T., Bradley, E.H., Falba, T.A., Cramer, L.D., Bogardus Jr, St.T and Kasl,S.V (2004) 'Involuntary job loss as a risk factor for subsequent myocardial infarction and stroke: findings from the Health and Retirement Survey' American Journal of Industrial Medicine, 45(5), 408-416

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

[36] Graham et al (2018): 'The experiences of everyday travel for older people in rural areas: A systematic review of UK qualitative studies'

[37] Peters et al (2018): 'How is neighbourhood of mixed social networks altered by neighbourhood deprivation for ethnic groups'

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

[39] The Housing and Ageing Alliance (2013) 'Policy Paper: Health, Housing and Ageing', Available at www.housingling.org/HAA/

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

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

[42] UCL (2018): 'Greener neighbourhoods may be good for children's brains'. Available at: https://www.ucl.ac.uk/ioe/news/2018/sep/greener-neighbourhoods-may-be-good-childrens-brains

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

Risks and opportunities	Affected groups	Risk or opportunity	Key resident feedback
Provision of community resources and improved social cohesion: Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation. An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.	• **Children** • Older people • **Disabled people** • Pregnant people • **Ethnic minority groups** • LGBT people	Opportunity	Key resident feedback delivered during the engagement period of the development of the preferred scenario in 2019 highlighted support for a new community centre which could be hired by residents At the final residents' consultation, in Spring 2020 94% of onsite residents' respondents reported feeling mostly positive about the proposed mix of community, leisure, and retail uses on the site.
Tackling crime and disorder: Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. [44] Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.	• **Children** • Young people • Older people • **Disabled people** • **Ethnic minority groups** • Men • Women • LGBT people	Opportunity	Key resident feedback delivered during the engagement period of the development of the preferred scenario in 2019 highlighted a need for improved security. Resident feedback delivered during the pre- planning consultation in 2019 welcomed plans to make the new estate feel more open, and therefore improve the perceptions of safety.
Improved access, mobility and navigation: Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of protected characteristic groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. [45] Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.	• **Children** • Older people • **Disabled people**	Opportunity	Key resident feedback delivered during the engagement period of the development of the preferred scenario in 2019 highlighted support for better parking facilities and better connections to the wider area Resident feedback delivered during the pre- planning consultation in 2019 welcomed plans to make the estate more pedestrian friendly.

[44] See for example, Monahan and Gemmell (2015) 'Reducing Crime Hotspots in City Centres'. Available at: http://www.bre.co.uk/filelibrary/Briefing%20papers/102417-Crime-Hotspots-Briefing-Paper-v4.pdf
[45] Wray et al. (2014): 'Social relationships, leisure activity and health in older adults' Available at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4467537/

3 Estate profile and proportionality

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

3.1 Socio-demographic profile of the area

The area profile summary below provides an overview of the demographic characterisation of the area in which the Estate falls.[46] The baseline compares the socio-demographic profile of the Estate with the City of Westminster, the Greater London region, and England. The summary includes analysis of protected characteristic groups under the Equality Act and the current socio-economic context of the area. In comparing these regions, where the Estate deviates by more than 3%, the difference is considered to be significant and is reported as such.

The data used in the baseline is the most current publicly available data from the Office of National Statistics. This data has not changed since the Detailed EqIA. Where there are higher proportions of certain groups on the Estate, this is written in **bold text.**

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

The table also provides an updated outline of where groups were identified through the equality surveys carried out in 2021 as being present on the Estate.

Table 3.1: Socio- demographic baseline

Protected Characteristic	Estate comparison with Westminster, Greater London and England[47]	Equality survey results[48]
Age	• **The proportion of people under the age of 16 on the Estate is higher than City of Westminster and England (24% compared with 17%, 19% respectively) but in line with Greater London (21%).**[49] • Population of young people (16-24) is consistent with other areas. • The percentage of working age people (aged between 16 and 64) (66%) is lower than Westminster (71%) but broadly in line with Greater London and England (65% and 64%, respectively). • Population of older people (65+) living on the Estate (10%) is consistent with Greater London (12%) and lower than Westminster (13%) and England (18%). • The percentage of older people over 65 years within the Estate (10%) is broadly in line with	In the resident survey, a range of ages were represented across Estate households Households with children, young people, working age people, and older people were identified through the surveys.

[46] It should be noted that, although attempts were made to capture data from all of those who are directly affected by the redevelopment, the Estate profile does not capture the demographics of all occupiers and owners of property within the Estate, as some did not participate in engagement activities.

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

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

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

	Westminster and Greater London (13% and 12%, respectively) but lower than England (18%).	
Disability[50]:	• **There are higher proportions of disabled people (those whose day-to-day activities are limited a little or a lot) within the Estate (17%) when compared with Westminster and Greater London (both 14%), however this figure is in line with the proportion of disabled people in England (17%).**	21 households across the survey reported having a disabled member of the household (24% of households) Two households reported that they did not know, and one household preferred not to say
Gender reassignment	• No information is publicly available for the Estate.[51]	One household which responded to the survey identified a household member as being trans.
Marriage and civil partnerships	• Population of those who are married or in a civil partnership is lower than or consistent with other areas.	22 households who responded to the surveys identified at least one person who is married or in a civil partnership in the household.
Pregnancy and maternity	• The general fertility rate (live births per 1000 women aged 16-44) and total fertility rate (avg. number of children born per woman) is lower than other areas.	One respondent to the surveys identified someone in their household as currently pregnant.
Race	• The Estate has a lower proportion of people from a Black, Asian or Minority Ethnic background (43%) when compared to Westminster (61%) and Greater London (55%) but higher than England (20%). • **There is a higher percentage of Other White people in the Estate (19%) compared to London (13%) and England (5%), but this is broadly in line with Westminster (21%).** • The next largest minority ethnic group on the Estate is Irish, followed by Mixed - White and Black African.	41 households who responded to the surveys identified at least one person who was from a minority ethnic background in the household.
Religion	• **The Estate has a higher proportion of Christian residents in comparison to the City of Westminster and London but lower than England.** • Islam is the next largest religious group represented on the Estate • Populations of people from other religious and faith groups are consistent with other areas.	A range of religious beliefs were identified through the surveys. Of those who responded to the surveys, most households who identified as having a religion had at least one person who was Christian (36 households). The next most common religion was Islam (9 households).
Sex	• The population of men and women is consistent with other areas.	Both men and women were identified as living on the Estate through the household surveys.
Sexual orientation	• No information is publicly available for the Estate.[52]	Of the households who took part in the surveys, no households identified at least one person as having a sexual orientation other than straight.

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

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

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

3.2 Residential properties, business and community resources

3.2.1 Overview of residential properties on the Estate (Summer 2021)

As of July 2021, there are currently 88 households remaining on the Estate. Those dwelling within the properties are a mix of secure Council tenants (49 households) and resident leaseholders (39 households).

As of August 2021, there are 137 households who have been decanted off the estate. Those dwelling within the properties are a mix of secure Council tenants and resident leaseholders. Of these households, 58 have moved to a new home on a permanent basis, whilst 79 residents have moved temporarily with a view to return to the Estate.

3.2.2 Residential relocation

The breakdown of how far residents who were relocated by July 2021 have moved from the Estate, is shown in the table below. 44 households (37%) have been relocated within a 15-minute walk of the existing Estate, whilst 73 (61%) have been moved further out but within the Borough of Westminster. Two households have been relocated outside the Borough (1%).

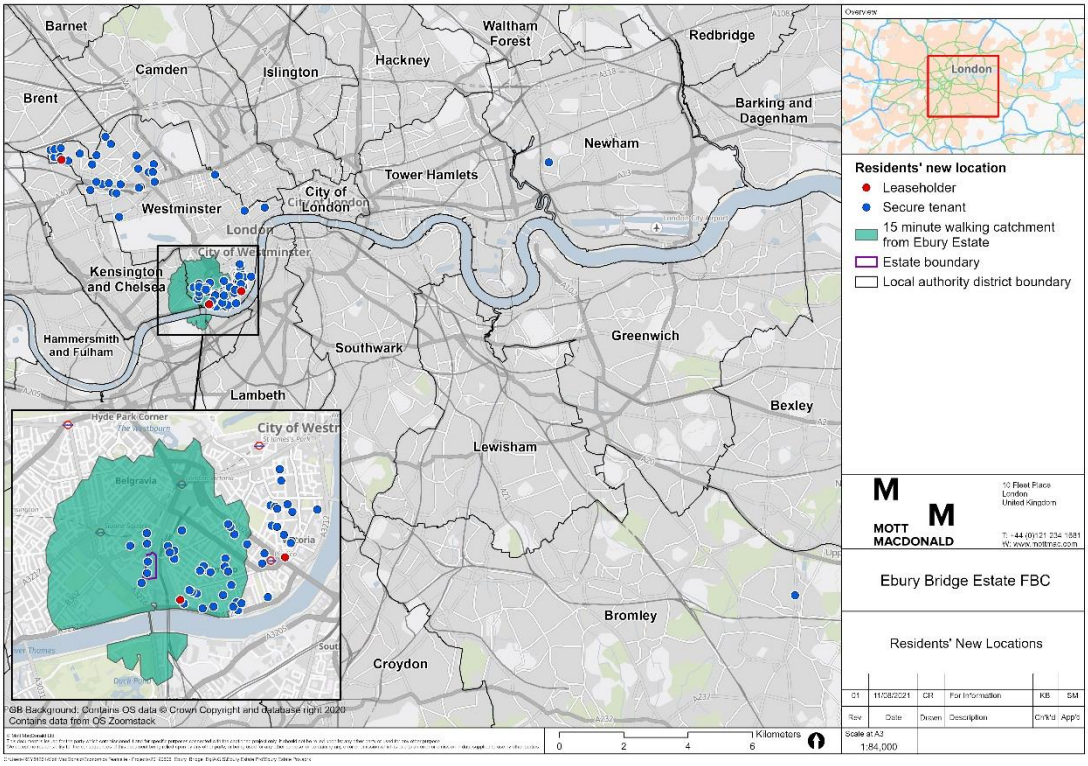
Table 3.2: New locations of decanted residents

Location	Number of households
Within a 15-minute walk of the Estate	44
Outside a 15-minute walk of the Estate but with the Borough of Westminster	73
Outside the Borough of Westminster	2

Source: Westminster City Council

The new locations of residents who have moved from the Estate, both on a permanent and temporary basis, is shown in Map 3.1.

Map 3.1: New locations of relocated residents



Source: Westminster City Council

3.2.3 Overview of community resources on the Estate (Summer 2021)

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

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

In November 2020, the 'meanwhile use' community hub space - 'Ebury Edge' - opened on the Estate. Ebury Edge is scheduled to run until 2024 whilst the Estate is in transition. The space is intended to act as a temporary high street and focal point for the existing Ebury community and has a community hall space available to rent to the local community, and a public courtyard. The community space is also home to a resident-led playgroup to provide childcare for the local area.

Ebury Edge also has a restaurant run by the social enterprise 'Fat Macy's'. The restaurant is intended to serve the community whilst also training young Londoners living in temporary accommodation and helping them move into their own homes. Trainees volunteer on the 200-

hour programme, working with professional chefs and front of house staff to help run the business over the course of a year to earn a deposit for a rented home. Fat Macy's then provides additional follow up support for two years as the trainees transition into independent living. Since the Fat Macy's programme started in London in 2016, 30 trainees have completed the programme.[53]

The courtyard is also available for multi-purpose use by local residents and is currently being used by the Fat Macy's restaurant to grow vegetables and flowers.[54]

Reflecting the easing of Covid-19 restrictions, an official launch event of the Ebury Edge space for residents took place in mid-August. The event will allow residents to meet the current tenants of the Edge, and a number of classes including pottery and hula-hooping will be put on. Free food and drink will also be provided for residents of the Estate.[55]

Whilst Ebury Edge is intended simply to be a temporary meanwhile use development, the café has proved popular with residents and the Council is investigating opportunities to establish a similar space permanently on the new Estate.

3.2.4 Overview of businesses on the Estate (Summer 2021)

Prior to the construction process, there were seven identified commercial properties on the Estate, all of which were located on Ebury Bridge Road. These businesses were all identified as microbusinesses (small in size, owned by one or two people, with one to four employees). As of July 2021, five businesses remained in their premises.

The table below shows the original commercial properties on the site, and their current status, as well as providing an outline of any groups identified as part of the Retail Support Review as being a significant part of the customer base of the business.

Table 3.3: Ebury Estate Commercial Properties

Name	Type	Location	Status (as of July 2021)	Customer base and equality review[56]
Vival Property Services	Estate Agents	Unit 3, Ebury Bridge Road	Accepted compensation and have option of first refusal on new property within the new site	N/A
Ideal Café	Café	Unit 11-13, Ebury Bridge Road	Have accepted support from Westminster City Council for help relocating	Many of the café's customer came from the flats above the shop which have now been decanted, leading to an impact on sales
Choice Specialist Dry Cleaners	Dry Cleaners	Unit 21, Ebury Bridge Road	Have accepted compensation and vacated premises	N/A
Ebury News	Newsagent	Unit 23, Ebury Bridge Road	Have accepted compensation and vacated premises	N/A
Occasions Party Shop	Party Shop	Unit 27, Ebury Bridge Road	Remaining on site within the unit until 2026, and have option of first refusal on new property within the new site	Key market segments for the store include the local community, both high and low income, and within a walking distance from the shop.

[53] Fat Macys, 2021. About. https://www.eburyrestaurant.com/about

[54] Ebury Edge, 2021. Homepage. https://www.eburyedge.com/

[55] Ebury Newsletter, August 2021. Issue 44. https://eburybridge.org/newsletters/newsletter-issue-44/

[56] Retail Revival Limited. EBURY BRIDGE ESTATE RETAIL SUPPORT REPORT

Name	Type	Location	Status (as of July 2021)	Customer base and equality review[56]
Greens Pharmacy	Chemist	Unit 29-31, Ebury Bridge Road	• Remaining on site within the unit until 2026, and have option of first refusal on new property within the new site	Local, lower- income residents are an important market segment. During the Covid- 19 lockdowns of 2020 and 21, the pharmacy provided an essential service to the community by delivering medication to elderly and other vulnerable customers.
Mauro Sergio	Hairdressers	Unit 33, Ebury Bridge Road	• Remaining on site within the unit until 2026, and have option of first refusal on new property within the new site	The customers of the store are mainly women over the age of 40. At present the store only cuts European hair but would be open to diversifying into Afro- Caribbean hair.

The Council worked with an independent advisor, Retail Revival, in late 2020 to create a Retail Support document, outlining the plans of each business, any business development support they could benefit from, and the future needs of each business. Business development support needs identified included diversifying into online sales and marketing, support with social media presence, and development of business plans.

The pharmacy has been identified by the Council as providing an essential service to the residents of the Estate and will be remaining open in its current property until the new retail facilities open on the redeveloped Estate. Through the retail support process outlined above, the pharmacy owners have been in discussions with the Council regarding their needs for the new premises, including a temperature-controlled environment suitable for storing medicines.

The ‘meanwhile use’ community hub space in the Estate, Ebury Edge, currently has six retail shops housing independent businesses, including a ceramics store, a skincare shop, homeware, and fashion stores.

Ebury Edge also has a total of ten office units on site, all of which are currently in use by businesses.

The businesses operating from Ebury Edge as of July 2021 are listed in the table below:

Table 3.4: Ebury Edge Businesses

Unit	Name of business	Description
Retail	Each x Every	Footwear
	Nini Organics	Skincare
	Clay Habitat	Ceramics store
	Manufactured Culture	Homeware
	Heir Wardrobe	Fashion boutique
	Her.o	Knitwear
Office	Mike Simonelli	Product design
	Telmie	Communication services
	Edgify	Artificial intelligence
	Glue Home	Smart Door Locks
	Amaia London	Kidswear
	The Pimlico Million	Community Development Organisation

Unit	Name of business	Description
	Web Expertise	Web design

Source: eburyedge.com

Ebury Edge also has a small retail unit available for temporary lets. The unit is intended to be used by young, local start-ups looking to test out their idea for a short period of time, and all occupiers must clearly demonstrate a benefit to local residents.

3.3 Findings from the surveys

Two surveys to assess the demographics of the households still resident on the Estate in spring 2021 were conducted by post. Of the residents on the estate, 64 households responded- 15 leaseholders and 49 secure tenancies. The results of both surveys have been combined in the below results. Analysis of the findings of these surveys, in addition to the publicly held data relating to the Ebury Bridge Estate households, has helped to build a demographic profile of residents within the Estate and provided the Council with a better understanding of their needs based on their protected characteristics.

These equality surveys were conducted in addition to surveys undertaken in 2020 and 2019. Please refer to Appendix B of the Detailed EqIA for further details.

3.3.1 Demographics of residents on the Estate

3.3.1.1 Age

In both the resident surveys, a range of ages were represented across households.

- A total of 24 households reported children and young people under the age of 19
- A total of 17 households reported young people between the ages 19 and 29.
- A total of 15 households reported older people ages 69 and older.

3.3.1.2 Disability

Across the households which took part in the resident surveys:

- 21 households reported having at least one person in the household had a disability, split between 3 leasehold household and 19 secure tenancies.

3.3.1.3 Gender reassignment

One household in the spring 2021 surveys reported having a trans member. One household responded that they did not know.

3.3.1.4 Marriage and civil partnerships

Across the households which took part in the resident surveys:

- A total of 22 household reported members who were married or in a civil partnership, split over 5 leasehold households and 14 secure tenancies.
- 1 household responded that they preferred not to say.

3.3.1.5 Pregnancy and maternity

One household reported having one member who was currently pregnant. They were resident of a secure tenancy home.

3.3.1.6 Race and ethnicity

A range of ethnicities were reported across both resident surveys:

- A total of 41 households reported members who were from a minority ethnic background (defined here as those who did not self- define as 'White British'). These were spilt across 10 leasehold and 31 secure tenancies.
- A total of 12 households reported members who were White British, split over 5 leaseholds and 8 secure tenancies.

3.3.1.7 Religion and belief

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

- A total of 36 households reported at least one member who is Christian. This was split over 9 leaseholds and 27 secure tenancies.
- A total of 9 households reported at least one member who is Muslim. These were all spread over secure tenancies.
- 6 households reported that they preferred not to say, 6 households reported no religion, and 4 reported that the religion was unknown.

3.3.1.8 Sexual orientation

Across the households which took part in the resident surveys:

- 59 households, spread over 12 leaseholds and 47 secure tenancies, reported having members who identify as heterosexual.
- 9 households did not respond to the question.
- 1 household selected prefer not to say, and 2 households selected unknown.

4 Impact assessment

This chapter sets out the results of the updated Equality Impact Assessment of each option on protected characteristic groups and outlines any existing and updated Westminster Council mitigation measures.

4.1 Overview

4.2 Impact on residents during redevelopment

The following table describes the potential impacts of the redevelopment on protected characteristic groups, with a focus on impacts for residents and local community resources during the renewal process. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Existing measures Westminster Council has in place to mitigate or enhance impacts are set out. Finally, a series of recommendations are provided to mitigate any further impacts, and the overall equality impact assessed.

Table 4.1: Impact on residents and community resources during redevelopment

Potential equality effects	Affected groups	Impact of redevelopment	Existing Westminster Council mitigations	Recommendations and Overall Equality Impact
Loss of social infrastructure and access to community resources: The renewal process can involve temporary or permanent resettlement of residents and demolition of housing and community resources. This can lead to a loss of access to these resources and knock on impacts on social cohesion. In particular, it can increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can disproportionately impact ethnic minority communities, disabled people, older people and children. The ongoing COVID- 19 pandemic and regulations have had already had an impact on access to social cohesion and resources, and as such any further impacts may have cumulative negative effects, especially on older people and disabled people. Loss of social cohesion and access to community resources can lead to increased stress and anxiety in children who may need to change school; and loneliness and isolation in older people which can turn to negative health outcomes such as poor mental health and obesity. Disabled people and pregnant women may also experience negative health impacts, including increased stress and anxiety due to the loss of social cohesion and access to community resources. Risks associated with relocation for these affected groups can be heightened if housed in temporary accommodation, due to the need to relocate more frequently.	• **Children** • Older people • **Ethnic minority groups** • **Disabled people** • Pregnant women • Religion and belief	**Risks** • Relocation of residents during redevelopment may create longer journeys to school for children and parents. • Loss of informal childcare support due to resident relocation • Reduced access to community facilities and social infrastructure during redevelopment due to temporary loss of proximity to local community resources for residents that relocate, particularly those who have been relocated further than a 15 minute walk from the Estate.	• To mitigate these effects, the Council has set out the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas (as summarised in section 2.3 of the Detailed EqIA) to provide information on housing options, financial compensation and practical support for residents. The key mitigation in this policy that responds to maintaining social connections within the Estate is that all existing Council tenants and resident leaseholders will have a right to return to a new home on the redeveloped Estate. • Within the policy, the Council recognises that many tenants and leaseholders have connections to their local area and will want to remain there. A range of rehousing options (including replacement affordable housing options such as social rent and intermediate ownership) are available for tenants and leaseholders who want to stay in or close to the Estate to suit different circumstances. This should help to ensure that residents are ultimately able to return to the Estate, and therefore continue to access the social infrastructure that is important to them. • 37% of residents decanted from the site have been moved to a new home within 15 minutes of the Estate, and 98% have been decanted within the Borough of Westminster. • Where households are rehoused temporarily or permanently, their housing needs will be considered. – The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems. – All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. – Private tenants have been offered rehousing support through the Trailblazers service on the basis of their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. – There is also dedicated support available to residents who need to access it, for ongoing information around the redevelopment.	This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects it is recommended that the Council: • continue to work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to-date records of changing needs and circumstances– particularly those who are most affected by relocation; • continue to hold community meetings and events during the process of redevelopment, including events for residents who have relocated in order to remediate feelings of social isolation; • continue to offer support to those in private accommodation through the Trailblazer service; • continue to ensure that access to community resources is maintained throughout the renewal process where possible; • explore ways to sustain the benefits of the Ebury Edge initiative on the redeveloped Estate. .

Potential equality effects	Affected groups	Impact of redevelopment	Existing Westminster Council mitigations	Recommendations and Overall Equality Impact
			• In terms of enhancement measures, the redevelopment consists of new community infrastructure including a nursery, café and community and co-working office space. • The Ebury Edge facility has been set up as a meanwhile use space for residents during the construction of the new estate, consisting of a community hall, café, outdoor courtyard, and retail spaces. There are plans for regular community events to be held at the Edge throughout the redevelopment process to support residents through the period and maintain social cohesion and community contact. • A childcare facility and playgroup have been set up in the Ebury Edge community hall to provide childcare to local residents during the redevelopment period. Westminster City Council are investigating ways to make this permanent. • Ebury Community History Project to record memories of the estate during the redevelopment period.	
Access to finance (e.g. costs associated with moving home) Where renewal schemes require residents to resettle, it can lead to an increase in their financial outgoings due to costs associated with moving, particularly for single parent families (the vast majority of whom are led by women) and ethnic minority households. Relocation costs could include removal services, the need to adapt a new home or buy new furniture. Access to the required finance to assist with relocation may be most limited for those at risk of financial exclusion, who experience difficulty accessing appropriate and mainstream financial services, such as bank accounts and loans.	• Young people • Older people • **Disabled people** • **Ethnic minority groups** • Women	**Risks** • Costs associated with resettlement such as securing new accommodation during the restoration process and moving home, particularly for residents who are moving twice during the redevelopment period.	• The Council has developed strategies to ensure that residents are able to access finance in order to relieve some of the financial burden associated with relocation. These include the following compensation measures: • The fair market value of the existing property, the stamp duty of the replacement home up to the value of the existing property, and legal fees (for leaseholders), as well as the below statutory compensation (for all tenants); – Home loss payments, a sum in recognition of the inconvenience of having to move out of an existing property, which is set at 10% of the value of the property and capped at £6,500 (as of July 2021). – Disturbance payments for reasonable expenses arising as a direct consequence of the Council purchase of a property. These payments may include costs such as costs of removals (including additional support for vulnerable residents), disconnections and reconnections, redirection of mail, fitting of existing curtains and carpets, early mortgage redemption fees or mortgage and tender fees arising from the purchase of a new property, stamp duty land tax and other fees arising from the purchase of a replacement property and costs of new school uniforms. • This compensation and availability of affordable housing options will serve to manage the main financial effects of rehousing.	This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended the Council: • continue to work proactively and constructively through face to face engagement with residents, keeping up-to date records of changing needs and circumstances– particularly those who are most affected by financial exclusion; • continue to communicate rehousing options available to residents, including information for private and Temporary Accommodation tenants on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby.
Access to finance Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who may experience difficulty accessing appropriate and financial services, such as mortgages	• Young people • Older people • **Disabled people** • **Ethnic minority groups** • Women	**Risks** • Residents may not be able to attain a mortgage to remain on the Estate if new properties cost more than the value of existing homes.	• For resident leaseholders, an equity loan scheme is available to help with buying one of the new properties which will be of a higher value but will have similar costs to their existing home. Leaseholders will also have the option to buy a new home on the estate on a shared ownership bases and in some special cases, such as health problems, will be able to remain in the local area as a social or intermediate tenant.	This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended the Council: • ensure leaseholders are able to purchase a property on the renewed Estate without taking on new debt.

Potential equality effects	Affected groups	Impact of redevelopment	Existing Westminster Council mitigations	Recommendations and Overall Equality Impact
Affordable housing Young people, older people, disabled people, ethnic minority groups and women all struggle with housing affordability issues. Homeownership has become increasingly more unaffordable for certain groups; and intermediate housing schemes such as Shared Ownership are often still too expensive for many groups such as disabled people and single parent families, the vast majority of whom are led by women. A lack of financial means can limit the range of ownership options, including intermediate options such as Shared Ownership, available to older people and relocation may cause older people to use savings and investments in order to secure a new home, potentially affecting their long-term financial independence and stability.	• Young people • Older people • **Ethnic minority groups** • Disabled people • Women	**Risks** • Potential financial implications of increased rent for social tenant rents, intended to bring estate rents in line with the local area. • Potential financial implications of increased service charge for secure tenants and leaseholders	• Affordable housing options are available within the HRA, which include replacement of existing social rent and intermediate ownership housing for those living on the Estate, additional social and intermediate rent homes and market sale options available to provide a ladder of housing opportunity. At least 50% will be affordable for social and intermediate rent, including the homes set aside for those residents with a right to return to the Estate. • For resident leaseholders, an equity loan scheme is available to help with buying one of the new properties which will be of a higher value but will have similar costs to their existing home. Leaseholders will also have the option to buy a new home on the estate on a shared ownership bases and in some special cases, such as health problems, will be able to remain in the local area as a social or intermediate tenant. • As set out above, there is also support for vulnerable private tenants and TA tenants to source suitable housing. • Rent levels for returning tenants will be linked to the value of their existing Ebury property, local average earnings, and will meet Westminster City Councils target social rent cap. • Housing Support will also continue to be provided by Westminster City Council to support tenants to pay for their rent and service charges.	This impact is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended the Council: • continue to work proactively and constructively through face to face engagement with residents, keeping up-to date records of changing needs and circumstances– particularly those who are most affected by financial exclusion; • continue to communicate rehousing options available to residents, including information for private and Temporary Accommodation tenants on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby.
Appropriate and accessible housing: Where renewal schemes require the resettlement of many residents, issues can arise regarding sourcing suitable housing that meets the needs of families with children as well as sourcing suitable housing that meets the needs of people requiring adaptable and accessible housing, such as people with mobility impairments. Accessible housing would include at least the basic four accessibility features (level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space and a toilet at entrance level). A lack of suitable housing can lead to families living in overcrowded properties. Overcrowding can negatively impact the health of older people and children, putting them at increased risk of developing respiratory conditions. Overcrowding can also contribute to infections, psychological problems, Sudden Infant Death Syndrome (SIDS), and stress among children. Homes without access to outdoor space can negatively impact the emotional wellbeing of residents, particularly children. Black people are much less likely to have access to outdoor space at home than white people.	• **Children** • **Disabled people** • **Ethnic minority groups**	**Risks** • Challenge finding appropriate temporary housing for those with specific housing needs (e.g. disabled people, families with children)	• As set out above, the Council has developed policies to ensure that there is support available for finding appropriate and accessible housing. Where households are rehoused temporarily or permanently, their housing needs will be considered. – The Council's rehousing policies and process will provide resident leaseholders with a choice of housing and priority status within existing rehousing systems. – All current Council tenants will have been given the opportunity to complete a Housing Needs Assessment, while current leaseholders have been given the opportunity to express their preferences through a Housing Preferences Assessment. – Private tenants have been offered rehousing support through the Trailblazers service on the basis of their income and desired price range for housing. Through this, support will be provided to source suitable and affordable rented accommodation. Support is being offered through the Covid-19 pandemic to safeguard against homelessness. – Temporary Accommodation tenants will be rehoused in Westminster. Currently there are two remaining TA tenants – one will be rehoused on the Estate and one will move into permanent accommodation elsewhere. – The Housing Assessment process will determine the size of home each household requires based on the number of household members, to solve any existing overcrowding problems. – More family accommodation has been included in the housing mix for the new estate, with a range of 3-5 bedroom homes to tackle overcrowding. • Those with special accessibility requirements are prioritised through the rehousing process. Where possible they are relocated in the HRA, otherwise housing that suits their needs is	This effect is considered to be managed overall through the mitigation measures set out for residents in the Policy for Tenants in Housing Renewal Areas and the Policy for Leaseholders in Housing Renewal Areas. To manage any residual effects, it is recommended that the Council: • continue to work proactively and constructively through face to face engagement with residents, keeping up-to date records of changing needs and circumstances – particularly those who are most affected by a loss of affordable and appropriate housing; and • continue to provide information on rehousing options available to residents, including information for private and Temporary Accommodation tenants on processes for accessing Council housing and affordable housing being built as part of the redevelopment or nearby.

Potential equality effects	Affected groups	Impact of redevelopment	Existing Westminster Council mitigations	Recommendations and Overall Equality Impact
			sourced in the local area. Adapted and accessible housing has been found for all current tenants requiring it, which meets mobility and housing needs as assessed through the Housing Needs Assessment process. Adaptations may also be funded through disturbance payments. • Housing for families will be provided as part of the redevelopment, including replacement housing for families based on the number of bedrooms required, to prevent any overcrowding. • The overall housing provision on the Estate will be enhanced by re-providing homes to a higher standard with lower energy and maintenance costs, ensuring housing on the Estate meets residents' needs. • Residents will be involved in the design of the new homes.	
Health effects: Home relocation can have a negative impact on mental health and well-being. Relocation can create a great deal of stress and anxiety amongst children, young people and older people due to the need to adapt to new routines, facilities and surroundings. Involuntary relocation can have important health impacts for older people, with an increased mortality rate for those moved for urban renewal projects. The health effects of relocation can also be particularly heightened for temporary accommodation households, many of which are households with dependent children led by single mothers. Women and children in these circumstances may see increased levels of stress and anxiety exacerbated by the uncertainty and instability of their circumstances. Health impacts as a result of social isolation due to the COVID-19 pandemic, such as poorer mental health, obesity, alcoholism, and a greater risk of hospitalisation, may be exacerbated by the redevelopment process. Physical health effects may also arise as a result of the environmental effects of demolition, refurbishment and construction processes. Older people, disabled people, and children are also likely to be disproportionality affected by changes in air quality that may arise during any construction and refurbishment period as increased air pollution can impact upon underlying respiratory conditions. Air pollution can contribute to health impacts in young children, including long term cognitive issues and neurodevelopment. Additionally, antenatal exposure to air pollution may alter the lung development of a baby whilst in the womb. If a baby is exposed to significant levels of air pollution, this can increase the risk of premature birth and low birth weight	• **Children** • Older people • **Disabled people** • Pregnant women	**Risks** • Noise pollution from refurbishment, demolition and construction • Poorer air quality from demolition and construction. • Health effects associated with relocation and the two moves for each resident, including stress and isolation.	• In order to manage health effects related to stress due to relocating, the Council will be providing rehousing support (as outlined above). • To manage health effects related to noise and air quality, demolition works will be monitored closely and disruption will be minimised as much as possible.[57] This would typically be managed through the creation of a Construction Environmental Management Plan (CEMP), which would be implemented by the contractor carrying out the works.	This impact is considered to be mostly managed overall through the mitigation measures set out. However, there may be some impact on certain groups, such as older people, due to two moves being required for each resident. To manage any residual effects, it is recommended that the Council: • continue to provide ongoing support to residents through the rehousing process; • identify and work with vulnerable people whose protected characteristics may make them more vulnerable to adverse health effects; and • develop a CEMP as part of the demolition and construction works. • provide extra support for residents, particularly vulnerable residents, to make the two moves as smooth as possible. Where possible, these vulnerable residents should be relocated in a single move

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

Potential equality effects	Affected groups	Impact of redevelopment	Existing Westminster Council mitigations	Recommendations and Overall Equality Impact
Safety and security In the lead up to the renewal process and during the decanting and demolition of properties in the area, properties will be vacated and can fall into disrepair. This can attract unwanted activity including anti-social behavior and crime, which can affect those who are more likely to be a victim or witness of crime or those who are more fearful of crime. It has been suggested that fear of crime can contribute to social isolation, particularly for vulnerable groups such as women, older people, children and people from ethnic minority groups.	• Young people • Older people • **Ethnic minority groups** • **Disabled people** • LBGT people • Men • Women	**Risks** • Potential for increased anti-social behaviour and vandalism during decanting and demolition period.	• Effects on personal security will be managed through the phasing strategy, which means that parts of the Estate will remain occupied for a longer period, reducing the potential for issues around personal safety associated with disused and derelict buildings. There is also a process in place for reporting and addressing any incidents of Anti-Social Behaviour (ASB) within the Estate. This process has been publicised through the Ebury Bridge newsletter.[58]	This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • consider the use of Property Guardians, people who will reside in and oversee the property for a short term, to secure the vacant Estate properties; and • continue to monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with remaining residents, as it risks adding to a sense of vulnerability, isolation, and loss of sense of community for residents.
Accessibility and mobility in the area: Evidence indicates that during construction the accessibility and mobility of the local area can be affected. In particular, construction can cause difficulties in relation to increased traffic in the local area, reduced parking (construction vehicles and subcontractors in parking), construction activities blocking access to homes, shops, bus stops and pavements and safe routes, as well as effects on wayfinding. This may also limit the ability of children to move around the estate safely alone, limiting outdoor play opportunities.	• Older people • **Disabled people**	**Risks** • The presence of tradesmen's vehicles and construction vehicles during construction may temporarily reduce access and parking. • The presence of more vehicles in the area may increase local traffic. • Potential for construction activities might block some access routes and could impact on wayfinding.	• The Council is engaging with residents on an ongoing basis around parking and access requirements. • Accessibility of the Estate will be considered through the process of construction planning (e.g. ensuring hoarding does not sever the Estate).	The consultation process highlighted that some stakeholders are particularly concerned around parking. There are concerns that the scheme will have a negative impact on existing parking spaces on surrounding local roads. This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • ensure any blue badge / accessible parking is retained for homes requiring it; • ensure that accessibility of the Estate is planned for and monitored through the construction process through the development of a CEMP.
Information and communication: Complex material and information on the regeneration may present a challenge to those who have different information and communication needs. This includes, but is not limited to, people with cognitive or learning disabilities, people with low literacy levels, older people, people with visual or hearing impairments and people who use English as a second language. Due to the COVID 19 pandemic, engagement and consultation has increasingly had to utilise digital tools, however this can exclude those who are less likely to be online, such as older people and disabled people. Some groups, such as children and young people, disabled people, and people from ethnic minority backgrounds, are more likely to face barriers to engagement. Consultation should 'go the extra mile' to speak with these groups, including holding events in a variety of different venues and times (COVID-19 regulations permitting).	• Older people • **Disabled people** • **Ethnic minority groups**	**Risks** • Residents do not fully understand or appreciate the Scheme, or are unable to engage properly with the process. Some residents may end up accepting an offer without fully understanding the implications of what is happening.	• The Council has developed a robust engagement approach that has been ongoing since the early stages of the project. • Engagement has been undertaken through a variety of mechanisms to ensure residents are kept informed of rehousing information, updates around the wider redevelopment and opportunities to provide feedback on the process. The consultation process was also moved online and extended during the Spring 2020 COVID-19 lockdown. • The consultation process has taken several forms to encourage participation and ensure that emerging designs were formed in collaboration with residents.[59] Such processes included: – Community Futures Group: the steering committee has continued to play a key role in the delivery of the scheme during consultation. – Dedicated consultation space: a vacant shop at No 9 Ebury Bridge Road has been used to provide a welcoming and accessible space for residents to visit. – Resident drop-ins: the designated redevelopment architects have provided themed sessions for residents to provide feedback. Subjects such as public realm, placemaking, re-housing and phasing have been covered. – Ebury Bridge website: a website has been created to provide an accessible platform for up to date scheme information.	This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, it is recommended that the Council: • Continue to share up-to-date information about the renewal, including what is going on before, during and after all stages of the renewal process with residents, businesses and community resources. This provides the means for residents to understand the options available in order to make an informed decision on what actions they should take and when. This includes timely delivery of information and keeping websites up to date. • Information should continue to be available in a variety of formats where it may be required (i.e., braille, audio, large print or translated) and be clear, concise and without jargon and easy to read. • Residents should continue to have the opportunity to provide feedback in a way which is suitable for them. • Information and communication strategies should continue to factor in COVID-19 social distancing strategies for as long as is required. • The use of third party organisations who can help with communication such as translators should continue to be an option to overcome any potential language barriers or a local disability organisation who can act as mediator to ensure

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

[59] Westminster City Council (2020) 'Statement of Community Invovlement'

Potential equality effects	Affected groups	Impact of redevelopment	Existing Westminster Council mitigations	Recommendations and Overall Equality Impact
			– Online consultation tool: for those unable to attend consultation events in person, or wanting to provide anonymous feedback, an online tool has been developed. – Newsletters: 43 editions of the Ebury Bridge Newsletter have been distributed over the last four years. Each copy provides details on how to give feedback. – Leaflet drops: all residents within a 1km radius of the Estate have received leaflets and booklets with the option to provide feedback. – Targeted consultation meetings: the project team have met with 15 different amenity and resident groups in the area on a one-to-one basis. – Exhibition: a public exhibition was held over a two-week period. Three events took place on Saturday's and in the evenings to ensure participation.[60] – Mail out information packs: A printed pack has been distributed to all households with final design information, with a feedback form and link to provide feedback online. – Phone calls: Follow up phone calls have been made to suit different communication needs, to enable those who may find using online methods more difficult to provide feedback – Face to face meetings: In exceptional situations where it is required and the resident is not presenting symptoms, arrangements can be made to meet face to face using social distancing guidelines.	information is clearly understood and the right questions are asked.

4.3 Impact on businesses during redevelopment

The following table describes the potential impacts of the renewal option on protected characteristic groups, with a focus on the businesses on the Estate during the renewal process. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified. Finally, existing measures in place to mitigate or enhance impacts are set out.

Table 4.2: Impact on businesses during redevelopment

Potential equality risks	Affected groups	Impact of Redevelopment	Existing Westminster Council mitigations	Recommendations
Potential loss of business Independent small businesses including shops, cafes and restaurants, play an important role in supporting the vitality and vibrancy of local communities and often operate from smaller premises, such as those that might be found on a housing Estate. Redevelopment can result in the permanent loss of such businesses, with the potential to affect self-employed business owners. ethnic minority groups and older people may be particularly affected by the loss of a business as they are more likely to be self-employed. .	• Older people • **Ethnic minority groups**	**Risk** • Relocation may cause businesses on site to permanently close.	Although there is no statutory obligation to relocate impacted businesses, in order to prevent businesses from facing closure, and their staff facing redundancy, the Council has developed support for businesses on the Estate. There is no formal Council policy for businesses, however the Council has worked with the affected businesses on a one-to-one basis to discuss their options. The Council has also hired an independent company to develop a retail support document to assist with advice, relocating, and business planning, and each business has received personal visits, multiple telephone calls and email conversations as part of this development. All businesses have been offered the first right of refusal on the new units available within the redevelopment. The new non- residential space within the	In 2019, feedback from businesses showed that they felt they had not been as engaged as residents in the redevelopment process. Following this, further actions were taken by the Council to improve their business response (see column, left). This impact is considered to be managed overall through the mitigation measures set out. To manage any residual effects, is recommended that the Council:
Financial implications associated with business relocation The renewal process could result in the relocation of businesses. Should businesses relocate to new industrial or commercial premises elsewhere, it is likely that access to finance will be required to secure a new location. ethnic minority groups and older people are more likely to experience difficulty accessing	• Older people • **Ethnic minority groups**	**Risk** • Potential costs from disruption to business trading.		

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

financial support, which could add further financial strain in securing alternative premises for business continuity following relocation.			• Cost of relocation and securing new premises, either on a temporary or permanent basis. • Difficulty finding affordable premises nearby may cause businesses to close.
Potential redundancy of employees associated with business loss or relocation Estate renewals may require businesses to relocate and may result in extinguishment. These changes may create direct redundancies or result in indirect redundancies by current staff being unable to access future employment at a different location. This can affect groups who are more likely to face barriers to employment than others.	• Older people • **Disabled people** • **Ethnic minority groups**	**Risk**	• Relocation may cause businesses to close and staff to be made redundant. • Relocation options for businesses on an interim or permanent basis may result in current staff not being able to access work.
Impact of redundancy on health and well-being Involuntary job loss due to redevelopment and renewal can have disproportionate health and well-being effects for certain groups. Older workers are at an increased risk of cardiovascular disease due to increased stress resulting from contributing factors such as a lower likelihood of re-employment, a substantial loss of income and the severance of work-based social interactions. Redundancy can create an increased risk of family tension and disruption, and that job loss for a parent can have detrimental effects on children including lowered self-esteem and socio-psychological well-being.	• **Children** • Older people	**Risk**	• Relocation may cause businesses to close and staff to be made redundant. • Redundancy may lead to increased levels of stress and anxiety for staff. • Possible redundancy of parents may negatively impact children's wellbeing.
Impacts on the existing customer base of businesses Estate renewal has the potential to result in relocation of local businesses currently operating on the Estate. Depending on the geography of where affected parties relocate to, such relocation from the local area might disrupt local customer bases that have been developed over time, ultimately resulting in a loss in business.	• **Ethnic minority groups**	**Risk**	• Potential relocation of business and customers may result in a loss of business, which may cause staff to be made redundant.
Impacts on local customers Estate renewal has the potential to close or relocate businesses and facilities used by the local population on the Estate, particular specific ethnic groups. Depending on the geography of where affected businesses relocate to, such relocation might make it harder for people to access local businesses and facilities they regularly use. It is also acknowledged that the total extinguishment of some businesses may be necessary, which might also result in the loss of service delivered to the local consumers.	• Older people • **Disabled people** • **Ethnic minority groups**	**Risk**	• Potential temporary relocation of customers may result in a loss of business, which may cause staff to be made redundant. • Relocation of businesses may limit residents' ability to access them • Relocation or closure of businesses may impact on the social cohesion of the local community and customers, leading to isolation

site will be designed to be flexible in size to meet changing future occupier demands.

Those who wish to sell their business have also been offered the chance to do so. As of July 2021, two businesses had accepted compensation from the Council and had vacated their premises.

One business, a pharmacy, was identified by the Council as providing essential services to those living on the Estate. The pharmacy will remain open in its current location until 2026 and will be offered right of first refusal of premises on the new estate.

Existing businesses have also been offered bespoke business development support identified in the Retail Support Plan in order to ensure they are equipped to maximise the opportunity that the regeneration will bring and deal with the challenges of temporary relocation, such as information on how they might diversify their business, and help and support related to setting up an online shop, marketing, and developing business plans.

A 'meanwhile use' facility is currently open on the Estate, providing retail units and office space for local businesses as well as temporary retail lets for local start-ups.

- continue to work proactively through face to face engagement with vulnerable business owners and employees;
- continue to provide business development support to help businesses deal with periods of incontinuity and change;
- ensure businesses are fully informed of the timescales that would affect them as soon as possible; and
- signpost to resources for finding employment or other support if an owner or employee is facing redundancy.
- Continue to work proactively with businesses to provide development support as identified in the Retail Support Plan.

4.4 Impact on community following redevelopment

The following table describes the potential impacts of the renewal option on protected characteristic groups, with a focus on the Estate and wider community following the renewal process. These impacts have been identified through a review of published literature and through engagement with residents. Potential disproportionate effects on particular groups based on the demographic analysis of the Estate are also identified.

Table 4.3: Impact on community following redevelopment

Potential equality effects	Affected groups	Impact of Redevelopment	Recommendations
Improved housing provision: Renewal can lead to improvements in housing provision within the regeneration area therefore improving appropriateness, accessibility and affordability, as well as its quality and efficiency in energy consumption. Warm and insulated homes can help prevent against the health and wellbeing impacts of living in a cold home. Children living in cold homes are more than twice as likely to suffer from a variety of respiratory problems than children living in warm homes. Cold housing can negatively affect children's educational attainment, emotional wellbeing and resilience. Effects of cold housing are also evident among older people in terms of higher mortality risk, physical health and mental health.	• **Children** • Older people • Disabled people • **Ethnic minority groups**	**Opportunity** • Total of 781 new homes, including 239 new council properties • All new homes built to new building, space and accessibility standards. • High quality homes with lower energy and maintenance costs • Homes built to meet the needs of residents • Large uplift in new homes. • Private balconies for all homes	The regenerated Estate will provide improved housing, with respect to appropriateness, accessibility and affordability. In order to further enhance measures: • ensure final housing mix that is delivered meets the needs of current and future residents; and • provide new housing that exceeds current minimum building standards e.g. Decent Homes Standard.
New employment opportunities: Renewal can act as a means of promoting economic growth and supporting job creation. For example, property development can contribute to urban economic regeneration by enabling local stores to grow and expand, and through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education. Improved opportunities to access employment and education can serve to help address issues of inequality and improve social mobility.	• Older people • **Disabled people** • **Ethnic minority groups** • Women • Young people	**Opportunity** • New construction employment onsite (varying by the amount of construction required for the job). • Improved commercial spaces for new and existing businesses. • Reprovision of retail units with an increased floor space • Employment opportunities through temporary retail space at Ebury Edge • Opportunity for young local start-ups at Ebury Edge with discounted rent. • Fat Macys training programme for locals living in temporary accommodation. • Current Social Value plan ideas being explored by Westminster City Council include employment opportunities within the management of the new site itself; and provision of employment and skills training to residents of the estate.	The regenerated Estate will provide new retail space and opportunities for employment. Where possible, current businesses are receiving support (as outlined above) to relocate to the new Estate. Beyond improving outcomes for existing businesses, there are also opportunities to improve equality outcomes by: • working with owners of new businesses in the renewal area to employ local people, focussing on groups that are vulnerable to unemployment e.g. people from minority ethnic groups, disabled people, young people. • Continuing to work with social enterprises in the area to prioritise commercial space for social enterprises in order to support and encourage positive social outcomes as well as economic activity in the local area, such as with Fat Macys at Ebury Edge.
Improved public realm and green space Renewal offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition the opening up of green space has been shown to impact positively on both physical and mental health. Inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people. Green space can also have a positive role in a child's cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.	• **Children** • Older people • Disabled people • **Ethnic minority groups**	**Opportunity** • New civic squares • Provision of high-quality green space • Increased provision of good quality and accessible play space for all ages	The regenerated Estate will provide additional green space and play space. In order to further enhance measures: • involve the local community in planning and designing improvements to the public realm and green spaces, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people; and • ensure that inclusive design principles are followed in the design of public spaces.
Provision of community resources and improved social cohesion Community resources provide important places of social connection and promote wellbeing for many groups. For example, community hubs can provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation. An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.	• **Children** • Older people • **Disabled people** • **Ethnic minority groups** • Pregnant women • LGBT	**Opportunity** • New community hub in the Central Square • New nursery • New fitness centre • Lifetime car club membership for all residents • Cycle parking provision • The Council are developing a Social Value plan to further promote social cohesion and integration on the estate. As part of the design, development and implementation of this scheme, the council will ensure the involvement of residents on the estate. • Current Social Value plan ideas being explored by Westminster City Council include neighbourhood integration events, food growing through college outreach programmes, and extra support provided to older people and disabled people to enable them to use the community spaces.	The regenerated Estate will provide new community resources including a nursery and community space. In order to further enhance measures: • continue to involve the local community in decisions about which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements; • work with the Carly's Angels temporary space childcare providers when developing the new nursery, in recognition of the success of the project; • ensure analysis is undertaken to understand on any potential pressure on public services that could result from redevelopment (e.g. extra pressure on schools and health care services). • Continue to develop the Social Value plan to improve social cohesion on the estate, and include all current ideas under consideration mentioned previously.

Potential equality effects	Affected groups	Impact of Redevelopment	Recommendations
Tackling crime and disorder Levels of crime have in part been attributed to the urban environment. It has been argued that the opportunity for some forms of crime can be reduced through thought-out approaches to planning and design of neighbourhoods and towns. Reducing potential for crime can affect those more likely to fear crime or be a victim or witness of crime.	• Young people • **Disabled people** • **Ethnic minority groups** • LGBT people • Men • Older people • Women • **Children**	**Opportunity** • Enhanced lighting • On site security and management of communal space to deal with any anti- social behaviour or other problems • Design Out Crime officer assisting with the design of the new estate • Access to communal space controlled by key- fob access.	The regenerated Estate will provide an opportunity to incorporate new security measures. This can be enhanced by: • following Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm; [61] • applying recommendations for safety and security (see above) in design where relevant (e.g. CCTV, design that avoids vandalism).
Improved access, mobility and navigation: Renewal processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. There are a number of equality groups who can experience difficulties with access, mobility and navigation who could benefit from improvements in this area. Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks.	• Children • Older people • Disabled people	**Opportunity** • Improved and increased pedestrian and cycle routes through Estate • Separate pedestrian access points to Estate • Segregated walking and cycling route through Estate • Electric vehicle charging points • Clear signage and wayfinding • Estate meets car free standard (excluding disabled parking) for residential developments as set out in the London Plan 2021. • Total of 42 disabled car parking spaces, an increase from seven on the current estate.	The regenerated Estate will improve connectivity and accessibility across the Estate. To enhance this, it is recommended to: • ensure the design of movement networks specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design;[62] and • apply design that creates a safer environment for all transport users by managing potential conflicts between modes.

[61] Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications
Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf

[62] Design Council (2006) 'The Principles of Inclusive Design'. Available at: https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf
Department for Transport (2005) 'Inclusive mobility' Available at: https://www.gov.uk/government/publications/inclusive-mobility
Department for Transport (2007) 'Manual for Streets'. Available at: https://www.gov.uk/government/publications/manual-for-streets

5 Conclusions and action plan

This chapter sets out the conclusion of the Equality Impact Assessment addendum as well as an equality action plan with assigned responsibilities.

5.1 Conclusion

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

The assessment has found that, where any negotiations of property acquisition to facilitate the redevelopment is deemed to not be possible and compulsory purchase must be used as a last resort, equality risks have been addressed. There is, therefore, a case for the use of the CPO, if it is required to facilitate the development. This must be weighed against the acknowledged potential risks set out above. In this case, the Council has sought to mitigate these through a range of reasonable and proportionate measures focused on engagement, compensation options, and the benefits of the redevelopment in order to improve the outcomes of the redevelopment for the current and future Estate community.

5.2 Action Plan

Table 5.1: Action Plan

The following action plan seeks to establish activities and responsibilities to continue to identify and address equality issues where they arise. It is the responsibility of Westminster Council to implement any recommendations and mitigations identified.

Recommendation	Potential impact addressed	Timeframe	Responsibility
Work proactively and constructively through engagement with residents using a variety of mediums, keeping up-to-date records of changing needs and circumstances	Loss of social cohesion and access to community resources Difficulty accessing finance Appropriate and accessible housing Affordable housing Health effects Impact of redundancy on health and well-being Information and communication	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, especially the engagement team Independent resident advisor
Continue to hold community meetings and events during the process of redevelopment, including events for residents who have relocated in order to remediate feelings of social isolation	Loss of social cohesion and access to community resources	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council
Continue to offer support to those in private accommodation through the Trailblazer service;	Loss of social cohesion and access to	Ongoing during redevelopment period until	Westminster City Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
	community resources	completion of redevelopment	
Continue to ensure that access to community resources is maintained throughout the redevelopment process where possible.	Loss of social cohesion and access to community resources	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council
Continue to share up-to-date information about the redevelopment, including what is going on before, during and after all stages of the redevelopment process with residents, businesses and community resources. This provides the means for residents to understand the options available in order to make an informed decision on what actions they should take and when. This includes timely delivery of information and keeping websites up to date.	Information and communication	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, especially the engagement team
Residents should continue to have the opportunity to provide feedback in a way which is suitable for them	Information and communication	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, especially the engagement team
Information should continue to be available in a variety of formats where it may be required (i.e., braille, audio, large print or translated) and be clear, concise and without jargon and easy to read	Information and communication	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, especially the engagement team
Information and communication strategies should continue to factor in COVID-19 social distancing strategies for as long as is required	Information and communication	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, especially the engagement team
The use of third party organisations who can help with communication such as translators should continue to be an option to overcome any potential language barriers or a local disability organisation who can act as mediator to ensure information is clearly understood and the right questions are asked	Information and communication	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, especially the engagement team
Continue to communicate rehousing options to residents, including processes for accessing Council housing and affordable housing being built as part of the redevelopment	Access to finance (e.g. costs associated with moving home) Access to finance (Affordable housing)	Ongoing during redevelopment period until all original residents are rehoused in the new Estate	Westminster City Council, especially the engagement team
Develop a CEMP as part of the demolition and construction works and ensure that the accessibility of the Estate is planned for as part of this.	Health effects Accessibility and mobility in the area	Ongoing	Westminster City Council, contractors
Provide extra support for residents, particularly vulnerable residents, to make the two moves as smooth as possible. Where possible, these vulnerable residents should be relocated in a single move	Health effects	Ongoing	Westminster City Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
Consider the use of Property Guardians, people who will reside in and oversee the property for a short term, to secure the vacant Estate properties	Safety and security	Ongoing until completion of demolition and construction	Westminster City Council
Continue to monitor the security of the Estate and consider additional security where concerns are flagged. However, any enhanced security measures should only be implemented as a last resort, if deemed necessary, and in conjunction with remaining residents	Safety and security	Ongoing until completion of demolition and construction	Westminster City Council
Ensure any blue badge / accessible parking is retained for homes requiring it;	Accessibility and mobility in the area	Ongoing	Westminster City Council, design team
Continue to work proactively through face to face engagement with vulnerable business owners and employees	Potential loss of business Financial implications associated with business relocation Potential redundancy of employees associated with business loss or relocation	Ongoing until completion of commercial space	Westminster City Council, especially the engagement team
Continue to provide business development support to help businesses deal with periods of incontinuity and change	Potential loss of business Financial implications associated with business relocation Potential redundancy of employees associated with business loss or relocation	Ongoing until completion of commercial space	Westminster City Council
Ensure businesses are fully informed of the timescales that would affect them as soon as possible	Potential loss of business Financial implications associated with business relocation	Ongoing until completion of commercial space	Westminster City Council, , especially the engagement team
Signpost to resources for finding employment or other support if an owner or employee is facing redundancy	Potential redundancy of employees associated with business loss or relocation Impact of redundancy on health and well-being	Ongoing until completion of commercial space	Westminster City Council
Continue to work proactively with businesses to provide development support as identified in the Retail Support Plan.	Potential loss of business Financial implications	Ongoing	Westminster City Council

Recommendation	Potential impact addressed	Timeframe	Responsibility
	associated with business relocation		
Ensure final housing mix that is delivered meets the needs of current and future residents	Improved housing provision	Ongoing	Westminster City Council, design team
Provide new housing that exceeds current minimum building standards e.g. Decent Homes Standard.	Improved housing provision	Ongoing	Westminster City Council, design team
Work with owners of new businesses in the redevelopment area to employ local people, focussing on groups that are vulnerable to unemployment e.g. people from ethnic minority groups, disabled people, young people.	New employment opportunities	Ongoing	Westminster City Council
Continue to work with social enterprises in the area to prioritise commercial space for social enterprises in order to support and encourage positive social outcomes as well as economic activity in the local area, such as with Fat Macys at Ebury Edge.	New employment opportunities	Ongoing	Westminster City Council
Involve the local community in planning and designing improvements to the public realm and green spaces, and with which resources should be incorporated into the area, specifically targeting protected characteristic groups that are likely to benefit from improvements e.g. children, older people and disabled people	Improved public realm and green space Provision of community resources and improved social cohesion	Ongoing until completion of public space	Westminster City Council, especially the engagement team
Ensure that inclusive design principles are followed in the design of public spaces.	Improved public realm and green space	Ongoing until completion of public space	Westminster City Council, design team
Work with the Carly's Angels temporary space childcare providers when developing the new nursery, in recognition of the success of the project	Provision of community resources and improved social cohesion	Ongoing	Westminster City Council
Ensure analysis is undertaken to understand on any potential pressure on public services that could result from redevelopment (eg. extra pressure on schools and health care services).	Provision of community resources and improved social cohesion	Ongoing	Westminster City Council,
Continue to develop the Social Value plan to improve social cohesion on the estate, and include all current ideas under consideration mentioned previously.	Provision of community resources and improved social cohesion	Ongoing	Westminster City Council
Follow Crime Prevention Through Environmental Design (CPTED) and Secure by Design principles in designing the built environment and public realm[63]	Tackling crime and disorder	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, design team

[63] Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications

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

Recommendation	Potential impact addressed	Timeframe	Responsibility
Apply recommendations for safety and security (see above) in design where relevant (e.g. CCTV, design that avoids vandalism).	Tackling crime and disorder	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, design team
Ensure the design of movement networks specifically addresses the mobility needs of vulnerable groups. This can be achieved by applying principles of inclusive design;[64]	Improved access, mobility and navigation	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, design team
Apply design that creates a safer environment for all transport users by managing potential conflicts between modes.	Improved access, mobility and navigation	Ongoing during redevelopment period until completion of redevelopment	Westminster City Council, design team

[64] Design Council (2006) 'The Principles of Inclusive Design'. Available at: https://www.designcouncil.org.uk/sites/default/files/asset/document/the-principles-of-inclusive-design.pdf
Department for Transport (2005) 'Inclusive mobility' Available at: https://www.gov.uk/government/publications/inclusive-mobility
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