

Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document

EQUALITY IMPACT ASSESSMENT

Equality Impact Assessment - Earl's Court and West Kensington Opportunity Area Supplementary Planning Document

March 2012

Overall Information	Details of Full Equalities Impact Assessment
Financial Year and Quarter	2011-2012, Q4
Name and details of policy, strategy, function, project, activity, or programme	<p>The Earl's Court West Kensington Opportunity Area (the 'Opportunity Area') Supplementary Planning Document (SPD) sets out detailed planning guidance on how the area should be redeveloped.</p> <p>The document is prepared as a Supplementary Planning Document (SPD) to supplement policies in LBHF's Core Strategy (2011) and the RBKC Core Strategy (2010) and Supplementary Planning Guidance (SPG) to supplement policies in the London Plan (2011).</p>
Name of Service Department	<p>LBHF: Thomas Cardis, Earl's Court Project Team, Environment Services, London Borough of Hammersmith and Fulham, King Street.</p> <p>RBKC: Brendon Roberts, Strategic Developments, Planning and Borough Development, RBKC Town Hall, Hornton Street</p>
Date of completion of final EIA	March 2012

Section 02	Scoping of Full EIA
Plan for completion	<p>The Opportunity Area SPD is of high public interest and therefore a full EIA is necessary.</p> <p>Timing: The EIA supports and informs the drafting of the SPD,</p> <p>Resources: Officer Time, census data and other statistics as listed throughout, feedback from preliminary issue-based consultation and first and second consultation on the SPD.</p> <p>Lead Officer: Thomas Cardis</p>
What is the policy, strategy, function, project, activity, or programme looking to achieve?	<p>Objectives The SPD sets out detailed planning guidance on how the Opportunity Area should be redeveloped on a comprehensive basis. The objectives of the SPD are:</p> <p>Urban Form</p> <ul style="list-style-type: none"> • Maximise connectivity; • Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces; • Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities; • Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context; • Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape; and • Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling. <p>Housing</p> <ul style="list-style-type: none"> • Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods. <p>Employment</p> <ul style="list-style-type: none"> • Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

Retail

- New 'comparison' retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd's Bush, Kensington High Street and King's Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and
- Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

Culture

- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor's London Plan; and
- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court 'brand'.

Social and Community facilities

- Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

Transport

- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

Energy

- All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and
- All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

Environment

- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;
- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

Section 106 and Phasing Strategy

- Ensure a comprehensive approach to redevelopment of the OA; and
- Ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development.

Assessment of Objectives

The SPD objectives are assessed against the nine protected characteristics, with an overall guide to findings in the chapters given below:

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Age	+/-	H	
			<p>Where age is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds). Those under 18 are not protected under Age at present under the Act. Therefore, the impact on children and young people is assessed under Children's Rights.</p> <p>Redevelopment of the OA in accordance with the SPD objectives will deliver an integrated, inclusive urban environment accommodating all age groups. All housing is proposed to be built to lifetimes homes standards and 10% of all housing will be built to wheelchair homes standards. There will be a substantial improvement in general accessibility throughout the OA with barriers to accessibility removed and footways and crossings built to accommodate all age groups. There will be accessibility improvements at the three nearby London Underground Stations. All new infrastructure including health and community facilities will accommodate all age groups.</p>

				There are negative impacts in relation to the disruption caused by the potential redevelopment of the estates. This is set out in detail in the assessment of the Housing Strategy below.
	Disability	+/-	H	<p>A person has a disability if s/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.</p> <p>Redevelopment of the OA in accordance with the Urban Form Strategy objectives requires designing buildings and places so that they are accessible to all. All housing is proposed to be built to lifetimes homes standards and 10% of all housing will be built to wheelchair homes standards. There will be a substantial improvement in general accessibility throughout the OA with barriers to accessibility removed and all footways and crossings built to accommodate people with disabilities. Accessibility improvements are proposed at the three nearby London Underground Stations. All new social and community facilities will be designed to accommodate those with disabilities.</p> <p>There are negative impacts in relation to the disruption caused by the potential redevelopment of the estates. This is set out in detail in the assessment of the Housing Strategy below.</p>
	Gender reassignment	N/A	N/A	<p>Gender reassignment is the process of transitioning from one gender to another.</p> <p>The SPD objectives have not so far emerged as relevant to this protected characteristic because it is not seeking to provide a service (e.g. land use for a health or care service for those transitioning).</p>
	Marriage & Civil Partnership	N/A	N/A	<p>Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.</p> <p>The law does not require service providers to take into account the impact of what they do on married people and civil partners. The SPD objectives have not so far emerged as relevant to this protected characteristic because it is not aiming to put in place a service for married people or civil partners (e.g. land use for a registrars service).</p>
	Pregnancy and	+/-	L-H	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

	maternity			<p>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.</p> <p>Redevelopment of the OA in accordance with the Urban Form Strategy requires designing buildings and places so that they are accessible to all. In accordance with the Housing Strategy, a wide range of affordable and accessible housing will be provided including for families. There will be a substantial improvement in general accessibility throughout the OA with barriers to accessibility removed and all footways and crossings built to safely and conveniently accommodate prams, buggies and young children which will positively impact on pregnant women and parents with babies and children. This will positively impact on pregnant women and women with babies and children, because it will make it easier for them to get about the OA There will also be accessibility improvements at the three nearby London Underground Stations. New social and community facilities including health facilities, nurseries and community facilities will also serve the OA.</p> <p>There are negative impacts in relation to the disruption caused by the potential redevelopment of the estates. This is set out in detail in the assessment of the Housing Strategy below.</p>	
	Race	+/-	L-H	<p>Race refers to the protected characteristic of race. It refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origins.</p> <p>Redevelopment of the OA in accordance with the SPD objectives will deliver an integrated, inclusive urban environment capable of accommodating all racial groups and ethnic minorities. In accordance with the Housing Strategy a wide range of housing typologies and tenures will be provided covering a broad range of affordability. 43% of the population on the West Kensington and Gibbs Green Estates come from minority backgrounds. Any estate regeneration is therefore likely to have a particularly strong impact on these minorities. Estate regeneration provides all residents with the opportunity to remain in the area in high quality new affordable housing if they so wish. A lively cultural quarter will also be established accommodating a wide range of arts and cultural activities. Education, health and community facilities, open space and play space will be available and usable by all. Local employment opportunities will also be created for all.</p>	

			There are negative impacts in relation to the disruption caused by the potential redevelopment of the estates. This is set out in detail in the assessment of the Housing Strategy below.
Religion/belief (including non-belief)	+	L-H	<p>Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p> <p>Redevelopment of the OA in accordance with the SPD objectives will deliver an integrated, inclusive urban environment accommodating all religious groups. All social and community infrastructure will be available for use by faith and special interest groups and the community hub will be required to include multi-faith space. Public open space and green space will also be available for formal and informal events.</p>
Sex	+	L-H	<p>Sex means a man or a woman.</p> <p>Redevelopment of the OA in accordance with the SPD objectives will deliver an integrated, inclusive urban environment, with some chapters being more relevant to this protected characteristic than others</p>
Sexual Orientation	N/A	N/A	<p>Sexual orientation means whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.</p> <p>The SPD objectives have not emerged as relevant to this protected characteristic because it is not seeking to provide a service (e.g. land use for a service for lesbian, gay, bisexual, or heterosexual people).</p>

Human Rights

It is not considered that the Objectives will have an impact on Human Rights

Children's Rights

As given throughout, there are a number of ways in which the SPD will impact positively on Children's Rights

Section 03	Assessment of relevant data and/or undertake research
Documents and data reviewed	<p>The following documents and data have been used to help inform this Equality Impact Assessment:</p> <p>LBHF Single Equality Scheme The Single Equality Scheme simplifies how we meet our requirements for all, including groups protected by discrimination law. Officers have given careful consideration to the statutory codes in relation to race, gender, and disability in preparing the scheme, as well as to the duties that were expected to arise from the Equality Act 2010, and most of the provisions which came into force on 01 October 2010 (see below).</p> <p>The Single Equality Scheme objectives are based on the same Community Strategy objectives as the Spatial vision of the LBHF Core Strategy in terms of creating a borough of opportunity for all, including promoting home ownership and regenerating the most deprived parts of the borough. The ECWKOA SPD works to these same broad objectives.</p> <p>RBKC commitment to Diversity and Equality RBKC is no longer employing an Equality Scheme approach and are instead developing a more targeted approach which aims to be transparent, responsive, specific and outcome focused.</p> <p>.</p> <p>Public Sector Equality Duty The public sector equality duty (PSED) states that in the exercise of our functions, we must have due regard to the need to:</p> <ul style="list-style-type: none"> ▪ Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act; ▪ Advance equality of opportunity between people who share a protected characteristic and those who do not; and ▪ Foster good relations between people who share a protected characteristic and those who do not. <p>Having due regard for advancing equality involves:</p> <ul style="list-style-type: none"> ▪ Removing or minimising disadvantages suffered by people due to their protected characteristics; ▪ Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and ▪ Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low <p>The Act states that meeting different needs involves taking steps to take account of groups with protected characteristics. It describes fostering good relations as tackling prejudice and promoting understanding between</p>

people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

LBHF Community Strategy

The Community Strategy was produced in 2007 and sets the framework of objectives used for both the LBHF Core Strategy and the Single Equality scheme. The Strategy was developed with local partners from across the public, private, voluntary and community sectors and was subject to public consultation. As partners in delivering local services the aim of the Council through the community strategy is to combine opportunity, with social responsibility and social justice to assist the vast majority of people in the borough to help themselves whilst supporting the most vulnerable in the community. The Community Strategy is therefore considered to be consistent with the statutory codes in relation to race, gender, disability etc.

RBKC Community Strategy

The Community Strategy was produced in 2008 and contains a suite of documents, which includes The Future of Our Community – Community Strategy (a set of long-term ambitions and some specific aims and objectives that will help achieve these ambitions), A Picture of Our Community (some facts and figures which support the ambitions, aims and objectives captured in the community strategy) and Improving Our Community (identification of which partner/s who will take the lead in achieving these and how, a set of measures to show progress and a public report clearly showing what has been achieved). The Community Strategy states that “the borough contains one of the most diverse populations in London. The community strategy recognises this and aims to respond to the needs and ambitions of all residents in the borough”.

RBKC Local Development Framework – Equalities Impact Analysis of the Core Strategy and North Kensington Plan

This EqIA examines the emerging Royal Borough of Kensington and Chelsea Local Development Framework (LDF). Although the LDF consist of several Development Plan Documents the EqIA will focus upon the Core Strategy and North Kensington Plan as it provides the vision and strategy for the borough and the core policies needed for that vision to be achieved. The EqIA concludes that the Core Strategy planning policies have taken into account a great number of equality issues, which affect the population of the Borough, through this Equalities Impact Analysis, the Core Strategy policies will be reviewed through annual monitoring to ensure that the policies have no negative effect upon equality groups, and provide a flexible framework to adapt to the changing needs of the Royal Borough.

Demographic Information Available

The OA’s residential population is approximately 1,900, with the vast majority of residents (1,500) living in the West Kensington Estate and a much smaller number (206) in the Gibbs Green Estate. The remaining residents live in converted flats on North End Road and Lillie Road, and in converted houses, flats and maisonettes between Old Brompton Road and the Seagrave Road Car Park. There are 660 residential units in the West Kensington and 110 residential units in the Gibbs Green Estate, and an average of just over 2 people per household. The West Kensington Estate is the fifth largest estate in LBHF.

Age

In terms of demographics, 24 percent of residents within the Gibbs Green and West Kensington Estates are under the age of 15, compared to 15 percent overall across LBHF and RBKC and 19 percent across Greater London. Across the North End and Fulham Broadway wards the most populous age group is between 18 and 34, making up 44 percent of the population. Breaking this demographic down further, the 30 to 44 age group comprise the single biggest age group (28 percent) within the surrounding wards of Earls Court, North End and Fulham Broadway. The 20 to 29 age group is the second largest at ward level comprising 26 percent of the residential population. This figure is 5 percent above the LBHF and the RBKC average, and 9 percent above the London average.

Sex

Female residents make up 52 percent of the residential population, in line with figures for LBHF and RBKC and 1 percent above the comparative figure for Greater London. The OA has an overall density of 19 people per hectare, well below the LBHF average of 105 persons per household although this is to be expected considering there are no residents within the RBKC part of the ECWKO and there is a substantial amount of non-residential use within the OA.

Race

The ethnic composition of OA residents is varied with a high proportion of foreign born residents. There are a high proportion of people of black and black British ethnicity with 27 percent of residents in the West Kensington Estate and 17 percent of residents within the Gibbs Green estate identifying themselves within this group. At the ward level, the ethnic composition is broadly in line with that of RBKC and LBHF, although the proportion of residents from a non-white background was slightly lower than that for Greater London. Overall, 'British and Irish white' and 'other white' is the biggest ethnic group in the Earls Court, North End and Fulham Broadway wards, although there is also considerable diversity within the white ethnic group. 23 percent of residents in Earls Court and adjacent wards are of non-British and non-Irish backgrounds, compared with 15 percent in LBHF, 25 percent in RBKC and 8 percent in Greater London.

Overall, population has grown consistently over the past 20 years in both LBHF and RBKC, although the GLA estimates there will be a steady but gradually declining rate of growth in the population of both LBHF and RBKC up to 2031. However, LBHF is expected to grow at a faster average annual rate over this period and accordingly its population is forecast to surpass RBKC's population in the short to medium term. By 2031, the population is estimated to reach 209,400 in LBHF and 187,900 in RBKC, with a total of 8,804,000 residents in Greater London.

Gender Reassignment and Lesbian, Gay, Bisexual and Heterosexual People

Official statistics, such as census data are not collected on LBG and heterosexual people and so are not available with regards to sexual orientation within London Borough of Hammersmith and Fulham or the Royal Borough of Kensington and Chelsea. However, the ONS's most recent research indicates that 1.5% of the adult population identify as lesbian, gay, or bisexual. This figure, taken proportionately across all equality strands is the basis for our

assessment on LGB people.

The 2001 census recorded 568 people (or 1.1% of couples), aged 16 and over, living as same sex couples in Hammersmith and Fulham. In 2009 there were 49 civil partnerships in this borough. Data on heterosexuality as such is also not collated although given the estimated numbers of LGBT people, it appears that the majority of the population is heterosexual. Data on transgendered or transitioning people was not available for either borough.

Disability

It is estimated that there are more than 10 million disabled people in the UK (Source: LBHF Access for All 2006) and more than 800,000 disabled people in London (Source: London Plan SPD: Planning for Equality 2007). This presents a significant challenge to ensure that new development makes provision for people with disabilities.

The proportions of people stating they have a limiting long term illness in the 2001 Census was 13.6 per cent in RBKC. Census data for H&F shows that in 2001, 14.66% of its population stated that they had a limiting long-term illness. Benefit data on the numbers and proportions of people claiming benefits for reasons of health, disability and incapacity can also provide an insight into these characteristics of a population. At May 2010, 6.6 per cent of the population of Hammersmith and Fulham were claiming incapacity benefits, compared with 5.3 per cent in RBKC. Based on the last census the predicted rate (2009) of disability in RBKC for all ages was 11% and 14% for residents of working age.

The H&F Single Equalities Scheme (SES) indicates that 15% of residents in Hammersmith and Fulham have a disability. Additionally, 9 percent of respondents to the preliminary SPD consultation carried out in October/November 2010 identified themselves as disabled (there were 1075 responses from a broad catchment within a 650m radius of the OA), although 9 percent of respondents to the preliminary SPD consultation carried out in October/November 2010 identified themselves as disabled (there were 1075 responses from a broad catchment within a 650m radius of the OA).

Due consideration of draft replacement London Plan (2010) policies 3A.14 (Protecting London's Diverse Population) and 4B.5: Inclusive Design set out the relevant London guidance to ensure appropriate provision is made for people with disabilities. LBHF and RBKC have also given consideration to the need to make the OA accessible for all disabled people.

Pregnancy and maternity

The General Fertility Rate (GFR) (which denotes the number of live births per 1000 women aged 15-44) was 63.6 in Hammersmith and Fulham and 57.8 in Kensington and Chelsea in 2010, both lower than the London average of 72.1. The GFR for both Hammersmith and Fulham and Kensington and Chelsea are also both below the England average of 65.5.*

Religion and Belief including Non-Belief**

	Popn 2001	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religions	No religion	not stated
Hammersmith & Fulham	165,242	63.65%	0.77%	1.09%	0.79%	6.85%	0.19%	0.43%	17.64%	8.59%
Kensington & Chelsea	158,919	61.96%	1.16%	1.00%	2.23%	8.41%	0.20%	0.57%	15.25%	9.20%

Marriage**

	Population 2001 over 16 years	Single (never married)	Married	Re-married	Separated (but still legally married)	Divorced	Widowed
		Hammersmith & Fulham	138,016	54.72%	26.00%	3.02%	2.81%
Kensington & Chelsea	134,125	49.27%	28.78%	4.15%	2.93%	9.27%	5.59%

*ONS 2010, birth registrations in the United Kingdom by area of usual residence of mother.

**Census 2001 Key Statistics - Urban area summary results for local authorities KS07 Religion Coverage: England and Wales Description: Urban area summary results for local authorities

Section 04	Assess or undertake consultation
Consultation	<p>SPD Consultation</p> <p>Three separate stages of consultation have informed the drafting of the SPD. A preliminary consultation exercise was undertaken in late 2010 to inform the public and interested parties of the proposals for redevelopment and to determine and clarify issues. The second stage of consultation on the draft SPD was carried out between March and May 2011 and provided feedback on objectives and key principles of the SPD, along with general feedback on redevelopment of the Opportunity Area. The third stage of consultation was undertaken in November-December 2011 and provided further feedback on the objectives and key principles, along with general feedback on redevelopment of the Opportunity Area.</p>

Preliminary Consultation – October and November 2010

Consultation Leaflet and Questionnaire

In late October and early November 2010, a consultation leaflet and questionnaire entitled 'Earls Court and West Kensington Opportunity Area Joint Planning Framework – consultation leaflet' was distributed to all addresses within a 650m radius of the boundary of the OA within both LBHF and RBKC. A copy of the leaflet and questionnaire is provided in Appendix 1 to this report, and the area the consultation leaflet was distributed to is shown in Figure 2 below:

Copies of the leaflet and questionnaire were also available from the Baron's Court and Fulham Broadway libraries and the Earl's Court Exhibition Centre. The questionnaire was also published on both LBHF's and RBKC's websites and the consultation was also advertised in a media release and newspaper article. A total of 35,000 leaflets were distributed.

Questionnaire Responses and Analysis

1075 completed questionnaires were received by the return deadline of Friday 12th November 2010. The vast majority of questionnaires (95%) were received from residents living within or near the OA. Of the 1075 completed questionnaires, 163 (15%) were received online.

Questionnaire data was collated by Abacus Data Entry Ltd and provided in spreadsheet format, and the statistical analysis of questionnaire data was carried out in Excel. The responses to the questions were presented in pie-graph form and discussed, and the results summarised by topic area. Written comments received were also collated and categorised by topic area in Excel and are appended. Discernible trends from the written comments have been summarised, although overall the written comments showed few clear trends.

Consultation Objectives

Public consultation is not a statutory requirement during the preliminary stages of drafting an SPD. However, public consultation at an early stage ensures key issues are identified and community aspirations are considered in the drafting of the SPD:

This consultation exercise therefore had three key objectives:

1. To introduce and inform the community on the potential redevelopment of the OA;
2. Identify the key issues affecting the OA and the surrounding area;
3. Identify what changes the community would like to see through redevelopment of the OA.

With respect to Objectives 2 and 3, the questionnaire sought to find out what aspects of the OA and surrounding area respondents 'like' or 'would change' in relation to four topics, namely:

- Housing;

- Traffic, transport and movement;
- Economic, community and leisure facilities; and
- Urban design and architecture.

A number of specific questions were asked on each topic. For example, with respect to housing, respondents were asked whether they 'like' or 'would change' the current sense of community, the quality of existing housing and the range of housing types.

Respondent Profile

The questionnaire asked respondents to provide demographic information, namely gender, age group, relationship to the OA (ie. resident or otherwise) and physical health. These questions helped establish in broad terms the respondent profile.

-Gender

569 (53%) of the 1075 questionnaire respondents were female, and 490 (46%) of respondents were male. 1% of respondents did not specify their gender.

-Age Group

The majority of respondents were in the 30 to 59 age group, with 650 (60%) in this group. The second largest was the 60 to 74 age group, with 232 (21%) in this group. The number of respondents within other age groups was insignificant by comparison. This may be significant in terms of developing the SPD, because the numbers of people under 15 are high (24% in Gibbs Green and West Kensington Estates). The numbers aged 18-34 are also high (44% in North End and Fulham Broadway wards).

-Relationship to the OA

Respondents were asked to state their relationship to the OA as:

- a resident;
- a local business employee;
- a visitor; or
- other.

Of the 1075 respondents to the questionnaire, 994 (95%) identified themselves as residents (note: this does not refer to residents of the OA itself, but rather residents within the wider LBHF and RBKC distribution catchment). Of the remainder, only 29 of the respondents were visitors (2%) and only four respondents (<1%) identified themselves as employees of local businesses.

-Disabilities

A total of 955 respondents (91%) stated that they did not have any disability, with 94 (9%) stating that they did have a

disability.

A small majority of the 1075 respondents were female, and the most represented age group in the survey was the 30 to 59 group followed by the 60 to 74 group, which collectively made up 81% of all respondents. Young people (younger than 16) were barely represented at all. The vast majority of respondents were residents (95%) and very few employees of local businesses responded. 9% of respondents have some form of disability although there was a significant non-response to this question amongst adults. There was no question asked on ethnicity.

Housing

The strongest response to the housing questions was with regard to the current sense of community, with 46% of respondents stating they like the current sense of community in the area compared to 25% who would change the sense of community. Responses to questions regarding the quality and range of housing were less clear and there was no strong preference for change. A total of 72 comments were made specifically with regard to housing covering a vast array of issues and opinions, and there was a variety of views expressed regarding the provision of affordable housing and private housing.

Traffic, Transport and Movement

Residents place high value on current opportunities to access London Underground services, West London Line services and bus services throughout the area, with the majority of respondents to these questions liking current opportunities for access. There is considerable dissatisfaction however at the amount of traffic in the area along with the impact of vehicles on the pedestrian environment, with 64% and 52% of respondents respectively wanting change in this respect. 47% of respondents would also like the cycle network and cycling facilities changed, although only 39% want change in terms of being able to walk through the area.

A total of 215 comments were received with respect to traffic, transport and movement. 148 comments were received with respect to roads, 27 with respect to public transport, 29 with respect to cycling, and 11 with respect to parking. In keeping with the questionnaire response, there were many comments expressing strong views about the current state of the roads, the high volume of traffic and the impact of traffic on the area. The large number of comments coupled with the questionnaire response on this topic was one of the more conclusive findings of the consultation.

Economy, Community and Leisure Facilities

Community, health and leisure facilities and services in the area appear to be highly valued. This is particularly the case with respect to local libraries and health and dental facilities, with 49% and 50% respectively liking the current provision of services. North End Road Market is clearly a highly valued part of the area's retail offer with 54% of respondents liking it in its current form.

Respondents appear less satisfied with the current provision of community space and open space for recreation and children's play, with 43% and 35% respectively wanting change. Attitudes towards local job opportunities and business accommodation appear ambivalent with no clear outcome in response to these questions. This was also the case with

respect to school spaces. The cultural reputation of Exhibition Centres is clearly valued in the area, with only 20% of respondents wanting to see change in terms of their reputation. Overall, there was a large 'no response' to questions in this section.

202 comments were received with respect to economic, community and leisure facilities, 89 comments were received on social and community issues, 65 with respect to retail, 20 with respect to safety, 12 with respect to crime, 8 with respect to leisure facilities and 6 with respect to jobs. Many comments highlighted the current lack of open space and green space and the need for greater provision. Many comments were also received regarding the area's retail offer, and it is clear that although the North End Road Market is valued there is also a strong desire for it to be upgraded. Overall, comments were wide ranging with regard to economic, community and leisure facilities and there were few discernible trends.

Urban Design and Architecture

Overall respondents generally like the current built environment within and surrounding the OA, including both existing buildings (40%) and the street layout (44%), although a fair proportion would also like change to the built environment and street layout (30% and 28% respectively).

A total of 193 comments were received with respect to urban design and architecture, 107 comments were received with respect to urban design, 75 with respect to the Earls Court Exhibition Centre and 10 with respect to the Empress State Building. There were many comments expressing opposition to more tall buildings in the area. The Earls Court Exhibition Centre is clearly valued with many comments both acknowledging its value and stating a desire for it to be retained. The small number of comments made with respect to the Empress State Building were largely in favour of it being retained.

Environment and Public Health

Although there were no specific questions with regard to the environment and public health, there were many comments received on these and other related topics. A total of 26 comments were received with respect to public health, 14 with respect to pollution and construction impacts, 9 with respect to air quality, 6 with respect to green design, 5 with respect to run down environment, 5 with respect to waste, 2 with respect to water and 1 with respect to wildlife.

Most comments highlighted the run down state of the area and various poor environmental aspects, and the need for these to be addressed in any redevelopment.

Draft SPD Consultation – March to May 2011

Consultation on the Draft SPD ran from Friday 11 March 2011 to 5pm on Tuesday 26 April 2011, although representations made after this date were accepted.

Consultation Status

Consultation on the draft SPD was undertaken in advance of the statutory public consultation required in accordance with Regulation 17 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and section 30 and 34(1) of the Greater London Authority Act 1999 (as amended).

Consultation on the draft SPD had four key objectives:

1. To introduce the SPD and key principles of development to interested parties at a very early stage;
2. To identify and refine key issues associated with redevelopment of the Opportunity Area and surrounding area;
3. To engage the public and interested parties in drafting the SPD by encouraging comments and feedback; and
4. To identify what changes and improvements should be made to the revised draft SPD.

Overview

Several consultation techniques were used to engage the public and interested parties and encourage feedback, namely;

- Consultation leaflet distributed to surrounding properties;
- Consultation letter mail-out to interested parties;
- Public notice in local newspapers;
- Press release sent to a range of media organisations along with publication on the LBHF, RBKC, and GLA (Mayor of London) websites;
- SPD Distribution to interested parties (both hardcopy and CD formats);
- Availability of the SPD for inspection at several public locations;
- Public 'Drop-In' sessions;
- Comment forms made available at drop-In sessions and online;
- Dedicated consultation email address;
- Dedicated consultation phone numbers for both LBHF and RBKC, allowing members of the public to speak directly to the SPD team; and
- Presentations to interested parties and a workshop event with the Earl's Court Society.

Further details of the various consultation techniques are provided below:

Consultation Leaflet

A consultation leaflet was distributed to nearly all properties within 650m of the Opportunity Area boundary within each borough on 11 March 2011. A total of 35,000 leaflets were distributed. A copy of the leaflet is provided in Appendix 1, and the distribution area is shown in Figure 2 below.

The leaflet invited people to 'have their say' on the future of the Earls Court and West Kensington Area, and introduced the Opportunity Area as "*West London's New Urban Quarter*". The leaflet introduced the SPD, invited comments, set out the dates and venues for public drop-in sessions, and provided links to the SPD, supporting documents and electronic comment forms. It also provided an email address and postal address to send comments to along with

phone numbers for the SPD team. A timetable setting out the indicative dates and stages leading to adoption of the SPD was also provided, along with the progress of the Landowners masterplan and the proposed submission date for a planning application.

Copies of the leaflet were also made available at West Kensington, Brompton, Chelsea, Kensington and Fulham Broadway libraries and the Earl's Court Exhibition Centre. The leaflet was also published on LBHF's and RBKC's websites.

Consultation Letter

In addition to the leaflet distribution, 1900 individually addressed letters and leaflets were sent to all individuals and groups on the RBKC and LBHF Local Development Framework database along with those who commented on the Oct / Nov 2010 consultation. The letter introduced the draft SPD and invited comments. Some special interest groups were also sent a letter and leaflet.

Public Notice

A public notice was placed in the Kensington and Chelsea Chronicle (page 30) and the Hammersmith and Fulham Chronicle (page 30) on Friday 11 March 2011. The public notice introduced the subject matter and area covered by the SPD, the period in which representations can be made, the address to which representations must be sent and locations where the SPD was available for inspection during the consultation period.

Press Release

A press release summarising the key points of the SPD and encouraging feedback was sent to all local and major daily newspapers along with radio, television and internet based media websites, and also appeared on the LBHF, RBKC and GLA (Mayor of London) websites. As far as the boroughs are aware no media groups ran stories on the draft SPD, although there was some coverage of the Landowner's masterplan at the time.

SPD Distribution

A hardcopy and/or CD of the draft SPD and all supporting information was sent to statutory organisations and other selected interested parties. The draft SPD was also sent to people or organisations who requested copies.

Copies of the draft SPD were also made available for inspection at the following locations:

- Duty Planning Office, Hammersmith Town Hall Extension;
- Planning Information Office, Kensington and Chelsea Town Hall;
- Housing Office, Fulham Town Hall;
- Hammersmith Library;
- Barons Court Library;
- Brompton Library;
- Kensington Central Library;
- Chelsea Library;

- Fulham Library;
- Earls Court Exhibition Centre; and
- Greater London Authority, City Hall.

The draft SPD was made available online for viewing and downloading from the LBHF, RBKC and GLA websites (as set out in the front of the SPD and consultation leaflet) at www.lbhf.gov.uk/earlscourtspd, www.rbkc.gov.uk/earlscourtspd, and www.london.gov.uk/consultation/earls-court-and-west-kensington-opportunity-area.

Drop-In Sessions

Five drop-in sessions were held (two in RBKC and three in LBHF) at locations surrounding the Opportunity area, with each session based around a display summarising the key principles of the draft SPD. Hardcopies of the draft SPD and other supporting documents were made available, along with comment forms for attendees to provide comments. RBKC, LBHF and GLA staff were on hand to provide further information to attendees, answer queries, encourage feedback and receive comments. A total of 129 people attended the drop-in sessions, with details below:

Date	Time	Venue	Attendance
Thursday 17 March 2011	14:30 to 18:30	The Westminster Suite, Earls Court Exhibition Centre, Warwick Road, SW5 9TA	14
Monday 21 March 2011	17:00 to 21:00	St Cuthberts Church Hall, 51 Philbeach Gardens, SW5 9EB	50
Saturday 26 March 2011	11:00 to 15:00	Holiday Inn Express, 295 North End Road, W14 9NS	18
Tuesday 29 March 2011	11:00 to 15:00 and 27:00 to 21:00	Holiday Inn Express, 295 North End Road, W14 9NS	47

Comment Forms

Comment forms were available at the drop-in sessions. These could either be returned during the session or via post. An electronic response form was also produced to record comments made online at www.lbhf.gov.uk/earlscourtspd or www.rbkc.gov.uk/earlscourtspd.

Email Address

A dedicated email address was set up so that respondents could email comments directly to the SPD team. The email address earlscourtspdconsultation@lbhf.gov.uk was included on consultation materials and the 'how to comment' page at the front of the draft SPD.

Contact Phone Numbers

Dedicated consultation phone numbers (one for LBHF and one for RBKC) were publicised in the consultation leaflet, public notice and LBHF and RBKC websites, allowing members of the public to speak directly to the SPD team during office hours.

Presentations

The SPD team also made presentations to organisations who requested them. Presentations were given to the joint Design Review Panel, Friends of Brompton Cemetery, English Heritage, RBKC Disability Forum, RBKC Councillors, RBKC Officers,

Planning Workshop

In RBKC, the Earl's Court Society also requested, and offered to host, a planning workshop. The workshop was held in the St. Cuthbert's Church hall on 12 April 2011. Nearly 100 residents from the local area attended. RBKC Council Planning Officers introduced the draft SPD and described how it would be used as a material planning consideration when determining planning applications in the Opportunity Area. Attendees were asked "what they would like to see" under each of the headings of the SPD. The comments were then fed back to the group before being written up. The full schedule of comments was supplied to the Earl's Court Society for consideration and submission as part of their comments on the draft SPD.

Consultation Outcome

Hundreds of written responses were received on the Draft SPD from a wide range of respondents including MPs, local councillors, local amenity societies, residents and other interested individuals, landowners, businesses, developers, statutory organisations and a range of special interest groups. Responses were further broken down into 1295 separate comments. Each comment was then assigned to a specific chapter, section and/or key principle of the draft SPD. Comments of a broad nature and/or that applied to several topic areas were assigned to more than one chapter.

The SPD team considered and responded to each comment and the comments and responses are set out in a detailed consultation schedule which has been published separately. A consultation summary report has also been prepared that summarises comments by SPD chapter and identifies themes and trends, especially where large numbers of comments were received on specific issues, and highlights where there was particular interest in certain topics. The consultation schedule and consultation summary report should be referred to for in-depth analysis of comments and officer responses, and is available from both RBKC and LBHF, and is also published on both local authority websites. The consultation responses have assisted in the redrafting of the SPD.

Revised Draft SPD Consultation November-December 2011

Consultation on the Revised Draft SPD ran from Friday 11 November 2011 to 5pm on Friday 23 December 2011, although representations made after this date were accepted.

Consultation Status

The statutory public consultation required in accordance with Regulation 17 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and section 30 and 34(1) of the Greater London Authority Act 1999 (as amended) is programmed to take place for a 6 week period starting from Friday 11 November and ending at 5pm on Friday 23 December 2011.

Overview

Several consultation techniques were used to engage the public and interested parties and encourage feedback, namely;

- Consultation letter delivered to 40,000 properties and mailed out to interested parties;
- Public notice in local newspapers;
- SPD Distribution to interested parties (both hardcopy and CD formats);
- Availability of the SPD for inspection at several public locations;
- Dedicated consultation email address;
- Dedicated consultation phone numbers for both LBHF and RBKC, allowing members of the public to speak directly to the SPD team; and
- Workshops with the Earl's Court Society and a presentation to estate residents.

Further details of the various consultation techniques are provided below:

Consultation Letter

1,900 individually addressed letters and leaflets were sent to all individuals and groups on the RBKC and LBHF Local Development Framework database along with those who commented on the Oct / Nov 2010 consultation and a further 40,000 letters were distributed to properties within 600 metres of the Opportunity Area and within the Opportunity Area itself. The letter introduced the draft SPD and invited comments.

Public Notice

A public notice was placed in the Kensington and Chelsea Chronicle and the Hammersmith and Fulham Chronicle on Friday 11 November 2011. The public notice introduced the subject matter and area covered by the SPD, the period in which representations can be made, the address to which representations must be sent and locations where the SPD was available for inspection during the consultation period.

SPD Distribution

A hardcopy and/or CD of the revised draft SPD and all supporting information was sent to statutory organisations and

other selected interested parties. The revised draft SPD was also sent to people or organisations who requested copies.

Copies of the revised draft SPD were also made available for inspection at the following locations:

- Duty Planning Office, Hammersmith Town Hall Extension;
- Planning Information Office, Kensington and Chelsea Town Hall;
- Housing Office, Fulham Town Hall;
- Hammersmith Library;
- Barons Court Library;
- Brompton Library;
- Kensington Central Library;
- Chelsea Library;
- Fulham Library;
- Earls Court Exhibition Centre; and
- Greater London Authority, City Hall.

The revised draft SPD was made available online for viewing and downloading from the LBHF, RBKC and GLA websites (as set out in the front of the SPD and consultation letter) at www.lbhf.gov.uk/earlscourtspd, www.rbkc.gov.uk/earlscourtspd, and www.london.gov.uk/consultation/earls-court-and-west-kensington-opportunity-area.

Email Address

A dedicated email address was set up so that respondents could email comments directly to the SPD team. The email address earlscourtspdconsultation@lbhf.gov.uk was included on consultation materials and the 'how to comment' page at the front of the draft SPD.

Contact Phone Numbers

Dedicated consultation phone numbers (one for LBHF and one for RBKC) were publicised in the consultation leaflet, public notice and LBHF and RBKC websites, allowing members of the public to speak directly to the SPD team during office hours.

Workshops and Presentation

In RBKC and as with the first round of consultation, the Earl's Court Society also requested, and offered to host, two planning workshops. The workshops were held in the St. Cuthbert's Church hall on the 29 November 2011, where general planning issues were discussed, and the 30 November 2011 where transport related issues were discussed. Nearly 100 residents from the local area attended the first workshop and nearly 40 people from the local area attended the second workshop. RBKC Council Planning Officers introduced the revised draft SPD and described how it would be used as a material planning consideration when determining planning applications in the Opportunity Area.

	<p>Attendees were asked “what elements of the Key Objectives and Key Principles they supported and which elements they would change” under each of the headings of the SPD. A summary of the comments were then fed back to the group before being written up. The full schedule of comments was supplied to the Earl’s Court Society for consideration and submission as part of their comments on the revised draft SPD.</p> <p>In LBHF, officers presented the SPD to residents of the West Kensington and Gibbs Green estates in an event organised by Planning Aid. Officers can an overview of the chapters covered in the SPD, with a particular focus on the issues concerning estate redevelopment and encouraged residents of the estates to consider the key principles and key objectives in the SPD and send through any comments in response to the consultation.</p> <p>Consultation Outcome</p> <p>The authorities received hundreds of responses from a wide range of respondents including MPs, local councillors, local amenity societies, residents and other interested individuals, landowners, businesses, developers, statutory organisations and a range of special interest groups. Responses were further broken down into 3,817 separate comments. Each comment was then assigned to a specific chapter, section and/or key principle of the revised draft SPD.</p> <p>The SPD team considered and responded to each comment and the comments and responses are set out in a detailed consultation schedule which has been published separately. A consultation summary report has also been prepared that summarises comments by SPD chapter and identifies themes and trends, especially where large numbers of comments were received on specific issues, and highlights where there was particular interest in certain topics. The consultation schedule and consultation summary report should be referred to for in-depth analysis of comments and officer responses, and is available from both RBKC and LBHF, and is also published on both local authority websites. The consultation responses have assisted in the finalising of the SPD and tracked copies of each of the SPD chapters have been published separately, showing where the SPD has been revised in relation to comments made as part of the consultation on the revised draft SPD.</p>
Assessment	<p>Both consultation processes highlighted a number of issues in relation to equality strands. The key concern related to the potential redevelopment of the estates and the impact that this might have on the residents in terms of disruption as part of the construction and re-housing process. This is dealt with in Key Principle HO5, which requires any applicant’s phasing strategy to demonstrate mechanisms that will be deployed in order to minimise the impact of construction and disruption of re-housing on existing residents.</p> <p>Consultation highlighted the importance to the community of social infrastructure and health facilities, and the current lack of open space, green space and play space for children. This is addressed through policies: UF14, UF15, UF16, and UF18 (children and open / play space). It is also addressed through policy HO17 in terms of housing, and in policy SC4 in terms of sport and access to space for sport.</p> <p>Residents clearly place high value on current opportunities to access public transport services although there are still</p>

barriers to access at many locations. This will be partly addressed through policies TRN1, TRN2, which seek to determine which level of impact is acceptable. Policies TRN4, TRN5, TRN6, TRN7, TRN7 seek to deliver better footways and space on footways, and wayfinding for pedestrians. Policies TRN16, TRN10, TRN11, TRN12 seek to deliver better transport infrastructure. There is also considerable dissatisfaction at the amount of traffic in the area along with the impact of vehicles on the pedestrian environment, and many respondents would also like the cycle network and cycling facilities improved. This is addressed through policies TRN8 and TRN9. Accessibility issues around safety when crossing roads was also raised as an issue affecting specific age groups and those with disabilities. Para 10.74 of the Transport and Accessibility Strategy relates to the specific needs of Blue Badge holders. Safety is addressed through policy UF37, which aims to keep speed under 20mph through street design.

Section 05	Assessment of Impact and Outcomes
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Assessment

This section assesses the Key Principles of the nine policy areas in the SPD against the nine protected characteristics. The seven policy areas of the SPD assessed are:

- Urban Form;
- Housing;
- Transport and Accessibility;
- Employment;
- Retail;
- Culture;
- Social and Community Facilities
- Environment; and
- Energy;

Each SPD policy area has been given a score which indicates whether it has a positive (+) or negative (-) impact on the nine protected groups, and also whether this is of low, medium or high relevance to each group. In some cases, for example where this is broadly indicated under Assessment of Objectives at the outset of this document, the policies contained within the SPD may not be applicable (N/A).

URBAN FORM STRATEGY			
Age	+	H	<p>Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment that cater for people of all ages. The Key Objective of maximising connectivity seeks to ensure it is easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that are readily accessible to pedestrians and wheelchair users. It also promotes a layout that avoids clutter and creates safe and readily usable streets for all. The UFS also encourages streets as ‘places for people’ accommodating all users. 4.107 of UF36 will support this, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups with reduced mobility such as older people. Key Principles relating to open space seek to ensure that children can easily go out and play ensuring that at least 90% of all new residential buildings are no more than 100m away from an open space. UF37 seeks to use street design to keep speeds down, which will improve safety for older and younger people who may be more vulnerable than other pedestrians</p>

	Disability	+	H	<p>Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment that has removed barriers for people with disabilities.</p> <p>Key Principles within the UFS promote movement for all people, and seek to ensure it is easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that are readily accessible, which will be of high relevance to disabled people. It also promotes a layout that avoids clutter and creates safe and readily usable streets for all. The UFS also encourages streets as 'places for people' accommodating all users. 4.107 of UF36 will be of direct benefit to disabled people, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2. UF37 seeks to use street design to keep speeds down, which will improve safety for disabled people with mobility impairments who are likely to be more vulnerable than other pedestrians</p>
	Gender reassignment	N/A	N/A	The UFS has not so far emerged as relevant people who have transitioned or are, transitioning and so is not relevant to this protected characteristic.
	Marriage & Civil Partnership	N/A	N/A	The UFS is not seeking to deliver a service for married people or people who are civil partners and so is not relevant to this protected characteristic.
	Pregnancy and maternity	+	H	The UFS objective of maximising connectivity and related key principles promotes movement for all people, and seeks to ensure it's easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that is readily accessible to pedestrians and suitable for buggies and prams. 4.107 of UF36 will support this, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups with reduced mobility such as pregnant women. It also promotes a layout that avoids clutter and creates safe and easily accessible streets. Further, policies UF14, UF15, UF16, UF18 seek to provide play space and ensure dwellings are in specified proximity of these, which will be benefit to mothers with small infants as social spaces, and if they have other children, places for those children to play
	Race	+	H	<p>Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment accommodating and responding to the needs of all racial groups.</p> <p>Key principles UF1, 2, 3 and 4 of the UFS will reduce severance by better connecting communities through a new street network and blends the OA into the surrounding area by extending the existing street network. Key Principle UF3 Also proposes street environment that will encourage people to interact. Key Principles UF10 and UF11</p>

			require a variety of open and green spaces potentially meeting the needs of all groups and ethnicities are proposed. Further key principles promote vibrancy and activity at all times of day promoting interaction and a cultural destination and related uses at the heart of the site.
Religion/belief (including non-belief)	+	M	<p>Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment accommodating a broad range of religious, faith and special interest groups.</p> <p>Key principles UF1, 2, 3 and 4 of the UFS seek to reduce severance by better connecting communities through a new street network and blends the OA into the surrounding area by extending the existing street network. Key Principle UF3 Also proposes street environment that will encourage people to interact. Key Principles UF10 and UF11 require a variety of open and green spaces potentially meeting the needs of all groups and ethnicities are proposed. Further key principles promote vibrancy and activity at all times of day promoting interaction and a cultural destination and related uses at the heart of the site.</p>
Sex	+	H	The UFS objective of maximising connectivity and related key principles promotes movement for all people, and seeks to ensure it is easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that is readily accessible to pedestrians and suitable for buggies and prams, which will benefit men and women as parents. It also promotes a layout that avoids clutter and creates safe and easily accessible streets. 4.107 of UF36 will support this, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups who require aspects such as level access, including parents with buggies and prams. Further, policies UF14, UF15, UF16, UF18 seek to provide play space and ensure dwellings are in specified proximity of these, which will be benefit to mothers with small infants as social spaces, and if they have other children, places for those children to play
Sexual Orientation	N/A	N/A	The UFS is not seeking to deliver a service for lesbian, gay, bisexual, or heterosexual people and so is not relevant to this protected characteristic.

Human Rights

It is not considered that the Urban Form Strategy will affect human rights.

Children’s Rights

It is considered that UF14, UF15, UF16, and UF18 will impact positively on Children’s Rights, by addressing the issue of open / play space. In particular, these policies will help consider their best interests, their right to development, rights for disabled children, the right to leisure. 4.107 of UF36 will support children’s movement about the built environment, as

applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups with reduced mobility such as children, who may find barriers such as steps more difficult to navigate than adults. UF37, while not being specifically relevant to Children's Rights, will have a positive impact on children by reducing speeds and thereby increasing child safety.

HOUSING STRATEGY

Policy HO3 requires that an assessment of housing need would have to be carried out with any planning application to provide affordable housing in order to facilitate the re-provision of housing for the residents of the West Kensington and Gibbs Green estates. As this will depend on the market and need at the time, this has not been assessed below as it is not possible to do so at this time.

Policy HO4 requires 25% of all new housing on Seagrove Road site to be social rented. It is not yet possible to know which groups would be housed here, as it is too early in the process. Therefore, it has not been assessed here.

Age	-	H	<p>During the consultation on the revised draft SPD, 201 letters of objection were received from residents of the estates and surrounding streets. The key concerns were:</p> <ul style="list-style-type: none"> • that development would unnecessarily destroy decent, well-loved homes and wreck a well-functioning community, damaging family ties, disrupting social networks and worrying elderly residents; • that as part of the previous consultation strong opposition was raised to the demolition of the Gibbs Green and West Kensington estates, and the associated upheaval and inconvenience to residents and communities associated with the decant process; • that the SPD portrays the community negatively by unfairly focusing exclusively on deprivation; • that the SPD uses spurious grounds to justify demolition such as the poverty of the occupants and 'discontinuous roads'; • that the SPD relies on a fundamentally flawed 'Estates Regeneration Economic Appraisal'; and • that the SPD wrongly implies we are not a mixed and balanced community and uses this as another justification for demolition. <p>For the residents that raised these issues, it is clear that development in accordance with Key Principle HO1 of the SPD, which would lead to the re-housing of a large number of residents, would be considered to have a negative impact. The consultees have not identified if they fall within a particular protected characteristic; however it is</p>
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			<p>known from the profile of the estates and surrounding North End ward that there are substantial numbers of elderly residents who would be particularly impacted on by a comprehensive approach being taken to redevelopment of the OA that includes the West Kensington and Gibbs Green estates.</p> <p>Key Principle HO5 requires developers to demonstrate that the phasing and re-housing of the West Kensington and Gibbs Green estates will have minimal disruption to existing residents. Despite there being this requirement, it is recognised that any approach to decant of the estates would cause disruption to existing residents, which could have a particularly strong impact on older people, to whom the disruption caused by having to move home would be greater as a result of physical and mental stress, in terms of the removal process. The Phasing Strategy required under Key Principle HO5 will need to set out measures that not only minimise the impacts of re-housing, but also set in place measures that assist elderly residents with the re-housing process.</p> <p>Key principles HO12 and HO14 require minimum proportions of family units, which will benefit younger people with children. Key Principle HO17 requires new homes to be carefully designed and laid out to have satisfactory access to outdoor amenity space. Family dwellings at ground level should have access to private open space. This will benefit younger people with families.</p>		
		+	L-H	Key Principle HO18 requires a minimum of 10% of residential units across both boroughs to be wheelchair accessible and Key Principle HO19 requires all residential units to be built to lifetime home standards.	
			+	L	Key Principle HO10 requires affordable housing as part of all applications for comprehensive development, which may be of more relevance to younger people who have built up less capital.
			+	L	Key principle HO8 sets out intermediate housing requirements and this may improve accommodation options for all age groups as it will set out a range of tenure types, which may be more suitable to those who have, or who have not yet, built up more capital due their age and length of time working to acquire capital.
			+	H	Key Principle HO15 specifically requires any comprehensive development to provide alternative housing types catering specifically for the needs of the elderly, vulnerable groups and students which will be relevant to older and younger people.
	Disability		-	H	During the consultation on the revised draft SPD, 201 letters of objection were received from residents of the estates and surrounding streets. The key concerns

		+	H	<p>were:</p> <ul style="list-style-type: none"> • that development would unnecessarily destroy decent, well-loved homes and wreck a well-functioning community, damaging family ties, disrupting social networks and worrying elderly residents; • that as part of the previous consultation strong opposition was raised to the demolition of the Gibbs Green and West Kensington estates, and the associated upheaval and inconvenience to residents and communities associated with the decant process; • that the SPD portrays the community negatively by unfairly focusing exclusively on deprivation; • that the SPD uses spurious grounds to justify demolition such as the poverty of the occupants and ‘discontinuous roads’; • that the SPD relies on a fundamentally flawed ‘Estates Regeneration Economic Appraisal’; and • that the SPD wrongly implies we are not a mixed and balanced community and uses this as another justification for demolition. <p>For the residents that raised these issues, it is clear that development in accordance with Key Principle HO1 of the SPD, which would lead to the re-housing of a large number of residents, would be considered to have a negative impact. The consultees have not identified if they fall within a particular protected characteristic; however it is known from the profile of the estates and surrounding North End ward that there are a proportion of disabled residents who would be particularly impacted on by a comprehensive approach being taken to redevelopment of the OA that includes the West Kensington and Gibbs Green estates.</p> <p>Key Principle HO5 requires developers to demonstrate that the phasing and decant of the West Kensington and Gibbs Green estates will have minimal disruption to existing residents. Despite there being this requirement, it is recognised that any approach to decant of the estates would cause disruption to existing residents, which could have a particularly strong impact on disabled people, who would be likely to find the removal process more stressful. The Phasing Strategy required under Key Principle HO5 will need to set out measures that not only minimise the impacts of re-housing, but also set in place measures that assist disabled residents with the re-housing process.</p> <p>The Housing Strategy requires a minimum of 10% of residential units across both boroughs to be wheelchair accessible. It also states if estate regeneration were to occur priority should be the provision of wheelchair and adaptable accommodation to</p>
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				<p>meet needs arising from the Gibbs Green and West Kensington Housing Estates. Any top up provision should be spread evenly across tenures and across all extra care units. If estate regeneration were not to occur, the accessible units should be spread evenly across all tenures and all extra care units.</p> <p>Key Principle HO18 requires that a minimum of 10% of all new units are wheelchair accessible.</p> <p>+ H Key Principle HO15 specifically requires any comprehensive development to provide alternative housing types catering specifically for the needs of the elderly, vulnerable groups and students. This may include disabled people.</p> <p>+ H Key Principle HO19 requires all residential units to be built to Lifetime Homes standards, which will be relevant to people who may become disabled as they get older and help them to stay in their own home for longer.</p>
	Gender reassignment	N/A	N/A	The Housing Strategy has not so far emerged as relevant to people who have transitioned or are transitioning.
	Marriage and Civil Partnership	N/A	N/A	The Housing Strategy is not seeking to deliver a service for married people or people who are civil partners and so is not relevant to this protected characteristic.
	Pregnancy and maternity	-	H	<p>During the consultation on the revised draft SPD, 201 letters of objection were received from residents of the estates and surrounding streets. The key concerns were:</p> <ul style="list-style-type: none"> • that development would unnecessarily destroy decent, well-loved homes and wreck a well-functioning community, damaging family ties, disrupting social networks and worrying elderly residents; • that as part of the previous consultation strong opposition was raised to the demolition of the Gibbs Green and West Kensington estates, and the associated upheaval and inconvenience to residents and communities associated with the decant process; • that the SPD portrays the community negatively by unfairly focusing exclusively on deprivation; • that the SPD uses spurious grounds to justify demolition such as the poverty of the occupants and 'discontinuous roads'; • that the SPD relies on a fundamentally flawed 'Estates Regeneration Economic Appraisal'; and • that the SPD wrongly implies we are not a mixed and balanced community and

				<p>uses this as another justification for demolition.</p> <p>For the residents that raised these issues, it is clear that development in accordance with Key Principle HO1 of the SPD, which would lead to the re-housing of a large number of residents, would be considered to have a negative impact. The consultees have not identified if they fall within a particular protected characteristic; however it is known from the profile of the estates and surrounding North End ward that there are substantial numbers of those that are pregnant or with babies and small children, who would be particularly impacted on by a comprehensive approach being taken to redevelopment of the OA that includes the West Kensington and Gibbs Green estates.</p> <p>Key Principle HO5 requires developers to demonstrate that the phasing and decant of the West Kensington and Gibbs Green estates will have minimal disruption to existing residents. Despite there being this requirement, it is recognised that any approach to decant of the estates would cause disruption to existing residents, which could have a particularly strong impact on those that are pregnant or with babies and small children, who would be likely to find the removal process more stressful and might also be more greatly impacted on through any nearby construction, in terms of noise disturbance. The Phasing Strategy required under Key Principle HO5 will need to set out measures that not only minimise the impacts of re-housing, but also set in place measures that assist those that are pregnant or with babies and small children with the re-housing process. Special consideration would also need to be given to the construction impacts on those that are pregnant or with babies and small children.</p> <p>Key Principle HO19 of The Housing Strategy proposes all houses to be lifetime homes standards. This requires high standards of accessibility for all residential dwellings suitable for pregnant women and parents with babies and small children.</p>
	Race	-	H	<p>During the consultation on the revised draft SPD, 201 letters of objection were received from residents of the estates and surrounding streets. The key concerns were:</p> <ul style="list-style-type: none"> • that development would unnecessarily destroy decent, well-loved homes and wreck a well-functioning community, damaging family ties, disrupting social networks and worrying elderly residents; • that as part of the previous consultation strong opposition was raised to the demolition of the Gibbs Green and West Kensington estates, and the associated upheaval and inconvenience to residents and communities associated with the decant process; • that the SPD portrays the community negatively by unfairly focusing exclusively on deprivation;

				<ul style="list-style-type: none"> • that the SPD uses spurious grounds to justify demolition such as the poverty of the occupants and ‘discontinuous roads’; • that the SPD relies on a fundamentally flawed ‘Estates Regeneration Economic Appraisal’; and • that the SPD wrongly implies we are not a mixed and balanced community and uses this as another justification for demolition. <p>For the residents that raised these issues, it is clear that development in accordance with Key Principle HO1 of the SPD, which would lead to the re-housing of a large number of residents, would be considered to have a negative impact. The consultees have not identified if they fall within a particular protected characteristic; however it is known from the profile of the estates and surrounding North End ward that there are substantial numbers of ethnic minority residents who would be particularly impacted on by a comprehensive approach being taken to redevelopment of the OA that includes the West Kensington and Gibbs Green estates.</p> <p>Key Principle HO5 requires developers to demonstrate that the phasing and decant of the West Kensington and Gibbs Green estates will have minimal disruption to existing residents. Despite there being this requirement, it is recognised that any approach to decant of the estates would cause disruption to existing residents, which could have a particularly strong impact on ethnic minority groups, who would be likely to find the removal process stressful. The Phasing Strategy required under Key Principle HO5 will need to set out measures that not only minimise the impacts of re-housing, but also set in place measures that assist ethnic minority groups with the re-housing process.</p> <p>Key Principle HO2 requires all existing residents of the estates to be accommodated in new housing in the area if they desire along with no net loss in affordable housing. The Housing Strategy also requires the affordable housing mix to have regard to local need and strategic housing needs assessment. Affordable housing will also be tenure blind helping to achieve an integrated and balanced community.</p> <p>Key Principles HO6 and HO7 require the provision of affordable housing within LBHF and RBKC. Key Principle HO8 seeks to ensure a broad range of affordability within the intermediate housing tenure and Key Principle HO9 seeks to ensure that the affordable housing is spread evenly across the Opportunity Area, mixed with any market housing.</p> <p>The Housing Strategy also requires any comprehensive development to provide alternative housing types catering specifically for the needs of the elderly, vulnerable</p>
		+	L	
		+	L	
		+	L	

			groups and students.
Sex	+	H	Key principles HO12 and HO14 require minimum proportions of family units, which will benefit younger men and women with children. Key Principle HO17 requires new homes to be carefully designed and laid out to have satisfactory access to outdoor amenity space. Family dwellings at ground level should have access to private open space. This will benefit younger men and women with families. Key Principle HO10 requires affordable housing as part of all applications for comprehensive development, which may be of more relevance to younger men and women who have built up less capital, and those who have one income, or whose combined income is not high.
Sexual Orientation	N/A	N/A	The Housing Strategy has not so far emerged as relevant to lesbian, gay, bisexual, or heterosexual people.
Religion/belief (including non-belief)	N/A	N/A	The Housing Strategy has not so far emerged as relevant to religious belief and non-belief.

Human Rights

The SPD requires a phasing strategy to be submitted (Key Principle PS2) and this phasing strategy would need to demonstrate minimal disruption to estate residents (Key Principle HO5). Separately, the council's housing department would need to consult with estate residents before deciding to include the estates within any wider development proposals.

Children's Rights

The Housing Strategy will have negative impacts in relation to estate redevelopment, where children would be likely to find the upheaval of any phased re-housing of residents more difficult. The Housing Strategy will have positive impacts through ensuring amenity space and private space is provided in conjunction with new housing, and ensuring accessibility for all. These key principles will help consider their best interests, their right to development, rights for disabled children and the right to leisure.

TRANSPORT AND ACCESS STRATEGY

Age	+	H	Key Principles TRN3 and TRN4 require north-south and east-west pedestrian movement to be improved, crossings and footway widths improved and accessibility improvements for all. TRN6 requires environmental improvements and wider and clearer footways on streets surrounding the OA, which will assist movement and
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			accessibility for all. These will be of benefit to older people and those with small children, who may have limited mobility in comparison to other age groups. Key Principles TRN10, TRN11, and TRN12 require physical, accessibility, and other significant improvements to all three LUL stations (West Kensington, Earls Court and West Brompton) including re-opening a pedestrian tunnel. Key Principle TRN14 requires step-free access at West Brompton and West Kensington Station and any new entrance at Earl's Court Station, which will be of particular assistance to parents with babies and young children. TRN17 requires additional bus stops and coach parking, which may benefit all age groups in getting about.	
	Disability	+	H	Key Principles TRN3 and TRN4 require north-south and east-west pedestrian movement to be improved and crossings and footway widths improved. TRN4 and TRN6 requires the width and quality of the pedestrian environment to be improved on streets around the OA including crossings, and TRN7 and TRN22 require better pedestrian crossing, and the installation of new ones, all of which will better connect streets and improve legibility for disabled people with mobility impairment. Key Principle TRN10 requires accessibility improvements to all three LUL stations (West Kensington, Earls Court and West Brompton) and Key Principle TRN14 requires step-free access at West Brompton and West Kensington Station and any new entrance at Earl's Court Station. TRN24 requires blue badge parking for residents and visitors (in line with London Plan and local guidance), which is of benefit to disabled people.
	Gender reassignment	N/A	N/A	The Transport and Access Strategy has not so far emerged as relevant to people who have transitioned or are transitioning.
	Marriage and Civil Partnership	N/A	N/A	The Transport and Access Strategy is not seeking to deliver a service for married people or people who are civil partners and so is not relevant to this protected characteristic.
	Pregnancy and maternity	+	H	Key Principles TRN3 and TRN4 require north-south and east-west pedestrian movement to be improved, crossings and footway widths improved and accessibility improvements for all. TRN6 requires environmental improvements and wider and clearer footways on streets surrounding the OA, which will assist movement and accessibility for pregnant women and those with small infants. Key Principles TRN10, TRN11, and TRN12 require physical, accessibility, and significant other improvements to all three LUL stations (West Kensington, Earls Court and West Brompton), including reopening a pedestrian tunnel, which will make moving about this area much easier for this group. Key Principle TRN14 requires step-free access at West Brompton and West Kensington Station and any new entrance at Earl's Court Station. which will be of particular assistance to pregnant women and those with babies and young children.
	Race	N/A	N/A	The Transport and Accessibility Strategy has not so far emerged as relevant to race.
	Religion/belief	N/A	N/A	Redevelopment of the OA in accordance with the Transport and Access Strategy will

ef (including non-belief)			<p>deliver an integrated, inclusive urban environment accommodating a broad range of religious, faith and special interest groups.</p> <p>The range of connectivity and accessibility improvements will reduce severance and better connect segregated communities through a new street network and blend the OA into the surrounding area by extending the existing street network</p>
Sex	+	H	<p>Key Principles TRN3 and TRN4 require north-south and east-west pedestrian movement to be improved, crossings and footway widths improved and accessibility improvements for all. TRN6 requires environmental improvements and wider and clearer footways on streets surrounding the OA, which will assist movement and accessibility for all. These will be of benefit to parents with small children, who may have limited mobility in comparison to other age groups. Key Principles TRN10, TRN11, and TRN12 require physical, accessibility, and other significant improvements to all three LUL stations (West Kensington, Earls Court and West Brompton) including re-opening a pedestrian tunnel. Key Principle TRN14 requires step-free access at West Brompton and West Kensington Station and any new entrance at Earl's Court Station, which will be of particular assistance to parents with babies and young children.</p>
Sexual Orientation	N/A	N/A	<p>The Transport and Access Strategy has not so far emerged as relevant to this protected characteristic</p>

Human Rights

The Transport and Access Strategy is not expected to impact on human rights

Children's Rights

The Transport and Accessibility Strategy will impact positively on Children's Rights in particular by ensuring connectivity and accessibility to open space and play space, safer and more accessible streets and safer access to schools and other educational facilities

EMPLOYMENT STRATEGY			
Age	+	L to H	<p>Key Principles ES4 and ES5 require adaptable, affordable space for very small, small, and medium sized enterprises across all phases of development. As such, these may be of relevance to Age in terms of those who lease the spaces, or receive a service from it, although it will not be possible to determine that this at this stage. As such it may be of various levels of relevance to different Age groups.</p>
	+	H	<p>Key Principle ES9 requires a local labour, skills and employment strategy and delivery plan that encourages full participation of the local labour force in employment. 6.62 of</p>

				the SPD outlines the expectation for opportunities for young people.
	Disability	+	L to H	Key Principles ES4 and ES5 require adaptable, affordable space for very small, small, and medium sized enterprises across all phases of development. As such, these may be of relevance to Disability in terms of those who lease the spaces, or receive a service from it, although it will not be possible to determine that this at this stage. As such it may be of various levels of relevance to disabled people.
		+	L to H	Key Principle ES8 requires funding for workplace coordinators to encourage full participation of the local labour force in employment. Disabled people face particular barriers in gaining access to employment, and the strategy encourages employment across all groups (see para 6.23).
	Gender reassignment	+	L	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The Employment Strategy has not so far emerged as particularly relevant people who have transitioned or are transitioning, although this group does have workplace protection and the overall aims and benefits may have a positive impact.
	Marriage and Civil Partnership	+	L	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The Employment Strategy has not so far emerged as relevant to married people or people who are civil partners although this group does have workplace protection and the overall aims and benefits may have a positive impact.
	Pregnancy maternity	+	L	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The key objective and all related key principles of the Employment Strategy will encourage participation in the workforce by pregnant women and child caregivers and so the overall aims and benefits may have a positive impact.
	Race	+	L to H	The OA and surrounding area features a diverse range of shops, businesses and office based activities, many of which are owned or managed by local residents from a diverse range of ethnicities. As such, Key Principles ES4 and ES5, which require adaptable, affordable space for very small, small, and medium sized enterprises across all phases of development are likely to be of benefit to a wide range of race groups. These may be of relevance to race groups in terms of those who lease the spaces, or receive a service from it, although it will not be possible to determine that this at this stage.
	+	H	The Key Objective of the Employment Strategy is to increase employment opportunities for local people by creating a minimum of 7000 new jobs and improving access to training initiatives and apprenticeships. Development proposals for office floorspace to incorporate variety in the type, size, cost and terms (lease agreements)	

			<p>and be designed to be readily adaptable for use by a range of tenants. Provision of office space for small and very small businesses and incubator units should meet borough level demand. Key Principle ES1 requires existing floorspace to be renewed and modernised to maintain and intensify existing employment provision.</p> <p>Key Principle ES8 requires funding for workplace coordinators to encourage full participation of the local labour force in employment.</p>	
	Religion/belief (including non-belief)	+	L	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The Employment Strategy has not so far emerged as relevant to married people or people who are civil partners although this group does have workplace protection and the overall aims and benefits may have a positive impact.
	Sex			<p>Both boroughs have large numbers of households occupied by single people of working age. RBKC has the third highest proportion in England and Wales at 33.5 per cent. Hammersmith and Fulham is ranked eighth in England and Wales at 27.4 per cent. Around a fifth of households in RBKC and Hammersmith and Fulham are households with dependent children. Of these households, Hammersmith and Fulham is the borough with higher numbers of lone parents, two percent higher than RBKC which has similar proportions to Westminster. Based on 2011 census data, this equates to 9% that are male lone parents and 91% that are female lone parents in H&F. All are lower than the London average but London is comparatively high to England.</p>
		+	H	As such, Key Principle EDS9 is of relevance to men and women but particularly to women, as it requires a local labour, skills and employment strategy and delivery plan that encourages full participation of the local labour force in employment.
		+	L to H	<p>Key Principle ES8 requires funding for workplace coordinators to encourage full participation of the local labour force in employment.</p> <p>Key Principles ES4 and ES5 require adaptable, affordable space for very small, small, and medium sized enterprises across all phases of development. As such, these may be of relevance to Sex in terms of those who lease the spaces, or receive a service from it, although it will not be possible to determine that this at this stage. As such it may be of various levels of relevance to men and women.</p>
Sexual Orientation	+	L	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The Employment Strategy has not so far emerged as relevant to lesbian, gay, bisexual, or heterosexual people although this group does have workplace protection and the overall aims and benefits may have a positive impact	

Human Rights

The Employment Strategy is not expected to impact on human rights

Children's Rights

The Employment Strategy is not expected to impact on Children's Rights

RETAIL STRATEGY

Aside from issues to do with Accessibility (UFS and TRN policies), and RS8 (below), the policies of the Retail Strategy have not emerged as particularly relevant to any group in particular. Key Principles RS2, RS4 require that retail is 'day to day', and RS3 requires retail to have a minimum impact on surrounding and residents. RS5 sets out that S106 processes will control the scale, nature and character of the retail in this area. RS7 sets aside a number of small affordable units for essential retailers, which may be of benefit to one or more groups, though it is too early to determine which these are

Age	+	L	RS8 provides for keeping North End Market. Given the high numbers of young people in this area, this will be overall of low relevance as it will still be there but keeping it will be positive.
Disability	+	H	The Retail Strategy, in accordance with the objectives of the UFS and the Transport and Accessibility Strategy stipulates that any new retail offer must be accessible to all, which will be of high relevance to disabled people with limited mobility.
Gender reassignment	N/A	N/A	The Retail Strategy has not so far emerged as relevant to people who have transitioned or are transitioning and so is not relevant to this protected characteristic.
Marriage and Civil Partnership	N/A	N/A	The Retail Strategy is not seeking to deliver a service for married people or people who are civil partners and so is not relevant to this protected characteristic.
Pregnancy maternity	+	H	The Retail Strategy, in accordance with the objectives of the UFS and the Transport and Accessibility Strategy stipulates that any new retail offer must be accessible to all., which will be of high relevance to pregnant women and those with small infants who may have limited mobility
Race	+/-	H	The first key objective of the Retail Strategy partly relates to extending Fulham Town Centre north along North End Road, which features an ethnically diverse mix of shops and businesses. The second key objective of the Retail Strategy is to meet the day to day needs of the new resident and worker population. This objective is inclusive by nature and does not discriminate against race. Key Principle RS8 and relates to the North End Road Market and the requirement that it be relocated and upgraded and/or maintained. It currently features a diverse ethnic mix of both traders and shoppers and the retail strategy seeks to preserve this

			diversity. Any decision to move the market would need to undergo a separate EQIA, which would need to examine any potential impacts on market traders in more detail. Nevertheless, it is recognised that any approach to the relocation of the market would cause disruption to market traders, which could have a particularly strong impact on ethnic minority groups.
Religion/belief (including non-belief)	+	M	The Retail Strategy has not so far emerged as relevant to religious belief and non-belief.
Sex	+	H	The Retail Strategy, in accordance with the objectives of the UFS and the Transport and Accessibility Strategy stipulates that any new retail offer must be accessible to all., which will be of high relevance to parents with young children and small infants who may have limited mobility
Sexual Orientation	N/A	N/A	The Retail Strategy has not so far emerged as relevant to this protected characteristic

Human Rights

The Retail Strategy is not expected to impact upon human rights. Any decision to move the market would need to undergo a separate EQIA, which would need to examine any potential impacts on market traders in more detail.

Children’s Rights

The Retail Strategy is not expected to impact upon children’s rights

CULTURE STRATEGY			
Any comprehensive redevelopment will need at least one cultural facility (CS1 and CS2). CS3 provides for affordable artists’ studios which may have a benefit across any of the groups below, but it is not possible to be more specific at this stage as it depends on who applies for those at the time.			
Age	+	H	A key objective of the Culture Strategy is to create a lively cultural destination with a variety of culture, arts and creative facilities that continues the ‘Earl’s Court’ brand. The objective is inclusive by nature and will accommodate all age groups.
Disability	+	H	Access to new cultural destinations and facilities will be in accordance with the key principles of the UFS and Transport and Access Strategy with regard to accessibility and will provide access for all. CS10 stipulates that at least 10% of hotel bedrooms should be accessible. These will have a positive impact on disabled people with limited mobility
Gender reassignme	N/A	N/A	The Culture Strategy has not so far emerged as relevant to people who have transitioned or are transitioning.

nt			
Marriage and Civil Partnership	N/A	N/A	The Culture Strategy is not seeking to deliver a service for married people or civil partners and so is not relevant to this protected characteristic
Pregnancy and maternity	+	M	Access to new cultural destinations and facilities will be in accordance with the key principles of the UFS and Transport and Access Strategy with regard to accessibility and will provide access for all. These will have a positive impact on pregnant women and those with small infants as moving around will be made easier.
Race	+	M	A key objective of the Culture Strategy is to create a lively cultural destination with a variety of culture, arts and creative facilities that continues the 'Earl's Court' brand. The Culture Strategy is inclusive by nature and will allow various cultural and religious groups within and surrounding the Opportunity Area to express themselves. Key Principle CS1 requires a new cultural destination that provides a range of cultural, artistic and creative facilities which will be inclusive of all races and cultures.
Religion/belief (including non-belief)	+	M	A key objective of the Culture Strategy is to create a lively cultural destination with a variety of culture, arts and creative facilities that continues the 'Earl's Court' brand. The Culture Strategy is inclusive in keeping with the key objective and will allow cultural and religious groups within and surrounding the Opportunity Area to express themselves.
Sex	+	L	During consultation and development, no aspects of the Culture Strategy have been identified as of relevance to men or to women in particular. It is considered that the Culture Strategy is inclusive by nature in keeping with the key objective of creating a lively cultural destination with a variety of culture, arts and creative facilities.
Sexual Orientation	+	L	During consultation and development, no aspects of the Culture Strategy have been identified as of relevance to sexual orientation. It is considered that the Culture Strategy is inclusive by nature in accordance with the key objective

Human Rights

The Culture Strategy is not expected to impact upon human rights

Children's Rights

The Culture Strategy is expected to positively impact upon children's rights, particularly Key Principles CS1, CS2 and CS4 which will provide opportunities and encourage children to become involved in artistic and cultural activities, upholding their rights to education, leisure, and the arts.

SOCIAL AND COMMUNITY FACILITIES STRATEGY

	Age	-	M	The relocation of estate residents may mean that despite new facilities being provided within the OA, they may need to travel further to their new social and community facilities than they are to their existing social and community facilities. This would particularly impact on elderly residents.
	Disability	+	M	Key Principle SC2 requires redevelopment to provide an accessible health facility to be located in an easily accessible location for all residents within the OA. All health and community facilities are expected to be accessible to all in keeping with the UFS and Transport and Access Strategies. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
		+/-	M	The relocation of estate residents may mean that despite new facilities being provided within the OA, they may need to travel further to their new social and community facilities than they are to their existing social and community facilities. This would particularly impact on those with disabilities. The SPD requires all social and community facilities to be fully accessible and this may result in an improvement to disabled residents access to social and community facilities.
	Gender reassignment	+	L	The Social and Community Facilities Strategy requires at SC2 that a health facility is provided, which may have a positive impact on those who are or who have transitioned, albeit that those who are transitioning are likely to require specialist services which are already provided in (west) London. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
	Marriage and Civil Partnership	N/A	N/A	The Social and Community Facilities Strategy is not seeking to deliver a service for married people or civil partners and so is not relevant to this protected characteristic
	Pregnancy and maternity	+	M	Key Principle SC2 requires redevelopment to provide a health facility to be located in an easily accessible location for all residents within the OA, which would benefit expectant and post natal women. All health and community facilities are expected to be accessible to all in keeping with the UFS and Transport and Access Strategy. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and community facilities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
-		M	The relocation of estate residents may mean that despite new facilities being provided	

				within the OA, they may need to travel further to their new social and community facilities than they are to their existing social and community facilities. This would particularly impact on those who are pregnant or with babies or small children.
	Religion/belief (including non-belief)	+	M	Key Principle SC6 requires development to provide a community hub of 4,500m2 GIA. This new community hub should have a library on the ground and possibly first floors, with the remainder of the building providing affordable and flexible office, training and meeting space, adult learning and training space and halls for hire for use by the voluntary sector and residents. the facility would be available for use by all religious groups, which has been further clarified in the final SPD. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
	Race	+	M	<p>The Key Objective of the Social and Community Facilities Strategy is to provide social and community facilities that support the new residential and worker population.</p> <p>Publicly accessible open space needs to fulfil a variety of functions to cater for a range of groups and uses, including the provision of playing pitches, children's play, court games passive recreation and nature conservation.</p> <p>Key Principle SC3 requires redevelopment to provide a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population catering for a variety of incomes (including those from lower socio-economic groups such as minority ethnic groups). A proportion of affordable sports and leisure provision will need to be secured in this respect.</p> <p>Key Principle SC6 requires development to provide a community hub of 4,500m2 GIA. This new community hub should have a library on the ground and possibly first floors, with the remainder of the building providing affordable and flexible office, training and meeting space, adult learning and training space and halls for hire for use by the voluntary sector and residents.</p> <p>Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.</p>
	Sex	+	H	The Social and Communities Facilities Strategy is inclusive by nature and gender neutral. Key Principle SC3 requires any applications in the OA to submit a Health

			Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
Sexual Orientation	+	L	The Social and Community Facilities Strategy requires at SC2 that a health facility is provided, which may have a positive impact on lesbian, gay, bisexual, heterosexual people in terms of their health, although there is already (for example) sexual health services provided in (west) London. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.

Human Rights

The Social and Communities Facilities Strategy is expected to positively impact upon human rights (Article 2 of Protocol 2: right to education)

Children’s Rights

The Social and Communities Facilities Strategy is expected to positively impact upon children’s rights. Key Principle SC1 requires any redevelopment to be assessed against both RBKC and LBHF child yield formulas and the outcomes should be used in order to provide the relevant educational (nursery, primary and secondary) capacity in order to cater for the future child population. This may involve both expansion of existing facilities or provision of new education facilities. This will uphold their right to education. The relocation of estate residents may mean that despite new educational facilities being provided within the OA, they may need to travel further to their new educational facility than they are to their existing educational facility.

The UFS requires the overall quantity of public open green open space to have regard to the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation. Ideally all residential properties should be within 100m of an area of publically accessible green open space. Key Principle SIS8 also requires publically accessible green open space to fulfil a number of functions including the provision of playing pitches, children’s play, court games, passive recreation and nature conservation. These will uphold their rights to health and leisure.

ENERGY STRATEGY AND ENVIRONMENT STRATEGY*			
Age	+	M	The Energy Strategy requires implementation of a decentralised energy system and associated heat network to be implemented for the development and an energy centre established during phase 1 of development. The energy centre (or centres) need to meet the needs of subsequent phases of development with the potential to meet the

				needs of the surrounding area in the future. The heat network will be connected to all households regardless of tenure. Sustainability measures including home energy efficiency measures, waste minimisation, site remediation, measures to encourage biodiversity and mitigate flood risk will all be implemented across the site on a tenure blind basis.
	Disability	+	L	Green spaces and sites of nature conservation will be accessible to all where practically possible.
	Gender reassignment	N/A	N/A	Neither the Energy Strategy or Environment Strategy have so far emerged as relevant people who have transitioned or are transitioning
	Marriage and Civil Partnership	N/A	N/A	Neither the Energy Strategy or Environment Strategy are seeking to deliver a service for married people or civil partners and so is not relevant to this protected characteristic
	Pregnancy maternity	N/A	N/A	Neither the Energy Strategy or Environment Strategy have so far emerged as relevant to this protected characteristic
	Religion/belief	N/A	N/A	The Energy Strategy and Environment Strategy have not so far emerged as relevant to this protected characteristic
	Race	+	M	All measures in the Energy Strategy and Environment Strategy are inclusive by nature. Key Principle ENE2 of the Energy Strategy requires implementation of a decentralised energy system and associated heat network and an energy centre established during phase 1 of development. The energy centre (or centres) need to meet the needs of subsequent phases of development with the potential to meet the needs of the surrounding area in the future. The heat network will be connected to all households regardless of tenure. Sustainability measures including home energy efficiency measures, waste minimisation, site remediation, measures to encourage biodiversity and mitigate flood risk will all be implemented across the site on a tenure blind basis.
	Sex	+	M	All measures in the Energy Strategy and Environment Strategy are inclusive by nature. Key Principle ENE2 of the Energy Strategy requires implementation of a decentralised energy system and associated heat network and an energy centre established during phase 1 of development. The energy centre (or centres) need to meet the needs of subsequent phases of development with the potential to meet the needs of the surrounding area in the future. The heat network will be connected to all households regardless of tenure.

				Sustainability measures including home energy efficiency measures, waste minimisation, site remediation, measures to encourage biodiversity and mitigate flood risk will all be implemented across the site on a tenure blind basis.
	Sexual Orientation	N/A	N/A	The Energy Strategy and Environment Strategy have not so far emerged as relevant to this protected characteristic
<p>Human Rights The Energy Strategy and Environment Strategy are not expected to impact upon human rights.</p> <p>Children's Rights The Energy Strategy and Environment Strategy are not expected to impact upon children's rights.</p> <p>*Although the Energy Strategy and Environment Strategy appear separately in the SPD they are considered together in the EIA to avoid repetition in assessment</p>				

Section 06	Reducing any Adverse Impacts
Outcome of Assessment	<p data-bbox="584 240 1048 272">Outcome and Recommendations</p> <p data-bbox="584 312 2051 408">The previous draft of the EQIA identified a number of outcomes and recommendations that should be considered when finalising the SPD. These are set out below and followed by a description of how the revising of the SPD has tried to address these recommendations.</p> <ul data-bbox="636 448 2051 611" style="list-style-type: none"> <li data-bbox="636 448 2051 611">▪ The Urban Form Strategy promotes movement for all people however Key Principles in relation to Connectivity and Streets could go further and require specific measures to ensure the OA is accessible to those with disabilities, including elderly people, blind people and wheelchair users. The application of the UFS would also positively impact on those with small children and who have caring responsibilities. This is more likely to be women than men. <p data-bbox="680 651 2029 746"><i>ACTION: The SPD now references Policy 7.2 of the Mayor’s London Plan (An Inclusive Environment) in the Policy Context for the Urban Form Strategy. This is covered by a higher order policy and it is not felt necessary to replicate this high order policy as a new Key Principle in the SPD.</i></p> <ul data-bbox="636 786 2051 1018" style="list-style-type: none"> <li data-bbox="636 786 2051 1018">▪ Although many Key Principles of the Urban Form Strategy relate to aspects of secure by design, there is no key principle that underpins it and requires it to be incorporated into the design of buildings and public space. Policy 7.3 of the London Plan ‘Designing out Crime’ requires Boroughs to seek to create safe, secure and appropriately accessible environments where crime and disorder and fear of crime so not undermine quality of life or community cohesion. It is therefore recommended that a key principle or set of key principles are included within the Urban Form Strategy to ensure safety and security for all people is fundamental to the redevelopment of the OA. <p data-bbox="680 1058 2029 1153"><i>ACTION: Policy 7.3 has now been referenced in the Policy Context Section for the Urban Form Strategy. This is covered by a higher order policy and it is not felt necessary to replicate this high order policy as a new Key Principle in the SPD.</i></p> <ul data-bbox="636 1193 2051 1329" style="list-style-type: none"> <li data-bbox="636 1193 2051 1329">▪ The Retail Strategy incorporates a number of Key Principles that will positively impact on all equality strands. In addition to Key Principle RS8, there is a need to protect and further promote the vibrant mix of retailers and traders associated with any upgrade of the North End Road Market, and to ensure local ethnic and minority groups are fully represented and diversity is encouraged. <p data-bbox="680 1361 2051 1457"><i>ACTION: Any decision to move the market would need to undergo a separate EQIA, which would need to consider any impacts on ethnic and minority groups. No change to the SPD is therefore proposed, which is simply asking any developer to allocate land for the market’s potential relocation.</i></p>

- The Cultural Strategy could better target local ethnic minority groups whose needs should be assessed as part of any consultation on the SPD.

ACTION: No change to the SPD proposed. The SPD is only seeking to allocate land for the use as cultural facilities. The occupation of these facilities would be dealt with as part of any detailed planning application and the SPD cannot restrict the occupancy of any cultural facilities at this stage.

- The Social and Community Facilities Strategy is inclusive of all races and ethnic groups, however health, education, and community facilities should be designed to accommodate the specific needs of identified local groups along with the needs of future residents.

ACTION: The health and education facilities sought in the SPD would be run by the council and PCT respectively and both have a statutory duty to meet the specific needs of the borough's residents. The supporting text for Key Principle SC6 identifies that the premises should be accessible to all. The Key Principle has also been amended to specify that space should be provided for multi-faith groups.

- Aside from identifying the need to provide social and community facilities (e.g. schools, community facilities, primary care facilities and open space), it is unclear what measures in the Social and Community Facilities Strategy are proposed to encourage the establishment of community organisations and strengthen existing organisations. A needs assessment of community groups within the OA and surrounding areas is recommended. This should identify requirements in terms of necessary support structures and facilities to enable them to establish and flourish within the OA.

ACTION: Further text has been added to Key Principle SC6 stating that provision must be made of new community space before any existing community space is demolished. The SPD can only require developers to mitigate against the impacts of their development. The SPD cannot require any developer to provide for the existing needs of surrounding community facilities.

- Childhood obesity has been identified as an issue in primary school children within London and although there is clear guidance on play space and open space within both the Urban Form Strategy and Social and Community Facilities Strategy, it is unclear the extent to which playing fields and open space suitable for active recreation will be accommodated in the proposed 2ha green space. Further investigation and accommodation of active recreation areas needs to be specified.

ACTION: Key Principle SC4 requires affordable access to any sports and leisure provision. Key Principle UF11 requires development to deliver public open spaces that provide for a range of different leisure pursuits, including sports pitches, children's play and court games. Given that the 2 ha open space would be the most significant open space required of any development, it is anticipated that this space would

	<p>need to provide for a wide variety of leisure pursuits.</p> <ul style="list-style-type: none"> Community facilities should be provided so they are accessible to groups of all faiths and beliefs, and the provision of a multi-faith facility should be investigated. <p>ACTION: Key Principle SC6 has been amended to include the provision of multi-faith space.</p>
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Section 07	Action Plan																								
Action Plan	<p>The below table identifies that issues and actions identified in the previous draft of the EQIA and the final column identifies whether these actions were undertaken and the outcomes of these actions.</p>																								
	<table border="1"> <thead> <tr> <th>Issue Identified</th> <th>Action (s) identified in draft EQIA</th> <th>Who will be responsible</th> <th>Targets and milestones</th> <th>Action undertaken?</th> </tr> </thead> <tbody> <tr> <td>Difficulty in raising awareness and interest in the SPD amongst ethnic and race based groups in the OA and surrounding area</td> <td>Continue to target hard to reach groups in future consultation on the SPD specifically during the statutory public consultation exercise</td> <td>Special Projects Team</td> <td>During the statutory public consultation exercise in late 2011</td> <td>Yes The SPD was presented to the estates residents. The authorities received more than double the number of consultation responses than received during the previous consultation.</td> </tr> <tr> <td>As identified in the outcome of assessment, Key Principles in some instances don't go far enough to cater for the needs of specific equality strands.</td> <td>The EIA recommendations will be discussed with the SPD authors for incorporation in the revised draft, and will also be presented to the SPD Steering Group</td> <td>Special Projects Team</td> <td>During the statutory public consultation exercise in late 2011</td> <td>Yes The specific responses are outlined in the Outcomes and Recommendations section above.</td> </tr> <tr> <td>The needs of people with disabilities need to</td> <td>Target Hammersmith and Fulham Disability Forum HAFAD and</td> <td>Special Projects Team</td> <td>During the statutory public consultation in</td> <td>Yes. HAFAD were presented the SPD during the</td> </tr> </tbody> </table>	Issue Identified	Action (s) identified in draft EQIA	Who will be responsible	Targets and milestones	Action undertaken?	Difficulty in raising awareness and interest in the SPD amongst ethnic and race based groups in the OA and surrounding area	Continue to target hard to reach groups in future consultation on the SPD specifically during the statutory public consultation exercise	Special Projects Team	During the statutory public consultation exercise in late 2011	Yes The SPD was presented to the estates residents. The authorities received more than double the number of consultation responses than received during the previous consultation.	As identified in the outcome of assessment, Key Principles in some instances don't go far enough to cater for the needs of specific equality strands.	The EIA recommendations will be discussed with the SPD authors for incorporation in the revised draft, and will also be presented to the SPD Steering Group	Special Projects Team	During the statutory public consultation exercise in late 2011	Yes The specific responses are outlined in the Outcomes and Recommendations section above.	The needs of people with disabilities need to	Target Hammersmith and Fulham Disability Forum HAFAD and	Special Projects Team	During the statutory public consultation in	Yes. HAFAD were presented the SPD during the				
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	be specifically assessed and addressed through the SPD.	specific age groups in the statutory consultation exercise to ensure as much feedback is received as possible.		late 2011.	March-April 2011 consultation. HAFAD were again asked if they wished to have the SPD presented during the November-December consultation, but declined. HAFAD sent representations through on the SPD, which were considered along with all other representations.

Section 08	Agreement, Publication and Monitoring		
Chief Officer sign-off	For LBHF: Name: Nigel Pallace Position: Director Transportation and Technical Services Email: nigel.pallace@lbhf.gov.uk Telephone No: 020 8753 300	For RBKC: Name: Jonathan Bore Position: Executive Director for Planning and Borough Development Email: jonathan.bore@rbkc.gov.uk Telephone No: 020 7361 2075	For GLA: Name: Colin Wilson Position: Senior Strategic Planning Manager Email: colin.wilson@london.gov.uk Telephone No: 020 7983 4783
Key Decision Report	<p>RBKC: Equalities Impact Assessment considered on [TO ADD] by the Cabinet Member for Planning as part of the Key Decision Report for the adoption of the SPD.</p> <p>LBHF: Date of report to Full Council: 19th March 2012. Resolution for adoption to be considered at Cabinet / Full Council.</p> <p>Confirmation that key equalities issues found here have been included: Yes</p>		
Opportunities Manager	(When EIAs have been determined to be of high relevance) Name: Carly Fry Position: Opportunities Manager Email: PEIA@lbhf.gov.uk Telephone No: 020 8753 3430 Date: 07 February 2012		