

Alton Estate Regeneration
Hybrid Application

REVISED EQUALITIES
IMPACT NEEDS
ASSESSMENT

WSP | Indigo
March 2020



ALTON GREEN

ROEHAMPTON SW15



EQUALITIES IMPACT NEEDS ASSESSMENT

Alton Estate regeneration programme

Directorate	Housing
Service Area	Regeneration
Scheme being assessed	Alton Estate regeneration programme
Which borough does the scheme apply to?	Wandsworth
Key staff involved	Andy Algar, Simon Pickles, Charlotte Haley
Date approved by Directorate Equality Group (if applicable)	Not applicable
Date approved by Policy and Review Manager	Original EINA approved by Clare O'Connor on 4 June 2019.

EXECUTIVE SUMMARY

Purpose of the EINA

Section 149 of the Equality Act 2010 requires local authorities to fulfil a public sector equality duty by considering the impact of policies and proposals on people with “protected characteristics” eg age, ethnicity, disability etc.

The responsibility for discharging the public sector equality duty rests with the Local Planning Authority. This equality impact and needs analysis (EINA) has been prepared by WSP|Indigo on behalf of Redrow Homes to enable the Local Planning Authority to consider the likely impacts on protected groups of the hybrid planning application for the Alton Estate regeneration programme.

The EINA is submitted for information only, in order to assist the Local Planning Authority in its independent consideration of the equalities issues.

The associated impacts for the redevelopment of Minstead Gardens have also been included in this EINA, although the proposals for Minstead Gardens will form part of a separate listed building consent application which is yet to be submitted.

This edition of the EINA updates the version submitted with the hybrid masterplan planning application in June 2019. The revised EINA reflects the implications for protected groups of changes to the masterplan following comments provided by the GLA in the Stage 1 referral letter of 27 August 2019.

Baseline assessment

The EINA includes a baseline assessment of protected groups living in a **neighbourhood impact area** defined by the catchment area that has been used over an extended period for consultation work supporting the regeneration programme.

The following protected groups are prominently represented in the baseline area:

- Black and minority ethnic (BAME) groups;
- Children and young people;
- Disabled residents;
- Women; and
- Lone parent households.

Temporary impacts

The EINA has identified a total of **13 temporary impacts** during the construction phase. Of these temporary impacts, **1 is positive, 6 are negative and 6 are neutral.**

The revised EINA includes an additional temporary negative impact which has been identified following the originally submitted EINA in relation to disabled residents due to changes to housing provision.

The main **positive temporary impact** is as follows:

- The temporary employment opportunities generated during the construction phase of the proposed development are likely to have a **positive impact** on existing residents from BAME groups.

The main **negative temporary impacts** are as follows:

- The disruption accompanying the construction phase is expected to have a **negative impact** on existing elderly residents. Mitigation measures are set out in Section 3;
- The short-term changes to play space provision are expected to have a **negative impact** on existing residents who are young. Mitigation measures are set out in Section 3;
- The disruption accompanying the construction phase is expected to have a **negative impact** on existing residents who are disabled. The reasoning behind this is set out in Section 3;

- The changes to housing provision are expected to have a **negative impact** on disabled residents. The reasoning behind this is set out in Section 3;
- The disruption accompanying the construction phase is expected to have a **negative impact** on existing residents who are pregnant or young mothers. Mitigation measures are set out in Section 3; and
- The disruption accompanying the construction phase is expected to have a **negative impact** on existing residents who are from BAME groups. Mitigation measures are set out in Section 3.

The EINA explains the mitigation measures that have been considered for the negative temporary impacts that will occur during the construction phase of the hybrid masterplan.

The main **neutral temporary impacts** are as follows:

- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on existing residents who are young or old;
- In the short term, the changes to housing provision are expected to have a **neutral impact** on disabled residents;
- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on disabled residents;
- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on existing residents who are pregnant or young mothers;
- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on existing residents from BAME groups; and
- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on existing residents from religious groups.

Permanent impacts

The EINA has identified a total of **20 permanent impacts** on protected groups from the Alton Estate regeneration programme. Of these permanent impacts, **17 are positive** and **3 are negative**. There are no neutral permanent impacts.

The revised EINA includes two additional permanent negative impacts which have been identified following the originally submitted EINA. This includes the impact on residents in temporary accommodation who are from BAME groups due to the change in housing provision, as well as the impact on those residents with severe disabilities and very elderly residents in particular resulting from the disruption to their existing living arrangements.

The main **positive permanent impacts** are as follows:

- The new replacement affordable housing is expected to have a **positive impact** on existing residents who are young or old;
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a **positive impact** on existing residents who are young or old;
- The improved opportunities for social interaction provided as part of the completed development are expected to have a **positive impact** on existing residents who are young or old;
- The improved and expanded play space provided as part of the completed development is expected to have a **positive impact** on existing residents who are young or old;
- The enhanced open space provided as part of the completed development is expected to have a **positive impact** on existing residents who are young or old;
- The community facilities provided as part of the completed development are expected to have a **positive impact** on existing residents who are young or old;
- The improved access to the site is expected to have a **positive impact** on existing residents who are old;
- The new replacement affordable housing is expected to have a **positive impact** on disabled residents;
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a **positive impact** on disabled residents;
- The improved access to the site is expected to have a **positive impact** on disabled residents;
- The improved opportunities for social interaction provided as part of the completed development are expected to have a **positive impact** on female residents;
- The new replacement affordable housing is expected to have a **positive impact** on existing residents who are pregnant or young mothers;
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a **positive impact** on existing and future residents who are pregnant or young mothers;

- The improved access to the site is expected to have a **positive impact** on existing and future residents who are pregnant or young mothers;
- The new replacement affordable housing is expected to have a **positive impact** on existing residents from BAME groups;
- The employment opportunities which the proposed development is likely to generate are expected to have a **positive impact** on existing residents who are from BAME groups; and
- The upgraded and improved social infrastructure provided as part of the completed development is expected to have a **positive impact** on existing residents who are from BAME groups.

The main **negative permanent impacts** are as follows:

- The change in housing provision is expected to have a **negative impact** on residents in temporary accommodation who are from BAME groups. The reasoning behind this is set out in Section 3;
- Members of some protected groups will experience **negative impacts** as a result of the disruption to their existing living arrangements, particularly those with severe disabilities and very elderly residents. The reasoning behind this is set out in Section 3; and
- A minority of existing non-secure council tenants will experience **negative impacts** as a result of being unlikely to be eligible for replacement new units in the proposed development. Wandsworth Council has provided a number of mitigation measures which are explained in Section 3 of the EINA.

1. Background

Why has this EINA been prepared?

Section 149 of the Equality Act 2010 requires local authorities to fulfil a public sector equality duty by considering the impact of policies and proposals on people with “protected characteristics” e.g. age, race, disability etc.

The responsibility for discharging the public sector equality duty rests with the Local Planning Authority. This equality impact and needs analysis (EINA) has been prepared by WSP|Indigo on behalf of Redrow Homes to enable the Local Planning Authority to consider the likely impacts on protected groups of the hybrid planning application for the Alton Estate regeneration programme.

Wandsworth Council uses the preparation of EINAs as a review tool to ensure that equality is considered in the design and development of key policies and services. For major projects like the Alton Estate regeneration programme, the preparation of an EINA enables the local authority to demonstrate that it has systematically considered the potential impacts of regeneration proposals on members of protected groups.

A High Court decision in 2018 found in favour of a local residents’ association who challenged Bath and North East Somerset Council’s decision to grant consent for the regeneration of the deprived Foxhill Estate. The Council was judged to have failed to fulfil its public sector equality duty by not considering the impact of the scheme on people with protected characteristics¹

This EINA builds on the Initial Equality Impact Assessment prepared by Wandsworth Council in September 2015 to support the Roehampton Supplementary Planning Document (SPD).

The SPD provides detailed guidance on how to translate the ideas and proposals of the Alton Area Masterplan into planning policy. In doing so, the SPD addresses the following four intervention areas: Roehampton Local Centre; Portswood Place Important Local Parade; Danebury Avenue Housing; and Central Landscape.

The draft EINA SPD consultation phase involved two formal consultation stages and various informal consultation methods, such as stakeholder meetings and interviews, as well as arts and community activities, a six-week Options consultation from September to October 2013 and an eight-week period of Preferred Options consultation from February to April 2014.

The final EINA SPD consultation phase included meetings with statutory and non-statutory groups, local businesses and residents, presentations to community groups and

¹ Buckley, R (on the application of) v Bath and North East Somerset Council & Anor [2018] EWHC 1551 (Admin) (20 June 2018)

forums, a tailored door-knocking exercise, a questionnaire, as well as updates in local publications. The final seven-week consultation was undertaken between 7 April 2015 and 24 May 2015.

The EINA SPD concludes that there were no major negative equalities impacts identified during the consultation phase. Furthermore, the EINA states that the minor and potential negative impacts could be mitigated through future management and monitoring of the planning, phasing delivery and housing allocation process.

Regarding positive equalities impacts, the EINA recognises that the diverse needs of the local community will be addressed through the provision of a variety of housing types and values, as well as access to a range of new and improved community facilities and usable green spaces.

What is the scheme being assessed by this EINA?

This edition of the EINA updates the version submitted with the hybrid masterplan planning application in June 2019. The revised EINA reflects the implications for protected groups of changes to the masterplan following comments provided by the GLA in the Stage 1 referral letter of 27 August 2019.



Figure 1: Illustrative masterplan

Figure 1 above shows the revised illustrative masterplan within the hybrid planning application red line boundary. Minstead Gardens, which is the subject of a forthcoming planning and listed building consent application, is also assessed in this document.

Scheme details

The main elements of the Alton Estate regeneration programme are summarised below.

Housing

- The detailed planning application will see the demolition of a total of 134 units, of which 73 are social rented and 61 are leasehold units. A further 154 units will be demolished as part of the outline planning application. The detailed application will also see the demolition of several non-residential facilities and associated structures; and
- The detailed planning application will see the construction of a total of 654 new and replacement units, of which 458 are private units, up to 136 are social rented units, 29 are Shared Equity and 31 are Shared Ownership. The broader hybrid application- encompassing both the detailed and outline elements- proposes a total of 1,108 new and replacement units, of which 847 are private units, up to 201 are social rented, 29 are Shared Equity and 31 are Shared Ownership.

Community Hub

- 5,368 sqm of community space, which will include a Community Hub encompassing a library, community hall, revamped facilities for the Base Youth Centre and health services, all accommodated in Block A. A new village square will adjoin the Community Hub, which will include a flexible external space for community activity;
- The proposed development will see the creation of a new community hub at Portswood Place with a new convenience retail space. New community facilities provided as part of the facility will include a new nursery and children's centre (which has been designed to enable out-of-hours community access to a function room), a new clubroom for the residents of Minstead Gardens, and health/community space; and
- Replacement and upgraded retail space will be provided along Danebury Avenue, along with a new office space which can be used by Council services and/or workspace for local businesses or community groups.

Open and play space

- Upgraded play space will be provided at Downshire Fields and the Alton Activity Centre; new play space facilities will be incorporated as part of the Village Square, in addition to play elements across the masterplan area and within the residential courtyards.

Parking

- A net uplift in the total number of parking spaces and accessible parking spaces will be provided across the development, in addition to improved on-street parking.

Access

- Enhanced movement and access across the estate, in the form of accessible pedestrian and cycle routes, upgraded bus facilities, enhanced pavements and level pedestrian crossings.

2. Analysis of need and impact

Baseline assessment

In order to understand the relative size of protected groups in the local area, we have assessed socio-economic conditions across a **neighbourhood impact area** defined by the catchment area that has been used over an extended period for consultation work supporting the regeneration programme.

The neighbourhood impact area encompasses the specific buildings which will be demolished as part of the regeneration programme, as well as the neighbouring residential communities, which are also likely to be affected by the development, albeit to a lesser extent.

The plan below shows the neighbourhood impact area used for the baseline assessment. It is estimated to contain around 5,600 households.



In undertaking this EINA, WSP | Indigo has drawn on data from the following sources:

- ONS 2011 Census;
- ONS mid-year small area-level population estimates (2018);
- Alton Estate Housing Needs Assessment (2019);
- Tenant Data (2018) from Wandsworth’s “Saffron” Housing Management System; and
- Pitney Bowes GeoInsight (2018).

At the neighbourhood impact area level, we have used 2011 Census-based data from the GeoInsight tool provided by Pitney Bowes. The GeoInsight tool uses Census data to provide projections for selected socio-economic characteristics for a bespoke boundary.

The “neighbourhood” section of the commentary on protected groups below is intended to provide an overview of baseline conditions at the time of the 2011 Census, across a relatively large area which encompasses the Alton Estate as well as those living in neighbouring streets who are likely to be indirectly affected by the proposals. The “Wandsworth and London figures” section provides equivalent data for the borough and the broader region. This demonstrates how over or under-represented certain protected groups are in the neighbourhood impact area compared with the borough and with London as a whole.

Given that Wandsworth’s population has changed considerably since the 2011 Census, the “post-2011 data” section of the baseline provides a more recent snapshot of local socio-economic characteristics. The post-2011 data is derived from a doorstep Housing Needs Assessment (HNA) conducted by Wandsworth Council.

The HNA was originally undertaken in 2017 across all blocks which will be demolished and residents decanted as part of the detailed element of the proposals, with the exception of the sheltered accommodation at Minstead Gardens. We have now updated the EINA to reflect the latest HNA conducted in 2019 which was based on the same questions and methodology. We have now updated the EINA to reflect the latest HNA conducted in 2019 which was based on the same questions and methodology. We have removed the residents from the nine properties who have moved early from the existing data and recalculated the breakdown of protected characteristics based on the balance of the properties. We have agreed this approach with the LBW Regeneration Team and consider this approach to provide an accurate reflection of the make-up of the estate at the time of the 2019 HNA.

In addition to information on the number of occupants, age, gender and languages spoken, respondents were asked questions on kitchen requirements, their local schools, doctors, mode of commute to work, whether they required a parking space, whether they had rent arrears, whether they were looking for employment, whether they required help paying debts and any other information that the resident felt was relevant to assessing their housing requirement.

A number of questions were also asked about disability, including whether support was required and the specific details of their disability and how these inform living arrangements.

The HNA data provides a detailed and current, household and individual-level picture of the characteristics of the population which will be rehoused as part of the scheme. A large share of the population across the blocks will be rehoused within the proposed development. Whilst the proposed development also includes market housing for sale and rent, as well as additional affordable housing, the HNA data can be considered a reliable enough indicator of the future population of the replacement affordable component of the development for it to be realistic to assess the “permanent” impacts of the scheme on those groups.

Protected group	Findings
Age	<p data-bbox="434 277 651 309">Neighbourhood</p> <p data-bbox="434 353 1377 506">There is a young age profile, with 20% of people aged 0 to 15 compared with 16.7% across Wandsworth. As a result, there is a smaller proportion of working age residents when compared with the borough as a whole and a comparable proportion of retirement-age residents.</p> <p data-bbox="434 551 639 582">Post-2011 data</p> <p data-bbox="434 627 1385 815">More recent, 2018 data provided by Wandsworth Council shows a large population aged 15 or under across the blocks proposed for demolition as part of the detailed element of the planning application (Portswood Place, Minstead Gardens, Kingsclere Close, Harbridge Avenue, Danebury Avenue and Allbrook House).</p> <p data-bbox="434 860 1361 1088">As set out in the table below, across a total of 198 households (664 residents), 31.8% of residents were aged 15 or under, 62.8% of residents were of working age (16 to 64 inclusive) and 5.4% were aged 65 or older. The share of the population who are 15 or under was considerably higher than the Wandsworth average and the share of elderly residents was marginally lower.</p> <p data-bbox="434 1133 874 1164">Wandsworth and London figures</p> <p data-bbox="434 1209 1385 1397">2017 population figures produced by the Greater London Authority estimated the average age across Wandsworth and London to be 35.0 and 36.0 years respectively, considerably higher than the average age of 29 across the local area, identified as part of the 2019 HNA and set out above.</p> <p data-bbox="434 1442 1385 1630">As of 2015, across Wandsworth 17.8% of residents were under the age of 16, 72.8% were of working age and 9.3% were at retirement age. This is only marginally different from 2015 London-wide trends, where 13.9% were under 16, 73.6% were of working age and 12.5% of residents were of retirement age.</p> <p data-bbox="434 1675 1366 1904">Notably, the 2011 Census data and 2019 HNA data reveal that the population of the neighbourhood impact area had a much larger share of residents who were younger than working age (with 31.8% of residents being under 16) and consequently a smaller share of working age residents than London-wide and Wandsworth-wide trends set out above.</p>

Age Group	6 blocks within regeneration area	
Age 0 to 4	27	4.1%
Age 5 to 7	36	5.5%
Age 8 to 9	27	4.1%
Age 10 to 14	82	12.4%
Age 15	18	2.0%
Age 16 to 17	32	4.9%
Age 18 to 19	29	4.4%
Age 20 to 24	80	12.1%
Age 25 to 29	36	5.5%
Age 30 to 44	118	17.9%
Age 45 to 59	116	17.6%
Age 60 to 64	19	2.9%
Age 65 to 74	21	3.2%
Age 75 to 84	11	1.7%
Age 85 to 89	4	0.6%
Age 90 and over	3	0.5%
TOTAL	664	100%

Disability	<p>Neighbourhood</p> <p>When assessed via the 2019 English Indices of Deprivation’s Health Deprivation and Disability Domain, all of the nine lower layer super output areas (SOAs) which lie within the neighbourhood impact area were ranked among the top 50% most deprived local authorities.</p> <p>Post-2011 data</p> <p>The 2019 Housing Needs Assessment survey revealed that a very large share of residents of Hardbridge Avenue, Danebury Avenue, Allbrook House, Portswood Place and Kingsclere Close suffer from some form of disability. 46 out of the 198 households surveyed contained residents who suffered from disabilities.</p> <p>Specific physical disabilities of residents mentioned by those surveyed included arthritis, diabetes, Down syndrome, severe asthma, sciatica and tinnitus. Specific mental disabilities mentioned by those surveyed included depression, schizophrenia and autism.</p> <p>Wandsworth and London figures</p> <p>A roughly equivalent proportion of people across London described their day-to-day activities as limited either “a little” or “a lot” (14.2%) as</p>
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	<p>the neighbourhood and local impact areas (15.5%), as of the 2011 Census. Rates across Wandsworth were lower at 11.2% of all residents.</p> <p>When compared to more recent and granular data from the six blocks surveyed as part of the HNA, the share of households which contained one or more disabled resident (23.2%) was notably lower than the reflective of London-wide trends (27.9% of households), though more reflective of the equivalent statistics for Wandsworth (20.7%) from the 2011 Census.</p>
Gender (sex)	<p>Neighbourhood</p> <p>The gender breakdown of the local population is 53.6% female and 46.4% male.</p> <p>Post-2011 data</p> <p>2018 tenant data from Wandsworth Council shows that across the blocks which will be redeveloped as part of the detailed element of the planning application, there was a higher share of women than men, with 382 female residents (54.0%) out of a total of 708 residents (across 203 households). This is consistent with the updated HNA (2019), which showed 357 female residents (53.8%) out of a total of 664 residents (across 198 households).</p> <p>Wandsworth and London figures</p> <p>The share of the neighbourhood impact area population who are female (53.6%) is higher than equivalent figures across Wandsworth (51.6%) and London (50.7%) at the time of the 2011 Census.</p>
Gender re-assignment	<p>The Office for National Statistics does not currently collect data on gender reassignment at any geographic level.</p> <p>In the absence of data, the assessment assumes that there is a share of the local population whose gender identity constitutes a minority identity.</p> <p>Guidance provided by the Equality and Human Rights Commission suggests that data should be collected on minority groups where it is relevant. In this instance, gender re-assignment is largely not relevant to the decant process nor housing provision services.</p>
Marriage and civil partnership	<p>Neighbourhood</p> <p>In terms of household composition, the neighbourhood impact area had a disproportionately large share of lone parent households with dependent children. Across the consultation area, 13.5% of all</p>

	<p>households were occupied by single parents with children who are dependent on that parent, compared to a borough average of 6.1% of all households.</p> <p>An above average share of local households was composed of lone households occupied by people aged 65 or older – 11.4% of households at the local level compared to 8.0% of households across Wandsworth.</p> <p>Post-2011 data</p> <p>2018 tenant data from Wandsworth Council also shows a disproportionately large share of lone parent households – an estimated 106 of 203 households (52.2%) across the blocks consisted of one parent families. A majority of these households contain dependent children.</p> <p>The protection of those in marriages or civil partnerships, as set out in the Equality Act 2010, tends to pertain more to employment matters, such as wrongful dismissal due to marital status, rather than the redevelopment of housing. In this instance there is limited evidence to suggest that those in marriages or civil partnerships represent a prominent user group whose presence would be disproportionate relative to their prevalence amongst the general population.</p> <p>Wandsworth and London figures</p> <p>Across Wandsworth, as of the 2011 Census, 54.0% of residents were estimated to be single and have never married or registered a same-sex civil partnership. 32.8% were married, 2.5% were separated and 6.5% were divorced and 3.7% were widowed. A roughly equivalent share of the local population were single or widowed, while a larger share of the population were married than across the neighbourhood impact area (28.6% across the nine Lower Super Output Areas that cover the neighbourhood impact area).</p>
<p>Pregnancy and maternity</p>	<p>There is no available data on pregnancy and maternity at this geographic scale.</p> <p>Post-2011 data</p> <p>The 2019 Housing Needs Assessment did not contain specific questions about pregnancy, but an opportunity was provided to mention this in the “other information” section.</p> <p>In the absence of this information, we have analysed 2011 Census data on household composition for the nine Lower Super Output Areas (LSOAs) that cover the defined neighbourhood area. They are:</p>

	<p>Wandsworth 013A, 013B, 013D, 016A, 016D, 023A, 023B, 023C and 023D.</p> <p>The share of households in the various LSOAs defined as “lone parent households” (with either dependent or non-dependent children) averages 16.8% of all households as of the 2011 Census. The proportions range from 29.4% in Wandsworth 013B and 10.5% in Wandsworth 016D.</p> <p>Of single-parent households in the neighbourhood area as of 2011, an average of 93.6% of single-parent households consist of a female single-parent and 51.7% of lone parent households are headed by a lone parent not in employment across the nine LSOAs.</p> <p>At the borough-level, ONS figures show that as of 2016 the live birth rate across Wandsworth was 15.4 live births per 1,000 population, compared to a UK average of 11.8.</p> <p>Wandsworth and London figures</p> <p>The neighbourhood impact area (covered by nine Lower Super Output areas) had a larger share of single parent households as of the 2011 Census relative to Wandsworth and London (16.8% of households compared to 9.5% and 12.7% respectively).</p> <p>The share of lone parent households headed by women was also higher at the local level, at 93.6% of all households, compared to 93.2% and 92.5% for Wandsworth and London, respectively.</p>
<p>Race/ethnicity</p>	<p>Neighbourhood</p> <p>There is a very diverse local community. 58.1% of the population within the neighbourhood impact area identify as other groups aside from white British, compared to 46.5% across the borough.</p> <p>More detailed 2011 Census ethnicity data at the ward-level for Roehampton and Putney Heath, which contains the majority of the baseline area, reveals that the ward contains a disproportionate share of residents who identified as Black African, Mixed-White and Black African, White-Polish and White-Other Eastern European Groups.</p> <p>Post-2011 data</p> <p>More granular, 2018 data from Wandsworth’s tenancy database reveals that of 385 out of 708 individuals for whom there was data on ethnic identity, a disproportionately large share were from minority groups.</p>

As set out in the table below, 58.2% of the local population belonged to BAME groups, with a disproportionately large proportion of the local population identifying as Black African (28.2%), Black Caribbean (3.7%), British Pakistani (9.1%), Any Other White 10.0% - encompassing all white ethnic groups other than British or Irish) and Mixed ethnic groups (8.9%) compared to equivalent figures for Wandsworth.

Ethnic Group	blocks redeveloped as part of Phases I and II	
	Number	%
White	145	41.3%
British	103	29.3%
Irish	7	2.0%
Any other white	35	10.0%
Asian/ Asian British	41	11.7%
Indian	2	0.6%
Pakistani	32	9.1%
Bangladeshi	2	0.6%
Any other Asian	5	1.4%
Black British	120	34.2%
Caribbean	13	3.7%
African	99	28.2%
Any other black	8	2.3%
Mixed	31	8.9%
White and Black Caribbean	3	0.9%
White and Black African	7	2.0%
White and Asian	7	2.0%
Any other mixed/ multiple ethnic backgrounds	14	4.0%
Other ethnic group	14	3.6%
Chinese	0	0.0%
Any other ethnic group	14	4.0%
TOTAL	351	100%

Languages spoken

The 2019 HNA survey (which captured a significant share of the residential population of Hardbridge Avenue, Danebury Avenue, Allbrook House, Portswood Place and Kingsclere Close) found that 39 of the 81 households (48.1%) who responded contained residents who spoke other languages aside from or in addition to English. Fewer than ten of the surveyed households made mention of members who had communication difficulties based on language skills.

	<p>Wandsworth and London figures</p> <p>A much larger share of the neighbourhood impact area are from BAME groups, compared to equivalent figures for Wandsworth and London. 58.2% of respondents to the 2019 HNA identified as being from a non-white group. In comparison, 2019 GLA housing-led projections published on the Wandsworth DataWand website, projected that as of 2019 non-white groups comprised 30.9% and 46.2% of the population of Wandsworth and London respectively.</p> <p>In terms of separate BAME groups, the 2019 GLA figures project that as of 2019, 5.2% of Wandsworth’s population are from Black African backgrounds, 3.6% from Black Caribbean backgrounds, 19.3% from Other (non-British or Irish) White backgrounds, 3.2% from Pakistani and 2.5% from Indian ethnic groups.</p> <p>When compared with the results of the 2019 HNA, it can be concluded that the population of the neighbourhood impact area is far more likely to be from Black African and Black Caribbean backgrounds, far less likely to be from White ethnic groups and more likely to be from Asian ethnic groups than the broader population of Wandsworth.</p>
<p>Religion and belief, including non-belief</p>	<p>Neighbourhood</p> <p>Information at the lower layer Super Output Area (SOA) level suggests that the neighbourhood impact area has a larger share of religious residents than the Wandsworth average, with a large Muslim community. The consultation process revealed that there is a large Christian community in the area, who are served by the local Methodist Church.</p> <p>Post-2011 data</p> <p>Data on the religion of residents is not captured in Wandsworth Council’s database of tenants, nor was it asked as part of the 2019 Housing Needs Assessment survey.</p> <p>In the absence of this information, we have analysed 2011 Census data on household composition for the nine Lower Super Output Areas (LSOAs) that cover the defined neighbourhood area. They are: Wandsworth 013A, 013B, 013D, 016A, 016D, 023A, 023B, 023C and 023D.</p> <p>As of the 2011 Census, 67.8% of the population across the average of nine LSOAs were religious. Amongst this group, 53.7% were Christian, 10.4% were Muslim, 0.9% were Buddhist, 1.3% were Hindu, 0.6% were</p>

	<p>Jewish, 0.4% were Sikh and 0.5% belonged to other religions. 24.4% had no religion and 7.9% did not state whether they were religious or not.</p> <p>Given that London’s population, and especially social housing in London, experiences high levels of churn, it is conceivable that the religious composition of area has changed considerably since the time of the 2011 Census.</p> <p>Wandsworth and London figures</p> <p>Relative to borough-wide and London-wide figures, the neighbourhood impact area has a comparable proportion of residents who identified as Muslim as of the 2011 Census relative to Wandsworth and London (10.4% of residents compared to 8.1% and 12.4% respectively).</p> <p>The share of the population who identified as Christian (53.7%) was broadly in line with figures for the wider borough (53.0%) and London (48.4%).</p> <p>The proportion of Buddhists is comparable to Wandsworth (0.8%) and London (1.0%). The proportion of Jewish residents and Sikhs is comparable to borough-wide averages (0.5% Jewish and 0.3% Sikhs), but lower than London averages (1.8% Jewish and 1.5% Sikhs).</p> <p>Hindus are under-represented in the immediate neighbourhood, compared with 2.1% in Wandsworth and 5% in London).</p>
Sexual orientation	There is no available data on sexual orientation at this geographic scale, nor were questions on this topic asked as part of the 2019 Housing Needs Assessment survey.
Across groups	<p>Overcrowded households</p> <p>Across the baseline area, a higher share of all households (27.9% of the total) had an occupancy rating of “-1” or less, indicating that there are one or more fewer rooms in the house than would be required to accommodate the existing residents. This was a considerably higher share of all households than the average for Wandsworth (20.0% of the total).</p> <p>Post-2011 data</p> <p>2018 data provided by Wandsworth Council on the existing population of the blocks found that the majority of households contained three or more residents, with 10 households containing seven or more residents, 15 households containing six or more residents and 27 households containing 5 or more residents.</p>

	<p>When compared to the number of bedrooms contained within each household, 137 of 203 households had a greater number of permanent residents than there were bedrooms, suggesting relatively high levels of overcrowding. Households with significantly more members than available rooms were disproportionately represented by ethnic minority groups, suggesting that overcrowding might be a more significant problem for BAME residents.</p> <p>Age and ethnicity</p> <p>A separate EINA was conducted by Wandsworth Children’s Services in August 2018, which focused on the re-provision of children and youth services away from Roehampton Youth Club and the Base to Block A within the proposed development.</p> <p>The assessment included age, disability, gender and ethnicity data on the users of the Base and Roehampton Youth Club. It found that in 2017/18, the ethnic breakdown for the Base and Roehampton Youth Club users was 61% and 49% BAME respectively.</p> <p>While this figure does not necessarily represent residents of the redeveloped blocks, the re-provision of youth services in Block A is a major part of the proposals and one which is likely to have a disproportionate impact on users who are young and from ethnic minority backgrounds.</p>
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Data gaps

Data gap(s)	How will this be addressed?
2017 data for the entire scheme	The data for the local impact area is derived from a GIS-based mapping tool called GeoInsight developed by Pitney Bowes. The tool generalises 2011 census data across multiple geographic localities to provide socio-economic data for bespoke areas. Given that Wandsworth has undergone considerable socio-demographic change in the period since the 2011 Census, the figures presented in the assessment should be treated as indicative, rather than conclusive estimates.
Sexual Orientation	The Office for National Statistics (ONS) does not currently collect comprehensive, local-level data on sexual or non-binary gender

	<p>identity. Similarly, questions about sexual orientation were not included in the 2019 HNA.</p> <p>In 2019 ONS released experimental statistics on sexual orientation from a survey conducted in 2017, revealing that approximately 2.6% of London’s population identified as Lesbian, Gay or Bisexual (LGB), with a confidence interval of 2.2% to 3%. The dataset does not include figures at the ward or LSOA level. Our understanding is that LBW does not collect data on sexual orientation on a whole borough, ward or LSOA basis that is applicable to this EINA.</p> <p>The assessment has assumed that these groups are likely to be represented in some form within the baseline area.</p>
Across Groups	<p>Where feasible we have analysed data on intersecting groups (for example, religious minority groups with a disability), although there are limitations to the geographic scale at which this analysis can be undertaken.</p>

3. Impact

Approach

This EINA analyses the anticipated impacts on protected groups in the neighbourhood impact area of the complete and operational development covering the detailed design component of the hybrid planning application.

The report assesses both the anticipated **temporary impacts**, which are defined as all impacts whose effects are likely to last for either a portion of or the entirety of the ten-year construction period; and **permanent impacts**, where the effect will be apparent upon the completion and operation of the Alton Estate regeneration programme. The period during which the construction phase is anticipated to have an impact will vary because of the phasing of the development, meaning that not all temporary impacts will occur at the same time or for the same length of time.

The identified impacts have been categorised as positive, negative or neutral, depending on their anticipated effect on protected groups in the neighbourhood impact area.

In assessing the **permanent impacts** of the Alton Estate regeneration programme we have considered the likely effects on protected groups using the following thematic areas:

- Housing;
- Open space;
- Play space;
- Community facilities²;
- Access to employment opportunities;
- Access to social infrastructure³;
- Opportunities for social interaction; and
- Construction disruption.

² Community facilities are defined throughout as facilities which have the explicit purpose of helping to serve the community or promoting social cohesion. This would include facilities such as community centres, sports halls, performance spaces and swimming pools etc. However, for the purposes of this assessment, community facilities would not include social infrastructure such as GP practices or schools, whose primary purpose is not explicitly to do with community-building or social cohesion.

³ Throughout this assessment, the term 'Social infrastructure' is used in a narrow sense to describe essential community-supporting infrastructure, such as primary schools, secondary schools, libraries and GP practices.

Temporary impacts

The EINA has identified a total of **13 temporary impacts** during the construction of the areas covered by the detailed application. Of these temporary impacts, **1 is positive, 6 are negative** and **6 are neutral**.

The revised EINA includes an additional temporary negative impact which has been identified following the originally submitted EINA in relation to disabled residents due to changes to housing provision.

The temporary impacts of the proposed development can be summarised as follows:

- The temporary employment opportunities generated during the construction phases of the proposed development are likely to have a **positive impact** on existing residents from BAME groups. The reasoning behind this is set out later in this section;
- The disruption accompanying the construction phase is expected to have a **negative impact** on existing elderly residents. The reasoning behind this is set out later in this section;
- The short-term changes to play space provision are expected to have a **negative impact** on existing residents who are young. The reasoning behind this is set out later in this section;
- The disruption accompanying the construction phase is expected to have a **negative impact** on disabled residents. The reasoning behind this is set out later in this section;
- The changes to housing provision are expected to have a **negative impact** on disabled residents. The reasoning behind this is set out later in this section;
- The disruption accompanying the construction phase is expected to have a **negative impact** on existing residents who are pregnant or young mothers. The reasoning behind this is set out later in this section;
- The disruption accompanying the construction phase is expected to have a **negative impact** on existing residents who are from BAME groups. The reasoning behind this is set out later in this section;
- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on existing residents who are young or old. The reasoning behind this is set out later in this section;
- In the short term, the changes to housing provision are expected to have a **neutral impact** on disabled residents. The reasoning behind this is set out later in this section;
- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on disabled residents. The reasoning behind this is set out later in this section;

- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on existing residents who are pregnant or young mothers. The reasoning behind this is set out later in this section;
- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on existing residents from BAME groups. The reasoning behind this is set out on later in this section, and;
- In the short term, the changes to social infrastructure provision are expected to have a **neutral impact** on existing residents who are from religious groups. The reasoning behind this is set out later in this section.

Protected group	Identified Temporary Impact
Age	<p>Construction disruption – negative impact</p> <p>As detailed in the accompanying Population and Human Health Chapter of the ES, provided by Barton Willmore, the construction period is expected to last approximately 10 years and will result in changes to access arrangements, dust and changes to existing daylight and sunlight levels for both the residential population that remain living on-site during the construction period and those in neighbouring blocks.</p> <p>In order to mitigate the negative impacts of the proposals, a Construction and Environmental Management Plan (CEMP) will be submitted subject to condition. The final CEMP for each phase will be agreed prior to works commencing and will set out a detailed strategy to minimise construction impacts. Such measures could include using low-noise machinery and equipment, enclosing and screening machinery, dust suppression and using low vibratory foundation methods.</p> <p>The submitted Framework Construction Logistics Plan (CLP) accompanies the Transport Assessment and sets out the general principles of how construction traffic will be managed, and a series of phased detailed CLPs will be developed following the appointment of a Principal Contractor in accordance with TfL’s best practice guidance once planning permission has been granted.</p> <p>The Framework CLP identifies a number of strategies and measures designed to reduce the impacts of construction and construction traffic on the local area. These include the coordination of deliveries, the preparation of a staff travel plan to encourage the use of sustainable modes of transport (including the provision of cycle</p>

parking on site), and the control of dust and dirt. The latter will be controlled through the regular inspection of vehicle routes for deposits of soil/debris from construction traffic with mechanical sweeping where necessary, the provision of effective wheel/body washing facilities, and dust suppression.

In addition to this, the hours of construction will be controlled. Building activity is anticipated to take place during normal construction working hours (08:00 – 18:00 Mon-Fri, 08:00-13:00 Saturday) to ensure that no work takes place during early mornings and late evenings on Monday to Saturday, and not at all on Sundays and Bank Holidays. Where out of hours working externally may be necessary from time to time, this will be formally notified to and considered by LBW.

All parking, loading and unloading is expected to be accommodated within the site as well as all plant and materials storage. In the event that any construction deliveries, plant and materials need to be made or located on the public highway, this will be agreed in advance with the highway's authority. Strategies will also be implemented for the minimisation of waste, with as much waste to be recycled as possible.

The developer will work with the local authority to enable collaboration, coordination and consolidation across the area.

The CEMP will also include a detailed plan and manage construction traffic to minimise the potential for disturbance to residents nearby and also on residential streets along the route.

In addition, there will be a commitment on the part of Wandsworth Council and the applicant (and its contractors) to keep residents informed throughout the construction process and to be responsive to concerns. The 2019 HNA survey recorded detailed information on mobility and disability amongst existing residents, which will inform the nature of the support provided over the course of the construction period.

Furthermore, a Framework Delivery and Servicing Plan has been appended to the submitted Transport Assessment that forms part of the Environmental Statement to accompany the planning application in order to minimise the impact of vehicle trips on the surrounding public highway. This plan includes measures through design, procurement, operational efficiency, waste management and road trip reduction. The plan will be monitored, and adjustments made as necessary to address issues and improve upon operation.

Even accounting for the above mitigation, the extensive construction period is likely to represent a sustained period of disruption compared to day-to-day activity in the absence of the proposed development. Whilst the accompanying Daylight, Sunlight, Overshadowing and Light Pollution ES Chapter prepared by GIA, demonstrates that the overall long-term effect on residents within the impact area is minimal or largely mitigated against, the construction period will nevertheless entail disruption to a share of existing residents, given that the proposals represent significant changes to the density of development.

This is likely to have a disproportionate impact on groups whose mobility is constrained, such as elderly and disabled residents.

Play space – negative impact

The proposed development will see the relocation of the existing Roehampton Youth Club and The Base to a purpose-built centre with combined community facilities by the village green (Block A) prior to the demolition of the existing premises.

In order to mitigate the negative impacts of the proposals, these facilities will be re-provided over the course of the construction period. Re-provision will be achieved by reconfiguring the facilities provided at the Base to accommodate the activities of existing users of Roehampton Youth Centre. Modifications to the Base include updates to the ICT facilities, extending the kitchenette to create a larger kitchen and combining rooms within the facility to create a multi-media/ music room.

In some instances, however, there may be disruption to existing play space and facilities for children and young people, in that the MUGA by the Roehampton Youth Centre is closed as of April 2019 and will be out-of-access at a point in the construction process when the Alton Activity Centre improvements to play for all ages (to be funded by the development) may not yet be completed and ready to use.

The phasing of the construction of Alton Activity Centre is not yet finalised, although, the works will be arranged to minimise disruption as much as is possible and allow for the continuation of play throughout the construction period. Works will also be required to fit out the Base to accommodate the activities of Roehampton Youth Centre, though these works will be completed before the Roehampton Youth Centre is closed.

In order to minimise disruption in play space and facilities, the delivery of the Alton Activity Centre and Downshire Fields play areas will be prioritised within the first 18 months of the development.

The short-term lack of access to these facilities will be mitigated by the delivery of a new service model for young people across the estate which will see the creation of a new youth activity van or minibus with flexible space, housing ICT and other facilities which will enable service delivery across Roehampton and to target young residents of less accessible corners and established community settings of the Roehampton area.

The mitigation measures will effectively extend the reach of youth services in the area beyond that provided by the Roehampton Youth Club. The new provision is likely to be staffed, where possible, by current staff at Roehampton Youth Club, to further minimise disruption to existing services. It is part of the strategy to enable users of the service to access existing sports and leisure facilities in the area, such as in Roehampton Leisure Centre.

In addition, Redrow have worked in conjunction with WBC to develop a Cultural Strategy for a varied programme of culturally and creatively engaging activities, building upon community engagement that has taken place since 2014. This will provide temporary interventions for a continuity of cultural activities and events throughout the construction phase and beyond to engage and inspire residents of all ages and encourage the development of community cohesion.

The Cultural Strategy will encourage play within the incidental public realm such as the provision of street furniture, playable hard landscape elements and climbable assets. It will also provide a wide range of activities including dance, music, drama, art and writing classes for both children and adults.

Funding has already been committed to enhancements to Witley Point MUGA and preliminary improvement works to the existing surface have already been completed. An additional funding commitment to further upgrade the space to provide a user-friendly, inclusive and accessible play offer and could be delivered at an early stage of the regeneration programme, subject to the preparation of a business plan, scope of works and further consultation on improvements.

Once all works are complete, the much enhanced MUGA will represent a significant improvement to sports and recreation facilities in the eastern part of the Estate.

The anticipated changes to Youth Service provision and play space facilities were carefully communicated to users, with a separate EINA prepared by Wandsworth Children's Services in August 2018. The facilities to be provided in Block A were informed by extensive

consultation with young people and youth workers between 2015 and 2017, which is detailed more thoroughly in the accompanying Statement of Community Engagement.

Access to social infrastructure – neutral impact

In order to mitigate the negative impacts of the proposals, the phasing strategy for the regeneration programme has been arranged to ensure that there will be minimal interruption to the service provision of the library, health facilities and youth services, as well as the replacement of Eastwood Nursery and Children’s Centre. All of these facilities will only be demolished once replacement facilities are operational so that there is no break in provision.

The new library within Block A represents a significant improvement to the existing library facility, which is likely to have a disproportionately positive impact on children and young people in the long term. The new facility contains a dedicated zone for children, along with flexible ground floor space which can be flexibly used to accommodate community events. The new facility also represents an uplift to the previous facility in terms of size, with the amount of dedicated library space increasing from a Gross Internal Area (GIA) of 527 sqm to 1,271 sqm.

The replacement club room at Minstead Gardens is to be built on the site of the existing facility but it is intended that temporary facilities will be provided close by for activities and the staff that use the current facility.

The proposed development will also see the demolition of the existing retail units along Danebury Avenue. A phasing strategy has been developed to allow some of the commercial units to move straight into new premises and ensure that there will be no break in retail provision for local residents.

To ensure the continued provision of the co-op supermarket and pharmacy beneath 1-29 Danebury Avenue, both uses will relocate to existing units within the Danebury Avenue parade before relocating permanently to bespoke accommodation on the ground floor of Block O. In addition, an 85sqm unit will be reprovided at Portswood Place to ensure continuity of convenience shopping to serve this part of the estate.

Furthermore, 1,000sqm of new flexible retail space (Class A1-A3, A5, B1 and D1) on the north side of Danebury Avenue will be provided in Phase 1a (beneath block N) which will enable the relocation of some of the current businesses from the existing Danebury Avenue parade,

and provide convenience shopping in response to local need following consultation which is expected to take place around two years prior to the expected completion of the new retail units.

This is to ensure that significant changes to the existing composition of retailers is minimised as much as possible. For example, Wandsworth Council has contacted owners of the retail units along Danebury Avenue and has offered frozen rents and the option of support towards the cost of fit-out.

The phasing also allows for the delivery of new convenience shopping in Portswood Place to serve that part of the estate. However, some of the retail units currently provided at Portswood Place will not be re-provided immediately and their ultimate re-provision will depend on lease terms and whether the retailer is likely to accept replacement premises elsewhere.

While the scheme will see the delivery of additional retail space overall and with a mix that meets existing and future needs, there is no guarantee of re-provision of all existing retail facilities. Therefore, a worst case scenario assumes that any short-term loss of existing retailers will have a disproportionately negative impact on older people, who are more likely to use local shops as an opportunity for social interaction and are often more reliant on certain local services, such as post offices.

166 Roehampton Lane currently houses offices for Family Action-Newpin, a small charity who work for the Council and the Clinical Commissioning Group in providing services and supporting those with mental health problems and their children. 166 Roehampton Lane is currently used as a back office for the charity, with some services offered on-site, as well as at Yvonne Carr Centre and Somerset Lodge.

The charity will need to relocate from this address at the point of the building's redevelopment around 2023/24. This is likely to represent a minor negative impact on local youth services. In order to mitigate the negative impacts of this, Wandsworth Council has sought to keep Family Action Newpin informed of the progress of the development and to work with them to find suitable alternative premises closer to the date of development.

If considered as a whole, the short term changes to social infrastructure provision on children and young people, as well as older residents, are considered to be neutral. The continuous provision and upgrade of existing social infrastructure has to be considered at the same time as the likely minor negative impact on younger and older

	<p>residents as a result of changes to the existing retail offer and the re-location of local charities out of 166 Roehampton Lane.</p>
<p>Disability</p>	<p>Construction disruption – negative impact</p> <p>The construction period is expected to last approximately 10 years and will result in changes to access arrangements, increased noise and dust and changes to existing lighting levels for the residential population that remain living on-site, as well as accommodation which backs onto the construction site. This is likely to have a disproportionate impact on groups whose mobility is constrained, such as elderly and disabled residents, even factoring in for the construction mitigation measures set out earlier in this section.</p> <p>Housing – neutral impact</p> <p>In order to minimise the potential negative impacts of the proposals, the demolition and construction programme of the detailed application has been phased and a decant strategy prepared in such a way as to ensure that existing secure tenants and resident homeowners who wish to remain on the estate will only experience one move, rather than decant to temporary accommodation and then on to permanent replacement accommodation at a later stage.</p> <p>Equally, the phasing plan means all secure tenants and resident homeowners that wish to remain living on the estate will be offered the opportunity to be permanently rehoused to an appropriately sized new home within the boundaries of the redevelopment area or at one of the two satellite sites at Fontley Way and Bessborough Road which are within the wider estate. These satellite sites will offer those residents in phases 0 and 1 who wish to remain living on the regenerated estate, a greater level of choice, both in the location and type of alternative accommodation available to them. The tenure of the satellite sites is a mixture of 13 social rent and 11 shared equity properties, which is based on decant housing need of residents in Phase 0 of the Application Site.</p> <p>All secure tenants in the application site are being given the opportunity to register for an early move. The properties vacated as a result of early moves are currently being occupied on a temporary basis to support the Council’s wider housing obligations and ensure the area remains occupied for as long as possible up until the point of demolition. Those residents currently occupying accommodation on a temporary basis will be re-housed in suitable accommodation, subject to an affordability assessment, and in line with the Council’s housing allocations scheme.</p>

All existing secure social rent tenants are guaranteed a right to remain on the application site once development works are completed.

The new homes will contain the same number of bedrooms as existing residents have, unless agreed with the Council following an assessment of needs. Residents currently underoccupying will be offered an incentive to downsize to a property that meets their needs. The new homes will have no less security of tenure than existing and residents will continue to have the 'Right to Buy'. Those with tenancies over one year old will be entitled to a statutory Home Loss Payment and disturbance payment to cover reasonable costs.

In addition, the revised decant phasing strategy will provide residents of Phase 0 and 1 additional re-housing choices through the inclusion of affordable homes in Block O.

The affordable housing tenure will be split between 77% social rent and 23% intermediate.

Existing resident leaseholders and freeholders will be offered a purchase price for their property based on its open market value. These residents and non-resident homeowners will also be provided with a statutory Home Loss Payment and can reclaim reasonable valuation, legal and moving costs supported by a CPO process.

There will also be an opportunity for existing resident leaseholders and freeholders to be able to purchase a new property within the development or satellite sites following redevelopment. The phased delivery of the Site will allow any leaseholders and freeholder to move directly from their existing property to a new property.

Resident homeowners, who will not be means tested, will be able to purchase a new property with the equivalent number of bedrooms and will be able to purchase a percentage share with the council retaining ownership of the remainder, with no rent being charged.

The Council's equity stake will be a second charge on the property with the Council's interest only being realised on sale of the property to the open market. The offer to leaseholders also includes the ability to pass on the equity share through inheritance on one occasion.

Those resident homeowners that do not wish to remain living on the regenerated estate have the opportunity to sell their home back to the Council and purchase an alternative property on the open market. These properties will continue to be occupied as temporary accommodation until they are ready for demolition and will be

replaced as intermediate and social rent housing within the regenerated estate

Non-resident homeowners who live elsewhere and / or rent out their property will be offered the market value of their property plus an additional statutory Basic Loss Payment and will be able to reclaim reasonable valuation, legal and moving costs. The shared equity package, however, will not be offered to non-resident homeowners as it has been designed specifically to help residents who live on the Estate to stay in the neighbourhood.

These measures form part of an overall strategy to minimise disruption to existing tenants and resident homeowners. The approach has been designed to help residents stay within the neighbourhood, which disabled residents are especially likely to be affected by. In addition, earlier doorstep Housing Needs Assessments included questions on disability (both mental and physical), which informed the nature of the decant strategy.

Given the mitigation measures set in place over the construction period and detailed earlier in this section, it is expected that disabled residents will experience a neutral impact on housing provision during the construction period.

Housing – negative impact

People with severe disabilities and the elderly are likely to be most affected by moving home, even where the quality and accessibility of their new homes will be an improvement to their existing, due to the loss of familiarity and feeling of safety/security may have both temporary and permanent impacts which are not easily mitigated.

In addition, those with disabilities or are elderly may have had and require adapted homes to meet their specific needs which the replacement housing may not accommodate and will need to be considered when being rehoused.

Access to social infrastructure – neutral impact

The decant and phasing strategy has been designed to ensure that community uses that deliver services to local residents and some of the existing retailers are able to move directly into new premises without a break in service provision including the library, health uses, youth facility and the Eastwood Nursery and Children's Centre. All of these facilities will only be demolished at the point when the replacement facilities are ready for operation.

Regenerate are a well-regarded youth group in the area who work closely with and are supported by the Council's youth services and provide services to young residents of the Estate, including services to disabled residents.

Regenerate currently operate out of a small shop premises in Portswood Place on a short lease, which will be redeveloped as part of phase 1B of the redevelopment, where the new Eastwood Nursery and Children's Centre will be built.

Based on the current phasing plans, it is not anticipated that Regenerate will need to vacate the premises until early 2022, at which point Block A (which will include the library, new Base youth facility and GP Surgery) will be completed, meaning that there would be no interruption to the type of services provided by Regenerate.

In discussions between the Council and Regenerate in Summer 2018, it was established that Regenerate wished to retain their presence on the Alton Estate, with offices in a prominent location to support their approach to creating a social enterprise model (as well as more traditional youth provision). At the point at which the property is required for development, there will most likely be finalised plans for their relocation into a vacant retail unit along the Danebury Avenue parade, on a short-term basis, prior to parade's re-development as part of the last phase.

There may also be options for Regenerate to take up space within the new Danebury Centre or at other community venues owned by Wandsworth Council. This approach has been discussed at a high level with Regenerate, who indicated that they would be supportive of such an approach. The Council will need to finalise strategies for their relocation following planning and the commencement of the first phase. However, there is a commitment to ensure they can continue to operate in the area.

The Small Steps charity provides support to physically disabled children and their parents. The charity is currently located at 166 Roehampton Lane. The service's recipients are not specifically tied to the immediate community or borough, with the charity offering its services to residents of the wider London area. The charity has plans to relocate to new premises, nearby in Richmond.

In the event of the charity remaining in the building, the Council would continue to engage with them and would be in a better position to identify future opportunities closer to the date of development. In the event of the charity re-locating to Richmond, however, it is not

	considered that this would have much more than a neutral impact on disabled residents.
Gender (sex)	There are no temporary impacts from the proposed development which are likely to be felt disproportionately or on a large scale by women.
Gender reassignment	There are no temporary impacts from the proposed development which are likely to be felt disproportionately or on a large scale by those from non-binary or transgender groups.
Marriage and civil partnership	There are no temporary impacts from the proposed development which are likely to impact or pertain specifically to this protected group.
Pregnancy and maternity	<p>Construction disruption – negative impact</p> <p>The construction period is expected to last approximately 10 years and will result in changes to access arrangements, increased noise and dust and changes to existing lighting levels for the residential population that remain living on-site during the construction period.</p> <p>Despite the mitigation measures to minimise the negative impacts of construction set out earlier in this section, the disruption during the construction period is likely to have a disproportionate impact on groups whose mobility is constrained, such as pregnant women.</p> <p>Access to social infrastructure – neutral impact</p> <p>The phasing strategy of the regeneration programme ensures that there will be no interruption to the service provision of the library, health centre, youth facility and Eastwood Nursery and Children’s Centre. All of these features will only be demolished at the point of replacement facilities being ready to move into. As such, it is expected that there will be a neutral impact on groups which are highly dependent on these services, such as young mothers and pregnant women.</p>
Race/ethnicity	<p>Construction disruption – negative impact</p> <p>The extensive construction period (expected to last approximately 10 years) will be undertaken in close proximity to occupied residential accommodation.</p> <p>A number of mitigation measures have been put in place to minimise the negative impacts of construction, which are set out earlier in this section. However, in common with all other groups, it is likely that the lengthy construction period will result in disruption to existing residents.</p>

Given that BAME groups are disproportionately represented in the impact area, as set out in the baseline assessment, the construction impacts can be considered to have a disproportionate effect on such groups.

Access to employment opportunities – positive impact

The accompanying Population and Human Health Chapter of the ES, provided by Barton Willmore, explains that during the construction and demolition phases of the development over a period of approximately 10 years, an estimated average of 240 full-time equivalent construction workers will be employed on site every month. An Employment and Skills Strategy will be developed in partnership with the Councils Work Match job brokerage service, which will include apprenticeship opportunities and schemes to provide employment opportunities for local residents.

Given that a disproportionate share of the local population are BAME when compared to the wider borough, it can be assumed that employment during the construction stage of the proposed development will have a disproportionately positive impact on BAME groups.

Access to social infrastructure – neutral impact

The phasing strategy of the regeneration programme ensures that there will be no interruption to the service provision of the library, health centre, youth facility and Eastwood Nursery and Children's Centre (currently based at Eastwood School). All of these facilities will only be demolished at the point when the replacement facility is ready to move into. Therefore, it can be assumed that there will be an overall neutral impact on local BAME groups.

Retail facilities will be provided in the first phase to re-house the Co-op and chemist and then in the second phase along the north side of Danebury Avenue to enable the re-location of some of the existing retailers prior to the demolition of existing Danebury retail units. The phasing also allows for the delivery of new convenience retail at Portswood Place to serve that part of the Estate. However, it can be assumed that the short-term loss of the existing retailers might have a minor negative impact on certain minority ethnic groups.

Wandsworth Council has contacted owners of the retail units along Danebury Avenue and has offered frozen rents and the option of financial support towards the cost of fit-out. However, some of the retail units currently provided at Portswood Place will not be reprovided immediately and their ultimate re-provision will depend on

	<p>lease terms and whether the retailer is likely to accept replacement premises elsewhere.</p> <p>Therefore, the demolition is likely to represent a disruption to local customers of such shops. This is of some relevance to non-British residents, given that at least one of the retail units (Polski Sklep) has a customer base which is likely to be disproportionately composed of non-British groups.</p>
Religion and belief, including non-belief	<p>Access to social infrastructure – neutral impact</p> <p>A local faith group previously used the Roehampton Youth Centre for events on Sundays. However, the church’s operations have already been relocated within the estate. The re-provision of the youth centre in Block A is therefore likely to have a neutral impact on such groups.</p>
Sexual orientation	<p>There are no temporary impacts from the proposed development which are likely to be felt disproportionately or on a large scale by those who identify as something other than heterosexual.</p>

Permanent impacts

The EINA has identified a total of **20 permanent impacts** during the construction of the areas covered by the detailed and outline planning application. Of these permanent impacts, **17** are **positive** and **3** are **negative**.

The revised EINA includes two additional permanent negative impacts which have been identified following the originally submitted EINA. This includes the impact on residents in temporary accommodation who are from BAME groups due to the change in housing provision, as well as the impact on those residents with severe disabilities and very elderly residents in particular resulting from the disruption to their existing living arrangements. The permanent impacts of the proposed development can be summarised as follows:

- The new replacement affordable housing is expected to have a **positive impact** on existing residents who are young or old. The reasoning behind this is set out later in this section;
- The additional social infrastructure provided as part of the completed development is expected to have a **positive impact** on existing residents who are young or old. The reasoning behind this is set out later in this section;
- The opportunities for social interaction and improved social cohesion are expected to have a **positive impact** on existing residents who are young or old. The reasoning behind this is set out later in this section;

- The improved and expanded play space provided as part of the completed development is expected to have a **positive impact** on existing residents who are young or old. The reasoning behind this is set out later in this section;
- The enhanced open space provided as part of the completed development is expected to have a **positive impact** on existing residents who are young or old. The reasoning behind this is set out later in this section;
- The community facilities provided as part of the completed development are expected to have a **positive impact** on existing residents who are young or old. The reasoning behind this is set out later in this section;
- The improved access to the site is expected to have a **positive impact** on existing residents who are old. The reasoning behind this is set out later in this section;
- The new replacement affordable housing is expected to have a **positive impact** on disabled residents. The reasoning behind this is set out later in this section;
- The additional social infrastructure provided as part of the completed development is expected to have a **positive impact** on disabled residents. The reasoning behind this is set out later in this section;
- The improved access to the site is expected to have a **positive impact** on existing disabled residents. The reasoning behind this is set out later in this section;
- The improved opportunities for social interaction which the proposed development offers are expected to represent a **positive impact** for female residents of the estate. The reasoning behind this is set out later in this section;
- The new replacement affordable housing is expected to have a **positive impact** on existing residents who are pregnant or young mothers. The reasoning behind this is set out on later in this section;
- The additional social infrastructure provided as part of the completed development is expected to have a **positive impact** on existing and future residents who are pregnant or young mothers. The reasoning behind this is set out later in this section;
- The improved access to the site is expected to have a **positive impact** on existing and future residents who are pregnant or young mothers. The reasoning behind this is set out on later in this section;
- The additional social infrastructure provided as part of the completed development is expected to have a **positive impact** on existing residents who are from BAME groups. The reasoning behind this is set out later in this section;

- The new replacement affordable housing is expected to have a **positive impact** on existing residents from BAME groups. The reasoning behind this is set out later in this section;
- The employment opportunities which the proposed development is likely to generate are expected to have a **positive impact** on existing residents who are from BAME groups. The reasoning behind this is set out later in this section,
- The change in housing provision is expected to have a **negative impact** on residents in temporary accommodation who are from BAME groups. The reasoning behind this is set out in Section 3;
- The disruption to existing living arrangements are likely to have a **negative impact** on members of some protected groups, particularly people with severe disabilities or very elderly residents. The reasoning behind this is set out later in this section; and
- A minority of existing non-secure council tenants or subtenants of non-resident landlords, will experience **negative impacts** as a result of being ineligible for replacement or equivalent units in the proposed development. The reasoning behind this is set out later in this section.

Protected group	Identified Permanent Impact
Age	<p>Housing – positive impact</p> <p>The proposals represent a significant improvement to the quality and choice of housing for existing residents across all age groups.</p> <p>The proposals include the full replacement of the 158 social rented homes with a mix of unit sizes to meet the needs of existing households, including a re-provision and increase in the amount of social rent tenure floorspace that accounts for decant demand. In addition, a further 103 new affordable homes, an uplift of 65% over the existing, will be provided with a mix of affordable tenures, thereby improving housing availability and choice. An additional 349 affordable habitable rooms, an uplift of 62% over the existing, are proposed.</p> <p>The overall scheme will provide 201 social rent homes, 29 shared equity homes and 31 shared ownership homes, respectively, for existing tenants and resident homeowners. The development is also likely to represent an improvement to housing conditions for those other than existing tenants, given that additional affordable homes will be delivered beyond the number required to re-house existing tenants.</p>

Wandsworth's local letting plan means that replacement units will be provided to all remaining secure tenants in line with assessed need (as informed by the 2019 Housing Needs Assessment), and at equivalent rents. Those in temporary accommodation for whom the Council has a duty to re-house will either be made an offer of alternative temporary accommodation elsewhere in the borough, or their permanent accommodation offer into a secure council tenancy elsewhere in the borough as applicable. This ensures that their priority is equivalent to that of other families in temporary accommodation in the borough.

The provision of new housing on the basis of a housing needs assessment is likely to have a positive impact on overcrowded households in social rented accommodation, who will be rehoused within the redeveloped estate. These households are also likely to include a disproportionately large share of children and young people.

In contrast, the policy of offering replacement units based on assessed need might have a minor negative impact on the elderly population, who are more likely to need long-term uninhabited bedrooms in their houses for visiting relatives.

This has been factored into Wandsworth's Local Lettings Plan, with existing tenants also eligible for one bedroom above housing need in certain instances (as long as the tenant is not impacted by the spare room subsidy).

Following comments from the GLA regarding the affordable housing provision, amendments have been made to the scheme including increasing the total number of affordable homes from 256 to 261 (24%) and the total number of habitable rooms from 905 to 909. In addition, to better meet local affordable housing needs, the mix of housing tenures has been adjusted so to increase the total number of proposed social rent tenure homes from 188 to 201, thereby altering the affordable tenure split to 77% social rent and 23% intermediate. The number of shared equity homes have been reduced from 45 to 29 and shared ownership homes increased from 23 to 31 following a review of housing needs in September 2019. All affordable homes in the Outline Element will be social rent. The amount of social rent floorspace on the Application Site has increased from 11,158 sqm to 16,372 sqm (47% increase), with replacement housing for Council tenants remaining on the Application Site sized to meet their needs. All tenants remaining on the Application Site will be housed on social rents and any new tenants will pay London Affordable Rent.

The proposed changes also frontload the delivery of affordable homes to deliver 75% of the affordable homes within the Detailed Element of

the proposed development compared to 61% in the previously submitted proposal.

To address the GLA’s concerns and improve the integration and distribution of affordable housing across the site, the tenure of Block O has been changed from 40 private tenure apartments to a mix of 35 social rent/shared equity accommodation. This has been achieved, in part, by bringing forward affordable housing previously indicatively shown in Block G within the Outline Element. To provide a broader mix of tenures in Block Q, 31 shared ownership homes have been introduced alongside social rent units, in place of the no longer needed shared equity housing and social rent tenure homes now accommodated in Block O. Block A will comprise a mix of shared equity and social rent homes.



Figure 2: Alton Estate housing tenure plan

The podium courtyard linking Blocks N and O has also been redesigned to allow it to be shared by residents living in the affordable and private accommodation in these two blocks, encouraging social interaction amongst different tenures.

Furthermore, the application site boundary forms part of the wider Estate and therefore, the proposed affordable housing will be located more centrally within the context of the wider Alton Estate regeneration scheme as opposed to the periphery which will encourage social cohesion and integration between all tenures across the Application Site.

**Access to social infrastructure and community facilities/
Opportunities for Social Interaction – positive impact**

Older residents

The club room at Minstead Gardens, which provides health and community facilities, will be reprovided within the Portswood Place redevelopment next to Downshire Field. The new purpose-built facility represents an improvement in the quality of social infrastructure provision and is likely to have a disproportionately positive impact on more elderly residents.

The new library in Block A represents a significant upgrade to the Roehampton Library on Danebury Avenue which it replaces. The upgrade of this community facility is expected to have a disproportionately positive impact on more elderly residents.

Younger residents

The new Eastwood Nursery and Children’s Centre will be provided within Portswood Place. The new facility represents a considerable improvement to the existing premises, with innovative new features to improve the learning experience, such as considered landscape design for external teaching and courtyard-facing teaching areas.

The improved play space at Downshire Fields and at the Alton Activity Centre, as well as the enhanced Witley Point multi-use games area (MUGA) lying just outside the site boundary (as set out in the below section on “play space”) are also anticipated to contribute to social cohesion and interaction amongst both existing and future residents who are young. There are also play spaces within the village square and within all the podium courtyards.

Both groups

The proposed development represents an upgrade to existing social infrastructure whilst ensuring minimal disruption to the composition of the existing community. Existing council tenants and resident homeowners are to be offered the opportunity to be rehoused within the new development and the majority of social infrastructure

facilities used by the community will be enhanced and re-provided with minimal interruption.

Block A will provide a new library, enhanced youth facilities, a café and community hall with its principal access from the new village square. It will also provide capacity for a six-GP health centre with access from Hershams Close. The building will provide a new focal point for the community offering a range of improved and co-located services in a vibrant and inspiring environment. The new library will provide more space than the existing building, and will have areas for quiet study, ICT and for reading. The new library will also open directly onto the new village square, providing the opportunity for outdoor activities and events. The building will offer scope for local voluntary groups to be able to 'sign-post' their services to the local community and have access to shared meeting rooms. The youth elements of the building form part of a wider design of youth services in support of the Council's early help strategy known as 'Wandsworth Thrive', and provides an accessible location across the estate.

The co-location of a mix of community facilities within Block A will enable social interaction and community cohesion across people of a mix of ages and backgrounds, and will help create a sense of local identity and belonging for local people.

There will also be two new high-quality community buildings located at Portswood Place responding to their heritage setting. The relocation of the existing bus stand will transform the area into an attractive new community hub.

The two new buildings will enable the relocation of the existing Eastwood Nursery and Children's Centre services from 166 Roehampton Lane within a single, purpose built building arranged around a central courtyard space. It will provide a wide range of services that focus on parents and carers supporting their child's learning and development. It will include seven classrooms, one of which has been designed for children with special educational needs and various therapy and treatment rooms. The new building will also include a double height hall with separate access, enabling it to be used for community use for activities and development outside nursery school hours.

A separate pavilion building containing an enhanced Minstead Gardens Club Room for elderly residents and flexible community floorspace capable of accommodating community use. A new retail convenience store that would meet the day to day needs of residents will also be provided. All community buildings go beyond the minimum standards of the building regulations.

These will be integrated within the wider public realm inclusive design strategy, to help develop an inclusive environment that encourages social interaction amongst all ages.

As a result, in the longer term, the development is expected to enhance the experience of the local community and to contribute to greater social interaction between groups.

Play space – positive impact

The proposed development will see the significant enhancement of play space at Downshire Fields and Alton Activity Centre, as well as play within the new Village Square, with play space also incorporated into the public realm improvements accompanying the masterplan.

The existing playspace at Downshire Field is hidden, poorly connected to the surrounding landscape, and does not include equipment deemed suitable for the naturalistic setting. Alton Activity Centre is currently limited in its contribution to meaningful play and its restricted opening hours result in issues for access to local children.

Both Downshire Field and Alton Activity Centre require extensive refurbishment to improve old equipment and surfaces that do not currently meet various design guidance and British Standards for play.

A key part of the proposed landscape strategy is to remodel and redesign these spaces to significantly improve the offer to the new and existing residents of the estate. The Alton Estate play strategy has been carefully considered and informed through government guidance to create high quality, inclusive and safe access to play space, resulting in a significant positive impact for children of different stages of development and levels of ability. This will enable them to develop physical and sensory experiences within this space as well as through the use of equipment.

There is currently a lack of doorstep access of play provision for under 5s and 5-11 year olds in particular. The scheme will result in the provision of an additional 1170sqm of doorstep play for 0-4 year olds, 648sqm of local play space for 5-11 year olds and 425sqm of youth play for 12-17 year olds. An additional 3087sqm will be provided in the form of redesigned existing local play as well as an additional 430sqm resulting from the enhanced facilities at the Witley Point Multi-Use Games Area (MUGA) relocated and designed into the Alton Activity Centre. This results in a total of 5760sqm of new and existing redesigned play space.

This is fundamental to successful place-making and the shaping of the community by developing an environment which encourages outdoor play and social interaction, helping people of all ages to develop social networks and a sense of community belonging.

The improved access across the site as part of the inclusive design strategy will create improved connectivity across the play spaces to encourage their use and accessibility for all.

The creation of new play space facilities based on the requirements of existing and future residents therefore represents an improvement to existing play space and is likely to have a disproportionately positive impact on both existing and future residents who are children or young people.

Open space – positive impact

The outline planning application includes substantive improvements to the existing landscaping of the Estate, with re-provided public amenity space, as well as enhanced open space at Downshire Field and open access to Alton Activity Centre. In addition, there will be open space within all podium courtyards. As set out within the Post Submission Landscape Update prepared by Gillespies, there will be a net uplift in open space across the site, from a total of 79,943 (83,460sqm including existing play provision) of combined space across the site (public, communal and private) to 84,500sqm (88,413sqm including additional play space). This results in a total provision of 4,557sqm of additional open space (4,953sqm including play space).

The Village Square will also provide flexible public space, lawn and terraces and welcomes entries with emphasis on announcing key public routes.

The improvements to open space are likely to have a disproportionately positive impact on the existing young population of the Alton Estate.

Improved access to the site – positive impact

The proposed development forms part of a wider masterplan which will see the redesign of certain aspects of the original Estate. In particular, the improvements to pedestrian crossings, the introduction of new north-south routes across the Alton Estate and the use of fewer level changes (which prevent step-free entry) between buildings are likely to improve the mobility of future and existing disabled residents.

	<p>The existing topography has challenging gradients and there is limited permeability through the site for people with mobility impairments due to the lack of crossings, limited blue badge parking or easy access gradients on pedestrian roads, of which many existing gradients would be considered unsafe for new buildings under current building regulations. In particular, there is very limited permeability north to south by accessible routes and step-free routes are extended because of the limited a number of drop-kerbs to cross roads, notably along Danebury Avenue.</p> <p>The proposed public realm strategy will increase north-south permeability and connectivity, provide easier to navigate pavements, and increase the number of level crossings along roads and places to sit and rest. The new crossings in the central sections will be shallow slopes, and align with strategic north-south routes similar to the existing site, but with more suitable gradients. This offers a better solution for all ages, particularly for older people who may have limited mobility.</p> <p>There are currently no seating areas within the existing public realm, which is a significant barrier to many people with limited mobility. As part of the development, resting points will be provided along these routes, encouraging people to linger and to engage with their surroundings. This encourages the formation of social networks across all ages within the community which in addition provides active surveillance.</p> <p>The improved access to the site has been assessed in further detail below with particular regard the positive impact to those with disabilities.</p> <p>Diagrams demonstrating the existing and proposed improved accessibility have been included within the Access Statement.</p>
<p>Disability</p>	<p>Access to social infrastructure – positive impact</p> <p>As set out in the accompanying Population and Human Health Chapter of the ES, provided by Barton Willmore, the estimated additional residential population on full completion of the outline development cannot be sufficiently served by the existing local GP practices (two of which are within the red line boundary).</p> <p>However, the negative impact of the increased patient population will be mitigated by the provision of additional GPs across the four practices which serve Roehampton ward and the capacity for a six-GP health centre within Block A. This will deliver additional GP capacity to accommodate the new population of the proposed development.</p>

As such, the impact on future and current disabled residents, who tend to be more dependent on such services, is expected to be positive, given that capacity for additional GPs will see the local ratio of patients to GPs reduced, representing an improved service.

Aside from GP capacity, the development represents an uplift to social infrastructure provision for those with disabilities. For example, the upgraded club house facilities for Minstead Gardens and the new retail convenience store at the Pavillion Building represents an improvement to the existing, as well as the enhanced and new community facilities at Block A including the new public library and community hall with principle access from the new village square.

Stepped seating will be provided within the square to support events to encourage the development of community cohesion, and to allow access to the upper level for wheelchair users or scooter users. To the south of Block A, a new Community Courtyard will be located adjacent to the entrance to the Community Centre entrance, with a drop off area to be provided and ramped access suitable for both wheelchair and mobility scooter users.

These facilities will be integrated within the wider public realm inclusive design strategy. In particular, the existing street routes, Ellisfield Drive, Kingsclere Close and Harbridge avenue will be step-free and the quality of the streetscape will be significantly improved from the existing situation. This will create an inclusive environment providing access to community facilities both suitable and accessible to those with disabilities.

Housing – positive impact

The majority of the Estate was constructed several decades ago and has not been substantively refurbished since. In many instances, existing units are not designed to fully meet the requirements of current residents. Some disabled and elderly residents live in accommodation where the number of bedrooms or the access requirements are not optimal.

The proposed development represents a substantive improvement to the quality of housing in the area. The design of new units has been informed by the requirements of existing residents, as informed by the 2019 Housing Needs Assessment (HNA), which included detailed questions about mental and physical disability and related housing requirements.

All units are in line with the Mayor of London's standards and include private amenity space and access to communal space. Equally, Wandsworth Council is committed to 10% of units being compliant with Building Regulations requirement M3. This is the national guidance on designing wheelchair-accessible dwellings.

Across the site, all entrances are clearly visible and individually designed, giving orientation and personality for residents that use them. The proportions and architectural detailing give a sense of arrival and help with wayfinding across the estate. Step-free access will be provided into all residential block entrance lobbies through either a single door leaf or double doors. In addition, entrances to communal blocks are generally located along east-west routes where level access can be provided to the main entrances as opposed to the sloping north south roads.

As part of the amendments to the scheme, adjustments have been made to the wheelchair accessible ramp to the rear of Block A in compliance with BS 8300-1:1:2018 and to allow users of both wheelchairs and mobility scooters to more easily negotiate this route.

Parking – positive impact

The detailed application will see an improvement to the provision of accessible parking spaces across the site, with 55 (out of a total of 551) new spaces provided, which represents an increase to existing provision of accessible spaces.

Parking for disabled residents is to be provided within the blocks and as such, direct step-free access to dwellings. In addition, parking within Block A will also provide two bays for disabled staff of the community uses within the Block.

Where provided within the blocks, the designated bays will be provided in accordance with the specification of M4(3) and be distributed adjacent to lift cores. In line with the draft London Plan, for three per cent of dwellings at least one designated disabled person's parking bay per dwelling will be available from the outset.

As part of the Parking Design and Management Plan, additional dwellings will be provided with a designated disabled persons parking space in future if required. Designated blue-badge bays are proposed within the Local Centre to serve the commercial uses in addition to the residents of Block A, and additional blue badge bays will be provided for the Library and GP Surgery.

Further loading bays on Harbridge Avenue and Holybourne Avenue are proposed to have restricted loading hours with a single or double yellow line preventing general parking at other times but allowing further blue badge parking.

The spaces will be designed to meet modern building regulation standards. The significant uplift in specialised disabled parking provision and flexibility to provide more blue-badge bays should demand require it is likely to have a disproportionately positive impact on existing and future disabled residents.

The submitted Framework Car Park Management Plan accompanies the Transport Assessment and the responsible management organisations will ensure that the parking facilities provided on-site are appropriately used in accordance with the Management Plan.

Improved access to the site – positive impact

The proposed development forms part of a wider masterplan which will see the redesign of certain aspects of the original Estate.

The existing topography has challenging gradients and there is limited permeability through the site for people with mobility impairments due to the lack of crossings, limited blue badge parking or easy access gradients on pedestrian routes.

In particular, there is very limited permeability north to south by accessible routes which are of poor quality and steep, and step-free routes are inevitably extended due to the limited number of drop-kerbs to cross roads, notably along Danebury Avenue.

A large section of Danebury Avenue is above street level and current access to the pedestrian routes between Danebury Avenue and Harbridge Avenue are via steep ramped sections above contemporary standards, acting as a barrier for those with mobility impairments.

The proposed public realm strategy will increase north-south permeability and connectivity, provide easier to navigate pavements, increase the number of level crossings along roads with more suitable gradients and provide places to sit and rest.

The new crossings in the central sections will have shallow slopes, and align with the strategic north-south routes similar to the existing site, but with more suitable gradients. This offers a better solution for people with limited mobility, and will allow manual wheelchair users to use these links independently, therefore representing an inclusive design approach. In addition, stepped 'short-cuts' will be provided

	<p>allowing for choice and shortening routes for ambulant disabled people, helping to reduce travel distances by avoiding the long sloped sections.</p> <p>There are currently no seating areas within the existing public realm. As part of the development, resting points will be provided along these routes, encouraging people to linger and to engage with their surroundings, and subsequently encourages the formation of social networks within the community which in addition provides active surveillance.</p> <p>The improvements to pedestrian crossings, the introduction of new north-south routes across the Alton Estate and the use of fewer level changes (which prevent step-free entry) between buildings are likely to improve the mobility of future and existing disabled residents. Improved streets will be well proportioned and easy to navigate, drawing people into and through the estate, to access the range of amenities on offer.</p> <p>It is therefore considered that the access improvements which will accompany the wider regeneration programme will have a disproportionately positive impact on disabled residents.</p>
Gender (sex)	<p>Opportunities for social interaction – positive impact</p> <p>The previous urban design and landscaping of the estate contained features which were considered to contribute to anti-social behaviour and crime, such as poorly lit areas and indefensible space. The local Secure by Design Officer for the Metropolitan Police Service was consulted extensively and the design of the scheme incorporated aspects of the guidance received.</p> <p>The Design Code set out in the hybrid application sets out to improve the connectivity and safety of the Alton Estate. One can assume that the redesigned public realm and shared areas will have a positive impact on all groups, including women, for whom personal safety is a key issue.</p>
Gender reassignment	<p>Enhanced safety – positive impact</p> <p>Guidance provided by the Equality and Human Rights Commission suggests that data should be collected on minority groups where it is relevant. In this instance, gender re-assignment is largely not relevant to the decant strategy or housing provision services.</p> <p>However, the previous urban design and landscaping of the estate contained features which were considered to contribute to anti-social</p>

	<p>behaviour and crime, such as poorly lit areas and indefensible space. The local crime prevention officer for Wandsworth Council was consulted extensively and the design of the scheme has incorporated the guidance received.</p> <p>The Design Code set out in the hybrid application sets out to improve the connectivity and safety of the Alton Estate. One can assume that the redesigned public realm and shared areas will have a positive impact on all groups, including people in the gender reassignment protected group, for whom personal safety is a key issue.</p>
Marriage and civil partnership	<p>No significant impacts have been identified which are likely to disproportionately impact this group.</p>
Pregnancy and maternity	<p>Access to social infrastructure – positive impact</p> <p>The new, purpose built, Eastwood Nursery and Children’s Centre will be provided within Portswood Place. The new facility represents a considerable improvement to the existing premises, with innovative new features to improve the learning experience, such as considered landscape design to enable external teaching, as well as improved access arrangements relative to the previous facility.</p> <p>The new Nursery and Children’s Centre will replace scattered and unfit-for-purpose facilities at 166 and 168 Roehampton Lane.</p> <p>The improved accessibility and enhanced facilities of the new Nursery and Children’s Centre are anticipated to have a disproportionately positive impact on residents who are young mothers.</p> <p>Housing – positive impact</p> <p>The majority of the estate was constructed several decades ago and, in many instances, existing units are not designed in such a way as to fully meet the requirements of current residents. The proposed development represents a substantive improvement to the quality of housing in the intervention area.</p> <p>The design of new units has been informed by the requirements of existing residents, as informed by the 2019 Housing Needs Assessment (HNA), which included information on the number of occupants in each household. This is therefore likely to have a positive impact on existing tenants who are single mothers.</p>

	<p>Improved access to the site – positive impact</p> <p>The proposed development forms part of a wider masterplan which will see the redesign of certain aspects of the original Estate. In particular, the improvements to pedestrian crossings, the introduction of new north-south routes across the Alton Estate and the use of fewer level changes (which prevent step-free entry) between buildings are likely to improve the mobility of future and existing residents with limited mobility.</p> <p>This is likely to represent a positive impact on the local pregnant population and young mothers, whose access is more likely to be constrained than other groups.</p>
Race/ethnicity	<p>Access to social infrastructure – positive impact</p> <p>The new community hub located at the Village Square will contain flexible community space, which could accommodate culturally specific activities for local residents. Similarly, the wider objectives of the masterplan and the design of the environment and public realm have sought to maximise opportunities for inter-group interaction and cross-cultural dialogue.</p> <p>Housing – positive impact</p> <p>The proposed development represents a long-term improvement to the quality of housing in the area, with all units in line with the Mayor of London’s standards. Given that BAME groups are disproportionately represented in the impact area, as set out in the baseline assessment, the improvement of housing provided can be considered to have a disproportionately positive impact on such groups.</p> <p>Access to employment opportunities – positive impact</p> <p>The accompanying Population and Human Health Chapter of the ES, provided by Barton Willmore, sets out that the commercial and retail units delivered as part of the proposed development represent an uplift to the total floorspace of 753 sqm. It is anticipated that the completed development will generate between 248 and 302 full-time equivalent jobs, or an employment uplift of between 55 and 65 net additional jobs. It is considered that this will have a positive impact on local employment and that this likely to have a disproportionately positive impact on BAME groups.</p> <p>The planning application will be accompanied by an Employment and Skills Strategy, which will set out specific ways of ensuring that</p>

unemployed residents are given priority access to construction jobs and permanent jobs associated with the proposed development.

Housing – negative impact

Residents in temporary accommodation

A number of units in the blocks planned for demolition which have become vacant as a result of the Voluntary Early Moves scheme and the buying back of properties, will be converted to temporary accommodation over the course of the construction period rather than remain unoccupied.

Whilst the use of vacant units as temporary accommodation is likely to represent a short-term positive impact on Wandsworth residents who otherwise would have had fewer options for temporary accommodation, the groups would be re-located at the point of demolition. As such, temporary residents would probably experience negative or neutral permanent impacts in the longer term, in comparison to other residents housed in temporary accommodation.

A high-level analysis of anonymised Council data on occupants of temporary accommodation within the Estate found that non-white British groups represented 85.3% of all occupants who provided information on ethnicity. The analysis also found that occupants were disproportionately female (60.2% of the total) and that a relatively small share described themselves as disabled (5.5%). As such, it can be assumed that temporary occupants from BAME backgrounds and women would disproportionately experience the long-term negative or neutral effects of relocation, when compared to other groups.

It is well known that BAME and female headed lone parent households are over-represented amongst those applying for and/or being accepted for statutory homelessness assistance.

The use of homes in the regeneration area for temporary accommodation purposes has been ongoing for the last several years as part of a strategy to a) minimise the use of bed and breakfast and other less suitable types of accommodation a b) maximise the provision of accommodation within the Council's district, in compliance with statutory obligations, in the face of c) successive years of rising homelessness and d) within that, a significant increase in a large family homelessness.

Using temporary accommodation in homes earmarked for demolition therefore delivers more positive outcomes for most if not all of the households concerned and, as the regeneration progresses, rehousing

	<p>into settled housing elsewhere would be ensured in the usual way i.e. by keeping in touch, clarifying current housing needs, discussing potential offers and by making offers of suitable, affordable and reasonable accommodation, within the statutory safeguards of rights to review and/or appeal.</p>
<p>Religion and belief, including non-belief</p>	<p>Access to social infrastructure – positive impact</p> <p>The proposed development includes a new Village Square, which is strategically positioned opposite Saint Joseph’s Church and will contain flexible external space which could feasibly accommodate events and community activities.</p> <p>The creation of this new space represents an improvement to Saint Joseph’s Church, in that the church will become more of a focal point, given its enhanced position on one side of the new community square. The adjoining public space could potentially accommodate future community outreach activities, along with the space for community groups provided as part of the Community Hub.</p>
<p>Sexual orientation</p>	<p>Enhanced safety – positive impact</p> <p>Guidance provided by the Equality and Human Rights Commission suggests that data should be collected on minority groups where it is relevant. In this instance, sexual orientation is largely not relevant to the decantation service or housing provision services.</p> <p>However, the previous urban design and landscaping of the estate contained features which were considered to contribute to antisocial behaviour and crime, such as poorly lit areas and indefensible space. Given that non-heterosexual groups are more likely to experience harassment, it can be assumed that the redesigned public realm and shared areas will represent a benefit to these groups.</p>
<p>All/ Some Groups</p>	<p>Disruption to living arrangements – negative impact</p> <p>Members of some protected groups will experience negative impacts as a result of the disruption to their existing living arrangements, even if the quality and accessibility of their new homes will be an improvement on existing conditions. These negative impacts are often felt on a permanent basis by more vulnerable residents despite the fact that the disruption is time limited.</p> <p>The protected groups most likely to be affected by disruption to their existing living arrangements are people with severe disabilities and very elderly residents. For these residents the loss of a familiar and</p>

safe living space, however temporary, can have permanent negative impacts which are not easily mitigated.

Housing – negative impact

A small share of the existing resident population, which may or may not comprise statutory protected groups will experience a longer-term negative change to their housing arrangement.

Existing leaseholders and freeholders

Existing resident homeowners who are leaseholders or freeholders are eligible for shared equity properties within the replacement development. In some instances, however, the financial circumstances of existing leaseholders might have changed since purchasing their property. Given that Wandsworth Council does not carry equalities data on leaseholders, it is impossible to determine whether any protected groups will be disproportionately affected by the proposals.

The Council has made a number of efforts to accommodate residents in these circumstances. The Council's obligation is to honour its commitment to leaseholders by either offering them a shared equity property in the scheme (in the case of resident leaseholders only) or to purchase the property from the leaseholder at market value with an additional Home or Basic Loss Payment.

Where leaseholders have expressed concern that they will not be able to afford similar alternative properties despite receiving market value plus an additional Home or Basic Loss payment plus the reinstatement of reasonable valuation, legal and moving costs, staff have supported the leaseholder in reviewing the options available to them, including by conducting research on property search sites such as Zoopla and Rightmove.

A flexible approach has also been taken in relation to shared equity percentages, to ensure that as many leaseholders as possible are able to buy properties within the new development. This has included capping service charges where possible, no minimum equity requirement for the offer, the consideration of leaseholders for Council social rented housing in extreme cases of hardship, as well as the ability for resident leaseholders to put in their home loss compensation and or not as equity, which could assist to provide a potential fund to cover any increased costs for those on fixed incomes for any increase in service charges.

The Council has sought to understand the financial circumstances of existing leaseholders and to accommodate their needs as much as is

feasible at this time, with detailed questions on existing debt included as part of the 2019 Housing Needs Assessment to identify those at risk and one-to-one housing advice offered to such households. Every resident and non-resident leaseholder has been allocated a case officer from the Regeneration Team who are known to them and will act as their first point of contact for any queries relating to the re-development.

Factoring in the Council's mitigation measures, it is considered that there may still be some longer term negative impacts for existing residents. It is, however, worth noting that the Council is continuing to develop their offer based on individual circumstances.

Leaseholders who take up shared equity will experience some additional restrictions to their use of replacement units, given the limitations to sub-letting, which is in place as the purpose of the offer is to enable existing resident homeowners to stay living in the area. This might have a negative impact on certain minority groups, depending on the composition of existing leaseholders who take up the shared equity offer. Wandsworth Council has factored in the need to sub-let in the event of contract work elsewhere or caring for a relative. In these instances, sub-letting is permitted, as long as the owners ask for prior approval.

Private tenants of non-resident leaseholders

Private tenants of leasehold and freehold properties are likely to experience disruption to living arrangements without the mitigation provided to Council tenants and resident leaseholders and will be required to make alternative private arrangements for rehousing at the point of their tenancies coming to an end.

As set out in the Alton Masterplan, a significant share of private tenants of leasehold and freehold properties in the area are likely to be students associated with Roehampton University. Students are more likely to be renting in the area on a short-term basis than other groups, and the Council has made the University aware of development plans from the outset of the regeneration process. However, it is anticipated that there will be some private tenants of leasehold and freehold properties who will experience a long-term negative impact on their housing status as a result of the proposals.

The duties of the Council towards private tenants of leasehold properties is the same as it would be for any other private tenant in the borough whose tenancy has come to an end and they are presented with homelessness.

The Council in its statutory role would provide advice as minimum on re-housing. Depending on circumstances, which is more likely to benefit some of those protected groups- families with children/disabled members, for example – the Council’s Housing Options team may also provide assistance with finding other suitable private accommodation. This could also include assistance with deposits, or alternatively, assistance with Council housing.

Factoring in the mitigation measures in places, some private tenants of non-resident leaseholders may experience other marginally negative changes to their housing situation, as a result of their landlord selling the property back to the Council. For example, long-term residents who may have benefitted from preferential rents due to their length of tenure and their rents not increasing in line with market rates. This group of residents may or may not include persons belonging to the statutory protected groups.

Residents in temporary accommodation

A number of units in the blocks planned for demolition which have become vacant as a result of the Voluntary Early Moves scheme and the buying back of properties, will be converted to temporary accommodation over the course of the construction period rather than remain unoccupied.

Whilst the use of vacant units as temporary accommodation is likely to represent a short-term positive impact on Wandsworth residents who otherwise would have had fewer options for temporary accommodation, the groups would be re-located at the point of demolition. As such, temporary residents would probably experience negative or neutral permanent impacts in the longer term, in comparison to other residents housed in temporary accommodation.

A high-level analysis of anonymised Council data on occupants of temporary accommodation within the Estate found that non-white British groups represented 85.3% of all occupants who provided information on ethnicity. The analysis also found that occupants were disproportionately female (60.2% of the total) and that a relatively small share described themselves as disabled (5.5%). As such, it can be assumed that temporary occupants from BAME backgrounds and women would disproportionately experience the long-term negative or neutral effects of relocation, when compared to other groups.

It is well known that BAME and female headed lone parent households are over-represented amongst those applying for and/or being accepted for statutory homelessness assistance.

	<p>The use of homes in the regeneration area for temporary accommodation purposes has been ongoing for the last several years as part of a strategy to a) minimise the use of bed and breakfast and other less suitable types of accommodation b) maximise the provision of accommodation within the Council's district, in compliance with statutory obligations, in the face of c) successive years of rising homelessness and d) within that, a significant increase in a large family homelessness.</p> <p>Using temporary accommodation in homes earmarked for demolition therefore delivers more positive outcomes for most if not all of the households concerned and, as the regeneration progresses, rehousing into settled housing elsewhere would be ensured in the usual way i.e. by keeping in touch, clarifying current housing needs, discussing potential offers and by making offers of suitable, affordable and reasonable accommodation, within the statutory safeguards of rights to review and/or appeal.</p>
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4. Actions

The table below highlights some of the main actions that will be required in monitoring the anticipated effects on protected groups of the Alton Estate regeneration programme. The action plan will be developed further in consultation with officers at Wandsworth Council. Further work is required to identify clear milestones for the delivery of the action plan.

Action	Lead responsibility	Deadline
1. Consultation with local residents about opportunities for construction training and employment.	Wandsworth Workmatch	Early 2020 and ongoing
2. Monitor take up by local residents of construction training and employment opportunities.	Wandsworth Workmatch	Early 2020 and ongoing
3. Manage the decant of Wandsworth tenants from the Alton Estate.	LBW Housing and Regeneration	Ongoing
4. Manage the move into new homes of returning Council tenants	LBW Housing and Regeneration	Ongoing
5. Maintain dialogue with existing leaseholders about any issues encountered in securing funding to buy new homes	LBW Housing and Regeneration	Ongoing
6. Monitor the use of new services and social infrastructure facilities to understand the extent to which they are being accessed by local residents.	Wandsworth Council	To be confirmed

5. Consultation

What consultation has been undertaken on this EINA?

Extensive community engagement has been undertaken over a considerable period for the Alton Estate regeneration programme, including the masterplan development phase which started in 2013. Following the approval of the Alton Area masterplan in 2014, a Supplementary Planning Document (SPD) was formalised in 2015.

The focus of this EINA, however, is on the consultation undertaken in the period from June 2017, after the Regeneration Agreement between Wandsworth Council and Redrow Homes Limited was signed in September 2018.

Since then, Redrow Homes has undertaken extensive engagement with the local community to reflect resident views in the design process.

Amongst other communication channels, leaflets were delivered in June 2017 to almost 6,000 households encouraging consultation event attendance. As part of the consultation programme, the Roehampton “Feel Good” Festival was held on 29 July 2017 to attract local community members, introducing Redrow Homes and the project team as well as explaining the public participation process.

After that, the second milestone in the consultation programme was the month-long public exhibition in the Roehampton Library, from 1 September 2017, showcasing the overall project and indicating further opportunities to participate.

The public exhibition was accompanied by open sessions attended by 120 people. Additionally, during the formal consultation period, a series of 14 consultant-led workshops was organised inviting members of the public to participate in topic-based sessions, such as ‘Community Safety’. This was followed by a series of open consultation sessions and workshops. The overall aim of the consultations held in 2017 was to help inform the scheme through local knowledge, before any plans were finalised. Feedback received during the participation process was reported back to consultees and addressed again during further community engagement in 2018.

In 2018, regular newsletters continued as well as one-to-one conversations with local residents in the intervention area. The final stage of community engagement activities was held in May and June 2018 during which 4,500 leaflets were delivered to encourage consultation attendance. On 6 and 9 June 2018, public exhibitions were held, followed up by pop-up exhibitions in between 6 and 19 June 2018, to inform how the design had evolved and to further influence the design proposals.

On 1 September 2018, the “Get Active Roehampton” Festival was held to inform participants about the masterplan and regeneration objectives as well as on key aspects of the scheme that had changed since the previous consultations in June 2017 and June 2018 consultation exercise.

The fundamentals of the masterplan remain unchanged from the June 2018 major consultation exercise and from what was displayed at the Roehampton Festival in September 2018. Any changes to the masterplan were focused on specific issues identified as a result of consultation with LBW's Planning team, the Wandsworth DRP and responding to feedback from stakeholders attending the consultation events and public meetings.

On 20 and 22 November 2018, two further public engagement events took place to enable residents to understand the proposal to relocate the existing bus turnaround on Danebury Avenue, near Portswood Place, and redevelop the Alton Activity Centre play space.

Furthermore, continued engagement with the public was made throughout the period leading up to and post submission, including door knocking and 104 housing needs surveys being completed between March and September 2019.

Further consultation run by LBW Regeneration was held during January 2020 in the form of drop-in information events to discuss changes to the phasing plan. In addition, 1-2-1 meetings with residents of phase 1 to discuss changes to the phasing plan and to invite residents to provide feedback at the end of January.

The detailed consultation programme and the overall findings are summarised in the Statement of Community Involvement prepared by Communications Potential.

Consultation with protected groups

The consultation has involved protected groups at every stage, in terms of consultation with all groups (amongst which protected groups are highly represented) and in terms of targeted consultation with specific groups. Some selected examples are identified below.

Age – young people

Young people were engaged via a number of means during July and August 2017, including a targeted survey about safety, which sought to understand the general perception of safety in and around the estate. The survey was conducted by Roehampton Base, a youth club on Danebury Avenue for young people with special educational needs and/or disabilities, who provide advice and guidance on education, training and employment.

The youth club is a place where young people can go to receive support and is, as such, very valued by the local community. 86 young people responded to the survey and expressed how they thought the regeneration would affect them. Questions like "*What leisure opportunities would you like to see for young people after the regeneration?*" helped the project team to understand how the survey participants consider themselves affected by the regeneration programme.

In addition to the 14 consultant-led workshops in September 2017, a special session was held on 12 October 2017 for young people living on the Alton Estate, enabling younger members of the public to have their say about safety and inviting them to make further suggestions. 15 young people, aged between 11 and 16, attended the workshop.

In the following year, on 14 June 2018, a consultation with young people was held to follow up on further suggestions and to explain how their feedback factored into the design process.

Roehampton Base Youth Club was additionally consulted in a direct engagement session, discussing the Alton Activity Centre, on 6 September 2018. Between 15 and 20 young people participated and shared their opinions and concerns about the Activity Centre and the general play strategy for Alton Estate. This feedback informed the redesign of the Alton Activity Centre to provide recreational space for all ages and abilities. A drop-in consultation session was held at the Alton Activity Centre on 22 November 2018 to present the revised proposals for the Alton Activity Centre which attracted 25 attendees, including many of those who had participated in earlier workshops.

Age – older people

Older residents were directly engaged, with specific consultation activity arranged with the residents of the Minstead Gardens bungalows. Design meetings were held in order to identify the specific needs of older people living at the sheltered accommodation at Minstead Gardens. The feedback received helped to inform the design of the proposed enhancements to the sheltered accommodation.

Disability

Direct engagement was undertaken with residents of the retirement housing at Minstead Gardens during 2017. Design meetings were held in order to capture and identify the specific needs of older people living in sheltered housing of Minstead Gardens to inform the design process on how to provide sheltered accommodation.

Religion

Direct engagement with faith groups was undertaken during both consultation phases in 2017. Meetings with representatives of faith groups were held to draw on local knowledge and identify specific needs and suggestions for the Alton Estate regeneration programme.

On 27 February 2018 a meeting was held with representatives of St. Joseph's Church to discuss proposals for the new Village Square and to explore the opportunities to improve pedestrian links in the area.

Prior to that meeting, a direct engagement session was held with representatives of the Roehampton Methodist Church who had expressed an interest in being involved in the development of plans for Portswood Place.

Further consultation

The EINA was finalised on 5 June 2019 and submitted in combination with the wider Hybrid Planning Application. If any impacts on protected groups have not been included in this assessment, residents are invited to inform the Wandsworth Regeneration Team. The EINA will be updated to reflect any further comments, with any feedback flagged to the Regeneration Team so that it can be taken into consideration alongside the EINA.

**Revised EINA prepared by WSP | Indigo
11 March 2020**