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Client: RHP and Hill Residential
Project: Ham Close
Report: Equalities Impact Assessment

QUALITY ASSURANCE

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1.0 INTRODUCTION

This Equalities Impact Assessment has been prepared on behalf of Hill Residential and RHP to assess the impact of the proposed development at Ham Close on persons who share a relevant protected characteristic and whether mitigation should be secured as part of any permission to advance equality of opportunity.

This assessment does this by assessing how the equal access and opportunity of the following characteristics listed as ‘protected characteristics’ in the Equality Act 2010 are addressed within the Hill Residential’s policies and procedures and the proposed development itself:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

The assessment includes the following:

- Description of the site and the proposed development;
- A review of relevant National, Regional and Local Policies and Legislation;
- A summary of the Public Consultation Strategy;
- A review of the local and site context relating to the protected characteristics; and
- An assessment of the impact of the proposed development on protected characteristics set out in the Equality Act 2010.

The impact on each of these characteristics has been assessed using a magnitude and sensitivity metric.

Table 1.1 *Proposals for Determining Significance of Impact*

Magnitude	Sensitivity		
	High	Moderate	Low
Major	Major Adverse/ Beneficial	Major - Moderate Adverse/ Beneficial	Moderate - Minor Adverse/ Beneficial
Moderate	Major - Moderate Adverse/ Beneficial	Moderate – Minor Adverse/ Beneficial	Minor Adverse/ Beneficial
Minor	Moderate – Minor Adverse/ Beneficial	Minor Adverse/ Beneficial	Minor - Negligible

Opportunity and mitigation measures will be provided aiming, where possible, to ensure the impact of the proposals overall impacts are negligible to major beneficial.

2.0 SITE DESCRIPTION AND PROPOSED DEVELOPMENT

Overview

The site covers an area of approximately 4.69 ha and is centred on National Grid Reference TQ 0030585, OS Co-ordinates 550309, 158566. It sits within the Ham, Petersham and Richmond Riverside ward.

The site is bound by Woodville Road to the north, Wiggins Lane and Ham Street to the east, Ham Clinic and Ashburnham Road to the south and St Richard’s C of E Primary School playing fields and the Woodville Day Centre to the west.

Existing Conditions

The buildings currently on Ham Close were built in the 1960s by the local authority, with a proportion of the estate retained for public open space, now known as Ham Village Green.

The site comprises of existing residential buildings arranged in five storey blocks, four storey deck access flats and three storey ‘T’ shaped blocks. Currently Ham Close consists of 192 homes which are undersized against current planning standards. There are currently no lifts on site, meaning many homes are not accessible. There is also no dedicated bicycle storage, and the buildings are not meeting residents needs.

The public realm consists of large areas of surface parking and amenity grassland with scattered trees. The existing landscaping does not have defined areas, with free access between the individual buildings and areas of hard standing. None of the existing homes have access to formal/defined private outdoor space.

There are a number of well used community facilities on site including a Community Centre, which houses the youth centre, and Richmond MakerLabs. There is also children’s play equipment and outdoor gym equipment located on Ham Village Green.

Figure 2.1 Existing site plan



Proposed Housing

The development proposals comprise the demolition of existing buildings on-site and use of land within i. the Woodville Day Centre, ii. St Richards Church of England Primary School, iii. existing recycling and parking area to the east of Ham Village Green iiiii. Two roads and v. community centre and associated car park for a phased mixed-use redevelopment comprising:

- a. 452 residential homes (Class C3) up to 6 storeys (with plant above);
- b. Community/Leisure Facility (Class F2) of up to 3 storeys in height (with plant above);
- c. “Maker labs” (sui generis) of up to 2 storeys;
- d. Basement car park;
- e. Provision of on-site cycle, vehicle and servicing parking;
- f. Provision of amenity space and playspace;
- g. Site wide landscaping and alterations to Ham Village Green; and,
New pedestrian, vehicle and cycle accesses and internal routes and associated highways works.”

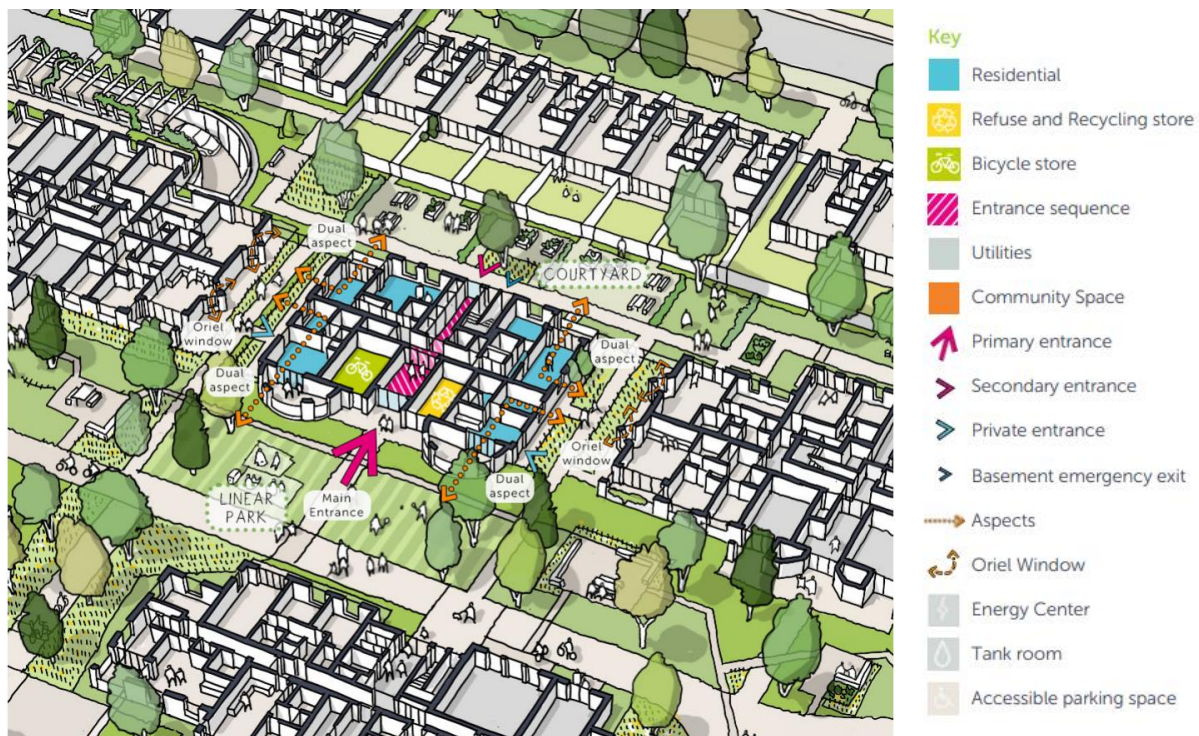
The 452 homes include:

- 224 x 1 bed flat (50%)
- 165 x 2 bed flat (37%)
- 21 x 3 bed flat (5%)
- 42 x houses with a mix of 4B7P, 4B8P and 5B9P (9%)

Of these, 221 are affordable tenure with a mix of social rent, London Affordable Rent, London living rent and shared ownership options. 63.5% of affordable homes are designated as re-provision for existing residents.

Figure 2.2 shows the accessible ground floor dwellings of a single block, with accompanying amenity space and pedestrian routes. Primary entrances to flat blocks are either from the Linear Park or existing/proposed streets with secondary access from communal courtyards. Separate private access is provided for select ground floor flats and all bin/bike stores are accessed at convenient and accessible ground floor locations across the flat blocks.

Figure 2.2 Apartment Block R - Ground Floor Arrangement



Source: Design and Access Statement p.144

Proposed Open Space and Play Space

The proposed scheme includes a central Linear Park which provides a visual and pedestrian connection from Ham Village Green to the small park, at the western end/ boundary of Ham Close. Habitats will be created through a richly planted public and communal landscapes promote biodiversity gain, urban greening, and living streets.

Ham Village Green will be completely retained, with only a minor path realignment proposed, and additional play spaces and small parks will be integrated into the housing area. Individual courtyards, with allotments, will provide private communal amenity spaces and growing areas for residents.

Play opportunities thread through the landscape with concentrations of new equipped space. The scheme focuses on providing an area of local playable space for the 5-11 age group to the western end of the Linear Park. This will be linked to the existing facilities via the explorer trail, a playable route where children can interact with the planting through the park. Under 4s provision is spread across the site within courtyard spaces and across the Linear Park.

Active travel is embedded in the proposed street arrangement, minimising car movements to promote safe community focused public realm. Limiting vehicular movements through the centre of the scheme allows for a series of pedestrian and cycle focussed spaces. Public and semi-private spaces allow for secondary movements with a key route through the Linear Park to Ham Street and the proposed Community Centre on Ham Village Green.

Proposed Community Facilities

A number of community facilities will be provided as follows:

- **Ham Community Centre:** The new community centre will be a stand alone building purposefully set apart from the residential element of the regeneration. The proposed bespoke design aims to provide multifunctional rooms and spaces for a variety of activities. The primary driver for the accommodation within the facility will be to replace the existing accommodation of the Youth Centre currently operated by Achieving For Children with more modern and suitably sized accommodation for the Youth Centre's current and changing needs. Alongside the needs of the current Youth Centre, the facility will also re-provide and improve on the accommodation currently used by the body TAG (Youth club for disabled young people). The new community centre will also be open for use by other community groups based locally in the area so that much of the accommodation within the centre will be multi-used and multi-occupied at different times of the day.
- **Richmond MakerLabs:** The Richmond MakerLabs is a member-run organisation within Ham United Group (HUG) and is the only one of its kind in south-west London. The current Richmond MakerLabs space in the caretaker's office (Little House) is too small for the equipment needed and demand from the community. A better designed, purpose built facility will enable the Richmond MakerLabs to improve upon their existing service and potentially expand to new services including woodwork, repairs, model-making and electronics. The new building design would allow more access for members of the community at different times of day.

3.0 POLICY BACKGROUND

NATIONAL POLICY AND LEGISLATION

Equality Act, 2010¹

The Equality Act provides a legal framework to protect the rights of individuals and advance the quality of opportunity for all. As such, it legally protects the individual in Great Britain from discrimination in the workplace and wider society. For instance, by ensuring equal accessibility to employment, services, education facilities, buildings etc.

The Act has entered into force on 1st October 2010 and combined 116 separate pieces of legislation and simplifies and merges previous legislation including the Equal Pay Act 1970, Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act 1995, Employment Equality (Religion or Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003, Employment Equality (Age) Regulations 2006, Equality Act 2006 (Part 2) and, Equality Act (Sexual Orientation) Regulations 2007².

The Act sets out a list of 'protected characteristics' that are to be considered in the assessment of equality issues:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

Overall, the Equality Act sets out provisions with the objective to eliminate unlawful discrimination, harassment and victimization; advance equality of opportunity; and foster good relation between communities.

With respect to the Equality Act it should be considered how the design process, planned construction and operation of the proposed development has taken communities and equality groups identified above under consideration. In particular, this assessment considers how communities and equality groups can benefit from the proposed development and how their participation can be encouraged.

National Planning Policy Framework (NPPF)³

The revised NPPF was published in July 2021, replacing the previous NPPF, adopted in February 2019. The revised NPPF sets out the Government's planning policies for England and how they are expected

to be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Within this framework, the Chapter 12 'Achieving Well Designed Places' states that planning policies and decisions should ensure that developers meet several specific policies including:

'f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

Regional

The London Plan, 2021

The London Plan 2021 was formally adopted in March 2021, forming the Spatial Development Plan for London and part of the statutory Development Plan for Greater London⁴.

The London Plan provides a longer-term view of London's development to inform decision making until 2041. This plan replaces the London Plan 2016 and is, therefore, a key material consideration in planning decisions and has thus been referenced within this assessment. The concept of good growth underpins the entirety of the London Plan which then in turn informs several specific policies which are listed below.

GG1 Building strong and inclusive communities

This policy encourages early and inclusive engagement with stakeholders, to ensure the changes to the physical environment achieve an overall positive contribution to London. This policy aims for the provision of quality community spaces, services, amenities, and infrastructure to accommodate, encourage, and strengthen communities to increase social integration and address social isolation.

GG3 Creating a healthy city

This policy aims to reduce health inequalities. Those involved in planning and development must ensure:

- Determinants of health are addressed;
- Active and healthy lifestyles are promoted;
- The Healthy Streets Approach is utilised;
- Air quality is improved and;
- Green infrastructure is provided.

GG4: Delivering the homes Londoners need

This policy aims to create a housing market that is better for all Londoners. To do this planners and developers must:

- Ensure that homes are delivered
- Support the delivery of the strategic target of 50% of all new homes being genuinely affordable

- Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing

Policy D5 Inclusive Design

This policy encourages Development Plans to support the creation of inclusive neighbourhoods by embedding inclusive design and collaborating with local communities in the development of planning policies that affect them.

Development proposals should achieve the highest standards of accessible and inclusive design. They should:

- be designed taking into account London's diverse population
- provide high quality people focused spaces that are designed to facilitate social interaction and inclusion
- be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
- be able to be entered, used and exited safely, easily and with dignity for all
- be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

Policy D7 Accessible housing

This policy aims to support the provision of suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:

- at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

Policy H4 Delivering affordable housing

This policy encourages affordable housing to be provided on site. The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:

- requiring major developments to provide affordable housing through the threshold approach
- using grant to increase affordable housing delivery beyond the level that would otherwise be provided

- all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners

Policy E11 Skills and Opportunities for all

This policy aims to address low pay and gender and ethnicity pay gaps, and, as set out in the Skills for Londoners Strategy, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.

Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that:

- enable those people undertaking training to complete their training and apprenticeships
- ensure the greatest possible level of take-up by Londoners of the training, apprenticeship and employment opportunities created
- increase the proportion of under-represented groups within the construction industry workforce

Mayor’s Equality, Diversity and Inclusion Strategy, 2018⁵

The Mayor’s Equality, Diversity and Inclusion Strategy sets out the former mayor’s equality framework for London. It commits the GLA to tackle inequality, improve the life chances of Londoners and remove barriers that hinder them from reaching their potential.

Page 10 of the Strategy includes a table of strategic objectives and particularly relevant groups. Those that are particularly relevant to this assessment are set out below.

Table 3.1 Strategic Equality, Diversity and Inclusion objectives with relevant groups

Strategic Objectives	Particularly Relevant Groups
1. To work with housing associations, councils, developers, investors, and government to help increase the supply of homes that are genuinely affordable to buy or rent. This will help to tackle the inequalities experienced by certain groups of Londoners most affected by the city’s shortage of affordable homes.	Black, Asian and other ethnic groups, children and young people, low-income households, migrants, refugees.
2. To work with councils, landlords and government to help improve property conditions, management standards, security, and affordability for private renters. This will help to support the growing numbers of households with	Black, Asian and other ethnic groups, children and young people, low-income households, migrants, refugees, disabled people.

Strategic Objectives	Particularly Relevant Groups
children in private rented homes, as well as groups who are more likely to live in the sector.	
4. To work with councils, housing associations, government, and communities to help improve the supply of homes available to meet Londoners' diverse housing needs, including for accessible and adapted housing, specialist and supported accommodation, and Gypsy and Traveller sites.	Older people, including older LGBT+ people and Black, Asian and other ethnic groups, disabled people, care leavers, gypsies and travellers, LGBT+ Londoners.
5. To work with councils, government, the voluntary sector, and communities to make preventing homelessness a priority and make Young people, LGBT+ Londoners, BAME groups, make sure that people who lose their home are helped into sustainable accommodation.	Young people, LGBT+ Londoners, Black, Asian and other ethnic groups, Londoners with mental ill-health, refugees and asylum seekers, women, veterans, single people on low-incomes.
6. To work with government, councils, the voluntary sector, and communities to ensure rough sleepers are helped off the streets as quickly and sustainably as possible. There should be a way for every rough sleeper in London to leave the streets.	Non-UK nationals, young people, LGBT+ people, single men, those with mental health issues.
9. To work with government, boroughs, developers, businesses, and communities to promote the use of inclusive design through planning, procurement and commissioning of projects and programmes.	Older people, disabled people, parents, women, people from low-income households.
19. To work with employers, education and skills providers, and voluntary and community organisations so that as many Londoners as possible can participate in, and benefit from, employment opportunities in London. This includes providing employability and skills support for those who are disadvantaged in London's skills, enterprise, and jobs market.	Black, Asian and other ethnic groups, older women, Deaf and disabled people, low-income households, lone parents, ex-offenders, veterans, carers, care leavers, refugees, migrants.
20. To work with employers and their organisations, unions, and the voluntary sector to help ensure London's employers have fair and inclusive employment practices to retain and help their employees progress. There will be a focus on	Women, Black, Asian and other ethnic groups, migrants, disabled people, carers, older people, low-income households.

Strategic Objectives	Particularly Relevant Groups
those groups that experience major barriers at work.	
23. To work through TfL and with the London boroughs, development partners and other planning authorities to help change London's streets and public places to address barriers to walking and cycling, and make sure they focus on accessibility and inclusion issues.	Black, Asian and other ethnic groups, older people, disabled people, women, low- income households

Local

*London Borough of Richmond upon Thames Local Plan (2018)*⁶

The LB Richmond upon Thames Local Plan was adopted in July 2018 and sets out policies and guidance for the development of the Borough over the next 15 years. The Local Plan forms part of the overall development plan for the Borough and it identifies where the main developments will take place, and how places within the Borough will change, or be protected from change, over that period.

Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination: This policy states that the Council will seek to ensure that the environmental impacts of all development proposals do not result in detrimental effects on health, safety and the amenity of existing and new users or occupiers of the development site. These environmental impacts include pollution, noise and vibration and land contamination.

- Policy LP 30 Health and Wellbeing: This policy states that the council will support development that encourages a number of health initiatives, such as:
 - Sustainable modes of travel;
 - Access to green infrastructure;
 - Access to local healthy food; and
 - An inclusive development layout and public realm.
- Policy LP 44 Sustainable Travel Choices: The Council will work collaboratively to promote safe and sustainable transport solutions that minimise environmental impacts and maximise opportunities including for health benefits. In order to implement this, the Council will undertake a number of initiatives, such as:
 - Ensure that new developments are designed to maximise permeability through the provision of safe and convenient cycle and walking routes;
 - Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services; and
 - Encourage use of the River Thames for transportation.

London Borough of Richmond upon Thames Draft Local Plan (December 2021)

The LBRuT Local Plan⁷ draft for public consultation sets out policies and guidance for the development of the borough over the next 15 years, from the date of its adoption. This Local Plan is due to be adopted in 2024.

The draft Local Plan is currently out for consultation and carries limited weight. It is nonetheless a material consideration.

The following draft policies are relevant to this assessment:

- Policy 11. Affordable Housing (Strategic Policy) sets out a borough wide target of 50% affordable housing provision for all new housing developments and states that the Council will expect any estate regeneration to provide the equivalent amount of affordable housing by habitable room, and where possible, achieve an uplift in provision;
- Policy 13. Housing mix and Standards that the housing mix should be appropriate to the site location and that 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'; and
- Policy 49. Social and Community Infrastructure (Strategic Policy) identifies that major developments should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient capacity within the existing infrastructure to accommodate the needs arising from the new development.

Planning Obligations SPD (2020)⁸

The LB Richmond upon Thames Planning Obligations Supplementary Planning Document (SPD) sets out the Section 106 obligations requirements for new developments. It sets out recommendations for the following topics that are relevant to this assessment:

- Site-specific transport requirements;
- Public realm. Public open spaces, play space and sport and recreation facilities;
- Employment and Skills Training;
- Community Safety; and
- Social Infrastructure.

The SPD also sets out specific requirements with regard to assessing healthcare based on the HUDU Planning Contributions Model in consultation with the local Clinical Commissioning Group (CCG), identifies service catchments for assessing different healthcare facilities and recommends that the FTE GP to patient ratio is used to assess GP capacity and the need for primary healthcare contributions based on the best practice ratio of 1 GP per 1,800 people. The service catchment for GP surgeries is recommended as 1km although this will vary based on the site location and existing patient patterns.

Residential Development Standards SPD (2010)

LBRuT Residential Development Standards SPD9 sets out the policy for residential space standards. The following policy relates to this assessment regarding garden and play space:

- Amenity space

This policy identifies that sufficient on-site outdoor amenity space must be provided in new residential developments. To provide adequate private amenity space, the Council will encourage a minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm should be provided for each additional occupant;

- Children's play areas
- This policy confirms that new developments should provide 10sqm of open space per child based on the Mayor of London's 'Providing children's and young people's play and informal recreation SPG';
- Private and communal gardens – sets out design standards for the provision of private and communal gardens.

Consultation Draft Revised Affordable Housing SPD (June 2022)

The latest version of the SPD is out for consultation at the time of writing. This aims to provide further detailed guidance to support the adopted Local Plan policies with regard to affordable housing and how it will assess viability within the planning process. This update to the existing SPD (2014), is to reflect new or updated requirements in the Local Plan and also guidance published by National Government, the Greater London Authority (GLA) and the Royal Institute of Chartered Surveyors (RICS).

The following policies are considered relevant for this assessment:

- The tenure mix set out in Policy LP36 for affordable housing provided in the borough is 40% housing for affordable rent and 10% intermediate housing.
- The approach to the design of affordable housing should be genuinely tenure blind to meet the same high quality and sustainability standards as private housing. On mixed tenure schemes, the affordable housing must be of the same style and materials so as to appear visually consistent and indistinguishable from the private housing. Policy requirements are set out in the Council's Local Plan, including Local Plan Policy LP 35 and the Council's Residential Development Standards SPD.
- 90% of new build homes should be to Building Regulation Requirement M4(2) 'accessible and adaptable dwellings' and 10% of all new housing should be to Building Regulation Requirement M4(3) 'wheelchair user dwellings'. The Council's preference is for low cost rented wheelchair accessible housing to meet M4 (3)(B) standards.

4.0 EQUALITIES POLICIES AND PROCEDURES OF THE APPLICANT AND LANDOWNER

The Landowner and Affordable Housing Provider

RHP

RHP own or manage approximately 10,000 affordable homes across west London. These include homes for social rent and shared ownership. RHP aim to build 750 more homes by 2027.

RHP: Our Inclusion Journey 2021/22 - 2022/23¹⁰

Within the Inclusions report published in 2022, RHP highlighted several policies under Goal 3: 'Integrate diversity, equity & inclusion into what we do' which are relevant to the equality impact of the Ham Close proposal.

- Use engagement surveys to understand more about how it feels across various groups
- 'In their Shoes' project looks at creating audio stories to understand cultures and perspectives. The team will use these to better understand the needs and inclusive strategies for their developments.
- Assessing how customer data is gathered and how engagement is carried out
- Ensure contractors have inclusion and diversity as a core part of how they work. Build partnership charters with key contractors.

RHP: Inclusion, Diversity and Equality Policy 2020¹¹

This policy covers both internal approaches and attitudes to how RHP carry out developments externally. The key policy points are as follows:

- Inclusion: accountability in ensuring services or other provisions are welcoming, relevant and equally accessible
- Equity and Diversity: Understanding inequalities and working to resolve them by ensuring richness of diversity

As part of this report, RHP surveyed their users to better understand who they are providing for. This will allow them to ensure services best fit the community's needs going forward. Strategies include developing 'Purpose Architecture' through customer insight. And ensuring that the voice of customers is heard at all key levels to shape strategies. RHP are also committed to inviting customers from different groups to participate in policy setting to help the organisation understand how services affect people and the barriers they face.

RHP Customer Offer

The RHP Customer Offer for the regeneration of Ham Close was provided to residents in the autumn of 2016. The offer document: "What regeneration could mean for you. A guide for RHP tenants & homeowners Autumn 2016" summarises:

- How current RHP tenants will be offered a new home in Ham Close
- How current RHP homeowners will be able to buy a new home in Ham Close
- What design standards the homes will meet, alongside details surrounding rents, compensation and support.

Tpas' (Tenant Participation Advisory Service) reviewed the offer document in 2017. Tpas' review advised: "To date RHP has followed good practice and produced a clear and detailed offer document. All the promises meet or exceed what is expected. Eventually, the project will deliver more low- rent homes than before on the site".

Since December 2019, homeowners choosing to leave Ham Close permanently have been able to benefit from the compensation and disturbance costs provided in the Customer Offer if they sell their homes back to RHP.

Subject to receiving a viable and implementable planning permission later this year, RHP will invite Tpas to review the full Customer Offer before commencing a formal consultation with RHP tenants and RHP homeowners.

The Applicant

Hill Residential

Hill Residential are a large-scale house builder with several regional offices. They have shifted their vision to focus on sustainability and creating inclusive communities that have longevity. This includes focusing on employment and closing the skills gap.

Hill Residential ESG Report 2021¹²

The ESG report published in 2021 highlights the overarching Hill Residential equality and inclusivity strategies. The key relevant points within this report are as follows:

- Education to Employment: Promoting careers to all ages and backgrounds to see greater diversity and inclusivity
- Women in Construction: Promote construction roles for women
- Connecting with voluntary, community and local organisations to understand the context in a development area

5.0 LOCAL AND SITE CONTEXT

The proposed development is located at Ham Close and is situated within the London Borough of Richmond upon Thames (LB Richmond upon Thames).

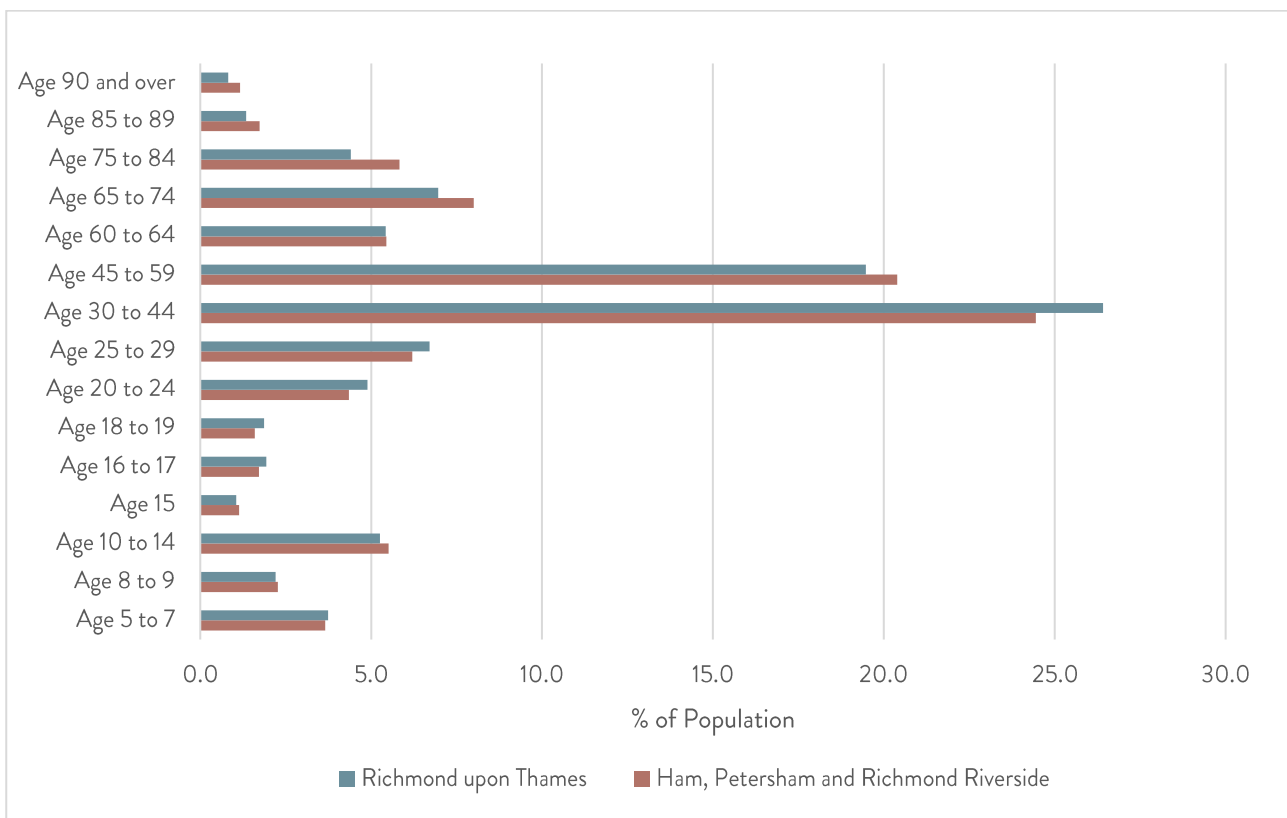
Sex

According to the ONS 2019 population estimates, LB Richmond upon Thames has a total population of 186,990 residents of which 48.7% are male and 51.3% are female. Within Ham, Petersham and Richmond Riverside Ward, there are 10,234 residents and of this total, 49.9% are male and 50.1% are female.¹³

Age

According to ONS population estimates¹⁴, Ham, Petersham and Richmond Riverside ward has a relatively young population with 24.4% of residents being aged 30 to 44 years. Compared to LB Richmond upon Thames, a lower proportion of residents are aged 30 to 44 years and 25 to 29 years in Ham, Petersham and Richmond Riverside ward with a slightly higher proportion of residents in older age groups. This is shown in Figure 5.1 below.

Figure 5.1 Age Structure of Ham, Petersham and Richmond Riverside and LB Richmond upon Thames 2011



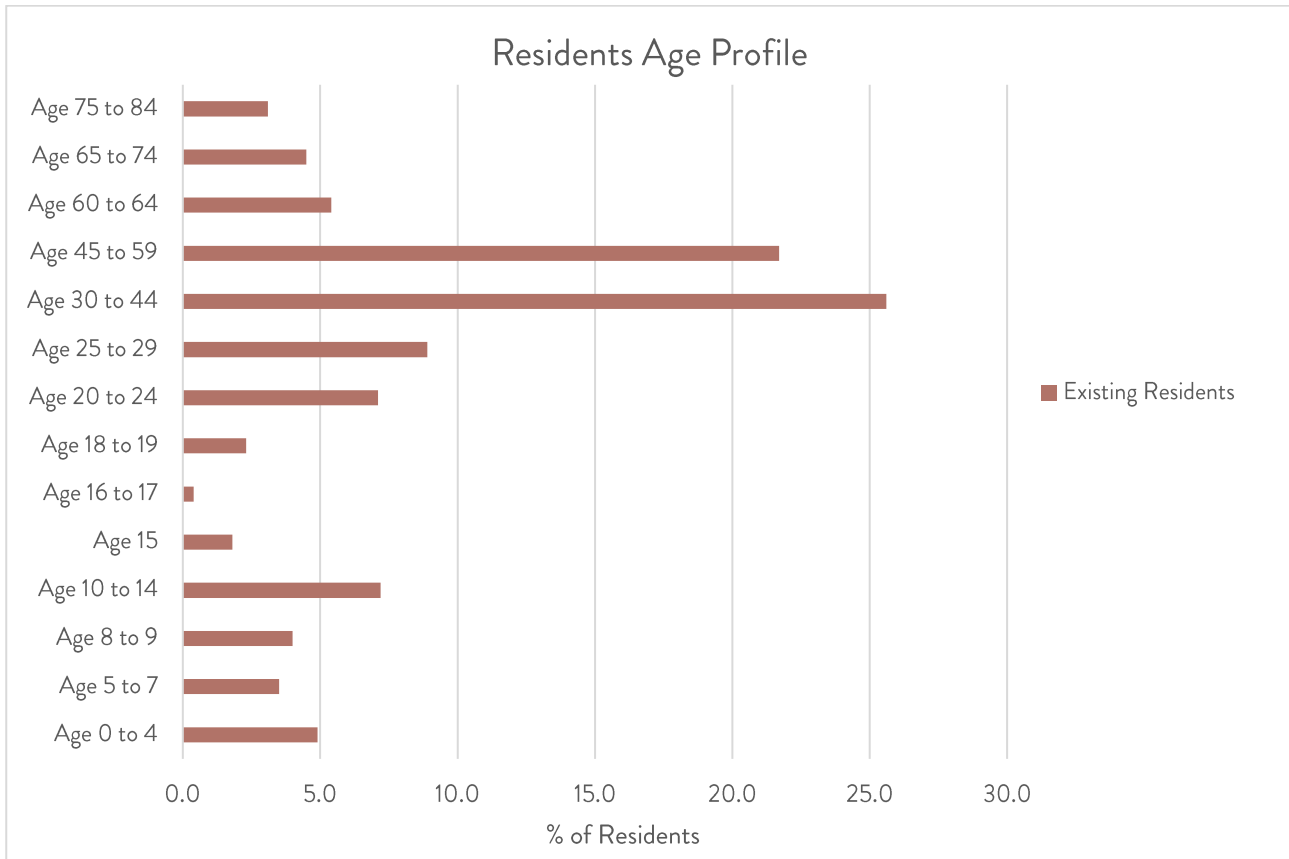
Source: ONS - 2011 Census (KS102EW)

A Customer Needs Survey¹⁵ was carried out among the existing RHP tenants at Ham Close which commenced in December 2020 and RHP continue to collate responses and update information. A similar Homeowner Survey was carried about amongst the existing leaseholders which commenced in January of 2021 and RHP continue to collate responses and update information. It should be noted that

it was optional for leaseholders to provide this information and therefore data only relates to tenanted households.

There are 122 RPH tenant households which includes 223 household members. The data gathered from RHP tenants shows that the current age profile on the site is largely similar to Ham, Petersham and Richmond Riverside ward, with 24.5% of residents between 30 and 44 years old and 21.7% aged 45 to 59. This is shown in Figure 5.2.

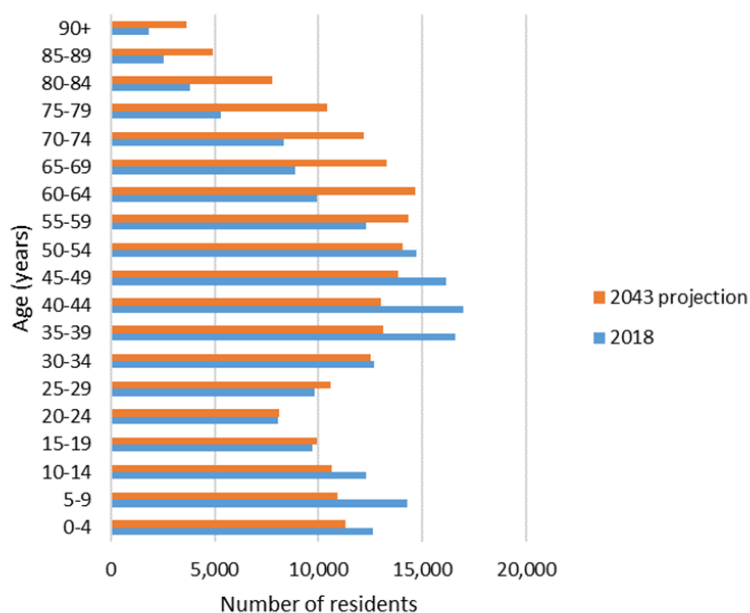
Figure 5.2 Existing Household Members Age Profiles



Source: Customer Needs Survey December 2020 onwards

Population forecasts for LB Richmond upon Thames show that the population is expected to increase by 6.3% (12,500 persons) between 2018 and 2043.¹⁶ Despite this relatively small change in overall population size, the proportion of residents aged 65 and above is predicted to increase by 9.4% over this period due to longer life expectancy. By 2043, 25.0% of residents will be over 65. Figure 5.3 overleaf shows the age profile for Richmond upon Thomas in 2018 and 2043 and shows that LB Richmond upon Thames is anticipated to have an ageing population in the future.

Figure 5.3 Population forecast for LB Richmond upon Thames, 2018-2043



Source: ONS subnational population projections, 2018-based

Children and young people are likely to be particularly dependent on good quality spaces (such as parks) to meet, play and socialise. They are also likely to be one of the heaviest users of active forms of travel such as walking and cycling.

Older people are likely to be disproportionately affected by poor health and/or disability. Older people are also widely recognised as being at greater risk of social isolation or exclusion because of the greater proportion of the population that lives alone.

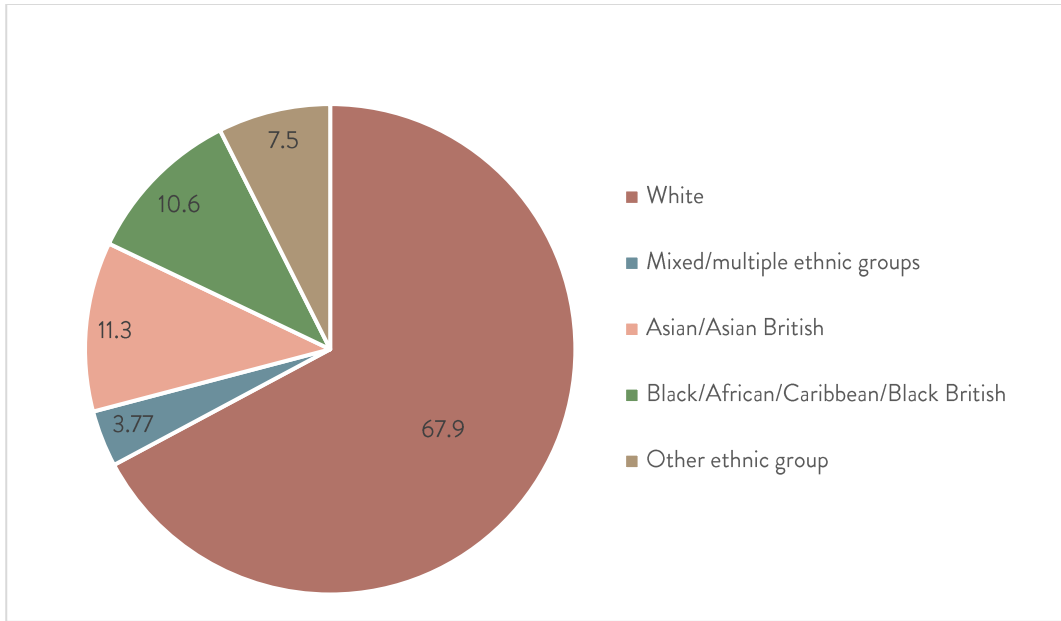
Ethnicity

According to the 2011 Census, the majority of residents in Ham, Petersham and Richmond Riverside ward are of White ethnicity, equating to 84.1% of residents, followed by 7.4% of residents being of Asian/Asian British ethnicity, 3.9% of residents in the ward being of Mixed ethnicity and 2.1% of residents being of Black/ African/ Caribbean/ Black British ethnicity.¹⁷

The proportion of residents of Asian/Asian British ethnicity and Black/ African/ Caribbean/ Black British ethnicity in Ham, Petersham and Richmond Riverside ward is slightly higher than LB Richmond upon Thames as a whole. Within LB Richmond upon Thames, 86% of residents are White, 7.3% of residents are of Asian/ Asian British, 1.5% of residents are Black/ African/ Caribbean/ Black British and 3.6% of residents are of Mixed ethnicity.

As a social landlord RHP hold data on their tenants via their Customer Relations Management System (CRM) and within this there is information on ethnicity for tenants of Ham Close. This shows that there is currently a greater proportion of Asian/ Asian British (11.3%) and Black/ African/ Caribbean/ Black British (10.6%) than the wider ward.

Figure 5.4 Ethnicity of Existing Residents



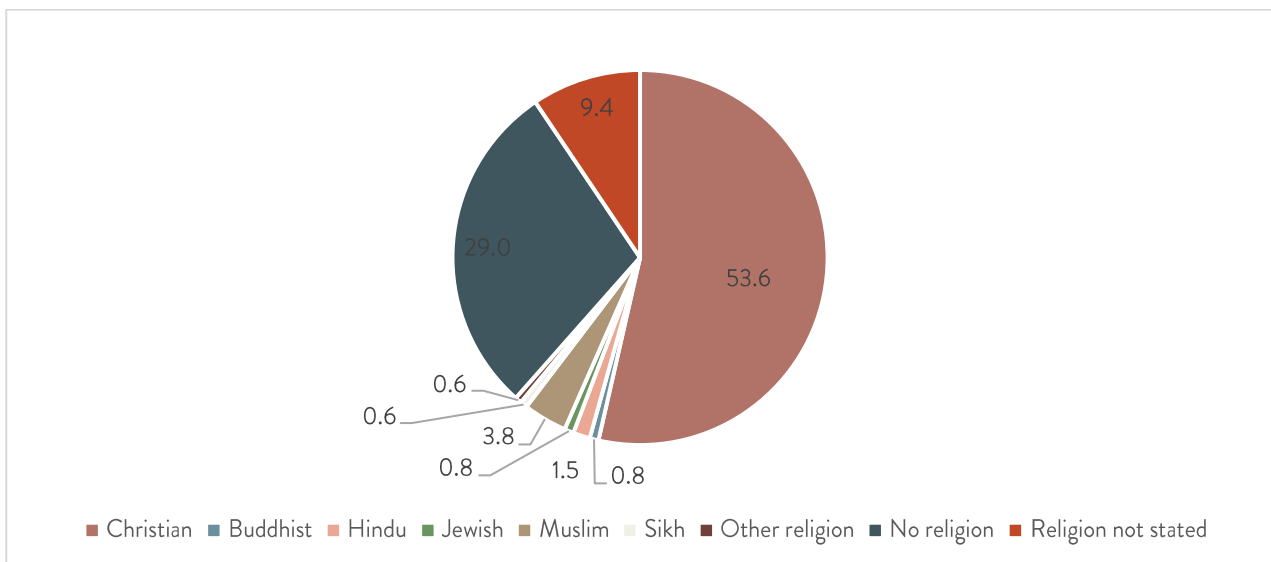
Source: Customer Needs Survey December 2020 onwards

Community safety/ perception of safety is a particular concern for some Black and Minority Ethnic groups and needs to be considered when public realm schemes are being considered.¹⁸ It is also likely that women belonging to some minority ethnic groups are more likely to be at home during the day and will therefore be disproportionately affected by the quality of the local built environment.¹⁹ Health status and life expectancy of minority ethnic groups can also vary significantly from the wider/ average population reinforced by the experience of deprivation.²⁰

Religion

According to the 2011 Census, 61.5% of residents in Ham, Petersham and Richmond Riverside ward are religious with the most common religions being Christian, Muslim and Hindu equating to 55.3%, 3.3% and 1.6% of residents respectively. These figures are similar to the wider LB Richmond upon Thames.

Figure 5.5 Religion in Ham, Petersham and Richmond Riverside Ward



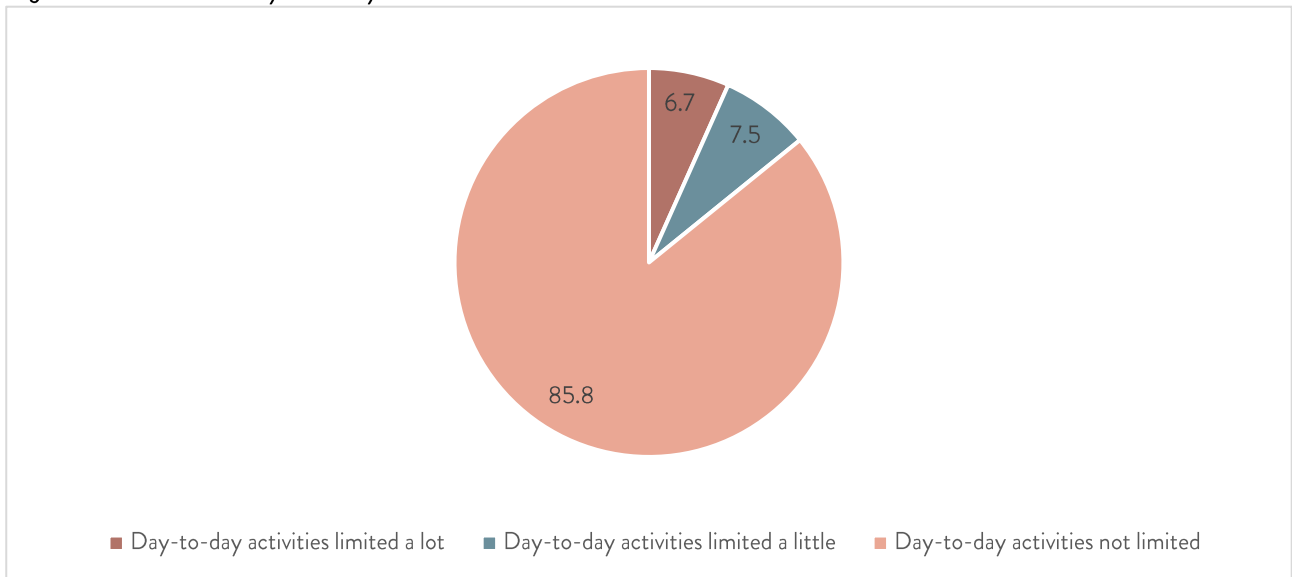
Source: ONS - 2011 Census

Disability

According to the most recent published census data (2011 Census), 52.6% of residents in Ham, Petersham and Richmond Riverside ward are in ‘Very Good Health’ and 32.6% of residents are in ‘Good Health’. This is slightly lower than in Richmond upon Thames where 57.3% of residents are in ‘Very Good Health’ and 30.5% are in ‘Good Health’. Only 0.9% of the ward’s population are in ‘Very Bad Health’ which is similar to the Richmond upon Thames average (0.9%).

ONS data from the 2011 census shows 22% of homes have one adult not in employment due to long-term health problems or disability.²¹ This data can also show us how limited levels of activity are within Ham, Petersham and Richmond Riverside ward. Reduced mobility and activity levels may be an indicator or underlying health conditions or disabilities. Figure 5.6 demonstrates the levels of activity within the ward and shows that 85.8% experience to health limitations to their day to day activities.

Figure 5.6 Limit to Day-to-Day Activities



Source: ONS - 2011 Census (KS301EW)

The west of the site, including all existing residential buildings, is located in Richmond upon Thames 017B LSOA. According to the Indices of Deprivation Multiple Deprivation Domain (2019) , the west of the site is within the 30% most deprived neighbourhoods in the country. Within the Health Deprivation and Disability Domain the site is among the 10% least deprived.

Within LB Richmond upon Thames 72.9% of adults are physically active (2019/ 2020) which was slightly lower than 2018/ 2019 when 76.1% of adults are physically active. This is higher than in London (65.2%) and in England (66.4%). Data also shows that there is a lower prevalence of obesity and childhood obesity within the LB Richmond upon Thames compared to regional and national estimates.

Despite this, the proportion of overweight and obese adults in LB Richmond upon Thames has increased since 2018/ 2019 from 47.7% to 51.9%.

According to the 2011 Census, 14.2% of residents in Ham, Petersham and Richmond Riverside ward reported a long-term illness or disability which is higher than the LB Richmond (11.5%) but lower than England (17.6%).

Within the existing RHP tenants of Ham Close, 41 residents (18%) reported existing disability or health needs. These are listed below;

- Severe allergies
- Severe A.D.H.D
- Learning Difficulties
- C.O.P.D and type 2 Diabetes
- Autistic
- Crohn's disease
- Epilepsy
- Mental Health Condition
- Chronic Pain
- Asthma
- Lung Disease
- Arthritis and Scoliosis
- Bi-polar, Borderline Personality disorder
- Visually impaired
- Deaf
- M.E
- Mobility Issues (*including with stairs*)

People with disabilities will often experience the built environment in different ways to the wider population. If these differences are not adequately considered when developments are being designed, then relative disadvantage and social isolation can be further entrenched. Buildings and spaces need to be legible and easy to navigate, free of physical barriers and appropriately lit.

Transport facilities and services need to be planned for ease of use and convenience. Particular care also needs to be taken to provide suitable parking arrangements (car or bike) for disabled users. As with the young and elderly, people with disabilities may participate less than the wider population in public life and as a consequence feel more isolated.

Pregnancy and Maternity

According to the 2011 Census, the proportion of lone parent households is slightly higher in Ham, Petersham and Richmond Riverside ward (6.1%) than LB Richmond upon Thames (4.8%) but lower than London (12.7%).

There are 18 lone parent household with dependent children, under the age of 16, within the existing RHP Ham Close tenants according to the information received as part of the Customer Needs Survey. This equates to 8% of residents which is higher than the average with the ward and wider LB Richmond upon Thames.

Young parents/ pregnant women are more likely to be present at home and therefore dependent on access to local facilities and services. Parents and carers may also play an enabling role in assisting and supervising young children's use of open space.

Sexual Orientation

Some of the issues applicable to wider populations discussed above, particularly around community safety and access to safe spaces and facilities, are relevant in terms of sexual orientation. Discrimination based on sexual orientation has been magnified by recently reported increases in hate crimes involving lesbian, gay, bisexual, transgender and queer (LGBTQ+) populations. LGBTQ+ communities are also more vulnerable to social isolation. This highlights the importance of facilities and spaces which can provide a safe environment in which LGBTQ+ communities are able to meet.

The Annual Population Survey (APS) produced by the Office for National Statistics in 2015 estimates that 1.8% of the population with Richmond upon Thames are LGBTQ+.

For the regeneration of Ham Close, a bespoke Customer Needs Survey was designed in 2020 to include all the questions present in both the RHP HomeChoice Survey and RHP Medical Self-Assessment form, alongside additional questions specific to the Customer Offer, to help identify Ham Close tenants' housing need.

Whilst the Customer Needs Survey did not specifically provide an opportunity for a tenant/s to declare their sexual orientation or those of their household members, a page was set aside titled "Other Information". The introduction to this page read "*RHP will be meeting with our customers both as a group and individually throughout the formal consultation around the planning of the new Ham Close once we have appointed a Development Partner and again during building. However, at this time, if there is anything else you wish to make us aware of that you feel is relevant or has not been included in this survey, please use the box below to raise it*".

None of the tenants that have completed and returned the surveys used this page to make RHP aware of their or their household member/s sexual orientation and as a consequence there is limited information concerning this group.

Currently RHP are able on request to record our customer's sexual orientation when signing a new tenancy or by an existing customer writing, e-mailing or phoning their Customer Services team. RHP are currently reviewing their policies both to improve how they use and retain their customers' data and

to align their approach with that of Richmond Council. The outcome of this review will inform future surveys related to the regeneration of Ham Close.

Transgender

Transgender people face discrimination and can often experience exclusion from spaces, hate crime and violence. Creating safe and inclusive places is crucial to ensure all people can participate in community activities and day to day life without fear or physical barriers.

For the regeneration of Ham Close, a bespoke Customer Needs Survey was designed in 2020 to include all the questions present in both the RHP HomeChoice Survey and RHP Medical Self-Assessment form, alongside additional questions specific to the Customer Offer, to help identify Ham Close tenants' housing need.

Whilst the Customer Needs Survey did require confirmation of a tenant/s and household member/s gender, it did not specifically provide an opportunity for a tenant/s to declare their transgender identity or those of their household members. A page of the Customer Needs Survey was set aside titled "Other Information". The introduction to this page read "*RHP will be meeting with our customers both as a group and individually throughout the formal consultation around the planning of the new Ham Close once we have appointed a Development Partner and again during building. However, at this time, if there is anything else you wish to make us aware of that you feel is relevant or has not been included in this survey, please use the box below to raise it*".

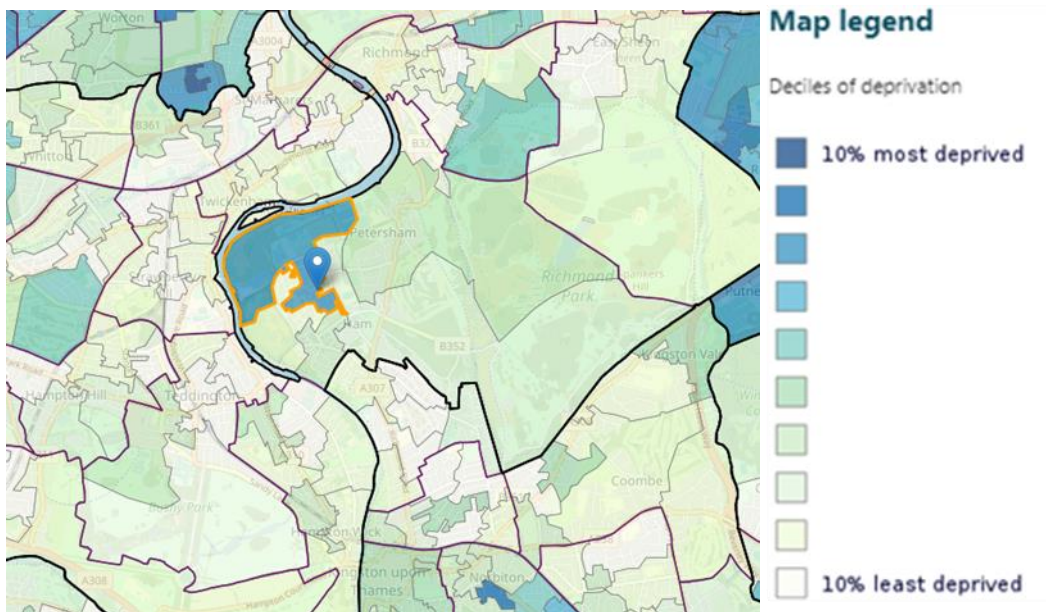
None of the tenants that have completed and returned the surveys have used this page to make RHP aware of their or their household member/s transgender identity and as a consequence there is limited information concerning this group.

On request, RHP are able to record their customer's transgender identity on the "Notes" section of our Customer Relationship Management system by existing customers writing, e-mailing or phoning our Customer Services team. RHP are currently reviewing their policies both to improve how they use and retain their customers' data and to align their approach with those of Richmond Council. The outcome of this review will inform future surveys related to the regeneration of Ham Close and the delivery of projects that include community facilities directly developed and owned by RHP.

Deprivation

According to the Indices of Deprivation (2019)²², the site of the proposed development is situated within one of the 30% most deprived neighbourhoods in the country on the Multiple Deprivation Domain.

Figure 5.6 Indices of Multiple Deprivation



Source: Indices of Deprivation 2019 (communities.gov.uk)

Data provided by the 2011 Census demonstrate that 46% of residents in Ham, Petersham and Richmond Riverside ward aged 16 years and over have gained Level 4 qualifications and above, which is lower than LB Richmond upon Thames (53%) but higher than the region of London (36.7%).

According to the 2011 Census, 72.6% of the population in Ham, Petersham and Richmond Riverside ward are economically active which is lower than the 75.5% in LB Richmond upon Thames. However, according to the Indices of Deprivation (2019), the site is situated within one of the 50% most deprived neighbourhoods in the country under the Employment Deprivation Domain.

The site is also within one of the 30% least deprived neighbourhoods in the country under the Crime Domain.

According to Public Health England (2013/14)²³, 13.9% of people are living in poverty within Ham, Petersham and Richmond Riverside Ward. This is lower than the average in England which is 21.2%.

6.0 PUBLIC CONSULTATION AND COMMUNITY ENGAGEMENT

A Statement of Community Involvement²⁴ was submitted as part of the planning application. This outlined RHP, Hill Residential and LBRuT's approach to consultation with the wider community in order to ensure that existing Ham Close residents had a meaningful opportunity to become involved in discussions on the future of the site and to feed into the evolution of scheme proposals.

The consultation aimed to focus on five key areas:

1. Allowing existing residents to remain in the community
2. Retaining and enhancing green space
3. Improving community facilities
4. Retaining a village feel
5. Creating a heart to Ham Close

The consultation used the following processes of engagement that are relevant to this assessment:

- Creating two forums where residents could express concerns and opinions. The Ham Close Stakeholder Reference Group has been in place since 2016. In 2020 a Residents Engagement Panel was also formed to discuss the redevelopment of the area.
- Those unable to attend meetings were able to view information online via the Ham Close website (hamclose.co.uk)
- A 'digital first' approach was taken in response to the Covid-19 pandemic to keep everyone as safe as possible
- Options for engagement through phone, email and post

The consultation process began in December 2013 and is still ongoing with Ham Close residents. Throughout this time engagement was carried out in a variety of ways including young people's sessions, public events, workshops and online resources. Running multiple sessions across a long period allowed the project team to accumulate feedback to revise the proposals, before presenting them to the public and stakeholders again for further input before the application's submission.

In light of the Covid-19 pandemic, from July 2021 the consultation was carried out in a hybrid format with some in-person outdoor events with social distancing in place. July 2021 to February 2022 saw the majority of the consultation with a new website in place, update emails, 1-2-1 meetings and outdoor engagement events. To view the consultation timeline of events and engagement information boards please visit www.hamcloseconsultation.co.uk.

7.0 EQUALITIES IMPACTS

In addition to equalities and diversity procedures of the applicants, all employment associated with the proposed development during construction and operation will adhere to anti-discrimination laws with respect to all protected characteristics set out in the Equality Act 2010.

The following table describes the potential impacts of the development process on the protected characteristics of the existing residents.

Table 7.1 Impact of development on existing residents

Potential Equality Risks	Affected groups	Impact	Actions, Opportunities and Mitigation
<p>Loss of social cohesion A risk that during construction community will lose existing connection when people are moved to temporary accommodation or rehoused elsewhere within site.</p>	<ul style="list-style-type: none"> • Children • Older People • Disabled People • People from Ethnic Minority groups, • Minority faith groups • LGBTQ+ People • Pregnancy and Maternity 	<p>Limited change in social cohesion as most residents can remain at Ham Close during regeneration. Reduced access or ease of movement around the site during construction</p>	<p>Extensive consultation has been carried out with residents throughout the process to gain design feedback and create spaces that encourage cohesion. Residents have been given the opportunity to move to a suitably sized home and remain within the area. There will be no impact on the community facilities due to a phased approach to construction.</p>
<p>Health effects Health effects may arise due to the stress of temporary relocation and knock-on effects of social isolation. Possible effects of demolition and construction on air quality, access and noise levels.</p>	<ul style="list-style-type: none"> • Young and elderly people • Disabled people • Pregnancy and maternity • Ethnicity 	<p>Air quality links to respiratory illnesses, particularly in vulnerable groups Mental health impacts of isolation and displacement or inability to access social resources, work and family Climate-related impacts such as</p>	<p>Dust mitigation strategies and planning conditions will control and mitigate impacts during the construction process. Maintain community events and activities within existing spaces. RHP will support customers alongside Hill Residential who</p>

Potential Equality Risks	Affected groups	Impact	Actions, Opportunities and Mitigation
		overheating are exacerbated due to a lack of control over their personal environment.	will have a dedicated Resident Liaison Manager as part of their team.
Safety and Security Vacant properties during the demolition process and reduced security for building sites leave residents more vulnerable. Possible disruptions to public transport, lighting, and surveillance infrastructure during construction	<ul style="list-style-type: none"> • Young and elderly people • Disabled people • Pregnancy and maternity • Ethnicity • Religion and belief • Sex • Sexual Orientation 	Risk of increased anti-social behaviour. A feeling of decreased safety and security. Vulnerable groups are more at risk or perception of greater risk which impacts mental well-being, physical health, and movement around the site.	Ensure the site is locked when not in use and CCTV or additional security measures are in place. Retain safe, well-lit, and visible access routes through the site. Active frontages have been considered throughout the design and Secure by Design principles have been used. RHP are proposing a property guarding company to keep vacant homes safe, secure and purposeful.
Accessibility Effects on mobility and accessibility during the construction period. Possibilities of reducing parking, construction work blocking access to homes, shops, bus stops and pavements.	<ul style="list-style-type: none"> • Young and elderly people • Disabled people • Pregnancy and maternity 	People may feel restricted in certain areas. Increased journey times or unable to make the journeys required safely within the day.	Ensure clear wayfinding and that routes remain unobstructed and clear of debris and uneven routes throughout the process. Parking for Ham Close residents will continue to be provided on site during construction on a phased basis.

Potential Equality Risks	Affected groups	Impact	Actions, Opportunities and Mitigation
<p>Information and Communication</p> <p>The consultation process may produce material that is confusing or hard for people to interpret and use.</p> <p>Wayfinding within the development could exclude groups.</p>	<ul style="list-style-type: none"> • Young and elderly people • Disabled people • Ethnicity 	<p>Language, interpretation, and communication barriers mean people are excluded from partaking in consultation and development. (16% of residents within Ham, Petersham and Richmond Riverside have one, or no members of a household who have English as their main language²⁵)</p> <p>People with disabilities including being deaf, mute, or blind may not be able to interact as easily with communications.</p>	<p>Multiple consultation methods were used to ensure a cross-section of the community was engaged with.</p> <p>Ensure sufficient interpretation measures and multiple methods of communication throughout construction.</p> <p>RHP will support customers alongside Hill Residential who will have a dedicated Resident Liaison Manager as part of their team.</p>
<p>Green and open space</p> <p>Loss or disruption to Ham Close Village green and associated play spaces during the construction process due to movement of machinery or areas fenced for safety.</p>	<ul style="list-style-type: none"> • Children, Young People • Older People • People from Ethnic Minority groups • Pregnancy and Maternity 	<p>People might not feel able to relax or access green spaces where they want to.</p> <p>Play space out of action during periods of time could restrict children's access to outdoor play.</p>	<p>Ensure people are made aware of local green spaces available within easy walking distances.</p> <p>Maintain routes to spaces for easy access for all.</p> <p>Ham Village Green will remain accessible and will not be altered throughout the development, allowing continued outdoor amenity space for residents.</p>

Potential Equality Risks	Affected groups	Impact	Actions, Opportunities and Mitigation
			<p>New playspace and equipment to be provided early in phase 1.</p> <p>Ensure seating and shelter spaces are maintained and improved throughout the construction process.</p> <p>There is some provision for private gardens.</p>
<p>Community Facilities</p> <p>Consider impacts on the running, reach and programme of the MakersLab.</p> <p>Loss of ad-hoc meetings and socialising within existing residential communities.</p> <p>Potential impact on public transport networks.</p>	<ul style="list-style-type: none"> • Young and elderly people • Disabled people • Pregnancy and maternity • Ethnicity • Religion and belief • Sex • Sexual Orientation 	<p>Reduced capacity or temporary removal of an important place for people to come together and feel safe within their environment. Minimise opportunities to learn from one another and come together in the short-term however longer-term positive impacts of having improved facilities to come together.</p>	<p>Improve provision through a new Ham Community Centre which will house the youth club.</p> <p>Continued use of existing community facilities until new facilities are completed.</p> <p>Ensure retention of space and accessible transport network around the site during the construction period and after completion.</p> <p>Re-provision of Richmond MakerLabs in a new purpose-built facility with two accessible and inclusive workshop spaces and outdoor space.</p>
<p>Housing Provision</p> <p>New housing should improve accessibility,</p>	<ul style="list-style-type: none"> • Children • Older People • Disabled People 	<p>Existing tenants receiving homes that are an improvement on</p>	<p>All homes will be built to accessible standards with high levels M4(2)</p>

Potential Equality Risks	Affected groups	Impact	Actions, Opportunities and Mitigation
sustainability and affordability as well as reduce energy demand and increase social mobility	<ul style="list-style-type: none"> • People from Ethnic Minority groups • Low-income existing residents 	the existing provision to ensure that the disruption has been worthwhile and improves quality of life.	and 10% M4(3). New homes are designed to maximise natural daylight with designs developed to improve separation distances. A mixture of tenures and sizes and increased provision of affordable housing on-site compared to existing.

7.1 AGE

Older and younger people can be adversely affected during the process of rehousing and the implications of construction work.

Older people are likely to need more specialist housing to deal with changing health and mobility needs as they get older. Due to an ageing population, there is likely to be a higher demand for adaptable and accessible housing going forward. There will also be access barriers to public amenities and transport that may be exacerbated during construction due to changes to routes, public transport routes and locations of stops, social connectivity, and access to services. Existing health conditions are also likely to be affected by changes in circumstances, including stress, lack of access to green space, increased noise and air pollution.

Children and young people are also adversely affected by stress and anxiety surrounding change and may suffer due to a lack of access to existing social networks. They may also experience poor health due to overcrowded or unsuitable living accommodation.

Measures Identified within the Proposal

A variety of measures will be embedded into the design and operation of the proposed development to ensure that the proposed development does not result in any adverse impacts on particular age groups. This includes the following:

- Retention of the existing youth centre to provide services for young people;
- Improved housing provision to give families more suitable spaces depending on the number of children. The design of homes adaptable to create the spaces a family needs, including division of spaces and provision of adequate bedrooms;

- Provision of a new linear park and play space for young children on-site for the residential aspect of the scheme. There are 5 local play spaces identified for children under 5 to young people (12+). These are within the walking catchment of the site;
- 'Friendly Parks for All' initiative implemented;
- Ham Community Centre is designed to be fully accessible with a particular focus on the user experience of both young and elderly;
- Provision of CIL payments to accommodate additional residents that will be brought to the area as a result of the proposed development.
- The Ham Village Green will remain fully accessible throughout, ensuring residents still have an open green space to play, exercise and socialise.

This is a relatively accessible location and there are a few close amenities or public transport links. The site has a PTAL rating of 1b. There are a number of adjacent bus stops along Ashburnham Road and Ham Street.

The following amenities have been highlighted as within walking distance of the site;

- Woodville Day Centre (2 minutes)
- St. Richards' Primary School (4 minutes walk)
- Grey Court School (4 minutes walk)
- Ham Café (4 minutes walk)
- Ham Library (4 minutes walk)
- Tesco Express (5 minutes walk)
- St Richard's Church (5 minutes walk)
- Ham Lands Local Nature Reserve (7 minutes walk)
- Meadlands Primary School (8 minutes walk)
- Sainsbury's Local Upper Ham Road (15 minutes walk)

Proximity to these local amenities should allow older residents to use active travel measures where possible and encourage reduced car usage.

The site offers excellent access to parks and open spaces. This will help to minimise any adverse impacts on particular age groups associated with a lack of appropriate green infrastructure nearby.

Mitigation and Improvements

Age has been considered an affected characteristic in all the reviewed areas of the design.

The most significant impacts are considered to be;

- Adverse health impacts including mental wellbeing, respiratory illness, and reduced mobility

- Impacts on the accessibility of houses, public spaces, transport routes due to construction traffic and development phasing

The design is therefore considered to have a 'Minor Adverse' impact on the age characteristic in the short term. However, the design shows that these impacts are temporary and in the long term there are likely to be increased benefits for groups based on age because of the redevelopment of the Ham Close area. Therefore, the impact is determined to be 'Moderate Beneficial' in the long-term based on the age characteristic.

7.2 DISABILITY

People with disabilities are more likely to experience difficulties as a result of housing, including the accessibility of homes, movement through public spaces and proximity to transport or parking. People with disabilities may also find existing health conditions are exacerbated by changes in the environment or factors outside of their control. This may be particularly relevant within Ham Close for the 41 residents who self-reported having a disability.

People with disabilities will often experience the built environment in different ways to the wider population. If these differences are not adequately considered when developments are being designed, then relative disadvantage and social isolation can be further entrenched. Buildings and spaces need to be legible and easy to navigate, free of physical barriers and appropriately lit.

Regeneration processes open up opportunities to create spaces and places that can be accessed and effectively used by all, regardless of age, size, ability or disability, using principles of inclusive design. Transport facilities and services need to be planned for ease of use and convenience. Particular care also needs to be taken to provide suitable parking arrangements (car or bike) for disabled users.

The specific impacts on those with disabilities during demolition, construction and operation are set out within Section 8 of this report.

7.3 PREGNANCY AND MATERNITY

The accessibility of the scheme can also affect people who are protected under pregnancy and maternity characteristics. This is due to potentially limited mobility during pregnancy and the use of a pushchair when caring for children who can often face similar challenges to wheelchair users in the need for step-free access.

Stress and change in circumstances during pregnancy can have knock-on health implications for both mother and baby. There may also be additional health stresses during construction such as air quality which could be exacerbated during pregnancy.

The impacts on those who are pregnant are considered most adverse in terms of social inclusion, health, and accessibility. The mitigation for these is similar to those outlined in terms of both age and disability. While the impacts in the short-term for expectant mothers may be 'minor adverse', the longer-term benefits of the development for people who are pregnant in the future is likely to be 'minor beneficial'. This is due to increased opportunities to gather together, improved public spaces and access routes.

7.4 ETHNICITY

Information from RHP's CRM system shows that within the existing tenants, 11.3% are Asian/ Asian British ethnicity, 10.6% are Black/African/Caribbean/Black British ethnicity, 7.3% are from other ethnic groups and 3.77% are from mixed/ multiple ethnic groups. This is highlighted as those minority ethnic groups are known to be disproportionately affected by housing, public space, and social infrastructure provision.

Of the areas of the design evaluated in this assessment, ethnicity was considered an impacted characteristic when reviewing health effects, safety and security, communication and information, and social infrastructure.

Secure by Design is the main measure that will be embedded into the design and operation of the proposed development to ensure that the scheme does not discriminate based on ethnicity. Mixed and Asian ethnic groups are more likely to have said they were victims of crime compared to white people. For this reason, Secure by Design principles are in place to ensure everyone feels safe within the development. Section 4.4.2 of the Design and Access Statement details these measures.

The impact based on ethnicity is likely to be '**minor beneficial**' as the redevelopment will improve the quality of housing and improve safety and security in the area. This should have knock-on health benefits and potential for greater social cohesion throughout the area.

7.5 OTHER PROTECTED CHARACTERISTICS

Impacts based on gender reassignment, marriage and civil partnerships, sex, sexual orientation, religion, and belief are considered more broadly under the impacts of the development. People within these characteristic groups may experience discrimination on a day-to-day basis and therefore safe, inclusive and accessible environments should be provided.

8.0 PROPOSAL IMPACTS

Social Cohesion

Affected groups: Children, Older People, Disabled People, People from Ethnic Minority groups, Minority faith groups, LGBTQ+ People, Pregnancy and Maternity.

The regeneration process will involve temporary resettlement of nine RHP tenanted households, demolition of housing. This can lead to the risk of loss of social infrastructure and access to these resources.

Community resources provide important places of social connection and promote wellbeing for many groups. For example, the nearby community facilities along Ham Street, including a library, shops and popular café, provide an accessible centre point for local activities, services and facilities. They allow for a cross section of the community to be brought together in a safe place, allowing for better social cohesion and helping to address social isolation.

An opportunity to socialise can have a positive effect on the loneliness of older people and disabled people, which may in turn provide positive health benefits. Social contact and out-of-classroom learning can also improve the wellbeing of children.

Demolition and Construction

Within the site boundary lie a number of community amenities. These include the Community Centre and Richmond MakerLabs, which will be replaced as part of the proposed development. A phased approach ensures these facilities remain operational throughout.

Due to the phased approach to development, there is potential for several meanwhiles uses. These could include:

- Temporary use of other local spaces to continue a programme of community making.
- Meanwhile spaces on site, for example shipping containers, to house facilities during redevelopment.

There are also several equalities policies and initiatives carried out by the applicants that will be able to continue as a result of sustained work, including carrying out the development at Ham Close. A number of these initiatives should also be applied on site within the next phases of the development.

- **Education to Employment:** On September 24th, 2021, a workshop was carried out with Achieving for Children and TAG. On 18th October 2021, there was also a consultation event with Ham Youth Centre users. Both provided opportunities for children from all backgrounds to engage with the scheme and with the profession as a whole. There are opportunities for the developer, contractor and design team to work with local schools to engage students in built environment careers through job fairs or work experience. Apprenticeships could also be offered on-site, focusing on connecting with local young adults.
- **Purpose Architecture:** RHP have committed, through their Inclusion, Diversity and Equalities Policy, to inviting customers to participate in policy setting to help the organisation understand how

services affect people and the barriers they face. Within the development, at Ham Close the existing residents were fully engaged from the outset to ensure the design suited their needs. Through the Ham Close Residents Engagement Panel (REP) they have and will continue to help shape the design and services that will be provided at the new Ham Close. RHP, at an early stage, employed Tpas to help facilitate the setting up and running of the REP. These are viewed as positive steps to fulfilling the equalities initiatives set out by RHP.

Operation

Once complete the scheme is likely to bring residents back together through a network of open spaces, play areas and community facilities. In addition to the existing Ham Youth Centre on-site, the nearest other community centre is YMCA Hawker (1.3km south). The nearest library is Ham Library is located less than 100m southeast of the site and the nearest leisure centre is Teddington Pool and Fitness Centre 1.5km west of the site.

The additional population of 551 persons estimated to be brought forward by the proposed development has the potential to place additional pressure on existing community facilities and infrastructure. A Community Infrastructure Levy (CIL) payment is to be made by the applicant to mitigate this.

The proposed development will include full re-provision of the existing community facilities on-site including a new 3-storey community centre which will contain the majority of the existing youth facilities.

The MakerLabs is the second community facility, to be located on the western boundary of the development site. The Richmond MakerLabs will contain a series of workshops and provide a programme of events for local people.

Hill Residential will be making eight annual payments of £250,000 to RHP through The Social Value Fund. A board will be set up in conjunction with the residents to determine how these funds will be distributed. This will have a long-term positive impact on bringing the community together and could be prioritised towards any of the protected characteristic groups, improving spaces and access.

Overall, it is considered that the proposed development would have a long term '**Moderate Beneficial**' impact on Ham Close residents and the local community through the provision of community facilities.

Health

Affected Groups: Young and elderly people, people with a disability, Pregnancy and maternity, People from Ethnic Minority groups

The potential health impacts during demolition and construction are primarily the mental impact of displacement and change as well as the noise, dust and air quality impacts.

Demolition and Construction

Continuing open channels of communication between Hill Residential, RHP and residents will help to mitigate impacts on the mental health of existing residents. Ensuring clear messaging and ample warning of changes, as well as offering logistical support during home moves, are recommended.

Best practice environmental management measures will be used during construction to ensure that environmental pollution as a result of construction work is kept to a minimum. This includes dust, noise, vibration and odours. Construction activity results in higher levels of dust, noise, vibration and traffic.

The accompanying ES chapter includes the following construction mitigation measures for the proposed development for air quality, noise, ecology, and ground conditions:

- Air quality: during the construction phase of the proposed development, there is the potential for dust and PM10 emissions to occur during site activities, particularly during demolition activities.
- Dust Management Plan: has shown that operational traffic associated with the development would have a Negligible impact on local air quality.
- Noise and vibration; An Acoustics Report has been prepared to assess the suitability of the site for residential occupation. The Noise Impact Assessment confirms that noise emissions from the proposed designs would remain below the specified background levels.
- Mitigation measures have been recommended to control the impact of noise and vibration on the existing population.

Operation

The overall health impact of the development is considered to be '**moderate beneficial**'. This is due to the improvement of open public spaces and enhanced opportunities for connection and social cohesion.

Physical health will also be improved with new access routes to promote walking and cycling. Housing provision will improve and alleviate the health issues associated with poor housing and health.

Safety and Security

Affected Groups: Young and elderly people, Disabled people, Pregnancy and maternity, People from Ethnic Minority groups, Religion and belief, Sex, LGBTQ+ People

Redevelopment could cause a change in crime rates or perception of crime within the Ham Close area. Anyone who falls within a protected characteristic group could feel adversely impacted during construction phases. This is due to a change in environment, routes and day-to-day patterns.

Secure by Design is the main measure that will be embedded into the design and operation of the proposed development.

Section 4.4.2 of the Design and Access Statement details the following measures:

- Layout of Vehicular/Pedestrian Routes; All private pathways to rear gardens will be provided with lockable gates for use of residents to increase the security to the rear of dwellings. Clear sight lines are maximised to provide visual security.
- Communal Areas; Buildings are orientated so that primary frontages and secondary entrances overlook either streets, courtyards or the Linear Park.

- Dwelling Boundaries; Boundaries to houses and apartment blocks are well defined with either front gardens or defensive planting. Front gardens and defensive planting provide separation from the urban spaces and public realm and clearly define boundaries.
- Building Orientation; End of terrace houses have windows overlooking the adjacent public realm. Buildings are orientated to maximise surveillance opportunities on all streets with houses/apartment blocks on corner locations having windows/ balconies on all facades facing the public realm
- Bicycle and Car Parking; Parking is located within the basement or at surface level. Each dwelling is provided with access to safely lock away their bicycle. Secure cycle and car parking is most critical as this is the most prevalent crime within Ham Close in its present form.
- Lighting: Ample street lighting is proposed providing a consistent level of lighting along streets and throughout the Linear Park with consideration to ecology.

These measures ensure that residents will feel safe and reduce crime through a sense of pride, ownership and surveillance within the area. There is already a very low crime rate in the area, and it is therefore considered that the impact on protected groups will be 'negligible'.

Accessibility

Affected groups: Young and elderly people, Disabled people, Pregnancy and maternity

The issues associated with accessibility are outlined under the disability-protected characteristics within Section 7. In addition to the access issues faced by those with disabilities, there are a number of access barriers for people with pushchairs or the young and elderly which need to be addressed.

Demolition and Construction

During the construction phase, the impact on those with a disability, or other access barriers, are likely to be 'minor adverse'. This is largely due to possible rehousing during construction and the potential for this temporary accommodation not to be suitable for specific needs.

The Statement of Community Involvement highlights one of the key aims of the consultation process as 'any resident of Ham Close wishing to remain in the community should be able to do so'. The phasing plan has been prepared to ensure a minimum temporary re-housing during construction. At this stage of consultation, it has been determined that 5 of the 9 households that are required to move within the phased approach will have to move off-site during the construction process. 4 households have been temporarily housed within Ham Close and therefore will have to move twice but are able to remain within the Ham Close site. Of the 5 households moving off-site, 3 are remaining within Ham. All these residents have the right to return if they choose to. For the remainder of the residents, their new homes will be built first and they will be able to move directly into them. This approach will help to significantly reduce the impacts on several protected characteristic groups, including those with disabilities and with reduced mobility. Please note that the demolition and construction of Ham Close is subject to planning permission.

During the demolition and construction phase there may be interruptions to access routes and uneven or hard to navigate surfaces in and around the site. As the phased development is carried out, clear

access routes should be maintained with appropriate signage and wayfinding. Ramped or sloping access must be incorporated into all temporary routes to both the residential buildings and public spaces. This will help to minimise impacts on those with mobility limitations as well as people with pushchairs, the young and older people, who may have greater difficulty navigating unfamiliar routes.

Bus stops may be temporarily relocated during the construction phases. These should be clearly noted, and residents should be made aware in advance to ensure all have equal access to public transport. This information should be made available in a variety of formats to meet residents' needs. If temporary pedestrian crossings are required these should include accessibility features for those with mobility issues and visual or audio impairments to ensure all residents remain safe.

Operation

A variety of measures will be embedded into the design and operation of the proposed development to ensure that the proposed development is accessible to all. This includes the following:

- All buildings have been designed to a minimum standard of M4(2) Category 2: Accessible and Adaptable dwellings.
- 10% of the homes are designed as Wheelchair user homes. This means 46 of the 452 homes will meet M4 (3) with all other homes meeting M4 (2) requirements. The M4 (3) designed homes are purposefully included across tenures and bedroom sizes.
- Resident spaces will also be fully accessible including lifts where required and accessible WCs
- Accessible cycle parking is located within the basement with an accessible lift
- The Village Green is fully accessible from all three site entry points with level access throughout the public realm
- Within the Richmond MakerLabs there are two accessible workshop spaces provided
- 14no. accessible parking bays have been located within the basement and 1no. at surface level. This equates to 3% of the spaces being designated as accessible in line with The London Plan (2021).
- Two blue badge spaces will be provided for the Community Centre and one blue badge space will be provided for the MakerLabs. This equates to a total of 17no. of accessible spaces on site.
- Car-free pedestrian spaces to allow clear access routes. These should be designed to be free of obstructions and give spaces to rest. The Linear Park provides a green spine to the masterplan creating a place that is easy to navigate through and around. New streets link existing roads with the Linear Park, responding to pedestrian desire lines. Pedestrian movement across the scheme is prioritised and celebrated by generously landscaped streets and open spaces.

In the long-term, the proposal would positively impact on the accessibility of the scheme based on the design details outlined above. Therefore, the long-term impact is considered to be '**Moderate Beneficial**'.

Open space and play space

Affected groups: Children, Young People, Older People, People from Ethnic Minority groups, Pregnancy and Maternity.

Children who cannot move about safely and independently on foot and bicycle often become less physically active, reducing opportunities for children to develop certain cognitive, motor and physical skills – as well as contributing towards childhood obesity risks. Parents and carers may also play an enabling role in assisting and supervising young children’s use of open space. Green space can also have a positive role in a child’s cognitive development, their wellbeing, and is linked to lower BMIs. Access to green space has also been shown to have positive health benefits for disabled people, and people with autism or learning difficulties in particular.

Regeneration offers an opportunity to improve the public realm. The ability to access and use the public realm is vitally important to ensuring people feel that they are active members of their society. This includes basic activities such as using local shops or meeting up with people in a shared space outside close to home. In addition, the opening up of green space has been shown to impact positively on both physical and mental health. Social contact is especially important for the health and wellbeing of older people.

Demolition and Construction

During the construction phase, there will be some loss of green space adjacent to housing in the short term however this is currently underused grassland. The Village Green will remain fully accessible throughout. The proposals see an increase in the built form footprint of 6,688m². However, the proposal has also resulted in a decrease of 7,788m² of streetscape hard standing. Many areas that communal space for residents and not publicly accessible will now be given over to public amenity green space. While in the long term the impacts are considered to be beneficial, in the short term this could impact the health and wellbeing of a number of residents.

Mitigation measures could include;

- Clear wayfinding and signage to ensure people can access green spaces during construction phases
- Develop play spaces in a phased strategy to ensure continuous provision
- Safe cycling and walking routes including temporary lighting, crossings and improved connections, and safe routes to school.
- Play and activity - this could include socialising, relaxing, being active and outdoor. This could be located with existing open spaces at Ham Village Green.

Operation

The landscape proposals are influenced by both the natural planted character of Ham Lands Nature Reserve and Ham Village, blending this with more formal geometric interventions. The landscape creates a healthy, community focused place to live sustainably, work, play and socialise. The landscape will include:

- Courtyards (shared formal gardens) using formal orthogonal planting to create a series of landscaped garden rooms;
- A linear park through the centre of the site referencing the naturalistic character of Ham Village Green and the river setting;
- Prioritizing walking and cycling using the TfL Healthy Streets approach;
- Pedestrian friendly streets that promote a safe travel into the linear park and village green;

The proposals include two additional types of open space not currently provided within Ham Close: Communal Courtyards (2,772m²) and Private Amenity Space (6,568m²), together with providing 5,335² of publicly accessible amenity green space and Linear Park.

The quality of the proposed open space will be of a greater quality in comparison to the existing network of amenity lawns. Therefore, the quality and variety of open spaces provided is greater than the current situation and will benefit Ham Close residents and the local community. The proposed development will have no impact on the Village Green.

Enabling children and young people to be physically active is important for healthy growth. The redevelopment provides 1,232m² doorstep play provision provided within the Communal Gardens and Linear Park as well as equipped play space.

The overall impact of the open space on the protected character group is considered to be 'major beneficial'.

Housing

Affected groups: Children, Older People, Disabled People, People from Ethnic Minority groups, and low income existing residents.

Demolition and Construction

The demolition and construction of the Proposed Development would result in the removal of the existing buildings on Site which comprises of 192 homes of which 143 are affordable tenanted (69%), 29 are private leaseholders and 20 are leaseholders bought by RHP.

The Applicant has provided a phasing strategy to ensure the existing residents have an opportunity to be rehoused within the Proposed Development once complete. It is proposed that all existing RHP tenants and leaseholders will be offered homes on-site.

Even though there is a temporary loss of existing residential units during the demolition phase, the proposal provides appropriate phasing which will ensure suitable accommodation is re-provided.

Therefore, considering the measures set out above, housing within the Proposed Development will have a '**Negligible**' impact during demolition and construction on children, older people, disabled people, people from Ethnic Minority groups, and low income existing residents.

Operation

The existing Ham Close consists of 192 properties of which 143 are affordably rented (74%), 49 (26%) properties were privately owned and RHP have bought back 20.

The Proposed Development will provide 452 residential units varying from studios to five bedrooms and will include 221 affordable homes. The Proposed Development will therefore result in a net increase of 78 affordable homes.

The proposed development includes 45 of the residential units (10%) to be M4(3) wheelchair user dwellings and the remaining 90% of dwellings will be accessible and adaptable in accordance with M4(2). The wheelchair homes are available in 1B2P, 2B3P, 2B4P, 3B4P, 3B5P, so that carers and families can also be accommodated. 73% of the accessible homes are affordable (33) and 12 are market tenures.

Each phase has a mix of affordable and private homes to ensure a mixed tenure community is delivered. Phases 1 and 2 re-provide affordable homes for existing residents early in the regeneration. The community facilities are also being delivered within the first phase.

The mix of homes is in line with the requirements set within the LBRuT Local Plan, and the London Plan, and will therefore contribute to creating a diverse mix of homes including those housing suitable for families with young children and low-income households.

Therefore, considering the measures set out above, the Proposed Development will have a **Positive** impact from housing during operation for children, older people, disabled people, people from Ethnic Minority groups, and low income existing residents.

9.0 SUMMARY AND CONCLUSIONS

This Equalities Impact Assessment has reviewed the Proposed Development at Ham Close with respect to relevant policies and procedures. In particular, the following protected groups have been considered:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

The proposed development will be subject to policies and procedures of the Applicant and residential management company set out to ensure equality for the protected groups outlined in the Equality Act 2010.

The impact on each protected group is set out below.

Group	Demolition and Construction	Operation	Overall Impact
Age	Minor adverse	Moderate Beneficial	Inclusive and accessible design principles have been applied to ensure that any person can access and utilise the proposed development with ease. Services for young children and families and play space will be provided on-site.
Disability	Minor Adverse	Moderate Beneficial	The proposal exceeds the requirements for accessibility in housing and also creates a fully accessible public realm with measures in place

Group	Demolition and Construction	Operation	Overall Impact
			to ensure all can participate in activities.
Pregnancy and Maternity	Minor Adverse	Minor Beneficial	Accessible design principles ensure easy access to dwellings and public areas for those who are pregnant.
Ethnicity	Minor Adverse	Minor Beneficial	Secure by design principles are in place to ensure people feel safe within the development and hope to prevent race-related crimes. Improved housing is also linked to improving health outcomes for all.
Gender reassignment, marriage and civil partnership, religion and belief, sex and sexual orientation	Negligible	Minor Beneficial	Safety and security measures are in place to ensure everyone feels safe moving around the proposal and community infrastructure is provided to create cohesion between all residents. The development is considered to provide an uplift in facilities in the long term.

The overall impact of the development is considered to be 'minor beneficial' to 'moderate beneficial'.

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- ¹⁵ 552076_HamClose_Baseline Data_EqlA (*All Information below is accurate as of 19 May 2022. Information has been taken from existing CRM data as well as data collected from returned "Customer Needs Survey December/January 2020/21")
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- ²⁰ Stephanie Wallace , Cumulative Effect of Racial Discrimination on the Mental Health of Ethnic Minorities in the United Kingdom (AJP201514941_Wallace 1294..1300 (nih.gov))
- ²¹ ONS - 2011 Census (KS106EW) Local Area Report for areas in England and Wales - Nomis (nomisweb.co.uk)
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