



FORMER NESTLE FACTORY, HAYES

EQUALITIES IMPACT ASSESSMENT
MAY 2017

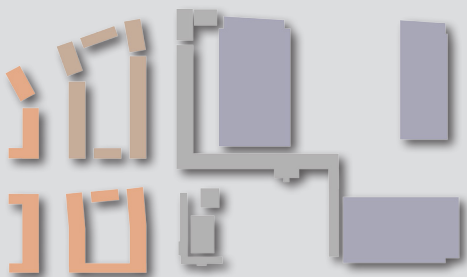
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This document sets out measures that have been incorporated into the design of the development, with the aim to reduce socio-economic inequalities.



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Former Nestlé Factory, Hayes

Equalities Impact Assessment

May 2017

Former Nestlé Factory, Hayes

Equalities Impact Assessment

Prepared on behalf of SEGRO PLC and
BDW Trading Limited (Barratt London)

Project Ref:	24552/A5/HIA	
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1 INTRODUCTION

- 1.1 This Equalities Impact Assessment (EqIA) has been prepared in response to a request from the London Borough of Hillingdon (LBH) for an EqIA to accompany the planning application for redevelopment of the Former Nestlé Factory in Hayes. The EqIA sets out: the legislative and planning policy context to EqIA; the background to the site and proposed development; the methodology used in this assessment; the baseline data collected; the assessment and conclusions.

Site Description

- 1.2 The site is located in the south east of the LBH, approximately 4.13km to the north east of Heathrow Airport. As shown in Appendix 1, North Hyde Gardens and Nestles Avenue form the eastern and southern boundaries while the Grand Union Canal forms the northern boundary of the site along with the Great Western Railway Line. Minet Country Park is located to the north-east of the site. Industrial buildings are located to the east of site, and run parallel with the railway line, with residential areas located beyond. Residential areas are located to the west of the site, to the south of the railway line with further industrial development located to the north of the railway line. A residential area lies immediately south of the site, on the opposite side of Nestles Avenue. The topography of the site is generally flat, between 25-35m Above Ordnance Datum (AOD).
- 1.3 The A312 (North Hyde Road) is located approximately 140m to the south of the site and the M4 motorway is approximately 1km to the south of the site (closest to Junction 3). The general uses surrounding the site comprise residential areas to the north, east, south and west with industrial uses situated to the east and west. Hayes town centre is located approximately 1km to the north. A small river (River Crane) is situated approximately 200m to the east of the site and flows north to south, ultimately discharging into the River Thames located 10km to the southwest of the site at its closest point. This is illustrated on the site location plan at Appendix 1.

Proposed Development

- 1.4 The proposals are shown on the masterplan in Appendix 2 and comprise:

Full planning permission for the part-demolition of existing factory buildings, associated structures and redevelopment to provide 1,381 dwellings (Use Class C3), office, retail, community and leisure uses (Use Classes

A1/A3/A4/B1/B8/D1/D2) 22,663 sqm (GEA) of commercial floorspace (Use Classes B1c/B2/B8 and Data Centre (sui generis), amenity and playspace, allotments, landscaping, access, service yards, associated car parking and other engineering works”.

- 1.5 A decentralised energy centre is also proposed within the residential part of the development and the maximum building height will be up to ground floor plus 10 storeys.

Legislative and Policy Context

The Equality Act 2010ⁱ

- 1.6 The purpose of the Equalities act is to ensure that *‘Ministers of the Crown and others when making strategic decisions about the exercise of their functions to have regard to the desirability of reducing socio-economic inequalities...’*. The act goes on to say at paragraph 1 that *‘An authority to which this section applies must, when making decisions of a strategic nature about how to exercise its functions, have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage...’*. The Act also defines the following ‘protected characteristics’: *age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation*.

The London Plan March 2016ⁱⁱ

- 1.7 The Introduction to the London Plan at paragraph 05 identifies that:

‘The Mayor has also had regard to the principle that there should be equality of opportunity for all people, and to:

- reducing health inequality and promoting Londoners’ health*
- climate change and the consequences of climate change*
- achieving sustainable development in the United Kingdom*
- the desirability of promoting and encouraging use of the Thames, particularly for passenger and freight transportation*
- the need to ensure consistency between the strategies prepared by the Mayor*
- the need to ensure consistency with national policies and international treaty obligations notified to the Mayor by Government, and*
- the resources available to implement the Mayor’s strategies’.*

- 1.8 Policy 3.1, Ensuring Equal Life Chances for All, states that:

‘The Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and

where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London.'

1.9 Policy 4.12, Improving Opportunities for All, states that:

'Delivery of the Mayor's Economic Development Strategy (EDS) will be essential to achievement of the objectives of this Plan, which sets out the spatial development policies that will be needed. The EDS highlights the importance of extending opportunity to all Londoners and outlines actions to:

- tackle worklessness and get more Londoners into work*
- address the root causes of low skills*
- promote equality and tackle deprivation.'*

[Housing Supplementary Planning Guidance May 2016ⁱⁱⁱ](#)

1.10 Policy 3.5, Part B of the Housing Supplementary Planning Guidance, within the section Neighbourhood Scales, identifies at paragraph 2.2.8 that *'...An Equality Impact Assessment should be undertaken to ensure that the needs of all those with 'protected characteristics' are considered.*

[Equal Life Chances for All, Policy Statement, July 2009^{iv}](#)

1.11 The Equal Chances for All is a policy statement set out by the Mayor of London to: *'ensure that all formal decisions are assessed for their impact on equality, inclusion and community cohesion and that an appropriate equality impact assessment or integrated impact assessment is carried out on all strategies, policies and appropriate programmes* and while not directly applicable to planning applications this EqIA has been prepared to ensure that equality opportunities have been considered in what is a large scale redevelopment of a 12 hectare site.

Assessment Methodology

1.12 A letter setting out the proposed scope of the EqIA was sent to LBH on 18th January 2017 (attached at Appendix 3). The letter identified that the EqIA would use the LBH Equalities Impact Assessment form as the basis for this report. No response had been received by the time the planning application was submitted.

2 BASELINE CONDITIONS

2.1 The following tables set out the baseline data relevant to the protected characteristics identified by the Equalities Act, in Hillingdon. The data cover the Hillingdon Wards (Botwell (within which site is located), Townfield and Pinkwell) and these Wards are collectively considered to form an appropriate Study Area for this assessment.

Table 1: Gender

	Study Area	Hillingdon
Males	22,010	135,811
Females	21,897	138,125
Total Population	43,907	273,936

Source: NOMIS derived ONS, 2011 Census Table QS104EW

Table 2: Age

	Study Area	Hillingdon
Younger Population (0 to 15 years)	10,914	56,893
Working Age Population (16 to 64 years)	28,974	181,865
Older Population	4,019	35,178

Source: NOMIS derived ONS, 2011 Census Table QS103EW

Table 3: Ethnicity

	Study Area	Hillingdon
White (English/Welsh/Scottish/Northern Irish/British/ Irish/Gypsy or Irish Traveller/Other)	15,922	166,031
Mixed/Multiple Ethnic Group (White and Black Caribbean/White and Black African/ White and Asian/Other)	1,677	10,479
Asian/Asian British (Indian/Pakistani/Chinese/Other)	18,422	69,253
Black/African/Caribbean/Black British (African/Caribbean/Other)	6,075	20,082
Other Ethnic Group (Arab/Other)	1,811	8,091

Table 4: Country of Birth

	Study Area	Hillingdon
Europe (inc UK)	28,055	212,577
Africa	4,364	17,226
Middle East and Asia	10,747	39,339
The Americas and the Caribbean	680	3,992
Antarctica and Oceania	60	800

Source: NOMIS derived ONS, 2011 Census Table QS203EW

Table 5: Economic Activity

	Study Area	Hillingdon
Economically Active	21,427	141,542
Economically Active but Unemployed	1,874 (9%)	8,693 (6%)
Economically Inactive	9,750	58,384

Source: NOMIS derived ONS, 2011 Census Table QS203EW

Table 6: Occupation

	Study Area	%	Hillingdon	%
Managers, directors, senior officials	1,502	8%	13,353	10%
Professional occupations	2,146	11%	22,237	17%
Associate professionals, technical occupations	1,785	9%	16,961	13%
Administrative and secretarial occupations	2,262	12%	17,313	13%
Skills trades occupations	1,984	10%	13,565	10%
Caring, leisure and other services	1,765	9%	11,542	9%
Sales and customer service	2,159	11%	11,242	9%
Process, plant and machine operatives	2,120	11%	9,716	7%
Elementary occupations	3,330	17%	14,361	11%

Source: NOMIS derived ONS, 2011 Census Table QS606EW

Table 7: Level of Qualifications Gained

	Study Area	Hillingdon
1-4 O levels/CSE/GCSEs (any grades), Entry Level, Foundation Diploma	9,085	67,711
No qualifications	7,782	41,548
5+ O level (Passes)/CSEs (Grade 1)/GCSEs (Grades A*-C), School Certificate, 1 A level/2-3 AS levels/VCEs, Higher Diploma, Welsh Baccalaureate Intermediate Diploma	6,864	68,884
Foreign qualifications	6,243	29,707
Degree (e.g. BA, BSc), Higher degree (for example MA, PhD, PGCE)	5,044	41,447
NVQ Level 2, Intermediate GNVQ, City and Guilds Craft, BTEC First/General Diploma, RSA Diploma	3,742	25,440
Other vocational/work-related qualifications	3,561	30,299
2+ A levels/VCEs, 4+ AS levels, Higher School Certificate, Progression/Advanced Diploma, Welsh Baccalaureate Advanced Diploma	3,433	38,709
Professional qualifications (for example teaching, nursing, accountancy)	2,614	26,966
NVQ Level 3, Advanced GNVQ, City and Guilds Advanced Craft, ONC, OND, BTEC National, RSA Advanced Diploma	2,585	19,305
NVQ Level 1, Foundation GNVQ, Basic Skills	2,359	13,983
Apprenticeship	1,070	10,675
NVQ Level 4-5, HNC, HND, RSA Higher Diploma, BTEC Higher Level	1,042	8,145

Source: NOMIS derived ONS, 2011 Census Table QS502EW

NB: Based on a study of population 16 and over

Table 8: Religion

	Study Area	%	Hillingdon	%
Christian	15,345	35%	134,813	49%
Muslim	9,034	21%	29,065	11%
Sikh	6,748	15%	18,230	7%
Hindu	4,878	11%	22,033	8%
No religion	4,504	10%	46,492	17%
Religion not stated	2,635	6%	17,495	6%
Buddhist	471	1%	2,386	1%
Other religion	265	1%	1,669	1%
Jewish	27	0%	1,753	1%

Source: NOMIS derived ONS, 2011 Census Table QS208EW

Table 9: General Health

	Study Area	%	Hillingdon	%
Very good health	20,750	47%	133,627	49%
Good health	15,514	35%	96,647	35%
Fair health	5,310	12%	31,492	11%
Bad health	1,761	4%	9,404	3%
Very bad health	572	1%	2,766	1%

Source: NOMIS derived ONS, 2011 Census Table QS302EW

Table 10: Physical Disability

	Hillingdon
Learning Difficulties	2,220
Arthritis	1,250
Psychosis	870
Disease of the Muscles, Bones or Joints	530
Back pain - other / Precise diagnosis not Specified	490
Neurological Diseases	470
Psychoneurosis	350
Unknown / Transfer from Attendance Allowance	310
Cerebrovascular Disease	280
Blindness	240
Heart Disease	220
Deafness	190
Chest Disease	190
Epilepsy	190
Multiple Sclerosis	190
Hyperkinetic Syndromes	190
Diabetes Mellitus	170
Spondylosis	160
Behavioural Disorder	160
Trauma to Limbs	150
Malignant Disease	140
Chronic Fatigue Syndromes	80
Asthma	70
Personality Disorder	70
Severely Mentally Impaired	70
Renal Disorders	60
AIDS	60
Parkinson's Disease	50
Major Trauma other than Traumatic Paraplegia/Tetraplegia	50
Bowel and Stomach Disease	50
Multi System Disorders	50
Skin Disease	50
Metabolic Disease	40
Traumatic Paraplegia/Tetraplegia	40
Dementia	40
Cystic Fibrosis	30
Peripheral Vascular Disease	30
Alcohol and Drug Abuse	30
Inflammatory Bowel Disease	30
Blood Disorders	30
Terminally Ill	30
Motor Neurone Disease	10
Haemophilia	10
Double Amputee	10
Cognitive disorder: Other / precise diagnosis not specified	10
TOTAL	9,970

Source: DWP, Benefit Claimants, Disability Living Allowance by disabling condition

NB: @ February 2016 being the most up-to-date data (as at time of investigating, Sept 2016)

Table 11: Income

	Hillingdon
Residential Analysis	
Hourly Pay - Gross	£15.41
Weekly Pay - Gross	£605.5
Workplace Analysis	
Hourly Pay - Gross	£15.63
Weekly Pay - Gross	£633.4

Source: Annual Survey of Hours and Earnings, 2015 (latest data)

3 ASSESSMENT

3.1 This assessment is based on the Impact Assessment (IA) form used by LBH to fulfil their statutory obligation to undertake equalities assessment. Where appropriate the form has been adapted for the purposes of this assessment. Text in italics is the wording of the IA form.

The process for an IA is as follows:

- *Step A – Description of what is to be assessed and its relevance to equality.*
- *Step B – Information and data consideration including outcomes of consultation and engagement.*
- *Step C – Carry out the assessment; what are the positive or adverse impacts?*
- *Step D – Conclusions and action planning*

Name of service, function, policy (or other) being assessed

The proposals assessed within this document relate to a planning application for redevelopment of the Former Nestlé Factory in Hayes to provide 1,382 dwellings, community facilities, retail/commercial uses, commercial floorspace, a data centre, amenity and play space and car parking.

Directorate or organisation responsible (and service, if it is a policy)

The Applicants are Barratt London and SEGRO.

Date of assessment (DD/MM/YY)

February 2017

Date next assessment due (Annually for service planning, 3 years if no change in service, function or policy or if no relevance to equality)

N/A

Names and job titles of people carrying out the assessment

Barton Willmore LLP on behalf of the Applicants

Accountable person (e.g. Head of Service, Corporate Director)

N/A

Date IA Form approved by accountable person

Form comprises chapter 3 of this Equalities Impact Assessment document which accompanies the planning application.

STEP A) DESCRIPTION OF WHAT IS TO BE ASSESSED AND ITS RELEVANCE TO EQUALITY**A.1) What are the aims or main purpose of the service, function or policy? What does it provide and how does it provide it?**

The purpose of the planning application is to redevelop the Former Nestlé Factory site to provide a mixed-use sustainability community which meets local housing and employment needs as well as providing welcoming and accessible open space, play spaces and community uses.

A.2) List any key policies or procedures to be reviewed as part of this assessment

A planning statement has been prepared to accompany the planning application which undertakes a thorough review of all planning policies relevant to the development. Where relevant, assessment within the Environmental Statement has also addressed planning policies.

A.3) What is the intended benefit of the service, function or policy?

The intended benefits of the development include the provision of housing, employment opportunities, access to open space and play space amongst others expected from new mixed use urban developments.

A.4) Who are the users or beneficiaries of the service, function or policy? What is their equality profile?

Beneficiaries are expected to include unemployed people, those seeking to rent or purchase new housing and the local community. Chapter 2 of this Equalities Impact Assessment sets out the equality profile of the local community.

A.5) Who are the stakeholders? What is their interest? E.g. PCT, Voluntary and Third Sector, other local authorities, cabinet members etc.

Stakeholders include existing residents of the local area, LBH, health care providers, local schools, local businesses and employers. Prior to submission of the planning application extensive consultation has been undertaken with the community including the specific following activities:

- Community Open Day 18th Jun 2016;
- Workshop Canal & Public Realm 1st Sep 2016;
- Public Exhibition 24th Nov 2016; and
- Public Exhibition 29th and 30th Dec 2016.

A.6) State why the service, function or policy is / is not relevant to equality

The planning application is relevant to all equality groups.

A.7) Identify which equality strands or community issues are relevant to the assessment:

Age	Y	Sexual Orientation	Y
Gender (men and women)	Y	Religion or belief	Y
Transgender	Y	Disability	Y
Race/Ethnicity	Y	Community Safety	Y
Community Cohesion	Y	Other – please state	N/A

STEP B) Consideration of information; data, research, consultation, engagement – evidence of needs, priorities and preferences

Consideration of information and data - what have you got and what is it telling you?

Chapter 2 of this Equalities Impact Assessment document contains the information used in this assessment including Office for National Statistics data.

B.2) Did you carry out any consultation or engagement as part of this assessment?

Not as part of this assessment but as part of the planning application to which this assessment relates as discussed in A.5 above.

B.3) Who was consulted or engaged? What was their equality profile? What were the findings?

The local community and key stakeholders in the development. A Statement of Community Engagement document has been prepared and accompanies the planning application setting out the consultation exercises undertaken in detail.

B.4) Describe other research, studies or information to assist with the assessment.

The planning application is accompanied by an extensive suite of documents including:

- Arboricultural Assessment;
- Acoustics and Vibration Reports;
- Affordable Housing Statement and Viability Assessment;
- Air Quality Assessment;
- Archaeological Desk Based Assessment;
- Aviation Report;
- Construction Management Plans;
- Daylight and Sunlight Assessment;
- Demolition Reports;
- Design and Access Statement;
- Ecological Reports;
- Economic Statement;
- Equalities Impact Assessment;
- Energy Statements;
- Flood Risk/Drainage Assessments;
- Health Impact Assessment;
- Heritage Assessment;
- Land Contamination Assessments;
- Lighting & CCTV Reports;
- Site Waste Management Plan;
- Statement of Community Involvement;
- Sustainability Statements (including Overheating Reports);
- Structural Survey and Conditions Report;
- Townscape and Visual Impact Assessment;
- Transport Assessment;
- Travel Plans;
- Utilities Assessments;

- Ventilation & Extraction Report; and
- Wind Assessment.

STEP C) Assessment

C.1) Describe the POSITIVE impacts:

User Group/Equality Strand/Community	Impact (<i>how</i> they may be affected).
<p>All groups: Age, Disability, Gender, Race, Religion/ belief or Orientation, Social belief, Sexual Inequality</p>	<p>The development targets and meets local needs, and is suitable for all Protected Characteristics groups. Specifically, the development directly contributes to, and results in the following impacts:</p> <ul style="list-style-type: none"> • Creation of local employment opportunities both during the construction phase and once the development is complete and occupied. Chapter 3 identifies that both the Study Area and LBH have a large working age population of which 9% are unemployed in the Study Area and 6% are unemployed in LBH. This development will therefore have the positive impact of seeking to reduce these unemployment numbers by providing local employment opportunities; • Creation of local housing provision for sale or rent, and including affordable rented provision. As set out in Tables 3, 4 and 8 of Chapter 2 of this report, the Study Area and LBH have diverse communities in terms of ethnicity and religion and the development seeks to provide good quality accommodation in a range of sizes and tenues available for all the local community thereby creating a positive impact and balanced community; • Creation of high quality landscaped play and open spaces for the new community and existing community to use. The data in Chapter 2 of this report show that for the Study Area 82% consider their health to be good or Very Good and for LBH 84% consider their health to be Good or Very Good. The provision of open space and a gym within the development will work towards improving the percentage of the population that feels Good or Very Good about their health which is a positive impact; and • Provision of local retail opportunities and community services including a gym and nursery which will support the pregnancy/maternity protected characteristic. As set out above the development will meet local health needs, provide community facilities and seek to create a balanced and quality regeneration of this part of Hayes. • In addition, an Access Statement was prepared to accompany the planning application. This document described the access provisions around the proposed development including:

User Group/Equality Strand/Community	Impact (<i>how</i> they may be affected).
	<ul style="list-style-type: none"> • Arrival at the site / entrance ways; • Approaches to the buildings; • Access to facilities; and • The emergency evacuation strategy.

C.2) Describe any ADVERSE impacts (actual or potential):

User Group/Equality Strand/Community	Impact (<i>how</i> they may be affected) and identify in the action plan what action you need to take to address this impact or mitigate against it.
All groups: Age, Disability, Gender, Race, Religion/ belief or Orientation, Social belief, Sexual Inequality	There are no negative impacts associated with the development in terms of equalities impacts. The development is suitable for all Protected Characteristics.

STEP D) Conclusions and Action Planning

Explain what and how negative impacts have been reduced or removed and positive impacts improved or included.

N/A– no negative effects identified.

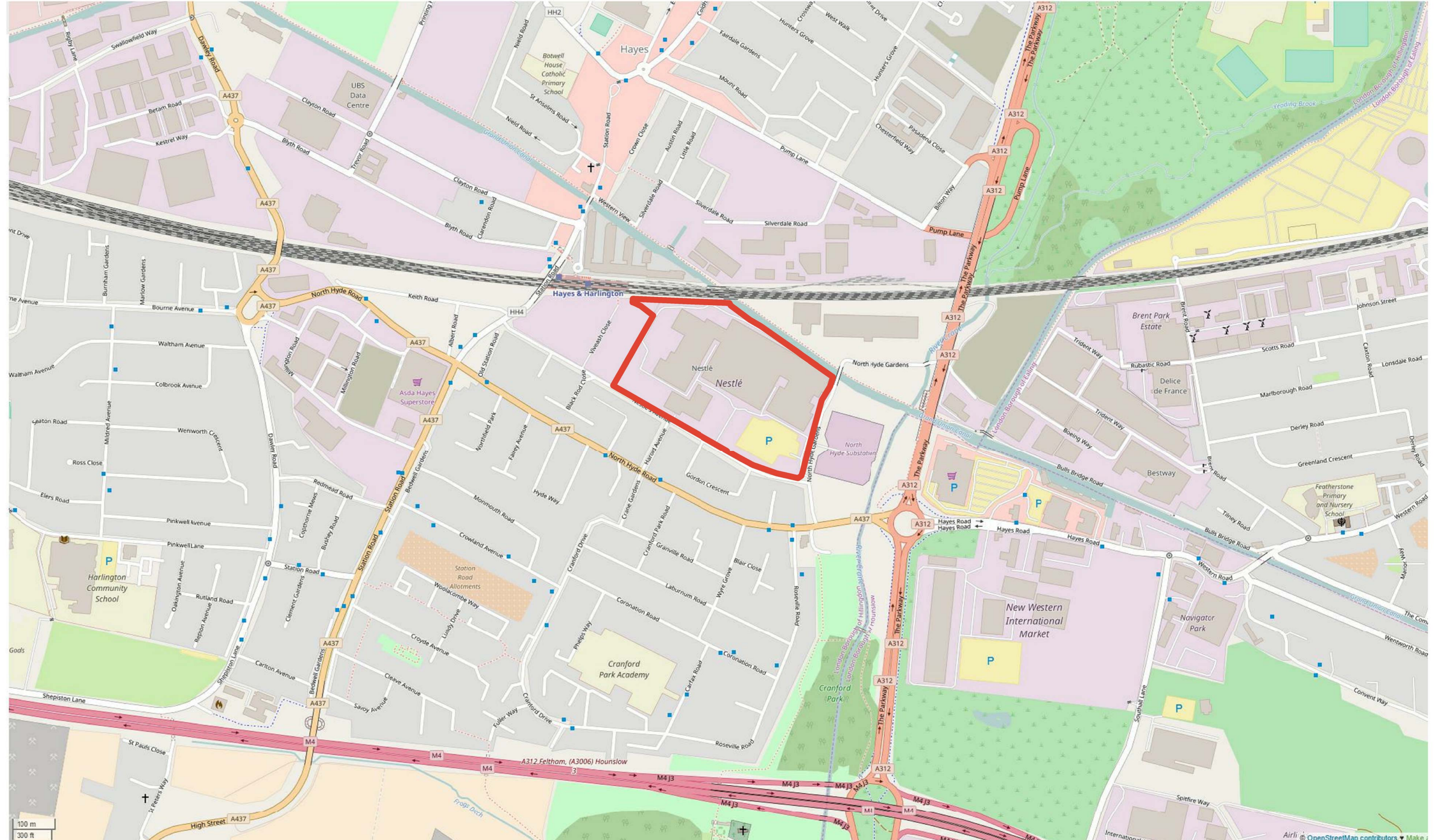
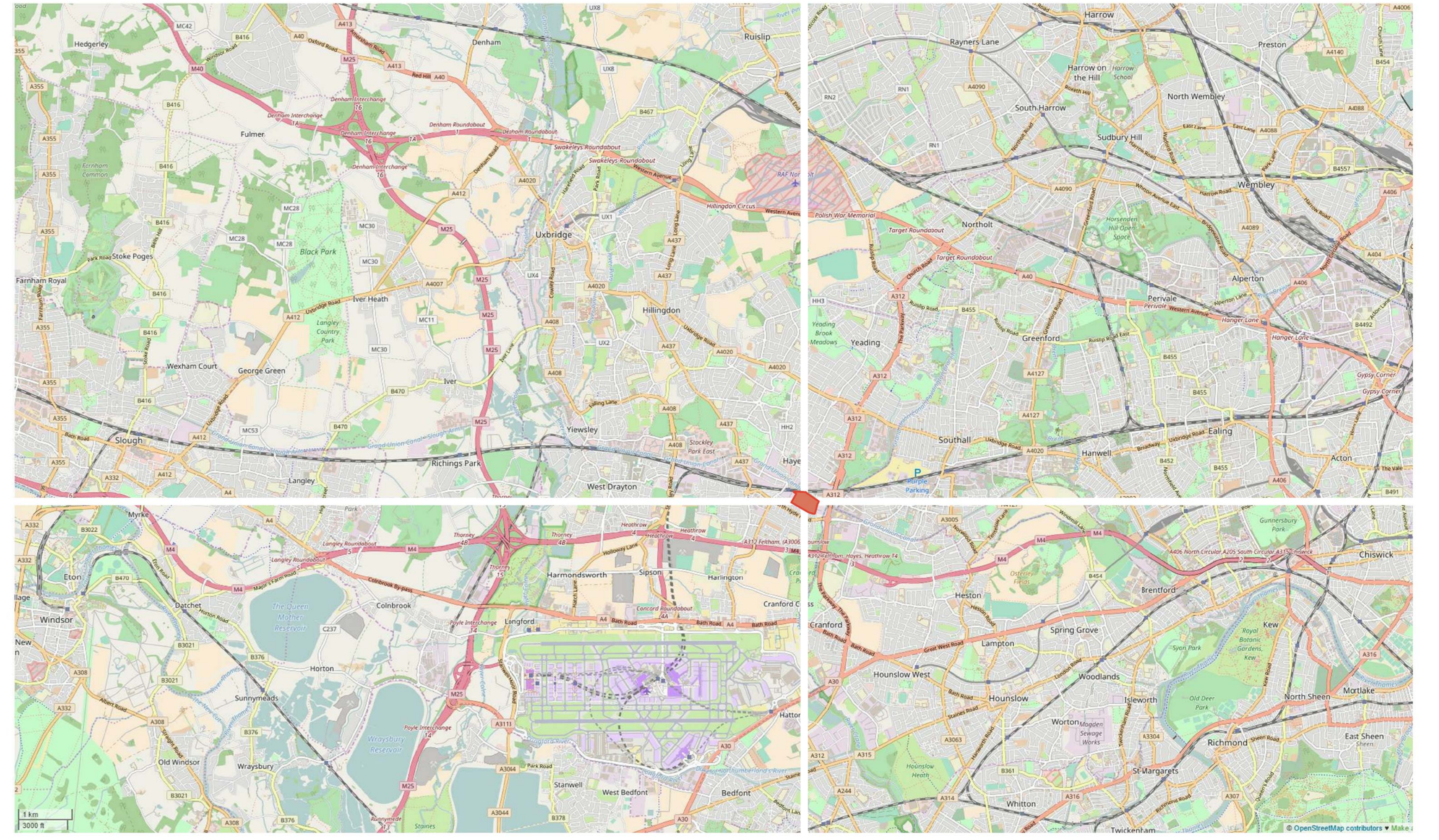
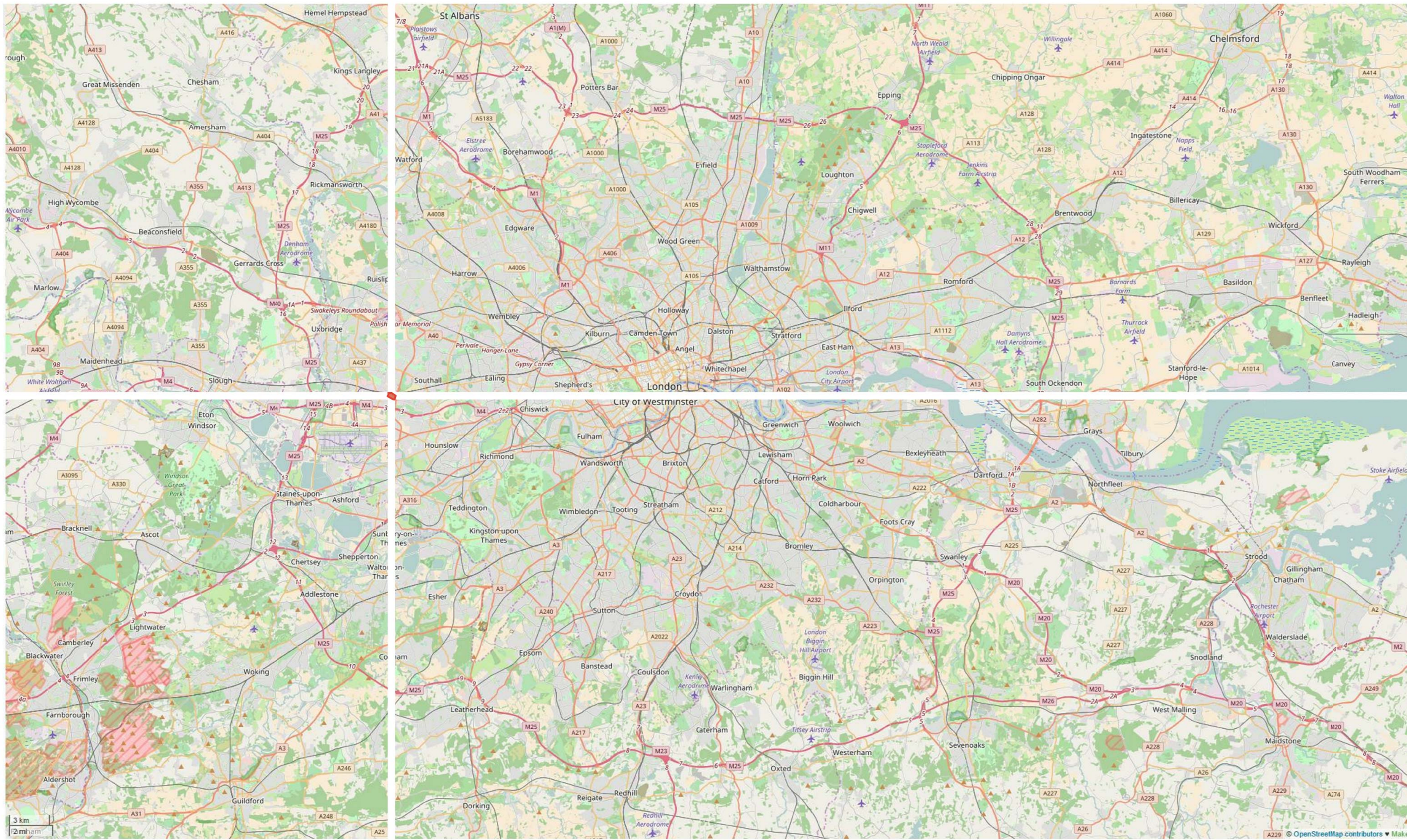
3.2 The aim of the development is to generate a redundant chocolate and coffee factory to provide a new community for Hayes which has employment opportunities, residential housing, play spaces, open space, retail units, and community uses. The design of the development will result in positive impacts in terms of equality.

REFERENCES

- ⁱ <http://www.legislation.gov.uk/ukpga/2010/15/contents>
- ⁱⁱ https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf
- ⁱⁱⁱ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/housing-supplementary>
- ^{iv} https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/archives/mayor-equalities-docs-equal-life-chances-240709.pdf

APPENDIX 1

SITE LOCATION PLAN



APPENDIX 2

MASTERPLAN



DATE	REV	DESCRIPTION	CHK
17010	01	01 - Design Frame Update	JA
17017	02	02 - Design Frame Update	BJ
17022	03	03 - Design Frame Update	BJ
17037	04	04 - Design Frame Update	BJ

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FORMER NESTLE FACTORY, HAYES
MASTERPLAN - Context Roof Plan -
Application

APPENDIX 3

SCOPING LETTER TO LBH

Matt Kolaszewski
Principal Planning Officer
Planning Department
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
Middlesex, UB8 1UW

Our Ref: 24552/A5/MM

19th January 2017

Dear Matt,

FORMER NESTLE FACTORY, HAYES, HILLINGDON

PROPOSED EQUALITIES IMPACT ASSESSMENT

We write to seek agreement with you on our proposed approach and scope for the preparation of an Equalities Impact Assessment (EqIA) we are preparing on behalf of Barratt London and Segro Plc, to support the planning application for development at the Former Nestle Factory in Hayes.

For a mixed-use development of this nature (1,382 residential dwellings, retail and commercial uses, 22,600 square metres of commercial floorspace, community facilities, amenity and place space, landscape, access and parking) we consider a desk based assessment to be appropriate. We propose to base the EqIA on the LBH EqIA Impact Assessment form following Steps A, B, C and D. We do not consider that consultation will be necessary as part of the EqIA.

We will assume you are content with this approach unless you notify us otherwise. If you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely



Mary Mescall
Associate Environmental Planner

