

St. Andrew's Gate, Town Centre Extension, Uxbridge

Hybrid Planning Application

Equalities Impact Assessment



ST. ANDREW'S PARK
UXBRIDGE

VINCI
PLC

ST. MODWEN

St. Andrew's Gate, Town Centre Extension, Uxbridge

Equalities Impact Assessment

Vinci St Modwen

June 2024



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1.0

Introduction

1.1 This Equalities Impact Assessment ('EqIA') has been prepared by Lichfields on behalf of Vinci St Modwen ('the Applicant') to accompany an application in respect of the site at St. Andrew's Gate, Town Centre Extension, Uxbridge ('the TCE Site') within the London Borough of Hillingdon ('LBH').

1.2 The purpose of this EqIA is to identify, assess and present any potential equality impacts arising from the proposed development on any group(s) with "protected characteristics" as defined by the Equality Act 2010, and to identify any interventions and/or measures required to mitigate any adverse effects. This report is intended to assist Hillingdon Council in its consideration of the planning application for the proposed development.

Background and Site Context

1.3 The TCE Site comprises vacant brownfield land, the Grade II listed former cinema building and its associated car park and the locally listed St Andrew's Gate. The site is currently enclosed by construction hoardings and not in active use, other than a temporary public right of way ('PRoW') across the site linking to Hillingdon Road and the underpass.

1.4 The TCE Site is located to the east of Park Road and Hillingdon Road. It is bound to the north and north-east by St. Andrew's Road, to the east by the spine road, Town Centre West phase of development and locally listed Mons building and to the south by Burton Road. Residential development which ranges in height from 3 to 8 storeys is located between the site and Dowding Park. Dowding Park provides a significant local amenity within a large area of urban green space, including sport pitches and play space. The John Locke Primary School is located within St. Andrew's Park, to the north of Dowding Park and is within walking distance of the TCE Site.

1.5 Additionally, the TCE Site lies within the eastern section of the demarcated Town Centre boundary for Uxbridge, as defined in the Hillingdon Local Plan¹, and is located within the London Plan's Metropolitan Town Centre designation. Uxbridge Town Centre accommodates a range of retail, commercial and community uses, as well as sustainable transport options. Uxbridge Underground Station and Bus Station are located within walking distance of the site. St Andrew's Church is located on the opposite side of Hillingdon Road between the TCE site and town centre.

Proposed Development

1.6 The proposed development considered in this HIA is for hybrid planning permission comprising

- 1 In outline:
- Creation of up to no. 356 residential dwellings (Class C3) within three new build blocks, of up to 10 storeys;

¹ Hillingdon Council (2012), *Local Plan: Part 1 – Strategic Policies*.

- Up to 660 sq.m gross internal area ('GIA') of flexible commercial space (Use Classes E(a), E(b), E(c), EI, E(g)(i) and E(g)(ii)) at ground floor level in Building Zones B and C, and up to 440 sq.m fixed as a convenience store (Use Class E(a)) (GIA) located in Building Zone C; and
- Associated car parking and hard and soft landscaping.

2 In full:

- Change of use of the former cinema building to reinstate a gym (E(d)) in the Main Hall and change of use of former squash courts to a café (E(b));
- Associated car parking and hard and soft landscaping and access alterations;
- External alterations to the building.

Scope of the Assessment

1.7 The scope of this EqIA has due regard of the proposed development and national legislation. It focuses on the local impact area ('LIA') surrounding the proposed development, which for the purpose of this study comprises the following 2022 electoral wards – Colham & Cowley, Hillingdon East, Hillingdon West and Uxbridge. An overview of the LIA is presented in Figure 2.2.

Report Structure

1.8 The remainder of this EqIA is structured as follows:

- **Section 2.0** sets out the methodology used in this EqIA, and defines the LIA used in the assessment;
- **Section 3.0** reviews the relevant legislative and policy framework in which the proposed development is to be delivered;
- **Section 4.0** considers the demographic and socio-economic profile of the LIA, benchmarked against LBH and Greater London more widely. This is used to identify the priority groups within the local community;
- **Section 5.0** undertakes an assessment of the likely equality impacts of the proposed development on the identified priority groups and the general population of the LIA; and
- **Section 6.0** presents this EqIA's overall conclusions.

2.0 Assessment Methodology

2.1 The approach to this EqIA draws on best practice approaches, including ones set out by the Greater London Authority's ('GLA') Planning for Equality and Diversity in London Supplementary Planning Guidance² ('SPG'). The assessment commences by undertaking a review of legislation, as well as regional and local planning policy to identify the issues (and policies) relating specifically to equality, both at the London-wide level, and more specifically in LBH.

2.2 The approach continues by identifying the particular priority groups (i.e. groups with "*protected characteristics*" as defined by the Equality Act 2010), drawing on data from the 2021 Census of Population³ and other information available the LBH. Equality determinants, pathways and outcomes are then identified based on the main components of the proposed development.

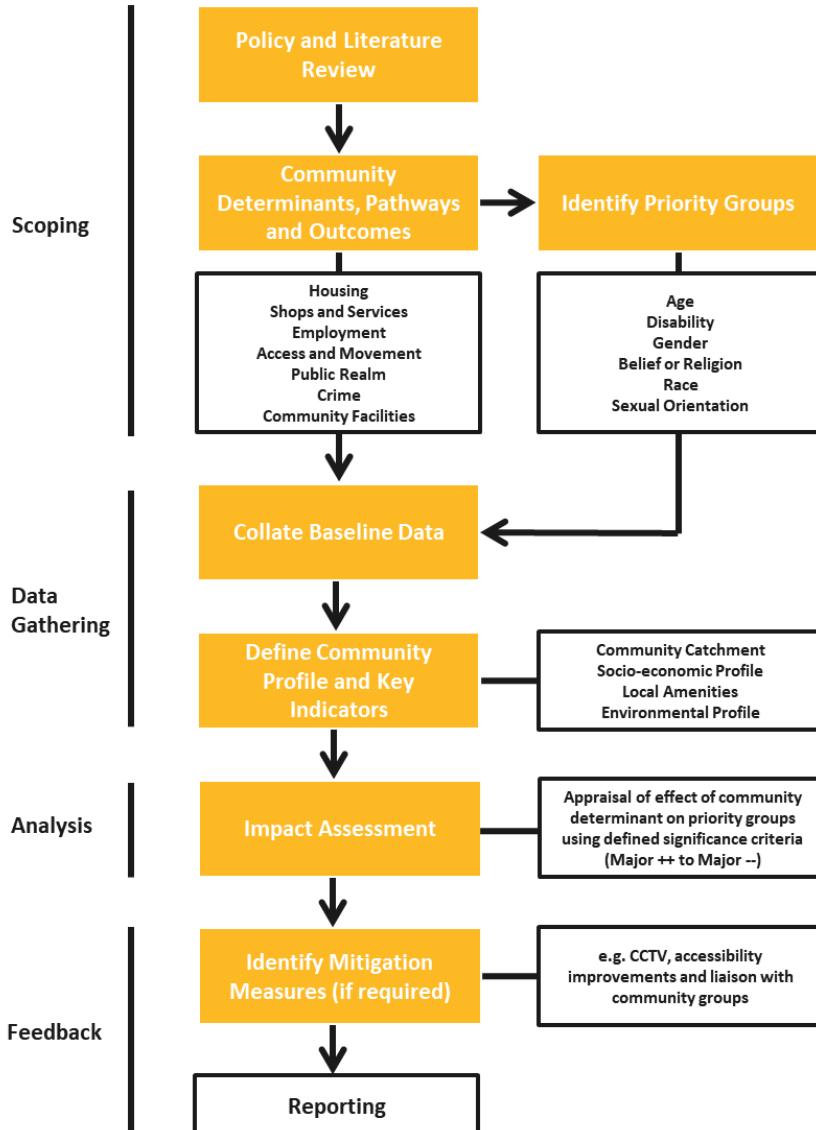
2.3 Once the baseline demographic and socio-economic profile for the LIA is established, the EqIA appraises the potential impacts of the equality determinants on the priority groups identified, using defined significance criteria on a matrix basis from major adverse to major beneficial, representing the scale of impacts over and above the baseline position.

2.4 The potential impacts of the proposed development are assessed during both construction and operational phases, taking into account the location and duration of an impact when relevant. Subsequently, the need for measures to address adverse impacts (and maximise beneficial ones) are considered, including the embedded measures included as part of the proposed development. The assessment framework is set out in Figure 2.1 overleaf.

² Mayor of London (2007), *Planning for Equality and Diversity in London SPG to the London Plan*.

³ Office for National Statistics (2021), *2021 Census of Population*.

Figure 2.1 EqIA impact framework

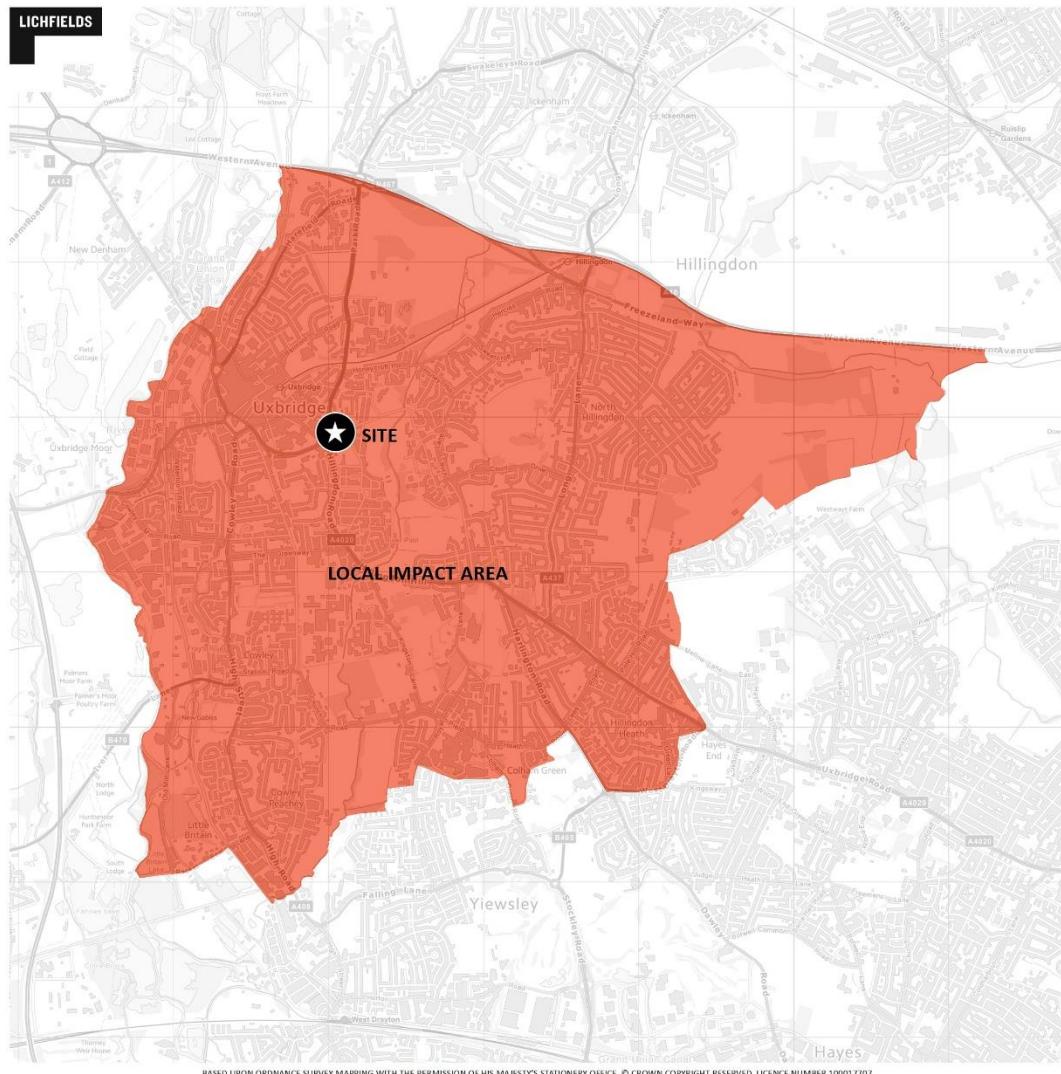


Local Impact Area

2.5 The LIA is considered to be the area most directly and significantly affected by the proposed development. The proposed development is located within the wider St Andrew's Park Masterplan area, which covers the regeneration of the former RAF Uxbridge site for mixed use redevelopment. For the purpose of this EqIA, the LIA is defined as the following 2022 electoral wards – Colham & Cowley, Hillingdon East, Hillingdon West and Uxbridge, shown in Figure 2.2 overleaf.

2.6 Where relevant, the LIA is considered against LBH and Greater London more widely to provide additional context.

Figure 2.2 Local Impact Area



Approach to the Assessment

2.7 The EqIA identifies links between a proposed development and equality measures using determinants, pathways and impacts.

Determinants and pathways

2.8 Determinants are factors that cause equality outcomes. Factors are personal, social, cultural, economic and environmental. They include living and working conditions such as housing, employment, the environment, transport, education and access to local services. For the purposes of this EqIA, the GLA's Planning for Equality and Diversity in London SPG is used to identify the determinants related to each of the priority groups identified at the end of Section 4.0. The indicators highlighted in local planning policy are also used. Pathways are variables that lead to a change in a determinant which affects equality.

2.9 The following pathways are considered in this assessment:

- Local employment opportunities;
- Housing provision;
- Public realm improvements; and
- Crime and safety.

Impacts

2.10 The following terms are used to define the significance of the equalities impacts identified

- **Major impact** – where the proposed development could be expected to have a very significant impact (i.e. either beneficial or adverse) on the identified priority groups, or the general population in equality terms;
- **Moderate impact** – where the proposed development could be expected to have a noticeable impact (i.e. either beneficial or adverse) on the identified priority groups, or the general population more widely in equality terms;
- **Minor impact** – where the proposed development could be expected to result in a minor and mainly un-noticeable impact (i.e. either beneficial or adverse) on the identified priority groups, or the general population in equality terms; and
- **Negligible impact** – where no discernible impact is expected as a result of the proposed development on the identified priority groups or general population in equality terms.

2.11 The impacts linked to each pathway are assessed in Section 5.0 of this report. The nature of impact is categorised as either beneficial, neutral or adverse. The assessment uses the following red/amber/green ('R/A/G') classification as outlined in Table 2.1 below, to highlight the nature of each impact on the wider population, and the priority groups identified.

Table 2.1 Nature of impact

Nature of Impact	Red / Amber / Green
Beneficial	Green
Neutral	Yellow
Adverse	Red
Uncertain	Grey

3.0

Legislative and Policy Framework

National Legislation

Equality Act 2010

3.1 The Equality Act 2010⁴ ('the Act') brings together the provision of previous equal rights legislation into a single legal framework. The Act introduces the terms "protected characteristics" to describe groups to whom it gives protection, and are defined as follows:

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

3.2 These protected characteristics have been taken as the starting point for understanding and establishing the demographic profile of the LIA, relative to the LBH and London more widely. The baseline assessment is used to identify up to three priority groups within the local community, against whom the assessment in the EqIA is undertaken (in addition to the general population in the LIA).

Regional Policy

The London Plan

3.3 The London Plan⁵ promotes the principle of Good Growth, as a new approach to planning which it defines as "planning for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit."

3.4 The London Plan is informed by six Good Growth ('GG') objectives, the first of which (GG1 Building strong and inclusive communities) is the most pertinent to this EqIA. Strategic objective GG1 seeks to build on London's tradition of openness, diversity and equality to ensure that London continues to generate a wide range of economic and other opportunities so that everyone is able to benefit from these, making it a fairer, more inclusive and equal city.

3.5 In addition, strategic objective GG1 also seeks to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, identity, marital status, religion, race, sexual orientation, social class, or whether they are

⁴ HM Government (2010), *Equality Act 2010*.

⁵ GLA (2021), *2021 London Plan*.

pregnant/have children can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Planning for Equality and Diversity in London

3.6 The Planning for Equality and Diversity in London SPG⁶ provides detailed guidance on how to address the needs of London's many communities alongside addressing issues such as poverty and discrimination. The SPG has been used to inform the assessment of impacts of the proposed development in Section 5.0 below.

Equal Life Changes for All

3.7 The Equal Life Chances for All⁷ framework sets out key equality objectives to promote outcomes for a diverse range of communities, and seeks to bring real changes to the quality of life for all Londoners. The framework's objectives relate to a range of topic areas, including:

- Employment pay and skills;
- Regeneration;
- Housing;
- Community engagement; and
- Crime and policing.

Inclusive London, the Mayor's Equality, Diversity and Inclusion Strategy

3.8 The Mayor's Equality, Diversity and Inclusion Strategy⁸ argues that despite London's many successes, the city is still characterised by a number of problems, some of which include:

- Child poverty;
- Disparities in attainment for some Black, Asian and ethnic minority ('BAME') groups;
- Transport inaccessibility;
- Employment, pay gaps and glass ceilings for women, the disabled and people from BAME background; and
- Knife crime.

3.9 This strategy sets out how, in all policies and programmes, the Mayor will work to help address these problems, thereby helping to create a fairer and more inclusive city where all people feel welcome and are able to fulfil their potential. The strategy outlines 39 strategic objectives set out across five key themes with regards to living in London, which are a great place to (1) live, (2) grow up, (3) work and do business, (4) getting around, in (5) a safe, healthy, green and enjoyable city.

⁶ GLA (2007), *Planning for Equality and Diversity in London SPG to the London Plan*.

⁷ GLA (2014), *Equal Life Chances for All*.

⁸ GLA (2018), *Equality, Diversity and Inclusion Strategy*.

Local Policy

Hillingdon Local Plan

3.10 The Hillingdon Local Plan⁹ forms the Council's future development strategy for the Borough. It sets out a framework and detailed policies to guide planning decisions.

3.11 The Local Plan Part 1 sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2 which comprises Development Management Policies, Site Allocations and Designations and the Policies Map.

3.12 The Local Plan Part 1 sets out the ambition for the creation of 9,000 jobs and sets an overall target of 6,375 homes to be delivered by 2026. This is the equivalent of 490 new homes per annum.

3.13 The following is an overview of the key policies within the Local Plan which are of relevance to this assessment:

- **Policy 4.1 - The Vision for Hillingdon 2026** states that there will be improved accessibility to local jobs and housing to improve quality of life for residents, an improved environment to support healthier living, helping the borough to mitigate and adapt to climate change and close the social and economic quality gaps in Hillingdon.
- **Policy 4.2 - Strategic Objectives to deliver The Vision** states that the council aims to promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.
- **Policy EM4 - Open Space and Informal Recreation** states that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes.
- **Policy E7 - Raising Skills** highlights the need to provide a range of training and employment opportunities for local people linked with the construction and development of major sites. The council will liaise with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will also engage with local businesses and universities to link high end jobs and green jobs in the Borough with higher education courses.

3.14 The Local Plan Part 2 outlines development management policies for the Borough across a variety of objectives including:

- **The Economy:** sets out policies related to employment growth in the Borough, including the uses that are acceptable on designated and non-designated sites, offices, and policies related to tourism.

⁹ Hillingdon Council (2012), *London Borough of Hillingdon Local Plan Part 1, Strategic Policies*.

- **Town Centres:** contains policies related to all aspects of town centre development including the uses that will be acceptable in designated town centres.
- **New Homes:** sets out policies to ensure the delivery of new homes, including affordable housing.
- **Historic and the Built Environment:** sets out policies to ensure the protection of Hillingdon's heritage and the built environment.
- **Environmental Protection and Enhancement:** contains a range of policies related to environmental protection including sustainable design standards, air, water and land quality, the natural environment, Green Belt and minerals.
- **Community Infrastructure:** contains policies related to community infrastructure protection and provision, including open space, education and healthcare.
- **Transport and Aviation:** policies related to all aspects of the transport network including Heathrow Airport.

4.0 Demographic and Socio-Economic Profile

4.1 This section sets out the demographic and socio-economic profile of the LIA by identifying the key characteristics of the local population and environment, based on the “protected characteristics” as outlined within the Equality Act 2010. The key demographic and socio-economic characteristics of the LIA are benchmarked against LBH and Greater London averages to help understand the wider context within which the LIA sits.

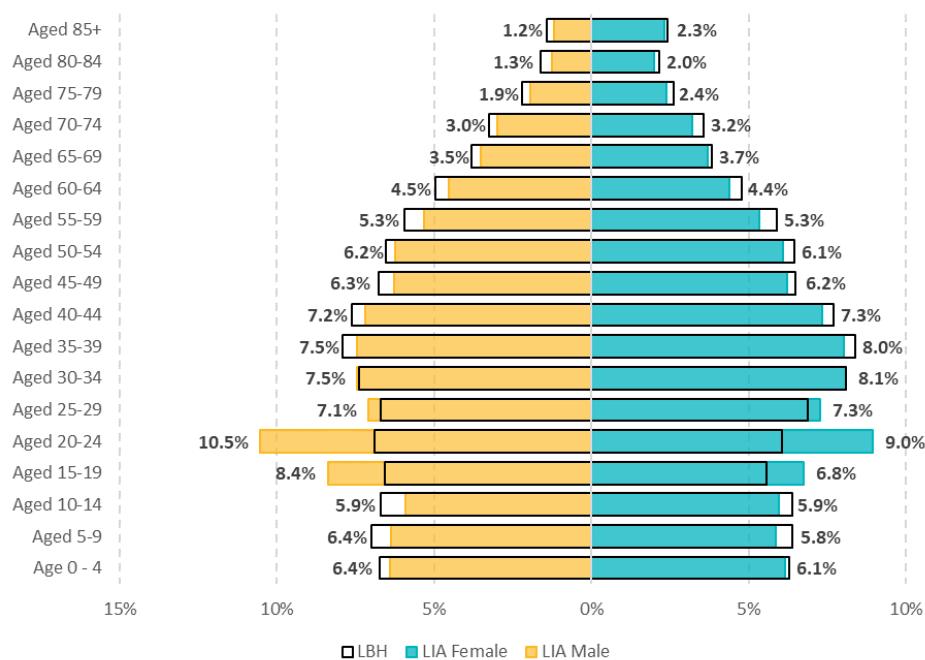
4.2 This section uses the latest publicly available data from the Office for National Statistics ('ONS'), the Department for Levelling Up, Housing and Communities ('DLUHC') and the Metropolitan Police Service ('MPS'), supported by various additional evidence at the local level. It should be noted that data drawn from third-party sources has not been independently verified by Lichfields.

Demographic Profile

Age

4.3 Data from the 2021 Census¹⁰ shows that the population of the LIA numbered approximately 62,600 people, or the equivalent of 20.5% of the LBH's total population (estimated to be 305,900 people). Figure 4.1 below provides a comparison of the population age structure in the LIA and LBH by five-year age groups. This shows an age profile that is typical of urban areas, with a relatively high proportion of younger working age adults.

Figure 4.1 Population Pyramid for the LIA and LB Hillingdon (2021)



Source: ONS (2021), 2021 Census / Lichfields analysis

¹⁰ ONS (2021), 2021 Census.

4.4 Table 4.1 below provides a breakdown of the LIA's population by broad age-group. It shows that over two thirds (68.4%) of the resident population within the LIA is of core working age (i.e. ages 16-64). This is above the average for LBH (65.6%) but below the London average of 68.9%.

Table 4.1 Comparative age breakdown of resident population (2021)

		LIA	LB Hillingdon	London
0-15		19.4%	20.9%	19.3%
16-64		68.4%	65.6%	68.9%
65+		12.2%	13.5%	11.9%
16-64	16-24	23.7%	17.3%	16.1%
	25-49	52.9%	56.4%	59.3%
	50-64	23.3%	26.4%	24.6%

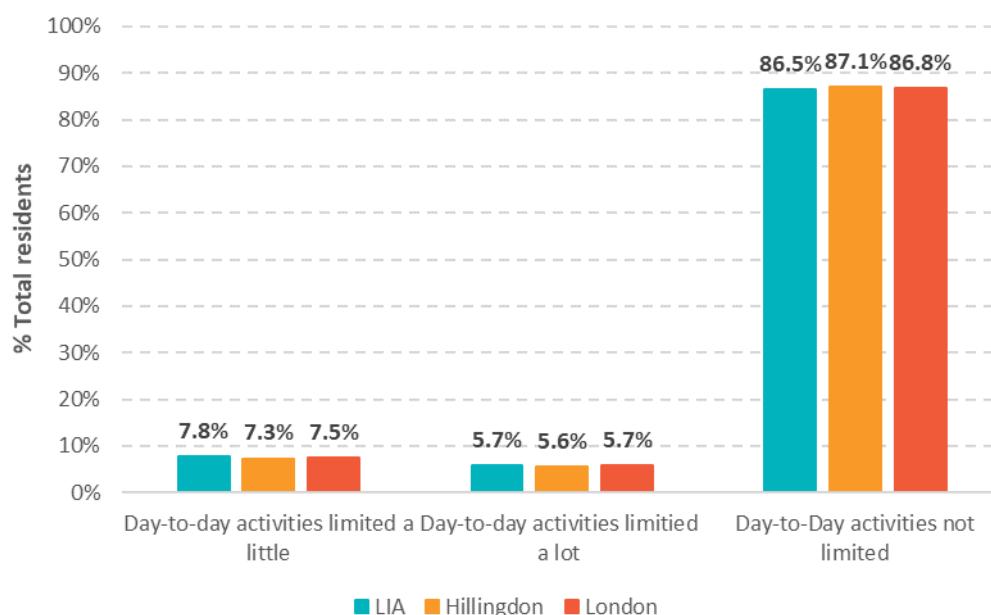
Source: ONS (2021), 2021 Census / Lichfields analysis

4.5 The LIA has a considerably higher proportion of younger working age adults (16-24) (23.7%) relative to both LBH (17.3%) and London (16.1%).

Disability

4.6 Figure 4.2 below shows that 13.5% of the LIA's population has a long-term health problem or disability that limits their day-to-day activities, compared with around 12.9% for LBH and 13.2% in London. Around 5.7% of the LIA's residents defined their day-to-day activities as being 'limited a lot', while 7.8% reported their activities as being 'limited a little'.

Figure 4.2 Population with long-term health problems/disabilities (2021)



Source: ONS (2021), 2021 Census / Lichfields analysis

4.7 Further data on health from the 2021 Census indicates that the LIA's residents have similar health outcomes when compared with LBH and the London averages. Census data indicates that 51.5% of the LIA's residents have "very good health", compared with 51.3% in LBH and 53.6% in London, whilst 0.9% recorded "very bad health", compared with 0.9% across LBH and 1.0% across London.

4.8 The 2019 English Indices of Deprivation ('IoD')¹¹ ranks LBH as the 194th most deprived local authority in England (out of 317 local authorities) in terms of health deprivation and disability. This places the borough within the 40% least deprived local authorities in England. LBH is the 17th most deprived local authority in London in relation to health deprivation (out of 32 London Boroughs and the City of London).

4.9 The 2019 IoD ranks overall deprivation based on seven sub-domains, which cover:

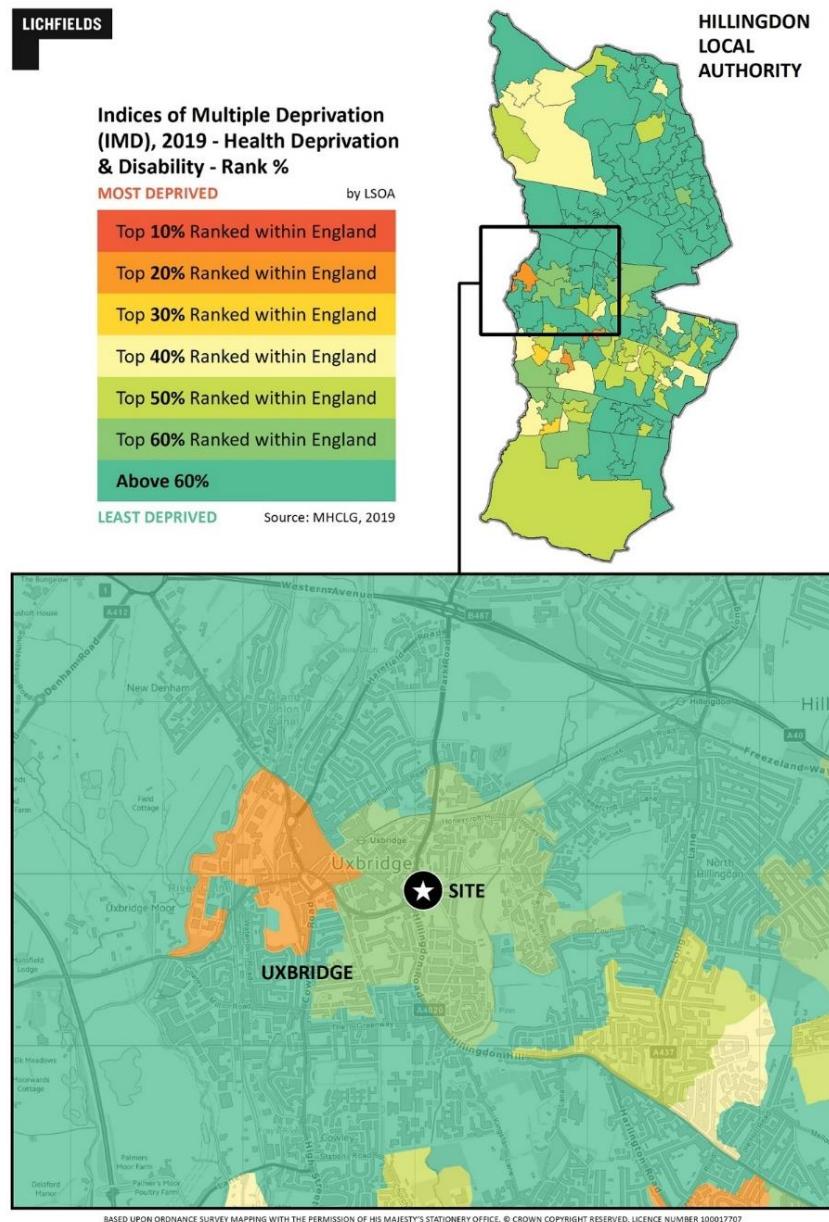
- Income – measures the proportion of the population experiencing deprivation relating to low income;
- Employment – measures the proportion of the working age population in an area involuntarily excluded from the labour market;
- Education – measures the lack of attainment and skills in the local population;
- Health and disability – measures the risk of premature death and impairment of quality of life through poor physical or mental health;
- Crime – measures the risk of personal and material victimisation at the local level;
- Barriers to housing and local services – measures the physical and financial accessibility of housing and local services; and
- Living environment – measures the quality of both the 'indoor' and 'outdoor' local environment.

4.10 Figure 4.3 below presents a detailed look at health deprivation and disability within the LIA and LBH. It shows that the majority of Lower-layer Super Output Areas¹² ('LSOAs') within the LIA fall within the 40% least deprived areas in England. The LSOA in which the TCE Site is located falls within the 50% least deprived areas in England.

¹¹ MHCLG (2019), *2019 English Indices of Deprivation*.

¹² Lower-layer Super Output Areas ('LSOA') represent a statistical geography used by MHCLG (now DLUHC) to analyse and generate a deprivation ranking used in the 2019 English Indices of Deprivation.

Figure 4.3 Indices of Multiple Deprivation – Health & disability domain (2019)



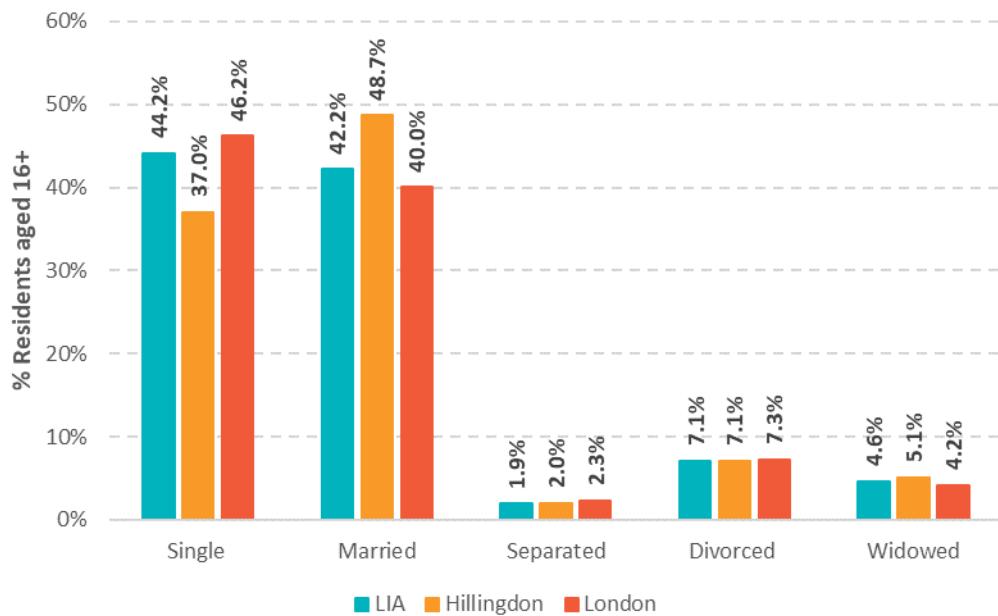
Source: MHCLG (2019), 2019 English Indices of Deprivation / Lichfields analysis

Marriage and civil partnership

4.11

Figure 4.4 presents the marital and civil partnership status of the resident population aged 16 years and over within the LIA, LBH and Greater London. It shows that in 2021, 44.2% of LIA's population was single (never been married or in a registered civil partnership) compared with 37% in LBH and 46.2% in London. The proportion of divorced people in the LIA (7.1%) is in line with LBH and London more widely, whilst the proportion of married people (42.2%) is lower than the Borough average (48.7%) but higher than the average for London (40%).

Figure 4.4 Marital and partnership status (2021)



Source: ONS (2021), 2021 Census / Lichfields analysis

Pregnancy and maternity

4.12 No specific data relating to this equality strand is available at the LIA spatial level. However, according to data from the ONS¹³, in 2021 there were just under 5,500 conceptions in LBH, which equates to a conception rate of 83.3 per 1,000 women aged 15-44 years. The conception rate in LBH was higher than both London (70.8 per 1,000 women) and the national figure (71.5 per 1,000 women). In the ten years to 2021, the conception rate in LBH has fallen 14.3% from 97.2 conceptions per 1,000 women in 2011, a slower rate of decline than that seen across Greater London (of -20.9%) but greater than the equivalent decline nationally (-11.1%) over the same period.

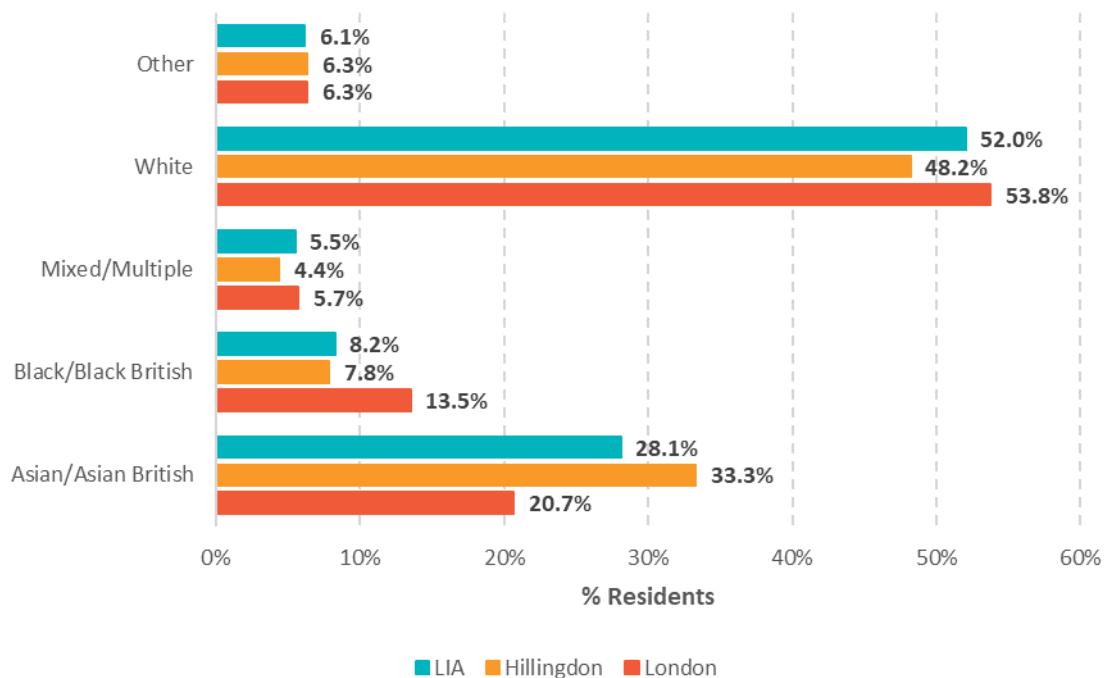
Ethnicity

4.13 Figure 4.5 overleaf indicates that as of 2021, the LIA had a higher proportion of white residents (52%) relative to LBH (48.2%) but a lower proportion when compared with Greater London average (53.8%), suggesting that the LIA is less ethnically diverse than LBH but marginally more diverse than Greater London.

4.14 The LIA has a significant proportion of Asian/Asian British representation (of 28.1%). This is significantly higher than the equivalent figure for London (20.7%) but lower than the LBH average of 33.3%. The LIA has slightly higher proportion of Black/Black British residents (8.2%) than the LBH (7.8%) but a significantly lower figure than that across Greater London (13.5%).

¹³ ONS (2021), *Conceptions in England and Wales*.

Figure 4.5 Comparative ethnic profile (2021)



Source: ONS (2021), 2021 Census / Lichfields analysis

4.15 A person's main language may also provide an indication of their ethnicity, and therefore contribute towards "protected characteristics" defined as per the 2010 Equality Act. Data from the 2021 Census regarding main language is not yet available at the LIA spatial level; as such, only data for LBH and London is presented in Table 4.2 below.

4.16 This indicates that English is the most widely spoken language group within LBH, with 77.9% of people recording it as their main language. This is slightly lower than the average for Greater London (of 78.4%). South Asian languages (spoken by 11.0% of LBH residents) are the second most widely spoken language group, followed by other European languages (EU) (5%), West or Central Asian languages (1.4%) and African languages (1.0%).

Table 4.2 Main language of residents (2021)

Main Language	LBH	London
English (English or Welsh in Wales)	77.9%	78.4%
South Asian language	11.0%	5.6%
Other European language (EU)	5.0%	6.4%
West or Central Asian language	1.4%	1.0%
African language	1.0%	1.1%
East Asian language	0.8%	1.4%
Arabic	0.8%	0.8%
Portuguese	0.7%	1.1%
Spanish	0.3%	1.4%
Other European language (non-EU)	0.3%	0.5%

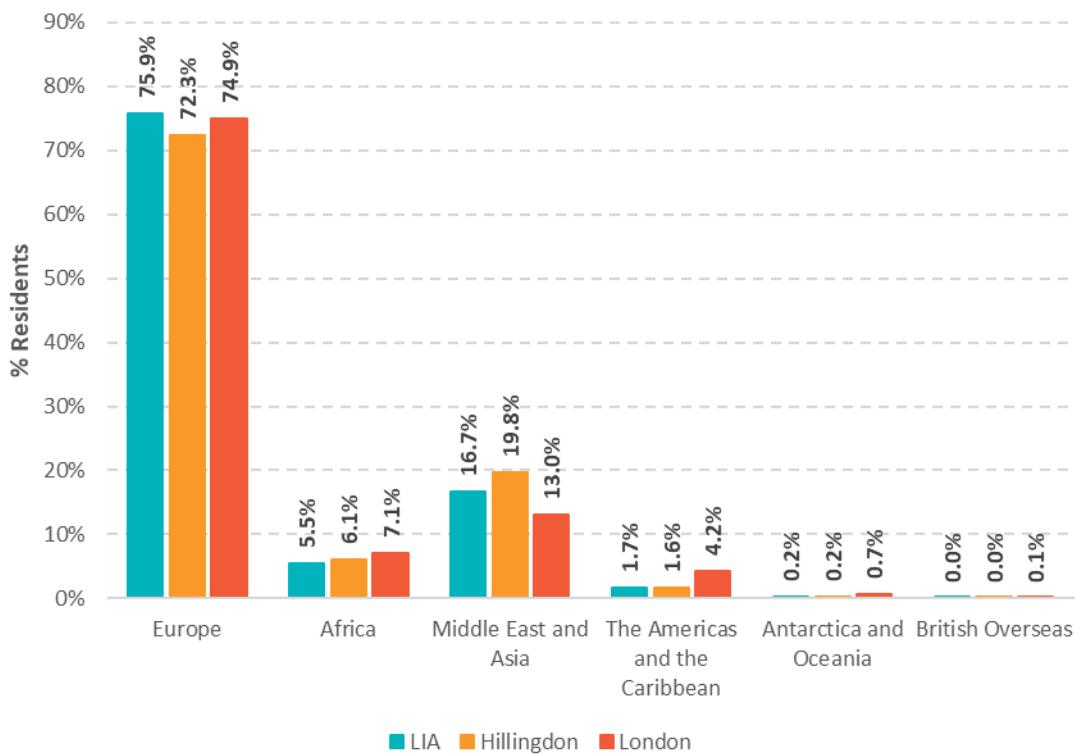
Russian	0.2%	0.4%
French	0.2%	0.8%
Turkish	0.1%	0.8%

Source: ONS (2021), 2021 Census / Lichfields analysis

Place of Birth

The 2021 Census also provides information relating to a person's country of birth. This data indicates that 75.8% of the LIA's population were born in the UK or Europe; an overall higher proportion than both LBH (of 72.3%) and Greater London (of 75.0%). The LIA has a significantly higher proportion of residents born in the Middle East or Asia (16.6%) than Greater London (13%), however lower than LBH's figure of 19.8%.

Figure 4.6 Place of Birth (2021)



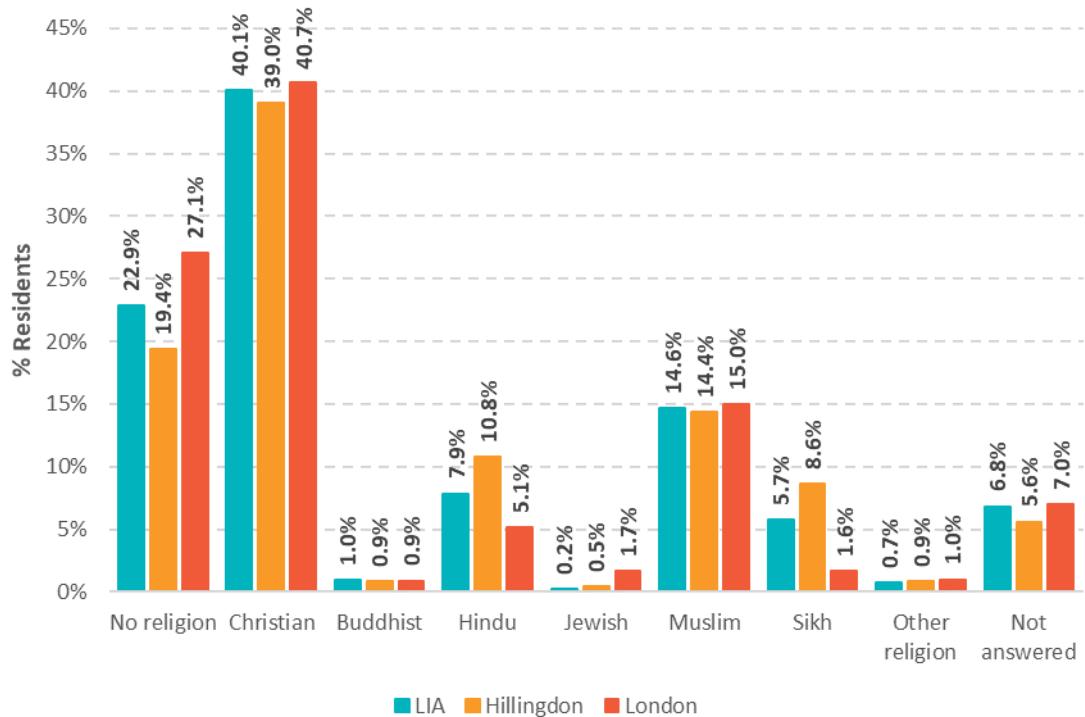
Source: ONS (2021), 2021 Census / Lichfields analysis

Religion or belief

4.17 In total, 70.3% of the LIA's residents ascribed themselves with a specific religion at the time of the 2021 Census. This proportion is lower than the equivalent rate for LBH (of 75%), but higher than the average for Greater London (66%). As presented in Figure 4.7 below, over 40% the LIA's residents affiliate with Christianity, compared with 39% in LBH and 40.7% across Greater London. In comparison, the proportion of residents affiliating with Islam in the LIA (14.6%) is slightly higher than the equivalent figure for LBH (14.4%) lower than that for Greater London (15%). The proportion of residents affiliating with Hinduism,

Buddhism, Judaism, Islam, Sikh and other religions in the LIA (in aggregate 30.2%) is lower than the equivalent proportion across LBH (36.0%) but higher than Greater London (25.3%).

Figure 4.7 Religion or belief of resident population (2021)



Source: ONS (2021), 2021 Census / Lichfields analysis

Gender

4.18 Data from the 2021 Census shows there were approximately 31,000 male residents and 31,600 female residents living within the LIA, equivalent to 49.5% male and 50.5% female. This is similarly balanced in comparison with the averages for both LBH (49.4% male to 50.6% female) and London (48.5% male and 51.5% female).

Sexual orientation

4.19 Data from the 2021 Census relating to sexual orientation is not available at the LIA spatial level. However, 88.9% of residents across LBH identified as straight/heterosexual, which is higher than the London average of 86.2%. In addition, 0.9% of people across the Borough identified as homosexual (lower than the London average of 2.2%), while 1% identified as bisexual (slightly lower than the London average of 1.5%).

Gender reassignment

4.20 Data from the 2021 Census relating to gender reassignment is not available at the LIA spatial level. However, at the Borough level, 91.7% of residents identify with the same gender they were assigned at birth, compared with 91.2% across Greater London. Furthermore, 0.9% of residents in LBH identify with a different gender to that which they were assigned at birth, which is in line with the London average of 0.9%.

Labour Market Indicators

4.21 Data from the 2021 Census shows that as of March 2021, overall labour market participation (also referred to as the economic activity rate) for residents aged 16 and over in the LIA was 62.2%. This was lower than both the averages for LBH (of 63.8%) and London (of 66.2%). In addition, the unemployment rate across the LIA during this period was 8.7%, compared with 7.5% in LBH and 7.3% across London¹⁴.

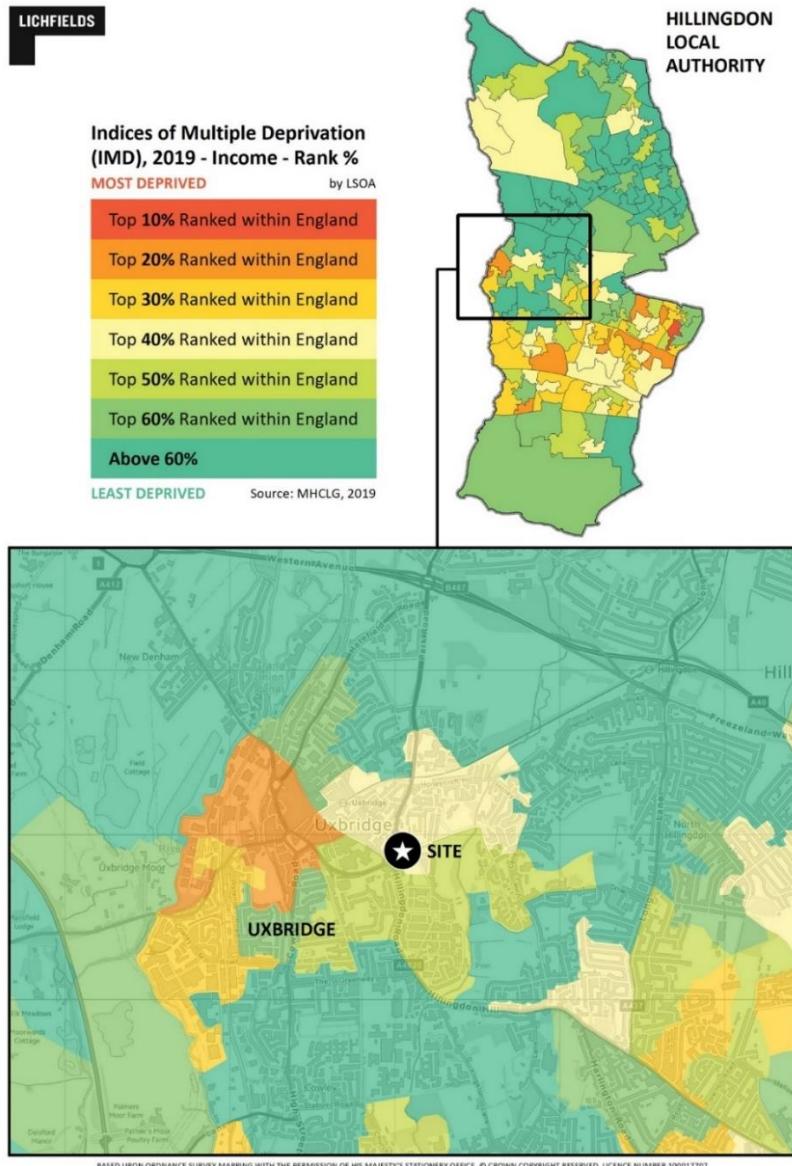
4.22 More recent data (i.e. from March 2024)¹⁵ indicates that within the LIA there were approximately 1,700 residents claiming unemployment support, equivalent to 4.2% of the LIA's economically active population. The equivalent figures for LBH and London are slightly higher, at 4.5% and 5.2%, respectively. Pre-pandemic (February 2020) the number of claimants within the LIA stood at around 860, equivalent to 2.0% of the LIA's economically active population.

4.23 The 2019 IoD indicates that income deprivation varies across the LIA, with the majority of LSOA's falling within the 50% least deprived neighbourhoods across England. In contrast, the LSOA in which the TCE Site is located falls within the 40% most deprived neighbourhoods nationally. The income domain of the IoD across LIA and LBH is illustrated in Figure 4.8 below.

¹⁴ It should be noted that at the time Census 2021 was being recorded, the UK economy was undergoing a unique period of rapid change due to the ongoing impacts of the Covid-19 pandemic.

¹⁵ ONS (2024), *Claimant Count, 2024*.

Figure 4.8 Indices of Deprivation – Income domain (2019)



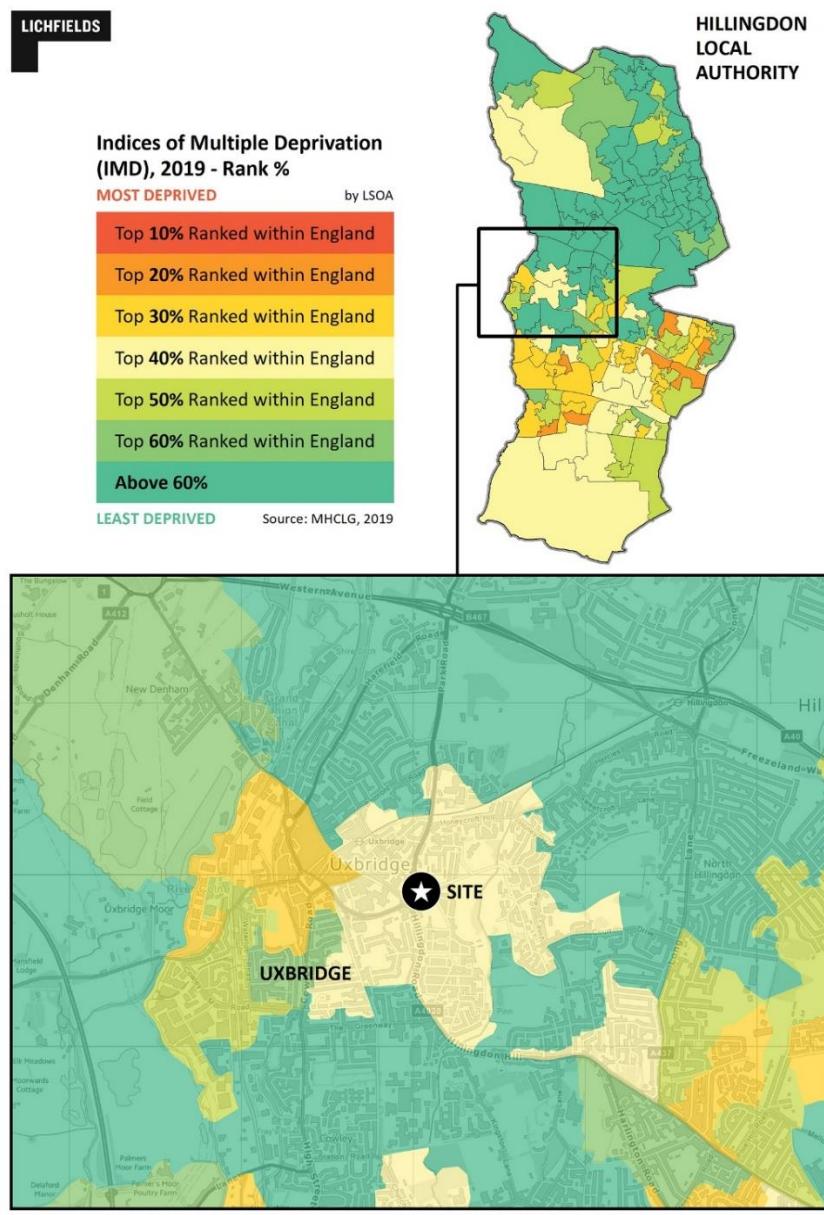
Source: MHCLG (2019), 2019 English Indices of Deprivation / Lichfields analysis

Local Environment

Overall deprivation

4.24 Figure 4.9 below illustrates overall deprivation across LBH in 2019. The LSOA in which the TCE Site is located falls within the 40% most deprived neighbourhoods across the country. This LSOA fairs similarly in relation to other sub-domains of deprivation, falling within the 40% most deprived areas in terms of income, education and living environment. The LSOA performs very poorly in relation to barriers to housing, falling within the 10% most deprived areas nationally. This is characteristic of LSOA's within London, where the housing market is significantly constrained in comparison with many other areas across the country.

Figure 4.9 IMD – Overall deprivation (2019)



Source: MHCLG (2019), 2019 English Indices of Deprivation / Lichfields analysis

Child poverty and food security

4.25 According to Public Health data¹⁶, 12.6% of children under the age of 16 live in absolute low-income¹⁷ families in Hillingdon which is lower than the proportion in both London (13.1%) and England (15.3%). Similarly, 15.9% of children under the age of 16 in LBH live in relative low-income families, which is also below the London and England averages (16.4% and 19.9%, respectively).

Crime

4.26 The Planning for Equality and Diversity in London SPG¹⁸ indicates that hate crimes tend to be specifically directed at groups with 'protected characteristics' (as defined in the Equality Act 2010) and can range from verbal abuse to direct hostility and physical attacks. On this basis, this assessment also considers incidences of crime.

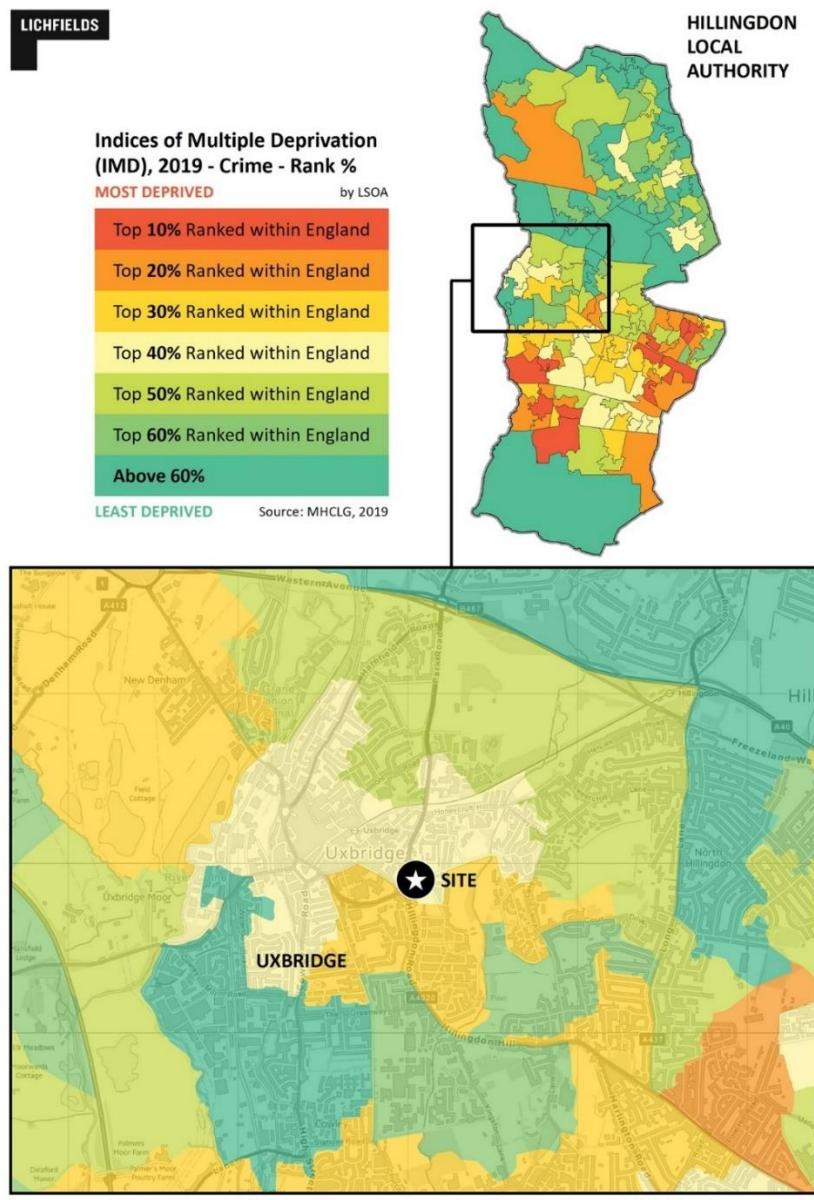
4.27 The 2019 IoD ranks LBH as the 83rd most deprived local authority area in England and 20th most deprived Borough in London in terms of crime, placing it within the top 30% most deprived in England. Figure 4.10 below indicates that crime-related deprivation varies across the LIA, with some LSOAs falling within the 30% most deprived neighbourhoods across England in terms of crime. The LSOA in which the TCE Site is located falls within the 40% most deprived neighbourhoods nationally.

¹⁶ PHE (2019), *Local Authority Health Profiles*.

¹⁷ Relative low income is defined as family income below 60% of median income in the reference year, whereas absolute low income is family income below 60% of the median income in 2010/11.

¹⁸ GLA (2007), *Planning for Equality and Diversity in London, SPG to the London Plan*.

Figure 4.10 IMD – Crime domain (2019)



Source: MHCLG (2019), 2019 English Indices of Deprivation / Lichfields analysis

4.28 Data from the MPS¹⁹ presented in Table 4.3 overleaf indicates that during the 12 months to October 2023, there were 29,600 instances of crime recorded within LBH. The most prevalent types of crime across the Borough include violence against the person (accounting for 27.6% of total offences), theft (17.6%) and other accepted crime (14.6%).

¹⁹ MPS (2024), *Crime Data Dashboard (November 2022 – October 2023)*.

Table 4.3 Crime summary statistics for LB Hillingdon (November 2022 – October 2023)

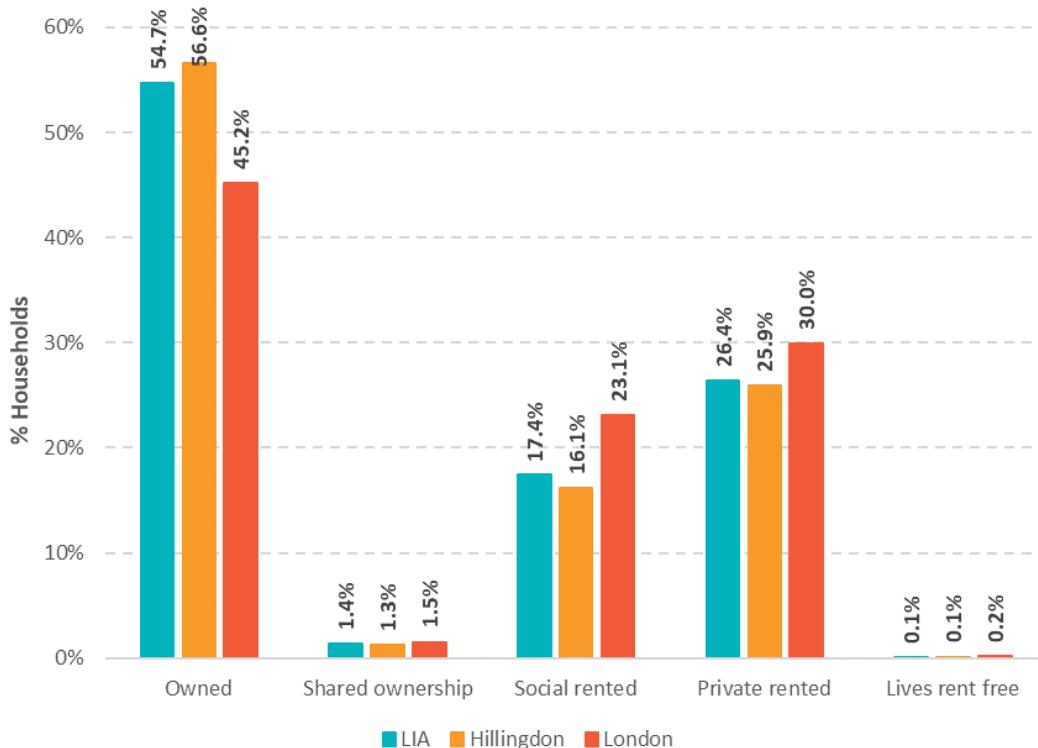
Type of Crime	Number of offences	% of Total Offences
Violence against the person	8,160	27.6%
Theft	5,218	17.6%
Other accepted crime	4,307	14.6%
Vehicle offences	4,050	13.7%
Arson and criminal damage	1,992	6.7%
Public order offences	1,940	6.6%
Burglary	1,423	4.8%
Drug offences	889	3.0%
Sexual offences	634	2.1%
Robbery	490	1.7%
Miscellaneous crime against society	368	1.2%
Possession of weapons	129	0.4%
Total	29,600	100%

Source: MPS (2024), *Crime Data Dashboard (Nov 2022 – Oct 2023)*.

Housing

Data from the Census indicates that in 2021, there were around 109,200 households in LBH, making up 3.2% of all households across Greater London. In the LIA, 54.7% of households owned their home, which is slightly lower than the equivalent figure for LBH of 56.6% but significantly higher than the figure for London of 45.2%. Meanwhile, 26.4% of households in the LIA rent their home privately, slightly higher than the equivalent figure for LBH (25.9%) but lower than the London average of 30%.

Figure 4.11 Tenure of households (2021)



Source: ONS (2021), 2021 Census / Lichfields analysis

4.29 The London Plan outlines a current target for LBH to deliver 1,083 net additional homes annually between 2019/20 and 2028/29. Data from the Housing Delivery Test²⁰ shows that LBH delivered 1,702 homes in 2019/20, 730 homes in 2020/21 and 898 homes in 2021/22. This represents an annual delivery of 1,110 homes, which represents a small surplus compared with the annual requirement figure set out in the London Plan.

Identification of Priority Groups

4.30 Through analysis of the baseline position presented in this section, a number of priority groups with 'protected characteristics' and which have potential to face a greater impact from the proposed development (because of their representation within the LIA) have been identified. These groups include:

- **Priority group 1:** Children and young adults (i.e. aged up to 24-years);
- **Priority group 2:** Residents with disabilities and/or long-term limiting illnesses (i.e. both "a little" and "a lot");
- **Priority group 3:** Residents from BAME communities in particular from an Asian / Asian British background; and
- **Priority group 4:** Residents who identify as LGBTQ+.

²⁰ DLUHC (2023), 2022 Housing Delivery Test.

5.0 **Assessment of Equality Impacts**

5.1 This section assesses the scale and nature of the main equality impacts arising from the construction and operation of the proposed development on the general population, as well as the priority groups in the LIA, as identified at the end of the preceding section.

During Construction

Local employment opportunities

5.2 Demolition and construction activity associated with the proposed development will generate employment opportunities in construction and related sectors across the economy.

5.3 Based on information provided by the Applicant, it is anticipated that construction activity at the TCE Site will support an average of 180 FTE direct jobs per annum on-site throughout the course of the construction period, in addition to a further 224 FTE jobs more widely through indirect and wider induced effects.

5.4 Given the scale of construction activity (i.e. relative to the size of the construction sector, both locally and across Greater London more widely), it is anticipated that its impact on local employment opportunities will be limited, generating an overall **minor beneficial** impact on the general population, as well as residents from BAME communities in particular from an Asian/Asian British background and residents who identify as LGBTQ+.

5.5 The priority groups that are most likely to face constraints in benefitting from local employment opportunities are priority groups 1 and 2 – i.e. children and young adults, and people with a long-term health issue and/or limiting illness. Construction work can be physically demanding, and therefore may not be suitable for people who have impairments that affect their physical mobility. Nevertheless, people from these priority groups could still benefit if members of their household gain employment and/or improved income as a result of construction activity during the construction phase of the proposed development. On this basis, the equalities impact on children and young adults, and individuals with a long-term health issue and/or disability as well as older residents is therefore assessed as **negligible**.

Housing provision

5.6 This theme is not considered to be relevant during the construction phase as the TCE Site does not currently include any residential units.

Quality of public realm

5.7 This theme is not considered to be relevant during the construction phase as the TCE Site does not currently include any publicly accessible open space/public realm that will be impacted by construction activity.

Security of residents, visitors and employees

5.8 This theme is not considered to be relevant during the construction phase of the proposed development. Access to/from the TCE Site during the construction phase will be via a number of entrances which will be marshalled during working hours. Outside of working hours (including weekend days), the site will be locked and protected in line with health and safety requirements and construction best practice. The TCE Site will be protected 24/7, and on-site security will patrol the area outside working hours (including weekend days)

During Operation

Local employment opportunities

5.9 Once completed and fully operational, the TCE Site is expected to deliver 660 sq.m of flexible commercial floorspace, a 440 sq.m convenience store), and 992 sq.m commercial floorspace within the listed former cinema building, which will be converted into a café and gym. As there is currently no active commercial floorspace on-site, this represents a net additional increase of 2,092 sq.m in the overall quantum of floorspace in use.

5.10 Based on the above, it is estimated that the on-site activity has potential to support around 69 FTE jobs directly (as shown in Table 5.1 below). In addition, these 69 direct FTE jobs will generate a further 31 FTE jobs more widely through indirect supply chain and wider induced employment effects.

Table 5.1 FTE jobs supported during the operational phase

Floorspace (sq.m)	Density (sq.m/FTE)	Direct Jobs Supported (FTE)
660 sq.m	22 (High street shop)	30
440 sq.m	22 (Foodstore)	20
216 sq.m	22 (Restaurant/Café)	10
776 sq.m	86.5 (Health and fitness centre/Sports Club/Gym)	9
2,092 sq.m	-	69

Source: Lichfields analysis

5.11 These jobs will provide people, including residents from across all priority groups considered (i.e. with the exception children and young adults), with the opportunity to access new jobs, potentially increasing income levels and improving their overall quality of life, whilst also lowering local inequality. Given the scale of net additional employment supported, the equality impact of the proposed development is therefore judged as **minor beneficial** on the general population, residents with disabilities and/or long-term limiting illnesses, residents from BAME communities in particular from an Asian / Asian British background and residents who identify as LGBTQ+. As local employment opportunities do not directly impact children and young adults, the equality impact on this priority group is judged to be **negligible**.

Housing provision

5.12 Once completed, the proposed development will comprise 356 net additional new homes within the LIA. A variety of new homes will be provided, ranging from 1-bedroom apartments to three-bedroom family homes. The completed proposed development will represent an increase in the local supply of housing, contributing 3.3% towards the Borough's 10-year housing target as outlined within the 2021 London Plan (i.e. of 10,830 homes, or 1,083 homes per annum).

5.13 On the basis of the above, the equalities impact of the proposed development on the general population and each of the priority groups identified is therefore assessed as **minor beneficial**.

5.14 In Greater London, housing costs typically make up a large proportion of residents' monthly disposable income, with people on lower incomes generally seeing a larger proportion of their disposable income going towards housing costs. Once completed, 35% of all habitable rooms within the proposed development will be affordable, with a split of 70% affordable and 30% intermediate tenure. As such, the proposed development is anticipated to increase the provision of affordable housing within the LIA and contribute towards the reduction of LBH's housing list.

Quality of public realm

5.15 Once completed, the proposed development will incorporate high-quality public realm (including the creation of a new public square), which will help foster social interaction, provide safe and accessible public spaces and enhance the health and wellbeing of residents, visitors and local employees.

5.16 The TCE Site's central location between Uxbridge town centre and Dowding Park also means the proposed development will create an accessible pedestrian route linking the amenities of the town centre with a large area of publicly accessible green space.

5.17 Based on the above, and the fact that the site does not currently include any publicly accessible space, the equalities impact of the new public realm included as part of the proposed development is therefore judged as **moderate beneficial** on the general population and all priority groups identified. This includes residents with long-term health issues and/or disabilities who will benefit significantly from a safe and accessible public space in close proximity to Dowding Park and Uxbridge town centre.

Security of residents, visitors and employees

5.18 The design of the proposed development draws on the principles of Secured by Design, including the following considerations:

- The creation of fluid pedestrian routes through the site, with clear lines of sight;
- Increased footfall and greater visibility of ground level (including via passive surveillance);
- Clear visibility across public spaces;
- No pedestrian dead-ends;

- Lighting that enhances a sense of safety at night, including lighting which minimises glare; and
- Creation of new street frontages and active ground floor uses, increasing natural surveillance.

5.19 Where appropriate, the proposed development will also incorporate design features aimed at discouraging incidence of crime, such as the use of close-circuit television ('CCTV') and lighting that lower the possibility of deep shadows. These measures are all aimed at lowering crime, and increasing people's feeling of safety, in particular residents with "protected characteristics" who are likely to be subjected to higher incidences of crime.

5.20 As such, the equalities impact of the proposed development on crime and safety is therefore judged as **moderate beneficial** across the general population, and all priority groups considered.

Intervention and Mitigation

5.21 Whilst the assessment presented above has not identified any moderate/major adverse effects, the Applicant may also consider putting in place a series of additional measures aimed at maximising benefits, such as:

- 1 The promotion of employment opportunities (i.e. both temporary during construction, and permanent once operational) and encouraging local participation, via the advertising of new roles locally and working with relevant local organisations (such as Hillingdon Council, Jobcentre Plus and the Hillingdon Chamber of Commerce) to promote opportunities;
- 2 Support the delivery of employment targets;
- 3 Preparation and delivery of a Skills and Employment Plan for the proposed development;
- 4 Ensure that dwellings are delivered to Building Regulation requirements M4(2) (i.e. accessible and adaptable) and/or M4(3) (i.e. wheelchair accessible).
- 5 Ensure that all the public realm improvements and open space proposed are delivered, and that features such as playable space elements are included for different age groups to benefit from; and
- 6 Ensure that measures such as CCTV and the landscape design are implemented as set out within the project description and/or adapted to remove long shadows, and provide an increased sense of safety.

Table 5.2 Summary of equality impacts of the proposed development during construction and once operational

Determinant	Pathway	Priority Group	Group-specific Equality Impact	Equality Impact on General Population	
During Construction					
Employment	Local employment opportunities	1. Children and young adults	Negligible	Minor beneficial	
		2. Residents with disabilities and/or long-term limiting illnesses	Negligible		
		3. Residents from BAME communities	Minor Beneficial		
		4. Residents who identify as LGBTQ+	Minor Beneficial		
Housing provision	Provision of new housing (including affordable homes)	This theme is not considered to be relevant during the construction phase of the proposed development, as the site does not currently include any residential units.			
Public realm	Quality of public realm	This theme is not considered to be relevant during the construction phase of the proposed development, as the site does not currently include any public realm space which will be impacted during the construction phase.			
Crime and safety	Security of residents, visitors and employees	This theme is not considered to be relevant during the construction phase, as access to/from the Site will be via a number of manned entrances which will be secured outside of working hours.			
During Operation					
Employment	Local employment opportunities	1. Children and young adults	Negligible	Minor Beneficial	
		2. Residents with disabilities and/or long-term limiting illnesses	Minor Beneficial		
		3. Residents from BAME communities	Minor Beneficial		
		4. Residents who identify as LGBTQ+	Minor Beneficial		
Housing provision	Provision of new housing (including affordable homes)	1. Children and young adults	Minor Beneficial	Minor Beneficial	
		2. Residents with disabilities and/or long-term limiting illnesses	Minor Beneficial		
		3. Residents from BAME communities	Minor Beneficial		
		4. Residents who identify as LGBTQ+	Minor Beneficial		

Determinant	Pathway	Priority Group	Group-specific Equality Impact	Equality Impact on General Population
Public realm	Quality of public realm	1. Children and young adults	Moderate Beneficial	Moderate Beneficial
		2. Residents with disabilities and/or long-term limiting illnesses	Moderate Beneficial	
		3. Residents from BAME communities	Moderate Beneficial	
		4. Residents who identify as LGBTQ+	Moderate Beneficial	
Crime and safety	Security of residents, visitors and employees	1. Children and young adults	Moderate Beneficial	Moderate Beneficial
		2. Residents with disabilities and/or long-term limiting illnesses	Moderate Beneficial	
		3. Residents from BAME communities	Moderate Beneficial	
		4. Residents who identify as LGBTQ+	Moderate Beneficial	

6.0 Conclusions

6.1 This EqIA has been prepared to identify, assess and present any potential equality impacts on groups with “protected characteristics” as defined by the Equality Act 2010, that would arise from the delivery of the proposed development comprising up to 356 homes (including 35% affordable by habitable rooms), in addition to the delivery of 660 sq.m of flexible commercial floorspace, a 440 sq.m convenience store and 992 sq.m of commercial floorspace in the former Cinema building providing a gym and café.

6.2 The assessment presented in this EqIA draws on best practice and guidance, including the Equality Act 2010, the GLA’s Planning for Equality and Diversity in London SPG, and local policy.

6.3 A review of the demographic and socio-economic indicators for the LIA predominantly drawn from the 2021 Census and other ONS datasets, and which has been supplemented by evidence published by LBH, has been undertaken to identify the key priority groups within the local community benchmarked against LBH and Greater London. The review has identified the following priority groups with “protected characteristics” in the LIA:

- **Priority group 1:** Children and young adults (i.e. aged up to 24-years);
- **Priority group 2:** Residents with disabilities and/or long-term limiting illnesses (i.e. both “a little” and “a lot”);
- **Priority group 3:** Residents from BAME communities in particular from an Asian / Asian British background; and
- **Priority group 4:** Residents who identify as LGBTQ+.

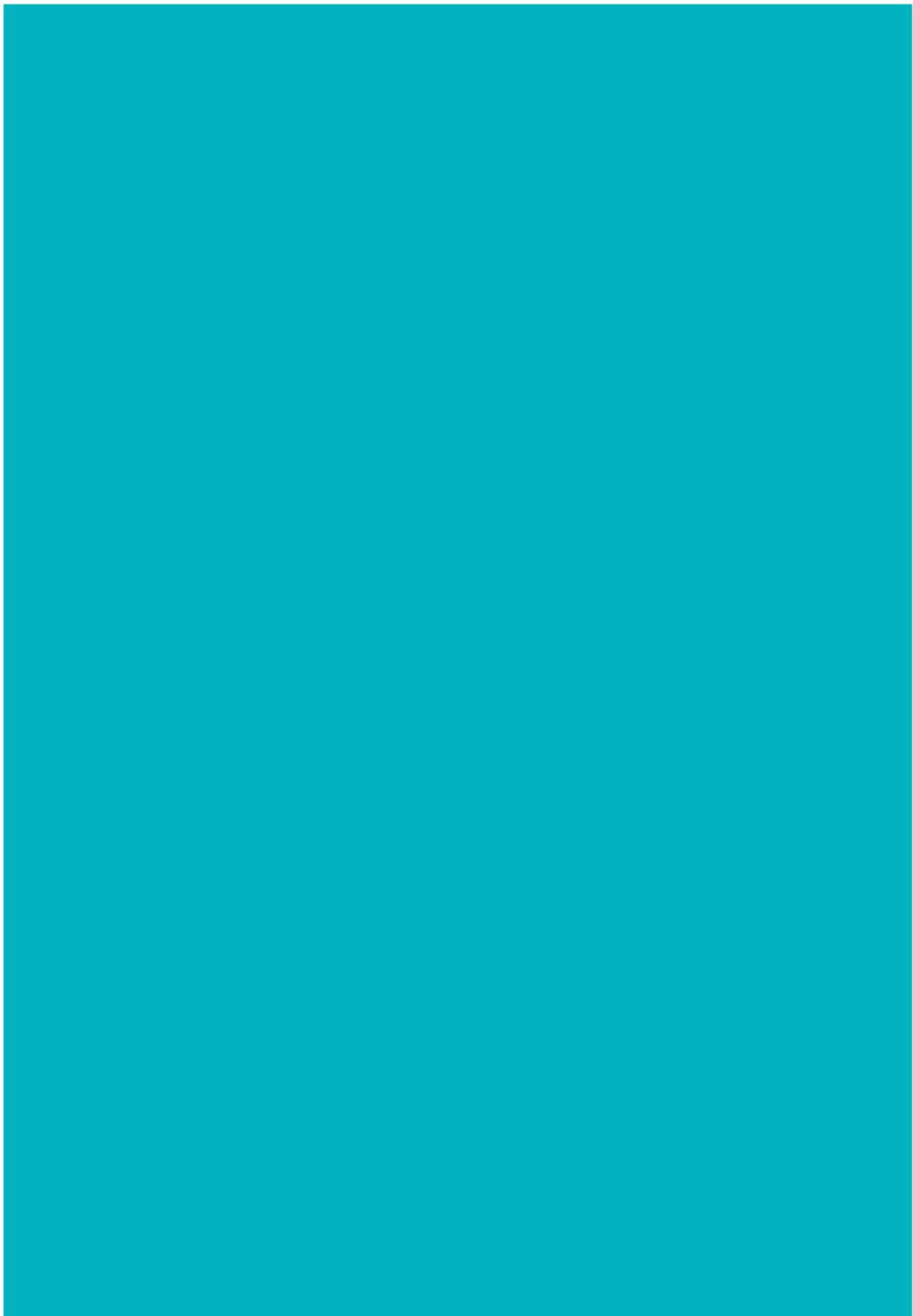
6.4 The proposed development will deliver a range of socio-economic and regeneration outcomes to the LIA and LBH, such as additional housing, employment floorspace and the delivery of new public realm improvements.

During Construction

6.5 The construction phase of the proposed development will support construction activity on-site, allowing residents to access opportunities in construction, generating an overall **minor beneficial** impact.

During Operation

6.6 The completed development will see the delivery of up to 356 new homes (including 35% affordable by habitable rooms), up to 660 sq.m sq.m of flexible commercial floorspace, a 440 sq.m convenience store and 992 sq.m of commercial floorspace which will become a gym and café in the former Cinema building, in addition to the creation of high quality new public realm in close proximity to Uxbridge town centre and the existing and emerging St. Andrew's Park community. Based on a review of the equality impact outline above, it is anticipated that the proposed development will be beneficial on employment, housing provision, public realm and crime reduction.



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