



London Borough of Richmond upon Thames

Local Development Framework

Twickenham Area Action Plan

Equalities Impact Assessment

June 2011

Equalities Impact Assessment of the LBRuT Local Development Framework Twickenham Area Action Plan

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1 Introduction

- 1.1 This document sets out the Equalities Impact Assessment (EqIA) of the London Borough of Richmond upon Thames (LBRuT) Local Development Framework (LDF) Twickenham Area Action Plan (AAP).
- 1.2 The purpose of the EqIA is to highlight the likely impact of the proposed scenarios and options of the Twickenham AAP on the target groups and to take action to improve the approaches where appropriate as a result.

2 Twickenham Area Action Plan

- 2.1 The Twickenham Area Action Plan (AAP) will form part of the Local Development Framework (LDF) and set out an overall strategy for the future of Twickenham town centre. The plan will cover the period up to 2027 and will be vital to the promotion of a prosperous local economy and investment.
- 2.2 Other Plans in the LDF are the [Core Strategy](#) (2009), which promotes the revitalisation of the town centre to create a high quality district centre, serving local residents, workers and visitors, and the [Development Management Plan](#) (soon to be adopted), which sets out more detailed policies for the control of new development including policies for housing, retail and employment, design and limitations on building heights.
- 2.3 For Twickenham the LDF will focus on creating a strong employment location, district retail centre, visitor and tourist destination and centre for sports, leisure arts and cultural activities as well as a more diverse evening economy. High quality, sustainable and accessible design and improvements to the environment, traffic management, public transport and pedestrian and cycle links will be required through redevelopment and refurbishment of under utilised land and buildings and creation of new public spaces.
- 2.4 There are currently three different scenarios for the future development and improvement of the town centre, which are as follows:

Scenario 1: Consolidation of the Town Centre

- 2.5 This Scenario represents the lowest level of change with an emphasis on improving the existing shopping and local environment and reinforcing Twickenham's reputation as a good place to live.

Scenario 2: Enhancement of the Town Centre

- 2.6 Scenario 2 builds on Scenario 1. The rationale is that even a consolidated Town Centre needs more than just a retail and food and beverage offer to attract the levels of footfall and spend necessary to improve retail performance.

Scenario 3: Transformation of the Town Centre

- 2.7 Scenario 3 builds on all the proposals in Scenarios 1 and 2 and would bring about the most ambitious level of change to the town centre. It would create a well integrated and vibrant town centre with an improved retail, leisure and cultural offer – a destination of choice which would meet the needs of local residents and businesses and attract a larger number of visitors.

3 Borough Profile and Characteristics and Key Issues affecting the Borough

- 3.1 Refer to the Equalities Impact Assessment for the Core Strategy for the Borough profile and key issues affecting the Borough. In addition, detailed information on borough characteristics can be found in the Annual Monitoring Report¹.

4 Target Groups

- 4.1 The main equality target groups defined in this assessment are: Black and Minority Ethnic People (BME); women; disabled people; younger people; older people; lesbians, gay men and transgender people; and faith groups. The relevant legislation is as follows:

- People from black and minority ethnic backgrounds: – The Race Relations Act 1976; as amended by the Race Relations (Amendment) Act (RRAA) 2000.
- Disabled people: – The Disability Discrimination Act (DDA) 1995; and DDA 2005, the Disability Discrimination Act (Amendment) Regulations 2003.
- Human Rights - Human Rights Act 1998.
- Men and Women:- The Equal Pay Act 1970, Sex Discrimination Act 1975, and Equality Act 2006
- Sexual Orientation and Religion - The Employment Equality (Sexual Orientation) Regulations 2003; Employment Equality (Religion and Belief) Regulations 2003 and Equality Act 2006

- 4.2 The equality areas, or strands as they are commonly called, are gender, race, disability, age, faith and sexuality. The strands are inclusive of all people.

- 4.3 The Equality Act 2010 provides a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society. On 5 April 2011 the new public sector Equality Duty came into force replacing the three previous duties on race, disability and gender, bringing them together into a single duty, and extends it to cover age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment (in full). The aim of the Duty is for public bodies to consider the needs of all individuals including in developing policy and in delivering services.

5 Richmond upon Thames Equality and Diversity Strategy

- 5.1 The Council's Equality and Diversity Strategy document and action plan details how the Council intends to promote equality, value diversity and prevent

¹ LBRUT UDP/LDF Annual Monitoring Report for the financial year 2009/10, December 2010 - http://www.richmond.gov.uk/ldf_udp_annual_monitoring_report.

discrimination through its roles as a service provider, employer and community leader.

The Council's Commitments

5.2 The specific commitments from the Equality and Diversity Strategy are detailed as follows:

- We will identify, tackle and prevent any form of institutional discrimination.
- We will promote equality of opportunity and fair treatment for all our communities.
- We will build on the strengths of diversity and aim to promote good relations between different communities.
- We will work with specific groups of people who are hard to reach and who may not have been provided with opportunities to voice their needs. We will particularly work with those groups who experience marginalisation, disadvantage and discrimination to discover previously unmet need.
- We will implement an equalities management framework, which is based on key requirements of the Equality Standard, Race Equality Scheme and the Disability Discrimination Act. This will help us towards our goal of the mainstreaming of equality/diversity considerations and objectives in all the work of the Council.
- We will ensure that all our partners and contractors are informed of our equality/diversity commitments and work towards the adoption of a shared code of practice.
- We will monitor and evaluate all aspects of service delivery and employment to inform our progress, objectives and review of outcomes. We will also initiate changes where necessary.
- We will develop corporate consultation and review mechanisms as part of our commitment to on-going consultation with key stakeholders, partners and community/voluntary groups.
- We will ensure that all Members, managers and staff are clear about their roles and responsibilities under equalities legislation and Council policy and are provided with learning and development opportunities to develop skills, knowledge and competencies to facilitate their roles.

Service delivery

5.3 The Council's commitments are also translated through to its particular responsibilities on an ongoing basis in relation to service delivery. The Council's central duty is to provide and enable the provision of appropriate, effective, responsive and sensitive services to the whole community. We will do this by working in partnership with all sections of the community, contractors and local partners to promote the economic, social and environmental well being of the whole community.

6 Findings of the EQIA

Black and Minority Ethnic Groups (BME)

- 6.1 The 2001 census figure for the borough showed that people from minority ethnic backgrounds make up just over 21% of the borough's population; this includes 12% of people from white Irish and white non-British backgrounds and 9% from BME backgrounds.
- 6.2 There are not considered to be any options or scenarios that would particularly impact BME, although any proposed new residential development may be beneficial for this group as a range of new homes could benefit overcrowded BME households.
- 6.3 The scenarios and options proposing an increased retail offer as well as local facilities and services (i.e. entertainment and leisure) could impact on all groups who may be able to use such services and facilities.
- 6.4 Commercial development opportunities and small businesses may help BME communities as a way out of unemployment. This may also apply to all other groups.

Women

- 6.5 Women generally have lower levels of access to cars than men and are more likely to travel by bus, whereas men are more likely to travel by train, underground or car. Scenarios and options that seek to create new local employment or local goods and services within walking distance or accessible by public transport will therefore benefit anyone without access to a car for employment or other activities.
- 6.6 Any improvements to the pedestrian environment and measures proposed that increase safety and security will particularly benefit women, and also those with children and buggies.

Disabled people

- 6.7 The 2001 Census data show that 12.5% of the borough's population has a long term limiting illness and 2.5% of the working age population are permanently sick or disabled and unable to work as a result, although these figures are each significantly lower than the national average. Disabled Londoners comprise 16 per cent of London's working age population².
- 6.8 Across London and the UK, disabled people experience relatively low rates of employment. The employment rate for disabled Londoners is 45%, significantly lower than the rate for non-disabled people of 74%. Disabled workers are also more likely to work part-time than non-disabled workers. In London, 28 per cent of disabled workers are employed on a part-time basis relative to 19 per cent for non-disabled workers³.
- 6.9 This data suggests that initiatives to improve the economy, help small businesses and therefore increase employment opportunities, and measures to increase accessibility to and within workplaces, will have particular benefits for disabled people. The AAP and measures proposed within the scenarios and

² Disabled people and the labour market in London: Key Facts, DMAG briefing 2007/05.

³ Disabled people and the labour market in London: Key Facts, DMAG briefing 2007/05.

options particularly focus on improving the local economy, which will therefore impact upon disabled people.

- 6.10 Access to a choice of transport should be made as easy as possible for all users, including those with disabilities. Disabled people will particularly benefit from some of the options in the scenarios of the AAP that improve the accessibility of public transport (such as the Station site) and the pedestrian environment (i.e. widening of footways, more secure and safer crossings etc.).

Younger people

- 6.11 Younger people tend to experience the same issues with transport as other groups but possibly more so during the day when they are more likely to be out rather than late at night. Using public transport and waiting at bus stops and railway stations during the darker winter months are likely to create the same sorts of issues as are experienced by other equality groups. Younger people are more likely to walk or cycle than other groups, so measures that aim to improve walking and cycling for the wider community will also benefit this group. Therefore, measures proposed in relation to transport, such as the removal of bus lanes and cycles lanes, could impact upon this group.
- 6.12 Younger people will also benefit from the proposed measures to increase the entertainment and cultural offer, as set out in Scenarios 2 and 3. Relocating the existing youth centre from Heatham House to a purpose designed facility, which will be for all age groups, should be done in consultation with the users of the existing youth facility. It should be ensured that the younger people will be able to use the new facility.
- 6.13 Younger people are a key group who will benefit from improved play space and open spaces for formal and informal recreation, such as those proposed at the Station, Twickenham Riverside site, and at the junction of Water Lane, King Street and Church Street.

Older people

- 6.14 The 2001 Census data suggest that the borough has a relatively high proportion of older persons particularly those aged 85 and over. Older people tend to make fewer journeys and travel shorter distances as they tend to drive less and may be more dependent on public transport.
- 6.15 Many of London's older people experience unacceptably high levels of isolation and poverty. It is necessary to ensure that appropriate housing is provided (various forms of housing for older people as well as support for independent living). To prevent isolation and fear of going out, better street lighting, crime reduction measures, and design of naturally defensive public spaces would be beneficial. The AAP proposes several measures that could benefit older people, such as an improved pedestrian environment, safer crossing and pedestrian links, new public and civic spaces, including cultural and entertainment activities for all age groups.
- 6.16 This group would benefit from the proposed scenarios within the AAP that improve accessibility to public transport including interchange facilities and enhance the pedestrian environment. They would also benefit particularly from

improvements to the footways and access to the railway station as well as from increased accessibility to the new proposed open spaces.

Lesbians, gay men, bisexuals and transgender people

- 6.17 Safety and security on trains, buses and stations is known to be of concern to people from this group who are often vulnerable to attack. Many of the same situations that apply to women, faith groups, and BME groups also apply to people in this community.

Faith groups

- 6.18 The impact on faith groups of anti-social behaviour tends to relate to visible signs of a person's faith and is often linked to BME groups. Scenarios and options within the AAP are likely to benefit different faith groups in much the same way as other target groups. Any proposed community/cultural and entertainment centres should be designed not to exclude any faith or religious groups.

People outside the target groups

- 6.19 These people will benefit from the measures proposed within the scenarios and options that benefit other groups, especially those relating to pedestrian environment, public transport, new retail and commercial development opportunities and in particular new job opportunities.
- 6.20 Retail, entertainment and cultural offers will benefit users from all groups. Easy access to services locally can have a significant impact on quality of life. The proposed mix of land uses including jobs and amenities as proposed for many of the opportunity sites within Twickenham can reduce the need to travel. Planning should facilitate and promote sustainable and inclusive patterns of development by ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.
- 6.21 Areas of mixed use are likely to result in lower crime rates than areas where single uses dominate, because of natural surveillance and the regular circulation of people. This will be of particular importance for the Royal Mail site, Twickenham station and proposals for other key sites in the town centre. A variety of uses including those likely to be occupied during the working day will help to increase the likelihood of natural surveillance throughout the day.

Appendix 1 sets out in detail the Equalities Impact Assessment for the Twickenham Area Action Plan scenarios and options.

Appendix 1: Equalities Impact Assessment

Impact of Policies on Equalities Categories

L – Low

M – Medium

H – High

EqIA	Equalities categories						
SCENARIOS	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
Scenario 1	L	L	M	M	L	L	This scenario is likely to benefit all groups, particularly the improvements in the townscape and the pedestrian environment will have positive impacts on the health and well-being of the population. Widening of footways and removal of street clutter may be of particular benefit to the disabled and elderly. This scenario, which entails a more enhanced and consolidated retail offer, will provide more services and facilities to all groups, particularly benefiting those less able to travel far, and therefore promotes equality across all the community.

EqIA	Equalities categories						
SCENARIOS	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
Scenario 2	L	L	M	M	L	L	<p>This scenario is also considered to have likely benefits to all groups. More extensive widening of the footways in the town centre, shared surfaces, raised and more secure pedestrians crossing including public realm improvements will benefit in particular people with physical disabilities and potential the elderly, providing the detailed designs are inclusive for all abilities. A purpose built community/youth/leisure facility for all ages on the Royal Mail site will be of benefit to the various age groups, particularly for the younger people. The removal of bus lanes proposed within this scenario may encourage the use of cars rather than buses, which could have impacts on people relying on the use of buses.</p>
Scenario 3	M	L	M	M	L	M	<p>This scenario promotes to strengthen retail, entertainment and culture. Whilst the possible closure of York Street may cause knock-on impacts on traffic and environment, including on the use of buses (see commentary under Scenario 2), it may provide an improved pedestrian environment, suitable for all age groups and of benefit to all equality groups. There could be impacts on the race and religion/faith groups in terms of providing and promoting cultural and entertainment uses, which should not exclude any particular equalities strands.</p>

EqIA	Equalities categories						
OPTIONS FOR SITES	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
Heatham House							
Option 1 – Retain as a youth centre (status quo)							
	L	L	L	M	L	L	Retaining a dedicated youth centre has impacts on the age group.
Option 2 – Relocation of existing youth facilities to new purpose designed facility on Royal Mail site, conversion to hotel/leisure/residential use and incorporation of land south of River Crane as part of comprehensive development area							
	L	L	L	M	L	L	A purpose built community/youth/leisure facility will benefit all strands of equality; particularly it will have a medium positive impact on the “age” category as the facility will be designed for all ages.
Royal Mail site							
Option 1 – Retain the status quo							
	L	L	L	L	L	L	Retaining the status quo has no impacts on any of the equality groups.
Option 2 – Mixed use development to include employment, community, leisure and residential uses							
	L	L	L	L	L	L	A mixed use development on the Royal Mail site is beneficial to all equalities categories, particularly if they meet local needs. Facilities will need to be designed not to exclude any particular equalities strands such as different races and different religions.
Option 3 – Mixed use development to include employment, residential, and purpose designed “State of the Art” community/youth/leisure/sports facilities for all age groups and public open space on extended site							

EqIA	Equalities categories						Commentary
OPTIONS FOR SITES	Race	Gender	Disability	Age	LBG	Religion/ Faith	
	M	L	L	M	L	M	A purpose built community/youth/leisure facility for all ages on the Royal Mail site will be of benefit to the various age groups, particularly for the younger people. Facilities will need to be designed not to exclude any particular equalities strands such as different races and different religions.
Station Yard							
Option 1 – Status quo (car park)							
	L	L	L	L	L	L	Retaining the status quo has no impacts on any of the equality groups.
Option 2 – Residential/transport use							
	L	L	L	L	L	L	This option would be neutral in terms of equalities considerations; if public transport is proposed on this site, it may be of particular benefit to groups who are relying on public transport facilities.
Police Station							
Option 1 – Status quo							
	L	L	L	L	L	L	Retaining the status quo has no impacts on any of the equality groups.
Option 2 – Potential longer term mixed use development site to include retail uses to London Road							
	L	L	L	L	L	L	Additional retail uses should be of benefit to all equalities categories, particularly if they meet local needs. Need to ensure continued police presence in centre to maintain a safe and secure environment for all of the equality groups.
Option 3 – Mixed use development including retail units on London Road and residential to rear with pedestrian link to Grosvenor Street							

EqIA	Equalities categories						
OPTIONS FOR SITES	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
	L	L	L	L	L	L	Additional retail uses should be of benefit to all equalities categories, particularly if they meet local needs. Need to ensure continued police presence in centre to maintain a safe and secure environment for all of the equality groups. Improvements to the pedestrian links will have positive impacts for all, but particularly for the elderly and disabled.
Holly Road car park							
Option 1 – Retain in car park use (status quo)							
	L	L	L	L	L	L	Retaining the status quo has no impacts on any of the equality groups.
Option 2 – Retain surface car park, move Farmers Market to an improved site at Twickenham Riverside to free up spaces							
	L	L	L	L	L	L	Whilst this option has no particular impacts on any equalities categories, the relocation of the farmers' market to a more convenient and easily accessible location could be beneficial to the physically disabled and elderly.
Option 3 – Retain surface car park, explore potential to provide second level of parking to non-residential side subject to mitigation of impacts on residential amenity							
	L	L	L	L	L	L	This option would be neutral in terms of equalities considerations.
Twickenham Riverside, Santander block, rear of King Street frontage							
Option 1 – Status quo							
	L	L	L	L	L	L	Retaining the status quo has no impacts on any of the equality groups.
Option 2 – New public open space/piazza with children's play space, possibly sensory garden, and replacement or reuse of existing buildings for community use or cafe/restaurant; relocation of market; any development to take account of flood risk							

EqIA	Equalities categories						
OPTIONS FOR SITES	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
	M	L	M	M	L	M	Community uses or café/restaurant should be of benefit to all equalities categories. Children's play space will be positive for parents with young children. Facilities will need to be designed not to exclude any particular equalities strands such as different races and different religions. The relocation of the farmers' market to a more convenient and easily accessible location could be beneficial to the physically disabled and elderly.
Option 3 – Mixed use redevelopment of Santander Block and adjacent Water Lane frontage to include specialist retail/cafes and possible small cinema/residential above and civic space. Creation of public space/piazza on riverside, children's playspace, possibly sensory garden, with potential for relocation of market and outdoor performances and events; any development to take account of flood risk							
	M	L	M	M	L	M	Community uses, café/restaurants and retail uses should be of benefit to all equalities categories. Children's play space will be positive for parents with young children. Facilities will need to be designed not to exclude any particular equalities strands such as different races and different religions. The relocation of the farmers' market to a more convenient and easily accessible location could be beneficial to the physically disabled and elderly.
Option 4 – Comprehensive approach to incorporate Santander building, parts of the rear of King Street frontage and service road and improve links between King St and riverside. Possible uses to include retail /cafes/arts and crafts studios/residential; civic space, public open space, children's play space, possibly sensory garden, piazza and performance space; relocation of parking from embankment to improve riverside environment; refurbishment of Kings Street frontage to create improved retail environment; any development to take account of flood risk							

EqIA	Equalities categories						
OPTIONS FOR SITES	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
	M	L	M	M	L	M	Community and retail uses, cafés/restaurants and an improved embankment as well as more civic space should be of benefit to all equalities categories. Children’s play space will be positive for parents with young children. Facilities will need to be designed not to exclude any particular equalities strands such as different races and different religions. The relocation of the farmers’ market to a more convenient and easily accessible location could be beneficial to the physically disabled and elderly.
York House							
Option 1 – Status quo							
	L	L	L	L	L	L	Retaining the status quo has no impacts on any of the equality groups.
Option 2 – Retain in civic use with additional café/restaurant within existing building and improved public access to gardens							
	L	L	L	L	L	L	Improved public access and café/restaurant use is beneficial to all equalities categories.
Option 3 – Part retained in civic use with café/restaurant and increased use of building for events							
	M	L	L	L	L	M	Improved public access and café/restaurant use is beneficial to all equalities categories. Events should be designed not to exclude any particular equalities strands such as different races and different religions.
Option 4 – Further extend use of building to create community/cultural hub with café/gallery/restaurant space, exhibition and performance space and improved access to gardens (retaining some civic space)							

EqIA	Equalities categories						
OPTIONS FOR SITES	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
	M	L	L	L	L	M	Improved public access and café/restaurant use is beneficial to all equalities categories. The community/cultural hub as well as the exhibitions and performances should be designed not to exclude any particular equalities strands such as different races and different religions.
Telephone Exchange							
Option 1 – Status quo							
	L	L	L	L	L	L	Retaining the status quo has no impacts on any of the equality groups.
Option 2 – Mixed use with active frontage onto Garfield Road; possible site for creative industries/indoor market/niche retail/cinema							
	L	L	L	L	L	L	Additional retail uses and potential cinema should be of benefit to all equalities categories, particularly if they meet local needs.
Regal House							
Option 1 – Refurbished business space and hotel (status quo)							
	L	L	L	L	L	L	Retaining the status quo has no impacts on any of the equality groups.
Option 2 – Refurbished business space and hotel with use of part of building as possible cinema/leisure space							
	L	L	L	L	L	L	New entertainment and leisure space is beneficial to all strands of equality, but they need to be designed not to exclude any particular equalities strands such as different races and different religions.
Option 3 – Refurbished business space, hotel and support facilities; possible cultural/entertainment/food and beverage uses on lower floors to create active frontage to London Road at street level							

EqIA	Equalities categories						
OPTIONS FOR SITES	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
	L	L	L	L	L	L	New entertainment, leisure space and cultural facilities as well as food and beverage uses are beneficial to all strands of equality, but they need to be designed not to exclude any particular equalities strands such as different races and different religions.
Twickenham Station							
Option 1 – Status quo							
	L	L	H	H	L	L	Retaining the station in its current form will have high (negative) impacts on disabled people and the elderly due to very poor existing access arrangements.
Option 2 – New station and mixed use development to include commercial, limited retail and residential uses and new public square							
	L	L	M	M	L	L	A mixed use development on the station site is beneficial to all equalities categories, particularly if they meet local needs. Improvements to the station itself, including improved lift access to the platforms, will be of particular benefit to the physically disabled, elderly and parents with young children.